

Pre-Submission Draft Local Plan Partial Update – full copies of representations received (V to Z)

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Viridis Real Estate

(Response from webform)

Title: Mr

First name: Tom

Last name: Jones

Would you like to include the contact details of an agent(s)?: Yes

Agent's Title (if applicable): Mrs

Agent's First Name (if applicable): Joanne

Agent's Last Name (if applicable): Unsworth

Agent's Job Title (if applicable): Associate Director

Agent's Organisation (if applicable): Savills

Agent's Address Line 1 (if applicable): One Forbury Square

Agent's Address Line 2 (if applicable): The Forbury

Agent's Address Line 3 (if applicable):

Agent's Address Line 4 (if applicable):

Agent's Telephone Number (if applicable):

Agent's Post Code (if applicable): RG1 3BB

Agent's E-mail Address (if applicable): junsworth@savills.com

To which part of the Local Plan does this representation relate?: See attached letter

Do you consider the Local Plan is legally compliant?: Yes

Do you consider the Local Plan is sound?: No

Do you consider the Local Plan complies with the Duty to co-operate?: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

See attached letter

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

See attached letter

Please upload any supporting information (if necessary). See separate representation

Do you wish to make further comments concerning another paragraph, policy or area of the policies map?: No

If you wish to participate in the hearing session(s) please outline why you consider this to be necessary: To enable full consideration of the issues and matters raised in the representations.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Author name: joanne Unsworth

Representations to the Reading Borough Local Plan Partial Update

Regulation 19 (Pre-Submission) Consultation
(November 2024)

Viridis Real Estate



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1. Introduction to Representations

1.1. Introduction

- 1.1.1. These representations are submitted on behalf of Viridis Real Estate ("Viridis") in response to the Regulation 19 Pre-Submission consultation on the Reading Borough Local Plan Partial Update (LPPU).
- 1.1.2. Viridis are the owners of land at Kenavon Drive, Reading, RG1 3DH ("the Site") which is allocated for residential development in the current adopted Local Plan as site reference CR13c, part of the East Side Major Opportunity Area. The allocation is maintained in the LPPU although with alterations upon which comments are provided in these representations.
- 1.1.3. The Site has previously been the subject of pre-application discussions with Reading Borough Council (on a number of occasions but most recently in 2019/2020) and has been the subject of a Design South East Review in 2022.

1.2. Report Structure

- 1.2.1. This report is structured as follows based on relevant draft policies contained within the Regulation 19 Pre-Submission consultation document (November 2024) and the supporting evidence base. Responses are set out under each relevant draft policy with proposed changes set out as necessary to ensure the soundness of the Plan based on paragraph 35 of the December 2023 National Planning Policy Framework (NPPF), as this is the version of national policy under which the Plan will be Examined. However, it is noted that paragraph 35 of the NPPF (2023) is unchanged in the new NPPF (December 2024), albeit that the paragraph reference is now 36.

- Policy H1: Provision of Housing;
- Policy H2: Density and Mix;
- Policy H3: Affordable Housing;
- Policy CR6: Living in Central Reading;
- Policy CR10: Tall Buildings;
- Policy CR13 and CR13c: East Side Major Opportunity Area (Kenavon Drive & Forbury Business Park).

2. Policy H1 (Provision of Housing)

2.1. Introduction

- 2.1.1. Policy H1 states that provision will be made for at least 14,850 new homes (825 homes per annum) during the Plan period 2023 to 2041. The supporting text to Policy H1 explains that the proposed housing requirement has been identified having regard to two different assessments of future housing need – 878 homes per year based on the standard methodology (including 35% urban uplift) or 735 homes per year based on a local Housing Needs Assessment (HNA) (2024).

2.2. Response

- 2.2.1. The NPPF is clear that the purpose of the planning system is to contribute towards the achievement of sustainable development (paragraph 7), including through the provision of a sufficient number and range of new homes (paragraph 8). Paragraph 60 outlines that the Government's objective is to significantly boost the supply of homes.
- 2.2.2. To achieve this objective, paragraph 61 of the NPPF (2023) is clear that, *'To determine the **minimum** number of homes needed, strategic policies should be informed by a local housing need assessment, **conducted using the standard method** in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area'* [our emphasis].
- 2.2.3. Paragraph 61 of the NPPF (2023) adds that, *'There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need...'*
- 2.2.4. The supporting text to Policy H1 and the LPPU evidence seek to explain that there are exceptional circumstances (relating to demographic issues and the required urban uplift) which justify using the Housing Needs Assessment (HNA) (2024) as an alternative approach to the use of the standard method.
- 2.2.5. The Housing Provision Background Paper (November 2024) (para 3.6) explains that the current standard method is 'flawed' with regards to demographic issues as it is based on 2014-based household projections. The Council consider that this is a *'sufficiently strong argument on its own'* for an alternative approach (para 3.7). Notably however, the Background Paper (November 2024) (para 3.5) adds that the 2014-based household projections are a 'particularly significant underestimate for Reading' and the HNA (2024) (para 5) states that the Standard Method (if the urban uplift is excluded) is an 'under-estimate' of local housing need on this basis.

- 2.2.6. The draft LPPU and Housing Provision Background Paper (November 2024) argue that the urban uplift is 'inappropriate' to apply in Reading based on its geographical area and existing population. Whilst it is acknowledged that the urban uplift does not take into account specific local needs and characteristics, the NPPF (2023) (paragraph 62 / footnote 27) and Planning Practice Guidance (PPG) are clear that the overall purpose of the urban uplift is rather to prioritise the use of brownfield sites within urban centres and to promote the most efficient use of land (PPG Paragraph: 035 Reference ID: 2a-035-20201216). The size and population of Reading are therefore not considered to be reasons for dis-applying the urban uplift; and to do so would undermine the Government's emphasis (through applying the urban uplift) of making efficient use of brownfield land.
- 2.2.7. Given the draft LPPU (para 4.4.1) acknowledges the 'pressing need' for 'strong delivery of new housing' and seeks to meet objectives to 'strengthen the role of Reading' and 'ensure that as many new homes as possible are delivered' (Objectives 2 and 3), it is considered that the Council should aim to deliver a housing requirement that matches or exceeds the requirement provided by the standard method. To deliver less than the standard methodology of 878 homes per annum, as proposed by Policy H1, conflicts with these objectives.
- 2.2.8. Furthermore, it is notable that the new NPPF (December 2024) and accompanying new standard method include a further strengthening of Government support for overall housing delivery and the development of brownfield land. The proposed standard method would further increase local housing needs in Reading to 1,028 homes per annum and is clear that these housing targets are mandatory rather than advisory. Whilst the draft LPPU is intended to be examined under the current NPPF (2023), based on transitional arrangements set out in the draft NPPF (July 2024), the Government's objectives and focus for the planning system moving forwards are clear: that the Council must plan positively to accommodate a significant increase in housing.

2.3. **Summary**

With reference to paragraph 35 of the NPPF 2023, Policy H1 as currently worded and evidence based does not meet the tests of soundness.

Accordingly, in order to ensure the soundness of the Plan, it is important that the Council identifies a housing requirement that matches or exceeds the requirement provided by the standard method.

3. Policy H2 (Density and Mix)

3.1. Introduction

- 3.1.1. Draft Policy H2 requires residential developments to meet minimum density targets based on location, which for town centre sites (such as at Kenavon Drive, within the East Side Major Opportunity Area) is 260 dwellings per hectare (dph).
- 3.1.2. The policy also requires that developments of 10 or more dwellings in district/local centres, outside the central area, provide a housing mix that includes at least 20% three-bedroom or larger homes.

3.2. Response

Density

- 3.2.1. In general, the increase in minimum density targets for town centre sites – from an indicative target of ‘above 100’ dph in the adopted Local Plan (2019) to a minimum density of 260dph in the draft LPPU – is welcomed. The approach aligns with the overall aims of the NPPF (2023), e.g. paragraphs 123, 129 and 135 which state that planning policies should ‘*promote an effective use of land in meeting the need for homes*’ and that development should optimise the use of land to meet identified housing needs, in particular town centres that are well served by public transport. Paragraphs 129 and 130 further encourage the use of ‘minimum’ density standards and ‘significant uplifts’, unless ‘*the resulting built form would be wholly out of character with the existing area*’.
- 3.2.2. We note that, when applying the minimum density target of 260dph to site CR13c (which is 2.07 ha in size), it results in an indicative capacity of 538 dwellings. This exceeds the indicative capacity identified in Policy CR13c (see comments below) – as a result, the indicative site capacity set out in CR13c should be increased for consistency. Further, whilst the density targets in Policy H2 are expressly stated as minimums, there is the potential for this to create conflict with other Policies in the LPPU (e.g. CR10, Tall Buildings) which are addressed later in this representation.
- 3.2.3. We note in addition that draft Policy H2 allows for a number of exceptions to meeting the minimum density targets, including where development would ‘prevent’ the minimum proportion of 3-bedroom homes being achieved, or ‘prevent’ policy requirements on the provision of open space or other on-site facilities being achieved.
- 3.2.4. This element of the policy has the potential to conflict with the wider stated objectives of the Plan, including objective 2 to, ‘*Make the most efficient use of Reading’s limited land, particularly previously developed land, to ensure that as many new homes as possible are delivered to meet identified needs...*’, as well as the overall aims of national policy to optimise the use of land and support increased housing delivery including through the use of brownfield land.

- 3.2.5. Further, many of the 'issues' addressed by the exceptions are dealt with under other policies in the LPPU (e.g. relating to housing mix, heritage, open space requirements etc) and should be considered as part of the overall planning balance in the consideration of planning applications.
- 3.2.6. On this basis, and to support meeting the Government's overall aims and the LPPU objectives, it is recommended that the emphasis of draft Policy H2 should be amended and the exceptions deleted. .
- 3.2.7. It is noted that the supporting text to Policy H2 (paragraph 4.4.10) states that *'Even above the minimum density, there is still significant scope for a range of densities. In the town centre in particular, the circumstances of the site may allow for a density that significantly exceeds the minimum specified.'*
- 3.2.8. This flexibility is welcomed and aligns with our view that the appropriate density should take into account site-specific circumstances and the opportunities and benefits of development, based on the minimum density targets. Each site will have unique characteristics, such as its location and accessibility to public transport, which will influence the appropriate density. It is important therefore that the minimum density requirements are applied as a guide with the precise density determined through detailed design and technical assessment. The acknowledgement for development to 'significantly exceed' these requirements should also be included in the policy wording itself.

Mix

- 3.2.9. Part 2 of draft Policy H2 includes an overall requirement for residential development to *'maximise the provision of family homes of three or more bedrooms'*, with specific mix requirements set out for developments outside the central area. It is noted that the overall requirement for 3-bed units is derived from the Reading Housing Needs Assessment (HNA) (2024) which provides a housing needs assessment across the Plan period.
- 3.2.10. Whilst it is acknowledged that the HNA (2024) (Figure 6) highlights an overall need for 3-bed units, the borough's overall housing needs are diverse and there are a number of more detailed factors arising from the HNA which should also be taken into account.
- 3.2.11. Notably, the HNA (2024) (Figure 6) shows that the overall mix of affordable housing needed is focused more towards smaller 1-bed units. In addition, the HNA (2024) (Figure 29) projects significant increases in smaller households, including both 'single person households' and 'couples without dependent children', which are each projected to increase by over 4,000 during the Plan period and to become the largest household groups in the borough. The HNA (2024) (Figure 51) states that the majority (62%) of dwellings occupied by households aged 75+ are 3-bedrooms or more. It is clear therefore that housing needs in the borough are more nuanced and are likely to change during the Plan period and across the borough, based on demographic changes and household formation for instance.
- 3.2.12. It is notable that draft Policy H2 states 'where possible' and it is important that specific mix requirements are not strictly applied. The LPPU should be sufficiently flexible to take into account changing needs, site-specific circumstances and viability considerations, particularly in light of the borough's overall increasing housing needs.

3.2.13. The LPPU should also recognise all forms of housing provision which can contribute to 'family' needs, including for instance the contribution of larger 2-bed units which can provide for families of up to 4 people and be of a similar size to 3-bed units, contributing to the borough's housing needs in a way the policy does not fully recognise. Indeed it is notable that the minimum gross internal floor areas for 2-bed 4-person dwellings (70sqm) and for 3-bed 4-person dwellings (74sqm) are very similar based on nationally described space standards (NDSS).

3.2.14. Accordingly it is recommended that reference to specific mix requirements is deleted from Policy H2.

3.3. **Summary**

With reference to paragraph 35 of the NPPF 2023, Policy H2 as currently worded and evidence based does not meet the tests of soundness. Accordingly, the following changes are recommended to Policy H2 in order to ensure the soundness of the Plan.

"1. Density

Residential development will be expected to achieve at least the following minimum densities:

- *Town centre sites: 260 dwellings per hectare*
- *Urban sites: 100 dwellings per hectare*
- *Suburban sites: 42 dwellings per hectare.*

Exceptions to the minimum densities will apply where achieving that density would:

- ~~*Cause unacceptable harm to a designated heritage asset or its setting;*~~
- ~~*Cause a detrimental effect on important landscapes;*~~
- ~~*Create unacceptable impacts on amenity of existing or new residents;*~~
- ~~*Prevent an appropriate conversion of an existing building or buildings;*~~
- ~~*Prevent policy requirements on the minimum proportion of family homes of three or more bedrooms from being achieved; or*~~
- ~~*Prevent policy requirements on the provision of open space or other necessary on-site facilities from being achieved.*~~

~~*Subject to the above, t*~~ *The appropriate density of residential development will be informed by:*

- *the character and mix of uses of the area in which it is located, including the housing mix, and including consideration of any nearby heritage assets or important landscape or townscape areas;*
- *its current and future level of accessibility by walking, cycling and public transport;*
- *the need to achieve high quality design;*
- *the need to maximise the efficiency of land use; and*
- *the need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.*

The circumstances of the site may allow for a density that significantly exceeds the minimum specified.

2. Mix of sizes

*Wherever possible, residential development should contribute towards meeting the needs for ~~the~~ a mix of housing **based on an up-to-date assessment of local needs and site-specific circumstances** set out in figure 4.5, and in particular should maximise the provision of family homes of three or more bedrooms..."*

4. Policy H3 (Affordable Housing)

4.1. Introduction

- 4.1.1. Draft Policy H3 requires developments of 10 or more dwellings to provide 30% affordable housing with provision made on site in the first instance. The proposed updates included within the policy include a specific tenure mix (at least 62% Reading Affordable Rent and up to 38% affordable home ownership products, including First Homes) and requirements relating to 'later viability review'.

4.2. Response

- 4.2.1. The tenure requirements set out at part 4 of draft Policy H3 are based on details set out within the Affordable Housing SPD (2021). However, given that affordable housing needs are likely to change across the borough over the course of the Plan period, it will be important that affordable housing is provided to meet local needs at the time of development coming forward and taking into account site-specific circumstances. Accordingly, it is recommended that a specific tenure mix is deleted from Policy H3.
- 4.2.2. Furthermore, as part 4 of the Policy is currently drafted, the LPPU proposes to retain 62% of the affordable housing mix as 'Reading Affordable Rent' (rental levels capped at 70% of market values) and the remaining 38% of 'other affordable ownership' (i.e. shared ownership) incorporates 25% to be secured as 'First Homes'. By providing First Homes within the 38% 'other affordable ownership', the level of potential shared ownership is effectively reduced to 13% of the overall tenure mix.
- 4.2.3. This is contrary to the approach set out in the PPG, which prioritises the provision of 25% First Homes, and then states that the remaining proportion of affordable provision should be split by a tenure mix identified in the Plan:

*"How should **the remaining** 75% of affordable housing be secured through developer contributions?"*

Once a minimum of 25% First Homes has been accounted for....the remainder of the affordable housing tenures should be delivered in line with the proportions set out in the local plan policy" (paragraph: 015 Reference ID: 70-015-20210524) (our emphasis).

4.3. Summary

With reference to paragraph 35 of the NPPF 2023, Policy H3 as currently worded and evidence based does not meet the tests of soundness. Accordingly, the following changes are recommended to Policy H3 in order to ensure the soundness of the Plan.

*“...In determining residential applications the site size, suitability, ~~and-type~~ **and tenure** of units to be delivered in relation to the current evidence of identified needs will be assessed. ~~The following tenure mix will be sought:~~*

- ~~At least 62% of the affordable housing to be provided as Reading Affordable Rent;~~*
- ~~A maximum of 38% of the affordable housing to be provided as affordable home ownership products, which may include First Homes and shared ownership....”~~*

5. Policy CR6 (Living in Central Reading)

5.1. Introduction

- 5.1.1. Draft Policy CR6 sets out criteria relating to the design of new development in Central Reading. The proposed updates included in draft Policy CR6 include a increased minimum 15% requirement for 3-bed units as part of new residential developments.

5.2. Response

- 5.2.1. It is noted that the increased requirement for 3-bed units is derived from the Reading Housing Needs Assessment (HNA) (2024) which provides a housing needs assessment across the Plan period.
- 5.2.2. As explained in response to draft Policy H2 above, whilst it is acknowledged that the HNA (2024) (Figure 6) highlights an overall need for 3-bed units, the borough's overall housing needs are diverse and there are a number of more detailed factors arising from the HNA which should also be taken into account.
- 5.2.3. Notably, the HNA (2024) (Figure 6) shows that the overall mix of affordable housing needed is focused more towards smaller 1-bed units. In addition, the HNA (2024) (Figure 29) projects significant increases in smaller households, including both 'single person households' and 'couples without dependent children', which are each projected to increase by over 4,000 during the Plan period and to become the largest household groups in the borough. The HNA (2024) (Figure 51) states that the majority (62%) of dwellings occupied by households aged 75+ are 3-bedrooms or more. It is clear therefore that housing needs in the borough are more nuanced and are likely to change during the Plan period and across the borough, based on demographic changes and household formation for instance.
- 5.2.4. It is noted that the mix requirements set out in Policy CR6 are provided 'as a guide' and it is important that specific mix requirements are not strictly applied for all sites in Central Reading. The LPPU should be sufficiently flexible to take into account changing needs, site-specific circumstances and viability considerations, particularly in light of the borough's overall increasing housing needs and the focus of development on town centre sites. Indeed this is particularly relevant for town centre brownfield sites where numerous factors may influence proposals and where the NPPF (December 2023) encourages significant uplifts in density.
- 5.2.5. The LPPU should also recognise all forms of housing provision which can contribute to 'family' needs, including for instance the contribution of larger 2-bed units which can provide for families of up to 4 people and be of a similar size to 3-bed units, contributing to the borough's housing needs in a way the policy does not fully recognise. Indeed it is notable that the minimum gross internal floor areas for 2-bed 4-person dwellings (70sqm) and for 3-bed 4-person dwellings (74sqm) are very similar based on nationally described space standards (NDSS).
- 5.2.6. Accordingly it is recommended that reference to specific mix requirements is deleted from Policy CR6.

5.3. Summary

With reference to paragraph 35 of the NPPF 2023, Policy CR6 as currently worded and evidence based does not meet the tests of soundness. Accordingly, the following changes are recommended to Policy CR6 in order to ensure the soundness of the Plan.

*“...All proposals for residential development within the central area will be required to contribute towards a mix of different sized units within the development. This will be measured by the number of bedrooms provided within individual units. Ideally, a mixture of one, two and three bedroom units should be provided **based on an up-to-date assessment of local needs and site-specific circumstances**. ~~As a guide, in developments of 15 dwellings or more, a maximum of 40% of units should be 1-bed/studios, and a minimum of 15% of units should be at least 3-bed, unless it can be clearly demonstrated that this would render a development unviable....~~”*

6. CR10: (Tall Buildings)

6.1. Introduction

6.1.1. Policy CR10 defines 'tall buildings' as being of 12 storeys of residential (equating to 36 metres tall) and above. The policy identifies three areas where there is a positive presumption that tall buildings will be acceptable (the Station Area Cluster, the Western Grouping and the Eastern Grouping), as well as identifying 'areas of less suitability' where there is a presumption against tall buildings unless a clear case can be made that such development would not undermine the clusters when all significant views are taken into account.

6.1.2. Site CR13c at Kenavon Drive lies outside of any of the cluster areas and also outside any 'areas of less suitability', and thus under Policy CR10 as drafted development of 12 storeys or above would not be supported.

6.2. Response

6.2.1. Policy CR10 as drafted is restrictive in its approach towards tall buildings in general, which is at odds with the general objectives of the LPPU and with national policy seeking to make efficient use of land, redevelop brownfield sites as a priority and increase densities in order to increase housing delivery.

6.2.2. More specifically, the Policy has the potential to conflict with the minimum target densities set out in Policy H2 (which promotes densities of at least 260 dph in the town centre – an area which extends significantly beyond the tall buildings clusters identified in Policy CR10). The approach of Policy CR10 needs to be more flexible to allow tall buildings in highly sustainable locations such as the town centre, where the LPPU already acknowledges that very high density development will be appropriate. In this way, Policy CR10 can be amended to be more consistent with Policy H2 so that the two policies work together to achieve the LPPU's vision and objectives.

6.3. Summary

With reference to paragraph 35 of the NPPF 2023, Policy CR10 as currently drafted does not meet the tests of soundness. Accordingly, the following changes are recommended to Policy CR10 in order to ensure the soundness of the Plan.

CR10: TALL BUILDINGS

In Reading, tall buildings are defined as 10 storeys of commercial floorspace or 12 storeys of residential (equating to 36 metres tall) or above. Tall buildings will meet all the requirements below.

i) Within Reading Borough, tall buildings will ~~only~~ be appropriate within the 'areas of potential for tall buildings' as defined on the Proposals Map, ~~other than as set out in criterion v).~~ These areas are as follows:

CR10a: Station Area Cluster

CR10b: Western Grouping

CR10c: Eastern Grouping

v) **Outside of these identified clusters, but elsewhere within the defined town centre,** ~~In addition to the three clusters, 'areas of less suitability for tall buildings' are shown on the Proposals Map, within which tall buildings will not~~ **may** be suitable ~~unless where it can be demonstrated a clear case can be made~~ that the cluster approach would not be undermined when all significant views are taken into account and that all of the other aspects of this policy are complied with.

~~vi) Outside the three clusters and the 'areas of less suitability for tall buildings', tall buildings will not be permitted.~~

7. Policy CR13 (East Side Major Opportunity Area)

7.1. Introduction

- 7.1.1. Policy CR13 identifies sites for development within this Opportunity Area and sets out requirements and principles for their development. Policy CR13c relates to land at Kenavon Drive and Forbury Business Park, which is owned by Viridis. These are:

‘CR13c, KENAVON DRIVE & FORBURY BUSINESS PARK:

This site would be largely residential in nature, although opportunities to create an area of open space close to the Kennet should be sought. Development will link into the existing pedestrian link under the railway to Napier Road. Development should deliver a fitted-out primary healthcare facility where this is viable and where there is a realistic prospect that an occupier to operate the facility can be found.

Site size: 2.07 ha

Indicative potential: 320-490 dwellings, primary healthcare’

7.2. Response

Policy CR13

- 7.2.1. The changes to Policy CR13 include that:

- Part i) confirms that development at the site will be high density (deleting the words ‘medium to’); and
- Part ii) adds healthcare to the list of acceptable uses within the Major Opportunity Area.

- 7.2.2. The deletion of the reference to medium density is welcomed, as it better aligns the Policy with the wider LPPU objectives and reflects the increased site capacity noted under CR13c (see comments below).

- 7.2.3. The addition of reference to a healthcare use is not supported, for the reasons outlined below.

Policy CR13c

- 7.2.4. The changes to Policy CR13c include:

- An increased indicative capacity of the site from 190-285 dwellings to 320-490 units; and
- Introduction of a requirement for the site to deliver *‘a fitted out primary healthcare facility where this is viable and where there is a realistic prospect that an occupier to operate the facility can be found’.*

- 7.2.5. The increase in site capacity is welcomed, as this reflects pre-application discussions held with RBC and feedback from the Design South East Review, both of which were informed by technical work undertaken by Viridis. However, it is noted that even the upper end of the range provided in Policy CR13c would not meet the minimum density targets for town centre sites set out in Policy H2. As such there is some degree of conflict with the LPPU's objectives (of making efficient use of land, increasing densities and boosting the delivery of housing in the borough). This can be rectified through further increasing the indicative dwelling capacity set out in the Policy.
- 7.2.6. The addition of the reference to provision of a healthcare facility is not supported, as the need for such a facility in this location has not been clearly evidenced and the requirements are particularly onerous (e.g. the reference to a 'fitted out' facility).

7.3. Summary

With reference to paragraph 35 of the NPPF 2023, the following changes are recommended to Policy CR14 in order to ensure the Plan meets the tests of soundness.

CR13c: KENAVON DRIVE & FORBURY BUSINESS PARK

This site would be largely residential in nature, although opportunities to create an area of open space close to the Kennet should be sought. Development will link into the existing pedestrian link under the railway to Napier Road. Development should deliver a fitted out primary healthcare facility where this is viable and where there is a realistic prospect that an occupier to operate the facility can be found.

Site size: 2.07 ha

Indicative potential: ~~320-490~~ 450 – 540 dwellings primary healthcare'

8. Conclusion

8.1. Summary

- 8.1.1. These representations have been prepared on behalf of Viridis Real Estate in relation to the current Regulation 19 Pre-Submission consultation for the Reading Borough LPPU. Viridis own land at Kenavon Drive which is identified for development under Policy CR13c.
- 8.1.2. It is welcomed that the Site retains the current Local Plan allocation and the changes sought to the Policy through the LPPU are generally supported. However, in order for the Policy to align with other policies in the LPPU, with its wider vision and objectives and indeed to reflect national policy (and thus be considered 'sound' under paragraph 35 of the NPPF, December 2023) amendments are suggested within this representation.
- 8.1.3. We request the right to appear on behalf of Viridis at the Examination of the LPPU in due course.

Phil Brown

Director

+44 (0) 796 855 0302

pbrown@savills.com

Jo Unsworth

Associate Director

+44 (0) 7967 555827

junsworth@savills.com



Warren and District Residents Association (WADRA)

Comments on the Reading Local Plan 2024

Having examined the Reading Local Plan, Partial Update Pre-Submission Draft November 2024, the Warren and District Residents Association (WADRA) offer the following comments on this Draft Plan, As follows:

Page 47 of the draft at 4.2.25 relates to Local Green Space (LGS) and states: **“The following LGS ‘s , as shown on the Proposal Map, will be protected from Development. Proposals that would result in the loss of any of these areas of open space, erode their quality through insensitive adjacent development or jeopardise their use or enjoyment by the public will not be permitted.”**

Mapledurham Playing Fields is listed as one of these LGS’s and is referenced as EN7Nm on page 49 of the document and is shown on Plan A on page 3 of the draft. We welcome these inclusions in the plan and would expect Reading Borough Council to fully honour these commitments in perpetuity.

It is also noted at page 49, at 4.2.25 of the draft update, that the size of Mapledurham Playing Fields, has been reduced from 10.86 to 10.35 Hectares, however, we question the accuracy of this figure.

We note that in Section 8.2, Strategy for Caversham and Emmer Green, the document states that there will be enhanced pedestrian and cycle links between Caversham and Reading town Centre, but no details have provided for these routes. This section also states that a mobility hub (park and ride) will be sought on the A4074, but no possible location, or timescale has been provided for this facility.

We note in clause 8.2.1.d that the document states the Council will continue to work with neighbouring authorities towards the provision of a crossing of the Thames east of Reading, but no location or timescale has been given for this crossing in the document.

On page 243 of the draft, reference is made to land at the rear of 1&3 Woodcote Road and 2 St Peters Hill and the potential for 11 to 17 dwellings being built on this land. As the only access to this area of land is from the A4074 via Symeon Place, measures should be incorporated into the plan in the interests of road safety, at this location.

Page 244 refers to Hemdean House School: The draft states that if this site is not required for a school, a change of use and development for residential purposes is possible. We would recommend this site be retained for **educational use only**.

Page 245 at 8.3.5 refers to Chazey Farm, the Warren and to the possible development of a 78 bed nursing home at this location. The listed buildings at this site must be preserved at all times should

this development proceed sometime in the future. Additionally access for construction vehicles etc. would need to be improved in the interests of safety.

In more general terms, we are very concerned at the very large number of apartments being constructed and planned for the near future in Reading, without the necessary infrastructure, such as doctors surgeries and health centres to support this being incorporated into the plans.

Additionally these additional homes will undoubtedly significantly increase the population and this in turn will have severe implications for traffic movements across the Town.

We ask that these comments be taken into account when preparing the final document.

WADRA

Waters, Julia

From: Julia Waters
Sent: 17 December 2024 16:03
To: Planning Policy
Subject: Response to the Local Plan Pre-Submission Draft Partial Update, November 2024 (Regulation 19).

Warning!
For the attention of
RBC, BFfC Staff and Councillors

This mail is from an external sender - please do not click any links or open any attachments unless you trust this sender, and know the content is safe

FAO Planning Inspector.

Dear Sir/Madam,

As a local Tilehurst resident and allotment-holder, I am hereby submitting my response to Reading Borough Council's Local Plan Draft Partial Update consultation (Regulation 19). I respond specifically to the following two questions:

Question 15: Do you consider that Land at Kentwood Hill (WR3s) and Land at Armour Hill (WR3t) would qualify as Local Green Space? (This question relates to policy EN7);

And Question 75: What is your view on the suggested changes to sites WR3s and WR3t?

Question 15: **All** of the land at Kentwood Hill and at Armour Hill (WR3s and WR3t) undoubtedly qualifies as Local Green Space on the same grounds as the already designated areas (the Withies, an additional 0.46ha of WR3s, the allotments and Victoria Rec). The land satisfies the LGS criteria, since "it is in reasonably close proximity to the community it serves; it is demonstrably special to a local community and holds a particular local significance because (in particular) of the richness of its wildlife; and it is local in character and is not an extensive tract of land." The local community has demonstrated the special value that the entirety of the land holds for them by joining the Keep Kentwood Green local action group (659 members of the Facebook group alone) and support of its activities, by signing the petition against the development of the land (over 1000 signatures in a month), by attending a public meeting to oppose the development of the land, by submitting comments to the original Local Plan, and by petitioning our local councillors and MP. None of these local residents has, as far as I am aware, ever distinguished between different sections of what is already a small site when asserting its local significance. To divide the land up in the way proposed in the Partial Update would have a detrimental effect on the biodiversity of the whole area, on the visual integrity of the site (as part of the West Reading Wooded Ridgeline) and goes against the expressed preferences of the local community. I believe that according LGS status to just a small additional part of the land (0.46ha) is environmentally unsound, because it fragments an already small but thriving wildlife refuge that is unique in an otherwise largely built-up urban area.

The entirety of the land at Kentwood Hill (WR3s) and Armour Hill (WR3t) also already meets the criteria for being classed a Local Wildlife Site, based on evidence - wildlife camera footage, echolocator, audio and photographic recordings - gathered from across the whole area and verified by Thames Valley Environmental Records Centre (TVERC) and by RBC's own ecologist. The only reason that LWS designation has not already been granted for all of the land is because the Trustees of the Charity that owns the land will not grant access for an independent ecology survey to be carried out. The Charity's development agent's own ecologist acknowledged that there is evidence of active badger setts in the 0.46ha now added as LGS. Yet the Badgers Trust's survey and local residents' evidence prove that there are also outlier setts,

as well as essential and active foraging habitat, in all areas of WR3s and WR3t. It is thus unsound reasoning for RBC to accord LGS status only to the area identified as of 'greatest importance for wildlife' by the Charity's ecologist. The entirety of WR3s and WR3t is of importance for wildlife: without the necessary foraging grounds provided by WR3s and WR3t (plus the allotments, nearby parks and gardens), the value of the land already given LGS status would be greatly diminished. It is also environmentally unsound to accord greater value to one protected species (badgers) over the other 99+ species, including several protected and notable species which live, hunt, forage, nest and root across all of the land, as has been verified by TVERC, based on evidence provided by local residents.

Question 75: It is my informed view that, while the addition of a further 0.46ha of WR3s as LGS is welcome, LGS status should rightly be accorded to the entirety of the land at WR3s and WR3t. There is verified existence of over 100 species of wildlife, including several protected and notable species, living, hunting, nesting and roosting across the entire area and beyond, meaning that it all meets the criteria for designation as a Local Wildlife Site. The local community's wish that the entire area be protected, as Local Green Space and a valuable wildlife refuge, has also been amply proven. There are however other compelling reasons why the whole site should be accorded LGS status, beyond the proven presence of rich and varied wildlife and numerous trees, protected by a blanket TPO. These reasons are already implied in the various caveats included in the wording of RBC's Partial Update. That is:

WR3s LAND AT KENTWOOD HILL: '*subject to the land not being identified as a Local Wildlife Site.*' If the Charity were to permit an independent ecology survey, this land would undoubtedly be identified as a Local Wildlife Site. '*Assess and mitigate any impacts on the Kentwood Hill/Norcot Road/School Road junction*' - this junction is already extremely busy and the road surface constantly in need of repair. I do not believe the impacts of additional traffic could be appropriately mitigated. '*Include a landscaped border to Kentwood Hill*' - I do not believe this could be achieved in such a way as to maintain its value as wildlife habitat, while also permitting residential development. '*Provide for well-vegetated green links between the copse and the Victoria Recreation Ground, and between the copse and Kentwood Hill*' - again, I do not believe this could be achieved in such a way as to maintain its value as wildlife habitat, while also permitting the proposed residential development. '*Avoid adverse effects on important trees, including those protected by TPO, and on the stream in the copse*' - all of the trees on the Charity's land are protected by a TPO. The stream is fed by water from springs across the whole of the site, including the allotments. I do not believe that adverse effects on trees and the stream could be avoided, while also permitting the proposed residential development. '*Retain and avoid detrimental impacts on important areas of biodiversity*' - the entirety of the site is rich in biodiversity and needed by wildlife for foraging, nesting, roosting and refuge from the surrounding built-up area. It would be impossible to avoid detrimental impacts on biodiversity, let alone achieve biodiversity net gain, if ANY of the land were developed. '*Avoid adverse visual impacts on the West Reading Wooded Ridgeline*' - given that the land at WR3s is situated on the brow of Kentwood Hill, I believe it would be impossible to ensure that such views are maintained if any residential development were to take place, let alone in the density proposed. '*Ensure that views can be gained through the site from the recreation ground and neighbouring streets towards the Chiltern escarpment*' - again, given that the land at WR3s is situated on the brow of Kentwood Hill, I believe it would be impossible to ensure that such views are maintained if any residential development were to take place, let alone in the density proposed. '*Ensure that development will not have a detrimental effect on land stability on the site and nearby*' - given the number of sink holes that have occurred in the vicinity in recent years, due to the geology of the area, and given that the site is on a steep hill, sloping in two directions, and given the presence of numerous springs across the whole area, I do not believe that the land stability on the site and nearby could be ensured, were residential development allowed. Given that the UK is due to suffer increasingly heavy and frequent rainfall, as a result of climate change, it would be foolhardy to destroy this land's essential function as water-soak and land stabiliser. '*Take account of the potential impact on water and wastewater infrastructure*' - whenever there is heavy rainfall, as increasingly the case, the drains on Kentwood Hill and Armour Hill overflow, leading to surface

flooding and noxious smells at the junction of Kentwood and Armour Hills. Adding more houses and associated tarmac on the land immediately above and behind this junction would be disastrous. For all of these reasons and more (strain on local services, increased traffic, light and other pollution), I believe that residential development of any of WR3s would be unsound. The entirety of the land should be granted Local Green Space status and thereby allowed to continue to provide its numerous existing environmental and wellbeing benefits.

WR3t LAND AT ARMOUR HILL: *'subject to the land not being identified as a Local Wildlife Site.'* If the Charity were to permit an independent ecology survey, this land would undoubtedly be identified as a Local Wildlife Site. *'Assess and mitigate any impacts on the Armour Hill/Kentwood Hill junction'* - at the confluence of three hills, this is a notoriously overloaded junction in terms of water runoff already. I do not believe that any additional housing and associated hard-standing could be added above and behind this junction without disastrous negative impacts. *'Include a landscaped border to Armour Hill'* - I do not believe this could be achieved in such a way as to maintain its value as wildlife habitat, while also permitting residential development. *'Avoid adverse effects on important trees, including those protected by TPO'* - I do not believe that adverse effects on trees and the stream could be avoided, while also permitting the proposed residential development. *'Retain and avoid detrimental impacts on important areas of biodiversity'* - the entirety of the site is rich in biodiversity and needed for foraging, nesting, roosting and refuge from the surrounding built-up area. It would be impossible to avoid detrimental impacts on biodiversity, let alone achieve biodiversity net gain, if ANY of the land were developed. *'Ensure that development will not have a detrimental effect on land stability on the site and nearby'* - given the number of sink holes that have occurred in the vicinity in recent years, due to the geology of the area - including on Dudley Close, immediately facing WR3t - and given that the site is on a steep hill, sloping in two directions, and given the presence of numerous springs across the whole area, I do not believe that the land stability on the site and nearby could be ensured, were residential development allowed. Given that the UK is due to suffer increasingly heavy and frequent rainfall, as a result of climate change, it would be foolhardy to destroy this land's essential function as water-soak and land stabiliser. *'Take account of the potential impact on water and wastewater infrastructure'* - whenever there is heavy rainfall, as is increasingly the case, the drains on Kentwood Hill and Armour Hill overflow, leading to surface flooding and noxious smells at the junction of Kentwood and Armour Hills, as the wastewater system overflows. Adding more houses and associated tarmac on the land immediately above and behind this junction would be disastrous. For all of these reasons and more (strain on local services, increased traffic, light and other pollution), I believe that residential development of any of WR3s would be unsound.

I hope that the Planning Inspector will heed the wishes of the local community and that the entirety of the land at WR3s and WR3t will be granted Local Green Space status and thereby allowed to continue to provide its numerous existing environmental and wellbeing benefits.

Yours sincerely,
Julia Waters

Watkin Jones Group PLC



12 Soho Square, London, W1D 3QF
Telephone: +44 (0)330 912 4000

25 November 2024

By Email – planningpolicy@reading.gov.uk

Dear Sirs,

Engagement on the Partial Update of the Reading Local Plan (Regulation 19 Pre-Submission Draft) – Representations by the Watkin Jones Group

Please find below the comments of the Watkin Jones Group PLC (WJG) in relation to the Partial Update of the Reading Local Plan (Regulation 19 Pre-Submission Draft).

About Watkin Jones Group

With a focus on delivering for our customers since 1791, WJG is the UK's leading developer and manager of residential for rent homes. By spearheading this sector, WJG is creating the future of living for a diverse and growing group of people who want flexibility, convenience, and a strong sense of community alongside the best location and value. Its purpose-built build to rent (BTR, multifamily), co-living and student homes are designed and built sustainably, and welcome people from all backgrounds to enjoy a great way of life, generating a positive impact for wider communities. Beyond residential for rent, its successful and well-established house building division has an increasing focus on the delivery of affordable and BTR single family homes.

Over the last 25 years WJG has delivered approximately 60,000 homes, including over 51,000 student homes, and approaching 5,000 BTR homes, and has a significant pipeline. This includes 315 BTR homes at Thames Quarter on Napier Road in Reading which WJG completed in 2021. WJG is also one of the first organisations in the UK to have delivered co-living at the Zinc Works in Bristol and at The Gorge in Exeter.

Today, WJG successfully works across every part of the UK focussing on centrally located, previously developed sites. WJG's end-to-end delivery model means that it acquires, designs, and builds places, and typically remain within communities as on-site building managers. Fresh is its multi award-winning operator-arm, who are currently managing approximately 20,000 rental homes across the UK and Ireland.

Scope of Representations

These representations focus on the land use policies in the consultation document relevant to the residential tenures that WJG delivers and manages. As such, this representation focusses primarily on the following:

- Build to Rent (BTR) – CR6 and H4
- Purpose Built Student Accommodation (PBSA) – H12

Creating the future of living

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2539870 (U.K.)



Reg No. FS 38552



Reg No. EMS 550807

- Co-Living/ Purpose Built Shared Living – H15

These are addressed in turn, along with our proposed recommendations to ensure that the Plan meets the tests of soundness set out in Paragraph 35 of the National Planning Policy Framework (NPPF) – namely, positively prepared, justified, effective, and consistent with national policy.

Build to Rent

Housing Mix

Part 1 of Draft Policy CR6 requires that all proposals for residential development within Central Reading provide at least 15% three-bed homes. Central Reading is likely to be the principle focus for BTR apartment developments, as demonstrated by the Thames Quarter scheme delivered by WJG.

The housing mix within BTR schemes is different from other forms of homes (e.g. for sale) and the requirement for 15% three-bedroom homes is not consistent with the requirements of occupiers of BTR homes. This is evidenced by research by the British Property Federation (BPF) 'Who Lives in BTR (2024)' which analysed data from 32,000 renters living in BTR apartments.

The BPF's data demonstrates BTR apartments are typically occupied by the following:

- Single – 35% of occupiers
- Couples/ sharers – 59% of occupiers
- Families – 6% of occupiers
- 75% of renters are under 34 years old.

This results in most apartments within BTR multi-family developments being studios or one-bedroom apartments (for single occupiers and couples) and two-bedroom apartments (for couples, sharers and small families). A small proportion of apartments (no more than 5%) are provided with three bedrooms for larger families. No four-bedroom apartments are provided.

To reflect this difference and ensure that policy is effective in delivering rental homes in the borough, WJG recommends that Part i. of Policy CR6 is changed to state:

“All proposals for residential development within the central area will be required to contribute towards a mix of different sized units within the development. This will be measured by the number of bedrooms provided within individual units. Ideally, a mixture of one, two and three bedroom units should be provided. As a guide, in developments of 15 dwellings or more, a maximum of 40% of units should be 1-bed/studios, and a minimum of 15% of units should be at least 3-bed, unless it can be clearly demonstrated that this would render a development unviable, or where a BTR development is proposed as these typically have smaller unit sizes”.

WJG recommends that Policy H4 is similarly amended to reflect the difference in housing mix in BTR developments.

Clawback Period

Part 1 of draft Policy H4 states that BTR is “secured in single ownership providing solely for the rental market for a minimum 20-year term with provision for clawback of affordable housing contributions should the covenant not be met”. Whilst WJG supports the principle of the proposed approach, it can find no explanation as to why the covenant period is 20 years.

The Council recognises that BTR is institutionally funded. Those funds rely on established investment assumptions. One of these is that BTR is covenanted to remain as a rental product for a period of 15 years. This is an approach established more widely across the UK, for example within Policy H11 of the London Plan. WJG is not aware of any policy which has a covenant period of greater than 15 years.

Whilst it may appear to be a minor point, a longer covenant period of 20 years will deter investment in BTR. To ensure that the policy is effective in delivering BTR and supports the borough in being attractive to BTR investors, WJG suggests that the covenant period is reduced to 15 years.

PBSA

Whilst WJG appreciates that the Council does not propose to amend Policy H12 through the partial update, WJG does not support Policy H12 as currently drafted. This is because it only allows new PBSA to be located within or adjacent to existing campuses, and no justification to support this approach is provided.

Students require access to many facilities, not just to university campuses. This may include shops, services and public transport interchanges. This explains why PBSA is typically located within town and city centres, even when university campuses are located out of centre (as illustrated in Bath and Bristol). Sites within Central Reading may provide suitable locations for PBSA and may more efficiently and effectively house students than in lower density locations around the university campus. Policy H12 should be updated to reflect this.

Para. 6.86 of the Local Housing Needs Assessment 2024 prepared by Opinion Research Services (ORS) states that it is difficult to project demand for PBSA as the data which forms the basis of their assessment, will likely have been skewed due to Covid. Para. 4.106 of the draft Plan also states that the need for additional PBSA is highly dependent on the future growth of the university. WJG disagrees, as the draft Plan and LHNA fail to recognise:

- That only a low proportion of students in Reading are living in university halls of residence or PBSA provided by specialist private operators. Figure 67 of the LHNA demonstrates that over the five years from academic year 2017/18 to 2021/22 (the most recent data available) that only between 30% and 39% of full-time students have had access to halls or PBSA. In comparison, other university cities and towns (e.g. Sheffield, Coventry, Nottingham and Loughborough) house more than 50% of full-time students within halls or private PBSA.
- That there has been a change in the trends of how students live. Our operational arm Fresh typically finds that between over 80% of students living within its developments are second or later year students, a significant change from a decade ago when privately provided PBSA was more likely to have been occupied by first years. There are a variety of reasons for this, including location, quality and certainty of cost.

These factors point towards the need for additional PBSA in Reading and Policy H12 will not be effective in delivering this. Many appeal decisions (e.g. 3211004, 3264641, 3264642, 3303205) also recognise that the provision of additional PBSA frees up HMOs, which may provide a valuable source of additional housing for Reading's residents. The Council should adopt a more positive policy approach to the provision of PBSA, allowing it to be provided in Central Reading as well.

WJG requests that Policy H12 is replaced with the following:

“New student accommodation will be provided on or adjacent to existing further or higher education campuses, within Central Reading or as an extension or reconfiguration of existing student accommodation. There will be a presumption against proposals for new student accommodation on other sites unless it can be clearly demonstrated how the proposal meets a need that cannot be met on the above sites”.

Co-Living/ Purpose Built Shared Living

Whilst WJG is largely supportive of draft Policy H15, it objects to Part 1 which requires that co-living is not located on sites identified for Class C3 residential (e.g. allocations or extant permissions), unless the co-living is in addition to the planned C3 residential.

There may be scenarios where the development of an identified housing site for co-living may present a better option (e.g. the physical characteristics of a site does not lend itself to Class C3, co-living would make a more efficient redevelopment of a site, proximity to places of employment). NPPG, within the Housing Delivery Test Measurement Rule Book (2018) also confirms 1.8 co-living bedrooms equates to one Class C3 home. The delivery of co-living within the borough will also contribute towards housing delivery.

To ensure that Part 1 of Policy H15 is effective, WJG requests that it is replaced with the following:

"It is located on a site that has not been identified for general residential (as plan allocations or extant permissions), unless the purpose-built shared living accommodation element would be in addition to the planned residential, or unless the applicant has robustly demonstrated that the site would be better used for co-living or demonstrates that any existing or proposed Class C3 housing is not deliverable or viable".

Final Comment

We trust that our representations on these aspects of the Partial Local Plan Update are of assistance to the Council and will be considered within the evolution of the Plan. In the meantime, please do not hesitate to contact Iain Smith on 07717 841321 or ian.smith@watkinjones.com should you have any queries.

Yours faithfully



Iain Smith
Planning Director

West Berkshire District Council



18 December 2024

Sent by email:
planningpolicy@reading.gov.uk

Planning Policy

Development and Planning
West Berkshire District Council
Market Street, Newbury
Berkshire, RG14 5LD

Please ask for: Planning Policy Team
Direct dial: 01635 519 111
Fax: 01635 519 408
e-mail: planningpolicy@westberks.gov.uk

Dear Sir/Madam,

Reading Local Plan Update – Regulation 19 Proposed Submission Consultation

Thank you for consulting West Berkshire District Council (WBDC) as part of the Regulation 19 consultation on the Reading Local Plan Update (LPU).

WBDC works closely with Reading Borough Council (RBC) and other neighbouring authorities to consider strategic planning issues in the area. The four authorities which make up the Western Berkshire Housing Market Area (WBDC, WBC, Bracknell Forest, and Reading) have co-operated on a Statement of Common Ground that details the situation regarding strategic matters across the area.

As WBDC has engaged with the LPU through its preparation, it considers that the duty to cooperate as far as WBDC is concerned has been fulfilled.

WBDC therefore welcomes the publication of the Reading Local Plan Update for the Regulation 19 proposed submission consultation and welcomes the opportunity to provide comment.

In terms of individual policies in the Plan, WBDC has the following comments:

EM1: Provision of Employment Development

As RBC are aware, WBDC has unmet employment floorspace needs over the LPR plan period to 2041. We note that whilst the LPU proposes to meet the identified needs for office and industrial / warehouse in full, the levels of need identified within the LPU are before the application of a safety margin and an allowance for future losses. It is also noted that there is no scope for unmet needs from other authorities to be accommodated.

EM2: Location of New Employment Development

It is recognised that two of the Core Employment Areas are existing designations in the RBC Local Plan – EM2a Green Park and EM2b North of M4. When originally designated these two employment areas were not located within the Detailed Emergency Planning Zone for the AWE, Burghfield, however, since the Zone has been expanded, they are now located within it. The

Council has concerns that any development within this area may lead to additional 'population' and intensification in an area in close proximity to the AWE sites, placing more stress on the AWE Off-Site Emergency Plan which is already significantly under stress. There is therefore an inherent tension in the Plan regarding development within the DEPZ which we consider needs to be addressed. Please see further comments below in relation to SR1 and SR4.

Policy H1: Provision of Housing

WBDC acknowledges RBC's position with regards housing needs over the LPU period 2023 to 2041.

WBDC also notes that Reading Borough Council's position is that its Partial Update to the Local Plan will meet its housing needs in full as identified through an alternative approach to calculating housing need rather than the Local Housing Need (LHN) identified under the standard methodology. It welcomes the intention that under this approach the Regulation 19 version of the Partial Update plans for the provision of 825 dwellings per annum compared to the identified need of 735 dwellings per annum, and therefore it is not intended that there will be any unmet needs to be accommodated in neighbouring authorities.

However, WBDC acknowledges that the approach proposed to be taken will come under scrutiny and under the current standard methodology the identified housing need for the Borough over the plan period 2023 – 2041 would be higher. In the event that the current standard methodology was to be used to identify housing need within Reading Borough, WBDC acknowledges there would be a shortfall in provision.

As you are aware WBDC is currently at examination with its Local Plan Review (LPR). A Post Hearing Letter was published by the Inspector on 31 July 2024 ([IN30](#)) setting out some interim findings and further action points for WBDC. In his letter the Inspector identified that there could be a shortfall in housing provision over the plan period of around 850 dwellings. As such the Inspector requested WBDC consider how the LPR could be modified to boost the housing land supply in light of the possible shortfall identified.

WBDC has identified additional provision, and this forms part of the consultation on the proposed Main Modifications which is running from 6 December 2024 until 31 January 2025. Given the current circumstances WBDC is not currently in a position to assist Reading with any unmet need that might arise within Reading Borough over the plan period to 2041.

WBDC is committed to an early review of the Local Plan and can, if necessary, consider this request again as part of this work. We will continue to work closely with Reading Borough Council and other neighbouring authorities in considering strategic planning issues in the area.

Policy H13: Provision for Gypsies and Travellers

WBDC notes that there are existing needs identified, and that no sites have been identified which could meet the permanent or transit need. We support the inclusion of policy H13 which supports proposals for Gypsies and Traveller accommodation subject to certain criteria.

WBDC needs to deliver 20 permanent Gypsy and Traveller pitches in the period to 2038. There is no requirement to identify a site for transit pitches, however WBDC's 2021 Gypsy, Traveller and Travelling Showpersons Assessment recommends that tolerated stopping places or negotiated stopping places should be provided.

The allocations included within WBDC's existing Local Plan are being rolled forward into the LPR and no additional sites are proposed. WBDC has commenced work on a Gypsy and Traveller Accommodation Development Plan Document (DPD) which will contain policies and allocations to meet the Gypsy and Traveller accommodation needs.

At this point in time, WBDC are unable to accommodate any of RBC's unmet needs. Nonetheless, as part of the Duty to Cooperate, WBDC will continue to liaise with RBC as work on the DPD progresses and will advise whether it will be possible to meet needs within West Berkshire district or not.

Policy OU2: Hazardous Installations (Strategic Policy)

The principles and intention of this policy are strongly supported. There are concerns that the policy and supporting information is not as clear as it could be though. In this context, WBDC suggests the policy and its supporting text would benefit from some clarity, including additional specifics in relation to ONR land use policy criteria and associated commentary where there are gaps and tightening required as follows:

Policy text:

Overall, it is considered that having the information in relation to hazardous substances concerns, hazardous sites or pipelines with a separate paragraph in relation to AWE Burghfield matters in the same policy is confusing, not least since there is a separate heading in the explanatory notes in relation to AWE Burghfield. It is therefore recommended that they are split to make clear the distinction such that hazardous substances concerns, hazardous sites or pipelines in the main relate to Control of Major Accident Hazard Regulations 2005 (COMAH) sites and Major Accident Hazard Pipelines 1996 (MAHP) as defined by the Health and Safety Executive.

It is recommended the additional policy paragraph in relation to AWE in the strategic policy, regardless of splitting it into a new separate policy, is changed for the following reasons:

- a. There is no mention of the consultation zones referred to and used in the ONR land use planning process so the Outer Consultation Zone, 12km zone and special cases as detailed in their website: [Land use planning | Office for Nuclear Regulation](#).
- b. in that the first bullet point at the end is amended to be **and/or** relating to the second bullet point.
- c. As regulator, should the ONR recommend refusal, the policy should make clear that this recommendation will be given significant weight in the decision making process.
- d. Reference needs to be made that the 'zones' size may change overtime as a result of legislation, guidance or operational changes on the AWE site.

Supporting text:

4.7.14. - this paragraph appears to relate mainly to the COMAH sites and therefore the additional commentary relating to '*and, for nuclear licensed sites, the Office for Nuclear Regulation (ONR), acting jointly with.....*' is incorrect for COMAH sites, appears to contradict itself later in the same paragraph and is generally confusing. As a result, as a minimum the paragraph needs to be reworded to be clearer, and if not, the elements relating to nuclear sites removed and placed in a separate policy for clarity.

Para 4.7.15 - it is correct to remove inner/middle and outer zones however as detailed above the full details of the ONR land use planning consultation criteria should be referred to, noting these can change and therefore reference to their website is advised to allow for these changes

Para 4.7.16 - this paragraph could be clearer and reworded for accuracy in that the process is that Emergency Planning within RBC will be consulted, who along with WBDC, who are the responsible Council for the AWE Off-Site Emergency Plan (OSEP), along with the AWE Off-Site Emergency Planning Group, as necessary, are best placed to judge how the proposal will impact the OSEP and therefore the health, safety and wellbeing of the community.

The second sentence in paragraph 4.7.16 should also relate to the ONR land use planning process and website.

Para 4.7.17 - it is unclear as to the reason for this paragraph.

Policy SR1 and Policy SR4

Both of these overarching policies include specific allocations to meet the employment requirements over the plan period. As outlined above some of these allocations are now within the DEPZ (SR1a / SR1c and SR4e) which creates an inherent tension with policy OU2. WBDC has significant concerns about the inclusion of allocations within this area and their potential impact on the OSEP. As such, WBDC would welcome further discussions relating to their inclusion and would welcome the opportunity to enter into a short Statement of Common Ground in this regard.

It is hoped that these comments are helpful. The Council may also wish to participate in the relevant hearing session(s) should the Inspector consider that appropriate.

Yours faithfully,

Laura Callan

Laura Callan
Service Lead – Planning

Wilkins, John

Rejwerska, Marcelina

From: Comments, Planning
Sent: 02 December 2024 08:20
To: Planning Policy
Subject: FW: Comments on update of Reading Plan

From: jdwilkins56@btinternet.com <jdwilkins56@btinternet.com>
Sent: Friday, November 29, 2024 9:26 AM
To: Planning Administration <Planning.Administration@reading.gov.uk>
Subject: Comments on update of Reading Plan

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RBC, BFfC Staff and Councillors

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- The plan identifies three areas of Reading where high rise buildings are being encouraged. Why? This style of building is out of kilter with much of Reading. I gather that there would be no need for car parking spaces in such buildings and it is not clear to me that any amenity space will be provided. This seems to be the sort of development which used to be found in Eastern Europe and some UK cities where such blocks now seem to be being demolished as unsuitable. Is this part of the plan encouraging the slums of the future? Do many people really want this type of development? Is it really just the developers which want such developments as a way of making more profit?
- I note that parts of what appear to be the closed landfill in Island Road are identified for commercial development. Is this land really suitable for this purpose?
- I have noted that RBC often want to restrict off road car parking spaces in new developments apparently as a way of reducing car use. Is there any evidence this works or does it just result in more cluttering of streets with parked cars?

John Wilkins



Wojtasz, Alf

(Response from webform)

Title: Mr

First name: Alf

Last name: Wojtasz

Would you like to include the contact details of an agent(s)?: No

To which part of the Local Plan does this representation relate?: Henley Road Cemetery

Do you consider the Local Plan is legally compliant?:

Do you consider the Local Plan is sound?:

Do you consider the Local Plan complies with the Duty to co-operate?:

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

Please upload any supporting information (if necessary).

Do you wish to make further comments concerning another paragraph, policy or area of the policies map?: No

If you wish to participate in the hearing session(s) please outline why you consider this to be necessary:

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Author name: Alf Wojtasz

Wokingham Borough Council

Email: ian.bellinger@wokingham.gov.uk

Date: 17 December 2024

Your ref: -

File ref: Letter/RBC/LP Partial Update Reg19



**WOKINGHAM
BOROUGH COUNCIL**

Mark Worringham
Planning Policy Manager
Reading Borough Council

Via email

P.O. Box 157

Shute End, Wokingham

Berkshire RG40 1WR

Tel: (0118) 974 6000

Dear Mark,

SUBJECT: Reading Borough Council Local Plan Partial Update

This forms the officer's response to the Reading Borough Council's consultation on the Local Plan Partial Update: Pre-Submission Draft (Regulation 19) November 2024 (hereafter referred to as the Plan).

At the outset, I wish to acknowledge the established and ongoing constructive working between Reading Borough Council (RBC) and Wokingham Borough Council (WBC) on strategic planning matters, and the wish of both parties for this to continue.

Unfortunately, in the absence of a transport assessment to show the Plan is effective, WBC has felt it necessary to state that at this time the Duty to Cooperate has not been discharged and the plan is unsound. As we have discussed, WBC wish to work proactively with RBC with a view to being able to confirm the Duty to Cooperate has been met and the broad soundness of the Plan in due course and before the Plan is submitted for examination.

Spatial strategy and transport

WBC acknowledges that meeting development needs in the context of Reading Borough will require the redevelopment and intensification of the town's urban area. The Plan

outlines that 59% of new dwellings are anticipated within the Central Reading area, 18% in the South Reading area and 13% elsewhere. WBC does not object to the principle of this approach, however it is necessary for the impacts of the spatial strategy to have been appropriately assessed and suitable mitigations identified. Whilst it is understood that a transport assessment has been commissioned, the assessment does not currently form part of the published evidence base supporting the Plan, nor has any draft output been shared with WBC on a confidential basis.

In the absence of a transport assessment, it is not possible to understand whether the impacts of the spatial strategy proposed by the Plan have been suitably assessed and therefore understood, or the effectiveness of proposed mitigations, both within Reading Borough and potentially beyond, including within Wokingham Borough.

WBC cannot therefore conclude that the impacts on the highway network in Wokingham Borough are acceptable. As a result, WBC must conclude the Plan at this time does not comply with the Duty to Cooperate and is unsound. As outlined above, WBC are aware that a transport assessment is being progressed and wish to work proactively with RBC in reviewing this with a view to being able to confirm compliance with the Duty to Cooperate and broad soundness in due course and before the Plan is submitted for examination.

Paragraph 3.1.3

WBC suggest paragraph 3.1.3 is modified to remove reference to the South of the M4 Strategic Development Location. This is currently referenced as being of particular significance to Reading Borough, however at 1 April 2024, only 138 dwellings had not been completed. At least a further 10 dwellings have been completed in the period since. Given the limited scale of remaining completions and the modest development proposed in the area under the Wokingham Borough Council Local Plan Update Proposed Submission Plan (circa 360 dwellings), WBC do not believe the SDL is of particular cross boundary significance that justifies reference in the Plan. As you will be aware, the SDL allocation is not carried forward in the Wokingham Borough Council Local Plan Update Proposed Submission Plan due to its advanced stage of delivery. It is accepted that the Loddon Valley Garden Village proposal is of significance and should be referenced. Suggested modifications are outlined below.

“There is no agreed overarching spatial strategy that applies to the local area, but there is a need for development plans in the area to complement one another. This is particularly the case across the main functional area, the West

of Berkshire area. Within this area, each authority has an adopted or emerging local plan that is at an advanced stage. Figure 3.1 sets out the overall spatial context for the area, including major areas of development outside Reading's boundaries. Of particular significance for Reading ~~are the strategic development locations (SDLs) in Wokingham due to their proximity to our boundary, including the South of the M4 SDL (much of which has already been completed and is not therefore shown), and is~~ the proposed Loddon Valley Garden Village SDL comprising phased delivery of 3,930 homes that forms part of Wokingham's Proposed Submission Local Plan Update. Developments on this scale will be expected to deliver a significant improvement in infrastructure, ~~and with~~ transport links into Reading in particular by active travel and public transport ~~will be of vital importance."~~

Figure 3.1

WBC do not object to Figure 3.1 but note that whilst the AWE Detailed Emergency Planning Zone is shown, the associated supporting text does not include reference. Given the AWE DEPZ has not been referred to in the Plan up to this point, it is suggested that a brief explanation is added to preceding text to assist the reader.

Paragraph 3.2.12

WBC suggest paragraph 3.2.12 is modified to remove reference to the South of the M4 Strategic Development Location for the reasons set out above in response to paragraph 3.1.3.

It is accepted that the Loddon Valley Garden Village proposal is of significance and should be referenced within the paragraph text. Notwithstanding, the text referring to Reading inevitably being the main town the development will rely on for higher order infrastructure is unclear.

Whilst WBC accepts that Reading town centre is a higher order centre for comparison retail, the Loddon Valley Garden Village will include primary schools, a secondary school and a district centre, and is in proximity to key employment destinations within Wokingham Borough. There are also a number of conveniently located supermarkets within Wokingham Borough to support more local food shopping, the likely use of which by residents is support by retail survey information.

Suggested modifications are outlined below.

“Major developments outside Reading: It is likely that there will be significant development of new homes, together with supporting facilities, on the edge of the Reading urban area. ~~A Strategic Development Location around Shinfield and Spencers Wood has been identified for some time in Wokingham’s development plan, and much of it is already complete.~~ As set out in paragraphs 3.1.3, the Proposed Submission Wokingham Local Plan ~~also~~ identifies major development at Loddon Valley Garden Village. Whilst ~~some~~ local services and facilities are to be provided ~~within large~~ as part of any major developments, residents will likely travel into Reading ~~will inevitably be the main town that these developments rely upon for higher order infrastructure~~ for some activities such as shopping. Consideration of transport links from these areas into Reading should therefore make up ~~a major~~ part of the spatial strategy.”

Figure 3.2

WBC suggests that Figure 3.2 is modified to remove the South of the M4 Strategic Development Location for the reasons referred to in the response to paragraph 3.1.3.

Policy EN15 Air Quality

Policy EN15 suggests that “*Development should have regard to the need to improve air quality...*” This narrow definition omits situations when transport ‘proposals’, intended to reallocate road-space to deliver bus priorities, contribute to additional congestion or result in longer fossil fuelled trips. Whilst WBC will generally support proposals to deliver more sustainable travel patterns, Policy EN15 should be changed to “*Proposals should....*” so that all proposals are required to achieve the same policy objective.

Policy EM1 Provision of employment

WBC notes the statement within paragraph 4.3.5 that there is scope to accommodate the full level of employment need within Reading Borough.

Policy H1 Provision of housing

Subject to the outcome of the transport assessment, WBC supports in principle Policy H1 in setting a housing requirement which equates to an average of 825 dwellings per annum.

It is noted that this exceeds the scale of housing need identified within the Reading Housing Needs Assessment July 2024 (735 dwellings per annum). It is further noted that whilst lower than the scale of housing need calculated by the national standard method under the NPPF 2023 (878 dwellings per annum), the proposed requirement exceeds the outcome before the additional step of the urban uplift is applied (650 dwellings per annum). Reading Borough Council have not defined any unmet housing need.

Whilst RBC are promoting the Reading Housing Needs Assessment July 2024 as the appropriate assessment of housing need, it is likely that other parties will promote the use of the national standard method.

It is important to acknowledge the advice contained within the NPPF 2023 regarding the standard method. NPPF paragraph 62 states:

“The standard method incorporates an uplift which applies to certain cities and urban centres, as set out in national planning guidance. This uplift should be accommodated within those cities and urban centres themselves except where there are voluntary cross boundary redistribution agreements in place, or where it would conflict with the policies in this Framework.”

Footnote 27 expands stating:

“In doing so, strategic policies should promote an effective use of land and optimise site densities in accordance with chapter 11. This is to ensure that homes are built in the right places, to prioritise brownfield and other under-utilised urban sites, to utilise existing infrastructure, and to allow people to live near the services they rely on, making travel patterns more sustainable.”

WBC’s reading of the above is that where a local authority is unable to meet housing need as calculated by the base formula, i.e. before the application of the urban uplift, cooperation between local authorities is expected to enable this need to be met. There is however no requirement or expectation on cooperation to meet the proportion of housing need required by the additional urban uplift stage.

For the avoidance of doubt, housing delivery in Wokingham Borough is highly dependent on developing greenfield land. Exporting any proportion of housing need required by the urban uplift to Wokingham Borough would require further significant greenfield land to be

utilised. This would be in clear conflict with the intended purpose of the urban uplift and national planning policy, and our view be inappropriate.

Policy TR1 Achieving the transport strategy

Policy TR1, alongside Policies TR5 and CC7, outline aspirations for sustainable transport but the Plan focuses on walking, cycling and public transport. The NPPF includes ultra-low and zero emission vehicles in its definition of sustainable forms of transport. Given that many trips to Reading originate beyond the borough, it is important that supporting infrastructure serves all forms of sustainable transport.

Policy TR2 Major transport projects

Policy TR2 supports the expansion of the Bus Rapid Transit (BRT) network. The policy references proposals for the southern (A33) and eastern (A4) corridors, identified on the Proposals Map. Limited evidence has been provided to inform proposals which is an essential part of the Sustainability Assessment / Strategic Environmental Assessment process to remove, reduce or mitigate adverse effects.

The adopted RBC Local Plan was supported by proposals to expand the network of Park & Ride sites in Wokingham Borough, serving destinations in Reading (generally retained in Figure 4.6). The Inspector's Examination Report (paragraph 77) considered these as necessary. The Plan suggests these might be replaced with mobility hubs, but these proposals are not supported by evidence to explain what form these hubs might take, how many might be necessary, where they might be located or any supporting infrastructure to enable longer range trips to shift mode to more sustainable alternatives. Whilst WBC are considering mobility hubs these are unlikely to be delivered until much later in the Plan period therefore RBC might need to support accelerated delivery close to the borough boundary.

Policy TR5 Car and cycle parking and electric vehicle charging

The densification of central Reading is generally supported. Policy TR5 places a requirement on developments to “...*provide car and cycle parking are appropriate to accessibility...*” Most of the proposed development locations are in high accessibility areas, as such WBC anticipate the car parking provision will be minimal. With an increased reliance on active travel, WBC assumes that the Infrastructure Delivery Plan (IDP) will deliver significant cycleway improvements – extending into Wokingham Borough. Whilst RBC has published a Local Cycle Walking Infrastructure Plan it is important that

investment and infrastructure delivery are mutually conducive to exploiting the potential for active travel, requiring some refinement of the IDP.

Limited evidence¹ has been provided suggesting development travel demands, with the exception of hotels, are forecast to be comparable with city locations. Table 3.1-4 suggests traffic demands are much lower than comparable land uses within 1.2km of town centres/stations elsewhere in England. Given the scale of development planned, the forecasts in Table 3.5 and Figure 3.2-5 suggest that material changes would occur to the WBC network that require further examination and mitigation.

If the development forecasts form part of a wider 'Decide & Provide' approach to manage travel demand, it might be practical to reduce parking provision and/or align other parts of the IDP for non-car infrastructure/services. Until further evidence is provided, WBC is unable to support these plans.

Policy OU1 New and existing community facilities

WBC supports the proposed general reliance on existing mainstream education provision in the Plan but notes that the proposals carry a low-level risk of insufficient school places being achieved within Reading Borough.

Most local authorities with education responsibilities are managing the effects of a falling birth rate on school rolls. Conversely, new housing development will bring additional children (credible child yield rates for new homes are set out in the Plan). However, this impact on demand may be localised, and at a borough level may not offset the roll reductions created by the falling birth rate. Moreover, in the context of new communities can rely on existing education provision either within walking distance of their homes or that is accessible by sustainable modes of travel.

If the borough child population were to increase (or capacity be reduced) in the period to 2041 beyond borough school capacity, a risk of overflow to schools within Wokingham Borough would arise. Currently there is some capacity in two key accessible areas (Earley and Woodley, but not Shinfield) but if birth numbers had risen across the west of Berkshire area, there would be a risk that some families from Wokingham Borough being unable to secure local places. WBC therefore seeks reassurance and wishes to understand the measures which would be activated to ensure that availability of increased capacity, should these circumstances arise.

¹ Sustainable Connectivity and Vehicle Trip Distribution Study, Stantec, December 2024.

Policy OU2 Hazardous installations

WBC welcomes the recognition of AWE Burghfield within Policy OU2 and the approach to development proposals within the Detailed Emergency Planning Zone (DEPZ). It is noted however that the policy makes no reference to the other consultation zones identified by the Office for Nuclear Regulation (ONR) and as a result is considered unsound.

WBC suggest the policy and supporting text is modified to include reference to the consultation zones surrounding AWE Burghfield set by ONR and proposals for development within all these zones being managed in the interests of public safety, emergency response, and national security and defence requirements. Such a modification would be consistent with the emerging policies in both the Wokingham Borough Council Local Plan Update Proposed Submission Plan and West Berkshire District Council Local Plan Review, which is currently at examination.

6. South Reading

Figure 6.1 illustrates aspirations for the A33 to become a Bus Rapid Transit (BRT) route into Reading. Historically this was the basis for changes to B3031 Basingstoke Road corridor when the A33 was opened. If these proposals are intended to support greater levels of modal shift via the Mere oak Park & Ride which is situated within Wokingham Borough, these should be supported by transport evidence to inform effects on the wider transport network.

Figure 6.1 also illustrates that the BRT would extend towards the A327 corridor, into the highway network within Wokingham Borough. The basis for BRT proposals contrasts with the Superbus network depicted in Figure 4.7, again highlighting the limitations of supporting evidence. Indeed, paragraphs 4.5.8 attempt to expand of BRT and Park & Ride sites, which might incorrectly reference Figure 4.9 (instead of 4.6), but supporting text for Mobility Hubs, suggests that Figure 4.9 might have been omitted.

8. Caversham & Emmer Green

WBC supports Paragraph 8.2.1 which states RBC will continue to work with other local authorities towards the provision of a crossing of the River Thames, east of Reading. To realise air quality goals, RBC acknowledge this will require mitigation on the road network on either side of the crossing. WBC continue to work with RBC on this Major Road Network

(MRN) improvement but note that if achieved it will ultimately link the M4, A329(M), A3290 and A4155, supporting some redistribution of traffic in the wider area. Through the preparation of the Wokingham Borough Council Local Plan Update Proposed Submission Plan, WBC note that several parts of the local highway network are likely to require complementary improvements into the 2030's. If the Thames Crossing is delivered other improvements will be necessary in Wokingham Borough to support these plans affecting the eastern (A4) corridor.

Policy ER2 Whiteknights Campus, University of Reading

WBC supports Policy ER2 Whiteknights Campus University of Reading. With the Whiteknights Campus straddling the administrative boundary, we are pleased to note it broadly aligns with Policy SS9 Whiteknights Campus of the Wokingham Borough Council Local Plan Update Proposed Submission Plan.

Sustainability Appraisal

As noted under 'Spatial strategy and transport' above, given the limitations of the transport evidence, it is not possible to understand whether the impacts of the spatial strategy have been suitably assessed. Indeed, paragraph 3.4 of the sustainability appraisal acknowledges this issue. Even with additional evidence provided by Stantec (Dec'24) it will be necessary to align other parts of the plan before the Plan is submitted for examination.

Summary

In summary, whilst WBC does not object to the principles and policies of the Plan, in the absence of more transport evidence, it is not possible to understand whether the impacts of the spatial strategy have been suitably assessed and therefore understood. Moreover that where the affects are likely to be detrimental that appropriate mitigations can or will be delivered within RBC and within Wokingham Borough.

WBC cannot therefore conclude that the impacts on the highway network in Wokingham Borough are acceptable. As a result, WBC must conclude at this time that the Duty to Cooperate has not been discharged and the Plan is unsound.

WBC are aware that a transport assessment is being progressed and wish to work proactively with RBC in reviewing this with a view to being able to confirm compliance with

the Duty to Cooperate and broad soundness in due course and before the Plan is submitted for examination.

WBC would be happy to participate in examination hearing sessions should the appointed Planning Inspector consider this helpful.

Yours sincerely,

Ian Bellinger

Ian Bellinger
Head of Planning Policy
Wokingham Borough Council

Woodland Trust

Woolf Bond Planning Ltd

(Response from webform)

Title: Mr

First name: Graham

Last name: Ritchie

Would you like to include the contact details of an agent(s)?: No

To which part of the Local Plan does this representation relate?: OU2

Do you consider the Local Plan is legally compliant?: Yes

Do you consider the Local Plan is sound?: No

Do you consider the Local Plan complies with the Duty to co-operate?: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

- a) It is not positively prepared as the approach hinders the ability of the plan as a whole to address the areas assessed needs;
- b) It is not justified since it is not supported by proportionate evidence;
- c) It is not justified as no evidence is provided indicating that either the existing off-site plan cannot accommodate additional residents/people within the vicinity of AWE;
- d) It is not justified as the potential for other measures as refinements to the current plan which would also provide further capacity to enable it to be activated to focus on the locations where sheltering could be necessary as the solution. Such further measures could entail installation of sensors providing continual information on the weather conditions and a dynamic illustrative of the associated zones within which any off-site plan needs to be activated. Such a dynamic real time solution to identifying the activation of any off-site plan would reflect the clear approach in REPPIR to avoiding the worry and harm to people regarding the unnecessary inclusion of zones following the unlikely incident.
- e) It is also not justified as the approach does not take account of reasonable alternatives.
- f) It is not effective as it is not deliverable.
- g) The approach is also inconsistent with national policy in failing to comply with paragraph 38 of the NPPF as it is not supported by a proportionate up to date evidence base.
- h) It is also inconsistent with national policy as the approach to defining the zones around AWE does not accord with the guidance in REPPIR, especially regarding avoiding the inclusion of too many people within the remit of an off-site plan.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

Amendments proposed to the policy are omitted, alongside a reduction in the extent of the DEPZ so it directly reflects the Urgent Protective Actions Zone

Please upload any supporting information (if necessary).

Do you wish to make further comments concerning another paragraph, policy or area of the policies map?: No

If you wish to participate in the hearing session(s) please outline why you consider this to be necessary:

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Author name: Graham Ritchie

Representations

**Reading Borough Local Plan Partial
Update: Proposed Submission Plan
(November 2024)**

Prepared by:

Woolf Bond Planning Ltd

DECEMBER 2024



Woolf Bond Planning
Chartered Town Planning Consultants

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1. POLICY OU2: HAZARDOUS INSTALLATIONS

Introduction and wider context for representation to the policy

- 1.1 In responding to the content of the draft policy, the representations cover several inter-related points which results in our conclusion that the approach in the plan is not sound. This is because the Council has not provided any of the documentation that they rely upon to demonstrate the extent of the emergency planning zone together the capacity of the emergency plan to accommodate changes in the number of people around the site, especially having regard to the limited chance of an incident at AWE Burghfield.
- 1.2 The matters of soundness whilst covering all four tests can be summarised as follows:
- a) No review of the capacity of the existing off-site plan to establish extent of flexibility to accommodate development,
 - b) The off-site plan will have been revised to ensure it addresses the enlarged area arising from The Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPiR Regulations) have been addressed within an updated version;
 - c) No consideration of the relevance of the likelihood of an incident resulting in a release of radioactive material and also how this needs to be considered with the weather conditions occurring at that time;
 - d) No consideration of differences in approach to definition of Urgent Protective Area (UPA) zones between the two facilities operated by AWE;
 - e) In the context of the currently defined DEPZ, no consideration of whether the boundary adequate accords with the guidance on REPPiR, especially on not including more people than necessary;
 - f) No review of different approaches for defining Detailed Emergency Planning Zones (DEPZ) around nuclear facilities across the UK;
 - g) No consideration of the importance of ensuring existing activities can continue and that this may be reflected in the off-site plan;
 - h) Finally, the importance of balancing AWE matters against other factors.
- 1.3 The Council has included a blanket restriction on further development around the AWE facility at Burghfield. However, the approach does not indicate how the various factors referenced above have been considered and assessed (especially through clear proportionate evidence). This is essential given the reasons relied upon by the Council

for restricting development around AWE are not covered by footnote 7 of the NPPF, and consequently do not provide a limitation of growth. Furthermore, even where footnote 7 constraints apply, this does not prevent locations for growth being identified, where exceptional circumstances are demonstrated i.e. for development in the Green Belt, major development in Areas of Outstanding Natural Beauty (AONB) (now known as National Landscapes) or within flood zones¹

- 1.4 The Local Plan's failure to consider these matters has resulted in an unsound document. Each of the above factors is explored indicating that the overall approach of the Plan results in an unsound plan.

A) No review of the capacity of the existing off-site plan to establish extent of flexibility to accommodate development

- 1.5 A copy of the current off-site plan is included with these representations. It indicates that sheltering is the recommended measure for safeguarding residents in the unlikely event of an incident at AWE resulting in the release of radioactive material.
- 1.6 No evidence is provided to demonstrate why this solution cannot apply for other schemes around the AWE site. This is important taking account of the comments on the other topics relevant to consideration of AWE matters.

B) The off-site plan will have been revised to ensure it addresses the enlarged area arising from the REPPiR Regulations have been addressed within an updated version

- 1.7 Emergency planning arrangements around the AWE facilities had (like other nuclear sites in the UK) were considered under The Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPiR 2001). Following the earthquake off Japan and the subsequent tsunami which affected the operation of the Fukushima nuclear power plant, the regulations were refined. This is through REPPiR 2019.

¹ NPPF and associated guidance indicates that less vulnerable uses (including commercial development) is acceptable in flood zone 2 and 3a, where confirmed through sequential test.

-
- 1.8 Under REPPiR 2019, the extent of zones within which measures might need to be undertaken was expanded, especially with respect to the AWE Facility at Burghfield. This resulted in the area within which Urgent Protective Actions had to take place increasing from 1.5km to 3.16km (as indicated in the Consequences Report for AWE Burghfield².
- 1.9 The increase in the Urgent Protective Actions zone resulted in the off-site emergency plan needing to function for the greater number of people living/working and or visiting the affected zone. This is summarised in the Report to West Berkshire Corporate Board on 4th March 2020 which noted that the revised DEPZ would now cover 7,154 dwellings³. This contrasts with the earlier DEPZ which contained 89 dwellings⁴. To comply with the requirements associated with REPPiR, the off-site emergency plan has to be adequate and to provide the relevant measures for all the people. Based on an assumption of 2.4 persons per dwelling, the population of the DEPZ has increased from 214 to 17,170. This is an increase of 16,956 people.
- 1.10 As indicated the DEPZ increased very substantially between following the reappraisal under REPPiR 2019. This resulted in the number of dwellings affected increasing eighty-fold, notwithstanding this excluded any permitted and uncompleted dwellings.
- 1.11 Alongside the very substantial increase in the population of the DEPZ associated with AWE Burghfield, both this and the corresponding UPA include the Reading FC Ground at the Select Car Leasing Stadium (formerly known as the Madejski Stadium). The off-site emergency plan alongside accommodating the residents within the relevant zone will also need ensure the safety of spectators at the Stadium.
- 1.12 As indicated in the Planning Committee Report on the wider development adjoining the stadium (Reading BC ref 160199), there is and remains approval for an increase in its seating capacity 36,900. This is in addition to any staff or players at the stadium which would further increase the number of people on the site. Therefore, the number of people that must be accommodated by the off-site emergency plan would be at least 54,070.

² Copy included as an appendix

³ Paragraph 5.10.2 of the Report to Corporate Board

⁴ Paragraph 5.4.1 of the 2019 version of the off-site plan

C) No consideration of the relevance of the likelihood of an incident resulting in a release of radioactive material and also how this needs to be considered with the weather conditions occurring at that time

- 1.13 The AWE Burghfield Consequences Report and the Report to West Berkshire Corporate Board referenced above both acknowledge that it was the need to consider the implications of less likely weather conditions which resulted in the increased area for defining the UPA (and the subsequent DEPZ which must include the whole UPA). Whilst under the 2001 version of REPPiR, the designation relied upon weather conditions which occur up to 55% of the time⁵ (Category D), under REPPiR 2019 it now takes account of less frequent conditions – those in category F.
- 1.14 If the definition of zones had taken account of more frequently occurring weather conditions, the emergency planning zone would have been reduced, potentially reflecting that previously imposed.
- 1.15 Alongside consideration of the frequency of the weather conditions and the associated impacts should there be a release of radioactive material, it is also relevant to acknowledge the likelihood of an incident which necessitates activation of the emergency plan. The National Risk Register indicates that the chance of the release of radioactive material from a site like AWE is 1:10,000. This therefore informs the preparation of the off-site plan.
- 1.16 For the wider area for the off-site emergency plan to be relevant (the minimum radius of 3.16km), the accident which activates the off-site emergency plan will also need to occur during the time of the year when Category F weather conditions occur. As indicated, this is a maximum of 12% of the time. Therefore, the chance of the extended DEPZ being necessary is 1:833,333 (or 1:166,667 over a 5 year period). To achieve the same 1:20,000 chance necessary requires consideration of a 40 year period). Consequently, there is a very limited chance of any off-site emergency plan needing to be activated where dose levels necessitate sheltering.

⁵ Category D conditions as indicated in paragraph f of the response to Question 1 in part 3 of the AWE Burghfield Consequences Report

- 1.17 The former extent of the zone at 1.5km was sufficient to ensure that if sheltering was necessary after the release of radioactive material. This can be relied upon as providing a better consideration of the risk to public health, and the adequacy of any off-site plan.
- 1.18 In the expansion of the UPA to encapsulate less frequent Category F weather, these can only occur on a still winters night, given the methodology for its definition. This is shown in Table 1.

Table 1: Meteorological conditions that define the Pasquill stability classes

Surface windspeed		Daytime incoming solar radiation ⁶			Nighttime cloud cover ⁷	
m/s	mi/h	Strong	Moderate	Slight	> 50%	< 50%
< 2	< 5	A	A – B	B	E	F
2 – 3	5 – 7	A – B	B	C	E	F
3 – 5	7 – 11	B	B – C	C	D	E
5 – 6	11 – 13	C	C – D	D	D	D
> 6	> 13	C	D	D	D	D

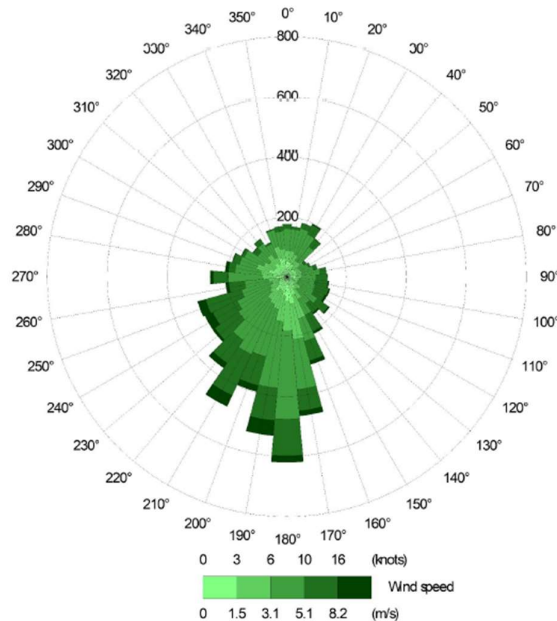
Note: Class D applies to heavily overcast skies, at any windspeed day or night

Incoming solar radiation is based on the following: strong ($> 700 \text{ W m}^{-2}$), moderate ($350\text{-}700 \text{ W m}^{-2}$), slight ($< 350 \text{ W m}^{-2}$).

- 1.19 A still winters night is necessary for Category F weather conditions due to the minimum radiation of heat together with low wind speeds and minimal cloud cover.
- 1.20 The wind direction rose for RAF Benson (below) indicates the limited timeframe during which low windspeeds occur, albeit this relates to the whole year and therefore does not depart from the information on the limited chance of the weather conditions for extended spread of the radioactive plume covering the whole of the UPA.

⁶ Strong insolation corresponds to sunny midday in midsummer in England; slight insolation to similar conditions in midwinter

⁷ Night refers to the period from 1 hour before sunset to 1 hour after sunrise. On the date of the winter solstice (21st December 2024) at AWE Burghfield, sunrise is at 08:07 with sunset at 15:57. Therefore, nighttime at AWE Burghfield on 21st December 2024 ends at 09:07 and re-starts at 14:57.



Wind rose for RAF Benson

- 1.21 Whilst recognising that coinciding of weather conditions with any release of nuclear material may be pertinent to the consideration of the UPA, the difference in chance is also a matter for consideration through plan making, especially as the Report to the Corporate Board was clear, no change has occurred for the activities undertaken at AWE Burghfield or the chance of an incident. Therefore, the need to activate the off-site plan for locations at the edge of the UPA is minimal.

D) No consideration of differences in approach to definition of Urgent Protective Area (UPA) zones between the two facilities operated by AWE

- 1.22 The Consequences Reports prepared for the AWE facilities at Aldermaston and Burghfield both detail the approach to identifying where the advocated measure to achieve the 3mSv reduction on dose should radioactive material be released should occur. In both instances, the advocated measure is to shelter, and this therefore informs the definition of the Urgent protective Actions (UPA) zone. Whilst no comments are made upon this, it is noted that for both sites, there is an assumption that there will be a warning given through landlines following the release of material following an incident.

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- 1.23 The Consequences Report for Aldermaston identifies the distance where sheltering achieves the 3mSv reduction in dose. This is at 1,540m as indicated in paragraph a of the answer to question 2 in part 2.
- 1.24 However, paragraph f of the answer to this question acknowledges that under Category F weather conditions, the plume will pass the UPA limit of 1,540m in around 13 minutes, which is less than the 15 minutes envisaged in the off-site plan to initiate the measures including activation of the landline calls to nearby residents. It is noted that the Lidl supermarket at Tadley relies upon the receipt of the call to activate their emergency measures, although based upon the Category F windspeed of 2m², the plume will travel the 600m from Aldermaston site boundary to the store in 5 minutes.
- 1.25 Therefore, although the off-site plan for both AWE sites' envisages sheltering, it is clear that this is not feasible around Aldermaston given the minimal time in order for this to occur due to the proximity of residents.
- 1.26 The Consequences Report for Burghfield notes that the 3mSV saving associated with sheltering occurs at 3,160m (paragraph b of answer to question 2 in part 2). In contrast to Aldermaston, the Consequences Report allows a 15 minute window following the release of material to enable initiation of the off-site plan and the activation of the phone messaging service. Thereafter, there is up to 10 minutes for people to shelter.
- 1.27 The Category F windspeed of 2m² means that the plume will have travelled up to 1,800m within the 15 minute window for initiation of the off-site plan. Therefore, only people between 1,800m and 3,160m from AWE Burghfield would have the opportunity to shelter, although the time available for this is dependent upon distance from the site. Nevertheless, the Consequences Report does indicate that there is scope for sheltering as an action.
- 1.28 The AWE Burghfield Consequences Report concludes that at 3,160m, sheltering is the effective measure for reduce the received dose by at least 3mSV, should there be an unlikely release of radioactive material from the site. Beyond this distance, sheltering still provides a reduction in dose, although the benefits of this within the wider off-site plan must be considered in the context of the REPIR 2019 guidance.

- 1.29 Consequently, a sites like those controlled by our clients at Spencers Wood, these are beyond the zone where sheltering is necessary to achieve the 3mSv reduction in dose, should the unlikely incident occur. Furthermore, the site is within the area where there is ample time to shelter should this actually be necessary, given the warning period exceeds the 10 minutes minimum which led to the definition of the UPA.

E) In the context of the currently defined DEPZ, no consideration of whether the boundary adequate accords with the guidance on REPPIR, especially on not including more people than necessary

- 1.30 The Report to West Berkshire's Corporate Board references the guidance in determining the boundary of the DEPZ, recognising that it must include all the land in the UPA. The REPPIR guidance on the DEPZ is detailed in Regulation 8 and referred to in section 5.6 of the Corporate Board Report.
- 1.31 Whilst the Corporate Board Reports contents are noted, especially with respect to consideration of the use of features to define the extent of the area and the need to avoid the bisection (where practicable) of existing communities, our view is that their approach has not considered the practical implementation issues, especially the impact of seeking to implement protective actions across too wide an area.
- 1.32 The Guidance associated with the implementation of REPPIR⁸ clarifies these points in paragraphs 237 and 238. These states:

The zone will be determined by the local authority based on their knowledge of the local area and understanding of emergency planning in that area. The zone should be suitable and sufficient to meet the requirements of the Regulations. The determination of the zone should consider properties which may fall beyond a natural boundary where it would be necessary to enter the detailed emergency planning zone to evacuate. Where a detailed emergency planning zone has a marine component, the most effective option to determine the boundary in this area would be to use a semi-circle of defined centre co-ordinate and radius. The boundary could also be determined using a rectangle with defined corner co-ordinates or a fixed integer distance from the coast bounded by two latitudinal co-ordinates.

⁸ Approved Code of Practice and Guidance from the HSE of REPPIR 2019

An adequate response should meet the requirements in the Regulations to mitigate a radiation emergency and have the capability available to ensure this happens without unnecessary delay. Although undertaking protective action can reduce the dose received, this needs to be balanced against the stress caused to affected people and the potential harm to them that could result from this action. The size of the detailed emergency planning zone and the protective action planned in it should not put people at risk of harm from unnecessary action. An excessively large area could also divert important resource from affected areas which require the most attention. If it is considered by the operator that the local authority has increased the detailed emergency planning zone excessively so that the increase is detrimental to the effectiveness of the off-site plan, this should be discussed with the local authority and the regulator. (my emphasis)

- 1.33 Although West Berkshire as the body that sets the DEPZ around the AWE facilities has referenced the guidance in REPIR regarding the definition of the wider zone, we do not consider that it fully accords with the national guidance.
- 1.34 The response above in referencing the consented use of the Reading FC football stadium (up to 36,900 attendees) with further people on the pitch and in support functions (security, catering, etc), in addition those living around the site as reference in the Report to West Berkshire Corporate Board.
- 1.35 The above assessment excludes others who would be located in the UPA, which depending upon the time of day could include visitors to the retail park adjoining the stadium (also within the UPA) together with users of other sites like the motorway service station at Reading. All other these would need to be accommodated within the measures (including sheltering) as detailed in the off-site plan.
- 1.36 The REPIR guidance is clear that any expansion of the DEPZ beyond the minimum UPA must take account of the potential harm and stress for the affected people alongside the burden on emergency services that this imposes. Whilst the blue light services may be able to accommodate this, had the DEPZ been focused solely on the UPA, this additional pressure on blue light services together with harm and stress to the affected residents would be avoided.
- 1.37 The uplift from residents and Reading FC spectators within the UPA is significant and will put undue pressure on emergency services and the health of residents. This is due

to the inclusion of the whole of the settlements of Three Mile Cross, Spencers Wood and Burghfield Common within the zone, whereas only the eastern part of Burghfield Common and the western part of Three Mile Cross are in the UPA.

- 1.38 Omitting the parts of Reading north of Green Park (in the vicinity of the household refuse centre) from the area within which the off-site plan needs to operate, and therefore by a constraint for potential development both reduces the pressure on blue light services and also means that residents in the areas are not subject to unnecessary harm or stress.

F) No review of different approaches for defining Detailed Emergency Planning Zones (DEPZ) around nuclear facilities across the UK

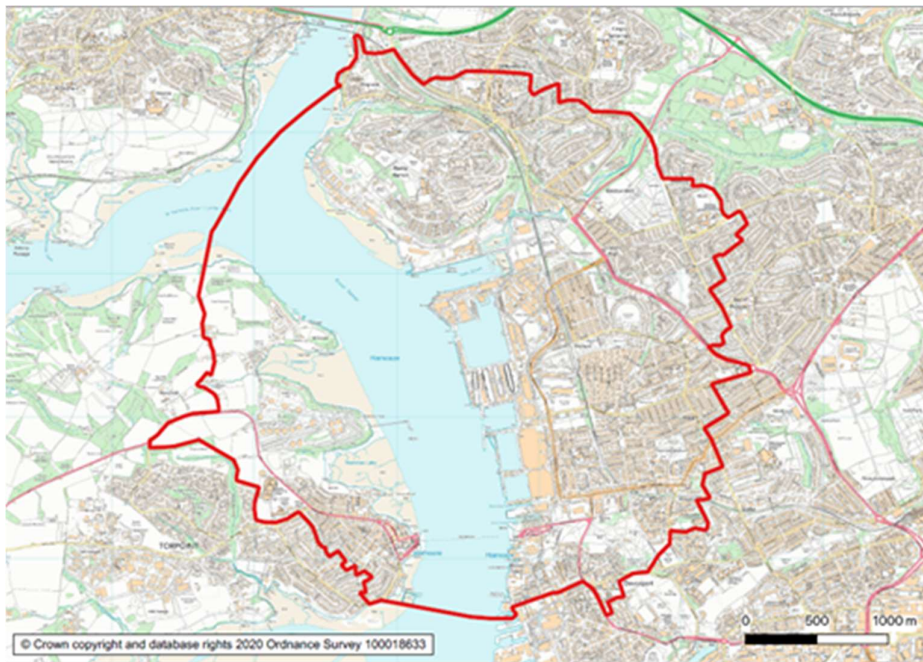
- 1.39 The note detailed note on AWE matters accompanying this statement highlights the approaches of other authorities to defining a DEPZ around nuclear sites, including where these extend across urban area. This is illustrated by the maps indicating the tight focus for DEPZ boundaries of the relevant defined radius for the facility. This is especially noticeable for those around Portsmouth, Southampton and Plymouth (Devonport) which minimise the built-up areas (especially residential) of the cities and their nearby settlements (Gosport and Hythe) within the respective DEPZ. This is shown below.



DEPZ for Portsmouth Naval Base



DEPZ for Southampton submarine mooring point



DEPZ for Devonport, Plymouth

1.40 The approaches of other authorities is clear that existing communities can be subdivided by a DEPZ, especially where this limits stress and harm on residents

immediately outside of the UPA. For this reason, the other locations have tightly defined DEPZ. The same should occur for AWE Burghfield.

G) No consideration of the importance of ensuring existing activities can continue and that this may be reflected in the off-site plan

1.41 The NPPF (paragraph 200) indicates that existing business should not have unreasonable restrictions placed upon them, as a result of development permitted after they were established. The same applies with respect to the expansion of the DEPZ and its impacts upon limiting the various activities undertaken in the area. Whilst the Draft Local Plan references to need for AWE to continue its operations, given its role in national defence, this principle also applies to other uses.

1.42 Through this representation, we reference the committed scheme to enable 36,900 spectators at Reading FC's Stadium. This is a use and activity to which NPPF paragraph 200 applies, as it does to the operation of AWE Burghfield. Given the approach must enable Reading FC to continue operating normally, there is no reason why this flexibility cannot allow other development to proceed.

H) Importance of balancing AWE matters against other factors.

1.43 Alongside the DEPZ, it is essential for the purposes of soundness testing, that Wokingham borough demonstrates how it has considered the various matters detailed above, alongside the wider need to support growth in the borough. No information on this is provided in the plan or supporting documentation.

1.44 The need to robustly review the implications of a constraint and the extent that measures can be included to resolve is an essential aspect for Local Plan preparation to ensure it is justified and supported by a proportionate up to date evidence base (as required by NPPF paragraph 31).

1.45 In this context, we reference the consideration of schemes around Gatwick airport, as this is a vital facility for UK aviation. The influence of Gatwick airport for the strategy prepared by Crawley Borough has been explored through the examination of their

Local Plan. The Inspector's Report for this was released on 6th September 2024⁹ and this includes references to the safeguard area for potential expansion of the airport, especially for the delivery of a wide spaced second runway¹⁰.

- 1.46 Whilst the safeguarding of the land that might be required for a wide spaced second runway was acknowledged, this did not prevent (as noted in paragraphs 72 and 76) from the Crawley Borough's review of the safeguarding zones to ensure all the areas defined were necessary and that there were opportunities to refine the area, especially given the very significant needs within that authority.
- 1.47 The same principle applies when considering the approach to the DEPZ, and that scope for adjustments or flexibility to accommodate growth must be considered. As indicated, this is not something which the Council has demonstrated that it has undertaken.
- 1.48 Through the determination of planning appeals for residential development, schemes have been allowed given the consideration of health matters alongside wider factors including supporting economic growth, especially from the provision of additional homes. This is confirmed through appeal decisions such as those at Boundary Hall, Aldermaston Road, Tadley¹¹ and on land west of Kingfisher Grove, Three Mile Cross¹². Both these sites are within the respective UPA associated with AWE Aldermaston and Burghfield respectively.
- 1.49 The Boundary Hall appeal decision followed the recovery by the Secretary of State of the decision in the application for the erection of 115 dwellings and 945 square metres of B1 commercial space. In paragraph 4 of the Secretary of State's decision letter, it notes that residents on the site would receive a dose of 30mSV in the event of an incident at AWE Aldermaston.
- 1.50 The wider implications for public health were considered in paragraphs 12 to 15 of the decision. These state:

⁹ Copy included as an appendix

¹⁰ As indicated in paragraphs 11, 15, 34-36 and 50-94).

¹¹ Appeal allowed on 16th June 2011 (LPA ref BDB/67609 and PINS ref APP/H1705/V/10/2124548). Copy of decision included as appendix.

¹² Appeal allowed on 31st January 2023 (LPA ref 201002 and PINS ref APP/X0360/W/22/3304042). Copy of decision included as appendix.

12. With regard to the risk of a nuclear accident (IR271-284 and 348-349), while observing that there is no historical evidence of any previous incidents at the AWE site involving the release of material to the open environment, the Secretary of State agrees with the Inspector that it is essential to consider the possibility of future incidents (IR272). He also agrees with the Inspector (IR276-281 and 284) that, although the REPIR approach towards 'reasonably foreseeable' events does not give a clear definition of the likelihood of an event occurring, it has the benefit of being the tried and tested statutory approach which is applied to the entire nuclear industry. Taking all this into account, the Secretary of State agrees with the Inspector at IR283 that the best description of the risk that an event at AWE would impinge on those living and working outside the site would be 'extremely remote', while acknowledging that some weight should be given to the potential for a "reasonably foreseeable" emergency at AWE.

13. For the reasons given at IR285-298, the Secretary of State agrees with the Inspector's conclusion (IR299 and 350) that the potential for a person to receive a 30mSv dose is an important material consideration (IR299). He also agrees with the Inspector that the fact that the HSE did not object to other housing developments in the area, most notably Kestrel Mead which is located slightly closer to the AWE, adds very little to the applicant's argument in this case (IR297). The Secretary of State further agrees with the Inspector (IR300-313 and 351) that the Off Site Plan is designed to be flexible and extendable and that, while it is possible that the implementation of the application scheme would necessitate changes to the Plan, the evidence does not lead to the conclusion that the Plan would fail (IR351). In coming to this conclusion, the Secretary of State has noted in particular (IR311) that West Berkshire Council (who chair the Off Site Plan Working Group) consider that the Plan could be adapted to allow for the proposed development.

14. The Secretary of State also agrees with the Inspector (IR322-344 and 352) with regard to population density criteria. He agrees that the demographic criteria in national policy are specifically intended to be used only for guidance, and that a breach in the policy and the semi-urban criterion should not, in itself, be a reason to refuse planning permission. However, he agrees with the Inspector that the semi-urban criterion is already breached in this location, and that the breach would be worsened by the proposal (IR341).

15. In conclusion on health matters (IR348-353), the Secretary of State agrees with the Inspector that each application must be treated on its own merits (IR347), that the risk of a nuclear accident at AWE occurring at all is very low and that there is no clear definition of the likelihood of an off-site event occurring (IR349). He accepts (IR350) that if such an event were to occur, the potential that those

on the application site could receive a materially harmful dose of the order of 30mSv is an important consideration, but he agrees with the Inspector (IR352) that the evidence does not lead to the conclusion that the Off Site Plan would fail. Therefore, although the Inspector goes on to conclude (IR353) that the HSE's "Advise Against" position is justified, the Secretary of State considers that, whilst it is the specific role of the HSE to advise Ministers - including emphasising the potential implications of an event occurring at AWE - it is his role to weigh that advice in the planning balance against the allocation of the site for housing in the LP and other material considerations.

- 1.51 Nevertheless, as indicated in the conclusions in paragraphs 22 and 23, the scheme was allowed. These paragraphs confirm:

Against these benefits, the Secretary of State agrees with the Inspector (IR398) that the sole objection relates to the potential effect on human health of a materially harmful radiation dose. However, while he does not seek to minimise the potential impact of any individual dose, the Secretary of State considers that this should be placed in the context of the probability of such a dose arising which, while unquantified, has been described as 'extremely remote' (see paragraph 13 above). Added to this, he has taken account of the fact that there is no evidence that the Off Site Plan for dealing with such emergencies would fail; and he is satisfied that the intensification of population density is not, in itself, a reason to refuse planning permission.

The Secretary of State considers that these factors temper the weight to be attached to the risk of a materially harmful radiation dose relative to the benefits of the proposed scheme. No activity can ever be regarded as being risk free, each case has to be considered on its own merits, and the Secretary of State concludes that the potential benefits of this scheme, coupled with the fact that is generally in accordance with the development plan, outweigh the real, but very small, risks attached.

- 1.52 As indicated above, no evidence regarding the flexibility to accommodate growth and the consequential capacity of the off-site plan has been provided. Furthermore, unlike the dose of 30mSV that residents might receive if the unlikely incident occurred, for sites beyond the edge of the UPA, it is significantly less.
- 1.53 The appeal decision for land west of Kingfisher Grove related to a scheme for up to 49 dwellings. This was considered through an appeal following the refusal of the application by Wokingham Borough Council. The relationship and relevance of the

Kingfisher Grove site to AWE Burghfield is detailed in paragraphs 8 to 21. Of particular relevance to these representations are paragraphs 10 – 20. These indicate:

10. The AWE Burghfield site has a role in maintaining national security that includes manufacture and disposal services. Despite the small risk of any accident occurring, emergency planning must be in place. One of the risks is a serious event in which radioactive material could be released into the atmosphere and which would most likely take the form of a plume that would be carried along the atmosphere according to wind direction, eventually dispersing. The type of activity taking place at AWE Burghfield means that any release of material would not be sustained, and thus any event would likely happen over hours or a small number of days.

11. Were an incident to occur, the most likely composition of a plume would be plutonium particulates. The type of activity carried out at the AWE Burghfield site together with the distance of the appeal site from the former means that although there are additional risks of different material release or various possible types of exposure, the greatest risk would be from inhalation. For example, larger particulates would be likely to drop from the atmosphere after being carried and settle on the ground before the plume were to pass over a 2.8km radius from the site.

12. The Council and the appellant agree that such a risk, or the risk of an incident occurring, is very small. The appellant carried out an exercise that considered potential risk factors of previously calculated event frequencies and the AWE Burghfield on-site fault sequences that could trigger an event, concluding that such an event could occur on a 1 in 10,000-year basis. The consideration of additional factors such as meteorological and wind conditions and adherence to the REPIR plan reduces the risk of a person on the appeal site being harmed by such an incident to a single event in many more thousands or millions of years.

13. The REPIR plan recommends sheltering within buildings during an event as the primary method of protection to human health. The barrier of a building (with closed doors and windows) would afford the greatest and most immediate and accessible type of protection in the event of the type described above. The REPIR plan also sets out measures for potential evacuation either during or after the event, but it is unlikely that this would be required for the appeal site should the shelter-in-place recommendation be followed. The same low risk factors mean that the requirement to shelter would be over a short period of no more than two days.

14. The consideration of risk was relevant to the Secretary of State's agreement to allow 115 dwellings at Boundary Hall close to the AWE Aldermaston site, which performs similar work to that of AWE Burghfield and is also covered by the REPPiR plan. The minimum distance between Boundary Hall and AWE Aldermaston was agreed to be 740 metres. He concluded in that case that the "extremely remote possibility" of an incident did not outweigh the other factors that led to him allowing the application.

15. The Council's duties under the REPPiR plan include the protection of the public and the organisation of emergency services. Its concerns are predominantly based on the ability of the plan to be carried out should the appeal development occur. Although only 49 properties and around 117 people, this would add to the number already within the DEPZ and UPA. The surroundings of the AWE site are predominantly rural, but other parts of the area have also been developed, and these include Burghfield Common, a larger residential settlement than Three Mile Cross, and Green Park, a mixed-use business area. These are to the west/southwest and north/northeast, respectively, of the AWE site. Although low in risk, I acknowledge that an incident would have a high impact as set out in the Crest Nicholson judgement.

16. The unidirectional nature of wind means that if a plume was to occur then it would disperse in a singular direction. This would be dependent on specific weather conditions and wind speeds, which are factors that inform the low risk of a plume passing over the appeal site. The REPPiR plan sectorises the DEPZ radially from the AWE site. The plan seeks to prioritise assistance within the sectors over which the plume would pass. Although I heard at the Inquiry that blue light and other relevant services would be working at capacity should an event occur, these are planned to address all areas within the DEPZ. The settlements elsewhere within the area that are larger than those in the appeal site sector (or a sector area comprising the sector and its neighbouring sectors) are in different directions. Given that the plan has the capacity to cover an incident in those sector areas, and that service resources would be predominantly focused on only one sector area, I consider that the addition of the proposed dwellings on the appeal site would not compromise the delivery of the plan.

17. Other implications for the safety of appeal site residents were presented to the Inquiry, including responses from WBDC and other agencies. In particular, the safety of home care workers entering the DEPZ during an incident was in issue, and it was mentioned that the potential for affordable housing to accommodate those with home care meant that this could occur. The Council would not send staff

into the DEPZ in an emergency without being confident that staff would not be at risk.

18. Based on the appellant's modelling, were an incident to occur, a person at the appeal site who was not sheltering might be exposed to a radiation dose of 1.5 milliSieverts (mSv). Advice from the Health and Safety Executive categorises the risk impact of such a dose to "minor"⁹. By comparison, WBDC's public advice¹⁰ provides example levels of 0.02 mSv from a single chest X-ray, 1 mSv as the average annual dose in the UK from naturally occurring radon in homes and 2 mSv as the average total annual dose in the UK from natural radiation sources, 8 mSv as the average annual dose from all sources of radiation in Cornwall, and 500 mSv as the threshold for nausea and reduction in white blood cells. 20 mSv is listed as the annual legal worker dose limit.

19. The effective dose received by anyone within the zone within the conditions set out previously would therefore be low, and lessened if REPPIR advice is followed. Although fear of contamination may prevent workers from entering the DEPZ, this could be disproportionate to the actual risk. Even in the event of plume particles settling on the ground in the appeal site, the risk from a dose following an incident would be lower than those occurring from the alternative sources set out above.

20. Should the REPPIR shelter-in-place advice be followed by those in the DEPZ, road traffic levels are unlikely to be greater than normal and the ability of services to access the zone would not be adversely affected. The possibility of self-evacuation by those within the zone was also raised as a potential safety issue, but this is addressed within the REPPIR plan and discouraged through the dissemination of public information. Other safety barriers such as being elsewhere on the appeal site away from shelter, travelling into the DEPZ, or not having access to a telephone landline (in the event of a safety announcement) are partly covered within the REPPIR plan. Alternatively, they are situations in which sufficient time would be available between the incident occurring and the plume passing over the site for people to become aware of the situation and gain access to shelter or other safety.

- 1.54 The Kingfisher Grove Inspector in paragraph 22 concluded that the scheme would not impact upon the ability of blue light services to carry out their duties, in the unlikely chance of an incident. The Inspector also concluded that the scheme would not affect the continued operation of AWE.

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- 1.55 As also referenced, commercial development, particularly the erection of a Lidl supermarket at Tadley (600m from the site boundary) has been approved. This is a further indication that development is and can still be permitted, within the UPA and there is no reason why the restrictions advanced by the Council through the suggested revisions to policy OU2 are necessary.

Conclusions

- 1.56 Therefore, the above indicates that there has and continues to be scope to accommodate additional development within the area surround AWE facilities at Aldermaston and Burghfield.
- 1.57 Should a future revision of the Consequences Reports for either AWE facility result in changes to the area within which measures must be taken following an incident, under Regulation 11 of REPPiR 2019, West Berkshire as the lead local authority must ensure the adequacy of the off-site plan. It is therefore not the role of the Local Plan to pre-empt this by arbitrarily restricting development around AWE, especially as this would conflict with the operation of the existing business (other than AWE) as obligated by NPPF paragraph 200).
- 1.58 The representation demonstrates why the approach to the expansion of the DEPZ beyond the immediate area of the UPA is inconsistent with the advice in the REPPiR guidance, particularly as it results in the off-site plan being obligated to address the needs of at least more people than would otherwise be necessary. Through its inclusion of the whole of Three Mile Cross, Burghfield Common and Spencers Wood together with the land north of Green Park (in the vicinity of the household refuse centre).
- 1.59 A reduction in the extent of the DEPZ so it is solely focused on the UPA would remove the pressure and concerns arising from other residents living at the same distance from AWE Burghfield as within the wider extent now defined. This can therefore result in the omission of the land north of Green Park (in the vicinity of the household refuse centre) from the defined zone (land south of Island Road), and thereby opening up opportunities for development.

- 1.60 As shown by the review detailed above, Reading Borough Council has not provided any evidence demonstrating that there is no capacity within the existing off-site plan to accommodate additional development, especially as proposals have been approved where this has been accepted i.e. Lidl in Tadley and the SSE Compound. The need to undertake such a review is essential in plan making as illustrated by the approach of Crawley Borough in the context of Gatwick airport. A reduction in the extent of the DEPZ so that it is solely focused on the UPA would also enable the release of capacity.

Consideration of legal and soundness tests of policy OU2

- 1.61 The policy is not sound for the following reasons:
- a) It is not **positively prepared** as the approach hinders the ability of the plan as a whole to address the areas assessed needs;
 - b) It is not **justified** since it is not supported by proportionate evidence;
 - c) It is not **justified** as no evidence is provided indicating that either the existing off-site plan cannot accommodate additional residents/people within the vicinity of AWE;
 - d) It is not **justified** as the potential for other measures as refinements to the current plan which would also provide further capacity to enable it to be activated to focus on the locations where sheltering could be necessary as the solution. Such further measures could entail installation of sensors providing continual information on the weather conditions and a dynamic illustrative of the associated zones within which any off-site plan needs to be activated. Such a dynamic real time solution to identifying the activation of any off-site plan would reflect the clear approach in REPPiR to avoiding the worry and harm to people regarding the unnecessary inclusion of zones following the unlikely incident.
 - e) It is also not **justified** as the approach does not take account of reasonable alternatives.
 - f) It is not **effective** as it is not deliverable.
 - g) The approach is also **inconsistent with national policy** in failing to comply with paragraph 38 of the NPPF as it is not supported by a proportionate up to date evidence base.

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- h) It is also **inconsistent with national policy** as the approach to defining the zones around AWE does not accord with the guidance in REPPiR, especially regarding avoiding the inclusion of too many people within the remit of an off-site plan.

1.62 To address these matters of soundness, significant revisions to the policy are essential.

Suggested Changes to Make Draft Policy OU2 Sound

1.63 That the proposed changes to draft Policy OU2 are omitted from the plan.

1.64 Furthermore that the geographic extent of the zone to which the Council will have regard to the capacity of the off-site plan does not extend beyond the boundary of the UPA as set in the AWE Consequences Report. Furthermore, a two tiered approach should be included where scope for development is considered within the UPA beyond the area where the boundary would be set under typical weather conditions (Category D i.e at 1.5km),

1.65 These changes are essential in order to ensure that the policy is sound and complies with the legal tests.

1.66 For the reasons detailed, our refined approach better reflects the need to consider development around the AWE whilst ensuring that any activation of the off-site plan focuses its resources on the locations would receive the relevant dose.

Report to Crawley Borough Council

**by Glen Rollings BA (Hons) MAUD MRTPI and
David Spencer BA (Hons) DipTP MRTPI**

Inspectors appointed by the Secretary of State

Date: 6 September 2024

Planning and Compulsory Purchase Act 2004 (as amended)

Section 20

Report on the Examination of the Crawley Borough Local Plan 2024-2040

The Plan was submitted for examination on 31 July 2023

The examination hearings were held between 21-23 November 2023 and 9-16 January 2024

File Ref: PINS/Q3820/429/9

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Abbreviations used in this report

DCO	Development Consent Order
DPA	Dwellings per annum
DtC	Duty to Cooperate
EGA	Economic Growth Assessment
ELAA	Employment Land Availability Assessment
FEMA	Functional Economic Market Area
HWNL	High Weald National Landscape ¹
GAL	Gatwick Airport Limited
GAMP	Gatwick Airport Master Plan
GTAA	Gypsy & Traveller Accommodation Assessment
IDS	Infrastructure Delivery Schedule
IP	Infrastructure Plan
LDS	Local Development Scheme
LEP	Local Enterprise Partnership
LPAB	Local Plan Airport Boundary
LPCVA	Local Plan & CIL Viability Assessment
MM	Main Modification
MPPA	Million Passengers Per Annum
MSA	Market Signals Assessment
MSCPs	Multi-Storey Car Parks
NPPF	National Planning Policy Framework
NRP	Northern Runway Project
OEMP	Operational Efficiency Master Plan
PD	Permitted Development
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
NWS	Northern West Sussex ²
NWSEGA	Northern West Sussex Economic Growth Assessment
NWSHMA	Northern West Sussex Housing Market Assessment
RBBC	Reigate & Banstead Borough Council
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SHLAA	Strategic Housing Land Availability Assessment
SNWRZ	Sussex North Water Resource Zone
SPA	Special Protection Area
SPD	Supplementary Planning Document
SoCG	Statement of Common Ground
WSCC	West Sussex County Council

¹ On 22 November 2023 Areas of Outstanding Natural Beauty (AONBs) were re-termed "National Landscapes".

² We use this term as an umbrella for the authority areas of Crawley, Horsham and Mid Sussex

Non-Technical Summary

This report concludes that the Crawley Borough Local Plan 2024-2040 provides an appropriate basis for the planning of the Borough, provided that a number of main modifications (MMs) are made to it. Crawley Borough Council has specifically requested that we recommend any MMs necessary to enable the Plan to be adopted.

Following the hearings, the Council prepared schedules of the proposed modifications and, where necessary, carried out sustainability appraisal and habitats regulations assessment of them. The MMs were subject to public consultation over a six-week period. In some cases, we have amended their detailed wording and/or added consequential modifications where necessary. We have recommended their inclusion in the Plan after considering the sustainability appraisal and habitats regulations assessment and all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Clarification of the plan period (in effect extending it by one year) with associated amendments to the housing and employment land requirements and a revised stepped housing trajectory;
- Various amendments to the policy for the Gatwick Green strategic employment site to more positively provide for employment needs over the plan period and to ensure a comprehensive and coordinated development that complements any planned expansion at the adjacent Gatwick Airport;
- Clarifications on the type and scale of development to be supported within the area safeguarded for Gatwick Airport;
- Various amendments to improve the clarity and justification of planning obligations sought in relation to affordable housing and employment skills; and
- A number of other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy.

Introduction

1. This report contains our assessment of the Crawley Borough Local Plan in terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is compliant with the legal requirements and whether it is sound. The National Planning Policy Framework 2021³ (paragraph 35) (NPPF) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Crawley Borough Local Plan 2024-2040, submitted in July 2023 is the basis for our examination. It is the same document as was published for further consultation in May 2023 following previous consultations under Regulation 19 in January 2020 and January 2021.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that we should recommend any main modifications (MMs) necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. Our report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2** etc, and are set out in full in the Appendix.
4. Following the examination hearings, the Council prepared a schedule of proposed MMs and, where necessary, carried out sustainability appraisal and habitats regulations assessment of them. The MM schedule was subject to consultation for six weeks. We have taken account of the consultation responses in coming to our conclusions in this report. We have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal/habitats regulations assessment that has been undertaken. Where necessary we have highlighted these amendments in the report.

³ An updated version of the NPPF was published on 19 December 2023. Paragraph 230 of the 2023 NPPF is clear that plans submitted prior to 19 March 2024, should be examined against the 2021 NPPF, which was extant at the time of plan submission.

Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as the Crawley Local Plan Map as set out in document CBLP/M/01.
6. The policies map is not defined in statute as a development plan document and so we do not have the power to recommend main modifications to it. However, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective.
7. These further changes to the policies map were published for consultation alongside the MMs [Crawley Local Plan Map Modifications Consultation Version – February 2024 – document MC/CBLP/M/01]
8. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the Crawley Local Plan Map [CBLP/M/01] and Crawley Local Plan Map Modifications Consultation Version – February 2024 published alongside the MMs.

Context of the Plan

9. The Crawley Borough Local Plan 2024-2040 would supersede the Crawley Local Plan 2015 in full. The submitted plan is an amalgam of new policies and those updated, where necessary, from the 2015 Local Plan. The Plan set out strategic policies for the Borough for the next 15 years, including a positive framework to support and deliver a revitalised town centre.
10. The Plan area is geographically small comprising the main built-up area of Crawley, Gatwick Airport and remaining open land between the town and the Airport. Crawley was designated a new town in 1947 and expanded on planned residential neighbourhoods each with their own facilities. The principal employment estate is at Manor Royal, which is a major employment hub of sub-regional significance. Ongoing development at Forge Wood represents a major new community for housing within the Borough during the Plan period. Elsewhere housing development at the edge of Crawley is occurring within either Horsham or Mid Sussex Districts, reflecting that land supply within the administrative boundary of the Borough is highly constrained.

11. Gatwick Airport exerts a strong influence over the Borough both as a major employer (directly and indirectly) and in terms of transport networks including bus services, rail and the M23. Land to south of the existing airport has been safeguarded for approximately the last twenty years to enable the option of a second wide-spaced runway at Gatwick Airport, if required.
12. To the south of the Borough is the High Weald National Landscape (HWNL). This verdant setting is complemented by extensive green infrastructure throughout the town. Large parts of the Borough are within the Sussex North Water Resource Zone (SNWRZ) where it is necessary to achieve water neutrality to avoid an adverse effect on qualifying features of the protected habitats of the Arun Valley Special Protection Area (SPA), Arun Valley Special Area of Conservation (SAC) and Arun Valley Ramsar⁴ sites.

Public Sector Equality Duty

13. We have had due regard to the aims expressed in S149(1) of the Equality Act 2010. This has included our consideration of several matters during the examination including the accommodation needs for gypsies and travellers, older persons accommodation, accessible and adaptable housing and access to community facilities. The Sustainability Appraisal (SA) of the Plan has iteratively considered the potential effects of the Plan on those with protected characteristics, such that the three aims expressed at S149 of the Equality Act have been appropriately taken into account in plan-making.

Assessment of Duty to Co-operate

14. Section 20(5)(c) of the 2004 Act requires that we consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
15. Crawley is geographically a small borough. Nearly all of the undeveloped land immediately to the north of the town has been safeguarded as part of the development plan since 2007 so as not to preclude the possibility of a second wide-spaced runway at Gatwick Airport. The previous 2015 Local Plan resulted in significant unmet housing and employment needs due to this constrained land availability. These were largely accommodated by neighbouring authorities as part of their subsequent plan-making⁵.
16. The submitted Plan seeks to accommodate the proposed full employment land requirement over the Plan period. It is evident, including through statements of common ground (SoCG), that Crawley has engaged with neighbouring

⁴ Ramsar Convention on Wetlands of International Importance (UNESCO) 1971

⁵ Horsham, Mid Sussex and Reigate & Banstead

authorities on employment land matters, and this extended to various jointly prepared evidence base documents⁶.

17. We are mindful that the Plan's employment land requirement is predicated to an appreciable degree on the reduced housing requirement. Accordingly, the SoCG with Horsham recognises that any strategic growth adjacent to Crawley in its Plan may not necessarily meet Crawley's unmet housing needs and therefore it would be anticipated that some employment needs arising from an urban extension may need to be met in Crawley (as the adjacent and dominant employment centre). Any remaining employment need arising from the development may be accommodated in the urban extension itself, or if necessary, accommodated elsewhere within neighbouring districts. This points to an element of unmet employment land needs should development West of Crawley be identified and allocated (in an adopted Plan) on the basis of meeting some of the Borough's unmet housing needs.
18. In light of the above, through the Duty to Cooperate (DtC) process, Northern West Sussex (NWS) authorities have signalled that they will ensure a sufficient supply and choice in employment floorspace through respective plan-making⁷. There is agreement that the latest Economic Growth Assessment work is appropriate for the wider NWS area, including the identification of at least 26.2ha of employment land for Crawley. There is also agreement within NWS on Crawley's approach to release a new strategic employment site. We deal with the soundness of this site later in this report but note here that at 44ha the proposed Gatwick Green site in this Plan could provide some headroom to accommodate needs arising from any urban extensions adjacent to Crawley that had capacity to meet some of the Borough's unmet housing needs. This would be addition to any potential capacity in Horsham District that may further assist any wider unmet employment land needs⁸.
19. Because Crawley was seeking to meet its (labour demand) employment land needs in full, we do not consider it was necessary that the DtC process explored the consequences of not releasing a strategic employment site. This is not what Crawley were planning for. The outcomes of the DtC process demonstrate cross-boundary support from adjoining authorities (and others) for Crawley's proposed approach to releasing a new strategic employment site at Gatwick Green as part of the submitted Plan.
20. Under the standard method for calculating local housing need, the annual figure for the Borough has increased to 755 dwellings per annum (dpa), compared to the previous objectively assessed need of 675dpa. It was clear from an early stage of plan-making that Crawley would be unable to accommodate all its

⁶ Northern West Sussex Economic Growth Assessment

⁷ Paragraph 13 of Northern West Sussex SoCG July 2023 [Document SOCG/01]

⁸ Horsham District Council Regulation 19 Representations 20 June 2023 page 2

housing need. This raises two strategic planning matters for the DtC. The first is the effort and extent of engagement from Crawley in securing an effective outcome, in terms of gaining potential commitments from others to assist in meeting the significant unmet housing need. The second, which is allied to this, is securing effective outcomes in terms of any wider planned housing growth adjacent to Crawley's administrative boundaries.

21. In respect of unmet housing needs, the scale of the issue is significant, with the submitted Plan seeking to accommodate less than half of the identified housing need. The issue was clearly identified by the Council, significantly in advance of Plan submission, through various forums, including regular meetings of the Northern West Sussex Housing Market Area (NWSHMA) authorities. In addition to regular dialogue, the Council issued formal requests to NWSHMA authorities, and beyond, seeking assistance in meeting the unmet housing needs in January 2020 and April 2023. The focus for accommodating the unmet housing need is inevitably on the NWSHMA authorities given the need to secure sustainable patterns of development.
22. Significant weight has been placed on the fact that during the last round of plan-making, Crawley's unmet housing needs were largely accommodated within the NWSHMA. Based on the evidence in both the SoCGs and representations from Horsham and Mid Sussex that cannot be assumed to occur again for this Plan. Neither authority have committed during the preparation of Crawley's Plan to accommodate any of the unmet housing need. Both Horsham and Mid Sussex are advancing reviews of their local plans. This is taking place in the context of an approximate 25% uplift in housing need, such that the cumulative need figure across the NWSHMA has increased from 2,201dpa under the existing adopted local plans to a figure of 2,756dpa based on the standard method outputs at the time of this examination. Whilst it will be for each authority to ultimately determine precisely how much housing development it can sustainably accommodate within the suitable land available, the cautiousness of NWSHMA authorities to assist addressing the unmet housing need does not represent a failure against the DtC on Crawley's part.
23. The NWSHMA SoCG, to which West Sussex County Council (WSCC) is also a signatory, is significant on this matter of unmet need. This clearly establishes an agreed hierarchical approach that should capacity arise then unmet needs within the Housing Market Area (HMA) would take priority over any other anticipated requests to accommodate unmet need. We are satisfied that at the time of the preparation of Crawley's Local Plan this is as far as the authorities can practicably go in establishing a strategy in respect of Crawley's unmet housing needs. This reflects the combination of significantly increased housing need and further environmental constraints, including water neutrality.

24. In respect of a greater effort in engaging beyond the NWSHMA, the formal requests, particularly in April 2023, have gone well beyond the immediate HMA authorities. There is no doubt that Crawley have cast a wide net and the various SoCGs with authorities in both Sussex and Surrey demonstrate the reasonable endeavours Crawley has undertaken to explore whether its unmet needs could be met elsewhere. Given the various constraints, including, Metropolitan Green Belt to the north in Surrey, Ashdown Forest SAC and SPA to the east, the HWNL and South Downs National Park to the south, it is perhaps unsurprising that Crawley's request for assistance from further afield has not elicited a positive response as part of the DtC.
25. Wider growth around Crawley has been considered as part of the regular engagement between the Borough and its neighbouring planning authorities. Options which would be, in spatial terms, strategic urban extensions to Crawley, have been consulted on as part of current plan preparation in both Horsham and Mid Sussex⁹. In the scenario that such development was to be allocated we are satisfied that neighbouring authorities are aware of Crawley's requirements, not least an acute affordable housing need and a secondary education capacity issue. Evidence, including the Joint Area Action Plan for West of Bewbush, the Planning Performance Agreement for West of Ifield and planning obligation negotiations in Mid Sussex, provides confidence that there would be effective, on-going joint working were major growth allocated adjacent to Crawley. We are also satisfied that the submitted Plan before us would not inhibit or preclude sustainable development adjacent to Crawley. This includes the positively prepared policy for an area of search for the Crawley Western Multi-Modal Link. This infrastructure is not technically required for the Plan's growth but would support strategic growth in Horsham District.
26. Whilst none of the prescribed bodies have asserted that Crawley has not met the DtC, there is a general concern regarding potential impacts arising from a lack of coordinated planning for growth around Crawley. Whilst the Gatwick Diamond Local Strategic Statement and West Sussex and Greater Brighton Local Strategic Statement provide a degree of strategic framework for plan preparation these are high-level, non-statutory documents. There is a cogent argument, in our view, that growth in and around Crawley would benefit from genuine strategic planning that could suitably consider growth options and infrastructure at an appropriate level and on a consistent evidence base.
27. Whilst jointly produced local plans can include strategic policies¹⁰, there is no obligation to prepare such plans. The Local Development Scheme (LDS) identifies the potential of a Joint Plan¹¹, but plan-making within the NWSHMA has been staggered such that there is no obvious point at which plan review for

⁹ West of Ifield in Horsham District and Crabbet Park in Mid Sussex District

¹⁰ NPPF paragraph 17 a)

¹¹ Local Development Scheme January 2023 [CB/LDS/01] paragraphs 2.8-2.13

the respective authorities could reasonably coalesce around a timely joint strategic plan. In preparing individual Local Plans across NWS, it is better, in our view, that Crawley's Plan is examined and adopted ahead of Horsham and Mid Sussex in terms of providing certainty around the scale of unmet needs and any infrastructure requirements.

28. The LDS confirms that "joint working is a known priority". This has occurred on strategic cross boundary matters and is evidenced in the SoCGs with Horsham and Mid Sussex in accordance with the requirements set out in the PPG¹². Through the various forums and groupings, including with WSCC, it is evident that effective consideration has been given to cross-boundary infrastructure implications¹³. For example, transport modelling for the submitted Plan, includes sensitivity testing, including allowances for West of Ifield (3,000 homes), were that option to come forward. Water Cycle Study work has also been undertaken on a wider 'Gatwick sub-region' basis including Mid Sussex, Horsham and Reigate & Banstead.
29. Importantly, water neutrality within the catchment of the Arun Valley has emerged as a significant strategic matter during the preparation of the Plan. We are satisfied, as demonstrated through the related SoCG, that the affected planning authorities, including Crawley, have engaged with Natural England, the Environment Agency and water utility companies to establish an effective policy approach to enable plans and projects to secure a positive appropriate assessment outcome under the Habitats Regulations. The collective approach to policy formulation¹⁴ and consistency across the catchment and the cooperative approach to shared resources and solutions to enable development to come forward across the catchment demonstrates that the DtC on this matter has been met.
30. In conclusion, the plan preparation process for Crawley has generated a very significant unmet housing need. At the time of Plan submission there was no clear mechanism or agreement as to how the unmet need could be accommodated. We are satisfied that Crawley has made appropriate efforts to engage with others on the issue. It is evident, however, in an area where housing need figures are significantly increasing and the capacity to accommodate growth is subject to various policy and environmental considerations that a resolution to meeting Crawley's unmet needs was not going to be straightforward. The NWSHMA SoCG provides a constructive approach but ultimately the DtC does not extend as far as a duty to agree that some or all of Crawley's unmet housing need must be accommodated.

¹² PPG paragraphs 61-010-20190315 – 61-015-20190315

¹³ SoCG/01 – Northern West Sussex (July 2023), Sections 4 & 5

¹⁴ Including the Water Neutrality Study Part B In Combination Assessment 2022 [ES/SDC/06]

31. Overall, we are satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the DtC has therefore been met.

Assessment of Other Aspects of Legal Compliance

Sustainability Appraisal and Strategic Environmental Assessment

32. The Council carried out a sustainability appraisal (SA) of the Plan, prepared a report of the findings of the appraisal, and published the report along with the plan and other submission documents under regulation 19. The appraisal was updated to assess the MMs. The submitted SA report is comprehensive and addresses the requirements of Strategic Environmental Assessment (SEA).
33. As required, the SA report must identify, describe and evaluate the likely significant effects that would arise from implementing the Plan, including “reasonable alternatives”, taking into account the objectives and geographical scope of the plan¹⁵. In terms of SA there will always be disagreements because the assessment process relies on judgments, which are inherently subjective. On the whole, we find the Council’s judgements that have informed what are preferred options taken forward into the Plan and the explanation for discounting alternatives to be logical and clearly set out.
34. One of the principal reasons for discounting what may have otherwise been reasonable options for sustainable development is the conflict with the objective to safeguard land for Gatwick Airport. This is particularly the case in respect of options for employment land. The Council has made its assessment of those areas it considers critical for airport expansion and those that are non-essential (in accordance with NPPF paragraph 106c) in terms of land that should continue to be safeguarded.
35. Nonetheless, there is a methodological concern regarding how the SA has considered alternative options for employment land. The SA of discounted employment sites is comprehensive and has considered various potential sites collectively and on an individual basis. Whilst there may be disagreements on how sites have been assessed against the individual SA objectives, we find the Council’s judgements in their assessment of sites to be reasonable. It is not explicit in the SA whether “rejected employment sites” are treated as reasonable alternatives to the proposed strategic Gatwick Green site but they are all presented in the same Appendix of the SA (Appendix H pages 396-441). Clearly, some of the sites are capable of being alternatives to Gatwick Green (in

¹⁵ Environmental Assessment of Plans and Programmes Regulations 2004, Regulation 12(2).

terms of strategic size) and so it is reasonable to consider that they were assessed as alternative strategic site options.

36. The SA report explains why these sites have been discounted, including being in conflict with the continued, precautionary need to safeguard land for Gatwick. There is a suggestion that SA should have been 'policy blind' on all site options within the 2015 Local Plan safeguarded land but this would have been an ineffective exercise given the evidence on the location of a second wide spaced runway and the policy approach to retain safeguarding. In our view SA has appropriately sieved the options and discounted alternatives at the appropriate stage having regard to the baseline evidence for the SA, including the 2013 Aviation Policy Framework, the draft 2018 ANPS and the 2019 Airport Master Plan.
37. Gatwick Airport is clearly a significant and special consideration for land use planning in the Borough. This includes issues such as hotel and visitor accommodation and airport related parking. We address the soundness of the policies later in this report, noting that they are a continuation of 2015 Local Plan policies which were found sound in the context of the NPPF. In respect of the SA process, this has looked at reasonable options for both policy areas¹⁶, including a 'do nothing' option. The SA process cogently explains why locally specific policies, that reflect the need for a specific sustainable pattern of development including Gatwick Airport, would form part of an appropriate strategy for Crawley.
38. Overall, we find no shortcomings in the SA of Policies EC7 and GAT3, including how the possible effects of the policy options have been assessed and the overall reasoning for selecting the preferred policy approach. SA is necessarily a high-level exercise, such that the options appraised should encompass identifiably separate policy approaches or objectives, rather than go into permutations that are not sufficiently distinctive. This matter was examined in the High Court¹⁷ for the 2015 Local Plan in respect of Policy GAT3, such that the Council's approach in SA for this Plan remains reasonable in testing the two separate high-level policy options for airport related parking.

Habitats Regulations

39. The Crawley Local Plan Habitats Regulations Report (January 2023) sets out that a full appraisal has been undertaken where it has been identified that the Plan, alone and/or in combination with other plans and projects, is likely to have a negative impact on the qualifying features of Habitats sites which requires mitigation. The principal issues are firstly in relation to hydrological impacts

¹⁶ Policy EC7 at pages 241-243 and Policy GAT3 at pages 252-254 of KD/SA/01

¹⁷ Holiday Extras Ltd v. Crawley Borough Council [2016] EWHC 3247 (Admin)

(water quantity and quality), particularly for the Arun Valley SPA, SAC and Ramsar sites. The second issue is air quality in terms of the impact of atmospheric nitrogen deposition and acidification, including at the Ashdown Forest SAC and SPA.

40. The policy areas that have been screened in for appropriate assessment relate to employment development, town centre redevelopment and housing, together with the proposed policy approach on water neutrality. In respect of water, the first matter is water quality in the wider Thames River basin catchment to the north of the Borough including the River Mole. Generally, improvements to Wastewater Treatment Works are predicted to provide capacity to accommodate planned development without deterioration in receiving watercourses below the current Water Framework Directive classification, as evidenced in the Water Cycle Study¹⁸.
41. In relation to water neutrality, it is evident without mitigation that levels of abstraction within the Sussex North Water Resource Zone serving the Arun Valley catchment needed to supply growth in the Local Plan would have an adverse impact on the integrity of the Arun Valley SAC, SPA and Ramsar sites and The Mens SAC site. The proposed approach is to secure stringent water efficiency measures (85 litres per person per day in housing and 3 credits within the water consumption category of BREEAM¹⁹ standard for non-domestic buildings) and through appropriate off-setting to achieve water neutrality. This is set out in submitted Policy SDC4. Tangible progress is being made on implementing a local authority-led water off-setting scheme²⁰. The HRA Report concludes that with this mitigation in place there would be no adverse impact in terms of water quantity impacts.
42. With regards to in-combination effects with other Plans and projects, the specific Water Neutrality SoCG demonstrates the significant co-operation and consistent approach being pursued by the relevant local planning authorities, together with WSCC, the Environment Agency and water utility providers. Natural England endorse the approach being taken and the conclusions of the HRA report. Overall, we find the mitigation in Policy SDC4 would be effective and so share the HRA report conclusions of ultimately no adverse impact on site integrity.
43. In relation to air quality, the Plan contains a number of policies aimed at maximising sustainable travel. These would be implemented in tandem with Crawley's Transport Strategy (which seeks to promote walking, cycling, public transport and electric car clubs) and the Local Cycling and Walking Infrastructure Plan. The HRA sets out in detail the outputs from air quality

¹⁸ Gatwick Sub-Region Water Cycle Study 2020 and Crawley Addendum 2021 [ES/SDC/08&09]

¹⁹ BREEAM – Building Research Establishment Environmental Assessment Method

²⁰ Progress Note July 2023 [DS/TP/00a] (with details of the Sussex North Offsetting Water Scheme (SNOWS)).

modelling for Ashdown Forest and Mole Gap to Reigate Escarpment and demonstrates in relation to baseline data, future trends and impact of Local Plan policy that there would be no adverse impact on site integrity.

Strategic Priorities and Climate Change

44. The Development Plan, taken as a whole, includes policies to address the strategic priorities for the development and use of land in the local planning authority's area. This includes submitted Policies SD1 and SD2. The first sets out Crawley's strategic objectives for development and how that would contribute to sustainable development in the Borough. The second singles out enabling healthy lifestyles and wellbeing as a particular strategic priority for the Borough, including a requirement for health impact assessments for major developments. Given the baseline evidence for the Borough²¹ on aging population, childhood obesity and various other health inequalities we consider the approach in Policy SD2 to be soundly based, consistent with NPPF paragraphs 92 and 93. Elsewhere the Plan contains identified strategic policies which correlate to the strategic objectives in Policy SD1 and to the evidence that has informed the SA objectives for Crawley. The submitted Plan would also provide spatial alignment in contributing towards delivery of the Council's Corporate Plan Priorities 2023-27 [PS/DS/CBCCP/01].
45. The Development Plan, taken as a whole, includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. This includes policies on sustainable design and construction addressing such matters as energy consumption, connectivity to district energy networks, tackling water stress and achieving water neutrality (Policies SDC1-4). There are also policies to prioritise modal shift through design (Policy CL3) and transport planning (Policy ST1), enhance green infrastructure and biodiversity and to ensure development is protected from, and does not exacerbate, flood risk²².

Other Matters of Legal Compliance

46. The Plan has been prepared in accordance with the Council's Local Development Scheme (LDS).

²¹ Including the West Sussex Joint Health and Wellbeing Strategy 2019-2024 & Sussex Health & care: Improving Lives Together – Our Ambition for a healthier future in Sussex (2022) [PS/DS/NHS/01]

²² The plan is informed by Strategic Flood Risk Assessment including the latest climate change allowances (2023) [PS/ES/EP/17].

47. Consultation on the Plan and the MMs was carried out in compliance with the Council's Statement of Community Involvement.
48. The Plan complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

Assessment of Soundness

Main Issues

49. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, we have identified 11 main issues upon which the soundness of this plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion or allocation in the Plan.

Issue 1 – Is the Plan's Spatial Strategy and approach to Safeguarding for Gatwick Airport based on robust evidence and is it justified, effective and consistent with national planning policy?

Spatial Strategy

50. In large part, due to the size and nature of the Borough, there are few genuine spatial options for accommodating the full development needs over the plan period. SA has assessed three high-level scenarios to inform an appropriate strategy. In terms of accommodating development needs further afield, the DtC process has identified at a strategic level that this is not presently feasible. Even if it were, we have strong reservations about a strategy that would involve the dispersal of a proportion of Crawley's growth well beyond the NWSHMA, including to locations where connectivity to Crawley and Gatwick Airport for work would be weak and largely reliant on the private car. Accordingly, plan preparation was justified in not seeking a wider dispersal of growth far beyond the Borough boundaries.
51. It therefore follows that a key spatial strategy matter is the extent to which development needs could be accommodated within the Borough. This would be intertwined with any approach to safeguarding for Gatwick Airport.
52. The submitted plan seeks to accommodate employment land requirements within the Borough, having determined the extent of land critical for safeguarding. We set out separately below under Issue 3, concluding at paragraph 127 that the minimum employment land requirement in the Plan is soundly based. At a strategic level having sought to accommodate the

employment land requirement, the spatial choices for doing so are limited. At a high level, there is insufficient capacity through remaining land parcels and any redevelopment opportunities on existing employment land, including Manor Royal, to accommodate the full employment land requirement. Some consolidation and reconfiguration on existing employment estates, through town centre redevelopment and at the Horley Business Park site, adjacent in Reigate and Banstead (RBBC), would meet some of the needs but there would remain a significant residual requirement for new land. This would be particularly the case for warehousing and logistics sectors, including those seeking large footplates. We are satisfied that the evidence in the Employment Land Availability Assessment (ELAA) and the SA demonstrates that plan-making has considered reasonable spatial options within the Borough for providing employment land.

53. Whilst extending Manor Royal would represent a logical choice for a sustainable pattern of employment development, this location has been discounted due to the continued safeguarding for Gatwick Airport. By reference to the Airport's 2019 Master Plan, the area of land between Manor Royal and the existing airport is clearly critical for physically implementing a second wide spaced runway, including necessary peripheral infrastructure, land for a safety buffer and essential realigned highways and watercourses.
54. The Plan's spatial strategy proposes to release land for employment at Gatwick Green in the north east of the Borough. The location is reasonably related to Manor Royal and to Gatwick Airport. The quantum of land proposed for allocation is sufficient to establish a new strategic employment site. It would complement rather than compete with Manor Royal or other strategic employment areas in the wider Functional Economic Market Area (FEMA). The Gatwick Green location requires land that has been previously safeguarded for Gatwick Airport and we address the soundness of this below. Nonetheless, in considering an appropriate spatial strategy for employment needs we are satisfied that the Plan has assessed reasonable spatial options.
55. In terms of the potential to accommodate housing within the Borough we are satisfied that the only reasonable spatial option is to optimise delivery within the existing built-up area of Crawley and to build out the remaining greenfield allocations from the 2015 Local Plan (Forge Wood). When taking into account the combination of safeguarding for the airport, acceptable living conditions due to noise and the need to safeguard environmental assets, there are effectively no reasonable options for further peripheral greenfield housing in this Plan. The SA has dealt with this appropriately.
56. Regarding development potential in Crawley, the Plan is evidenced by a comprehensive assessment of available sites in the Strategic Housing Land Availability Assessment (SHLAA). This includes potential sources of supply within the town centre, including various high-profile opportunity sites that are

positively identified as part of the coordinated revitalisation of the town centre as a central neighbourhood. It also includes sites that justify the town centre being appropriately considered as part of a longer-term broad location for further housing. Additionally, the Plan takes a positively prepared, character-led approach to suitably optimising windfall capacity within the town as evidenced in the Crawley Compact Residential Development Study 2023 [WC/CLD/01], and suite of Housing Typology Policies under the umbrella of submitted Policy H3. This includes estate regeneration, infill opportunities, town centre regeneration and upward extensions. There is no persuasive evidence that obvious sites or opportunities within the town for housing have been omitted.

57. It is asserted, that additional capacity could be derived from a more positive approach to estate regeneration and town centre redevelopment. On the former, there are no funded plans for comprehensive estate regeneration, which would be challenging to implement given the varying degrees of right to buy and the planned character of these areas. Recognisable sites or deliverable redevelopment opportunities within the neighbourhoods are positively factored into the Plan. Whilst there may be a perception of overt capacity within the town centre, a number of high-profile sites are already identified and accounted for. The Plan is predicated on an ambitious but realistic strategy to create a larger residential community within the town centre, as evidenced by various recently implemented redevelopment schemes. An alternative spatial strategy that sought to significantly optimise town centre capacity in addition to that already identified in the Plan would not be justified and without consideration of important factors such as heritage (listed buildings and conservation areas) and the need to retain and provide other land uses in the town centre. Overall, we are satisfied that there is no reasonable or deliverable alternative spatial strategy that could deliver significantly more development within the existing built-up area of the Borough than assumed in the Plan.
58. At a strategic level, we consider it is justified that the Plan is predicated on a strategy of optimising development in Crawley and then seeking to see development needs accommodated as close to Crawley as possible. We accept, as part of the latter, the Council would be reliant on neighbouring planning authorities. This, however, is not unreasonable given previous plan-making and the indications that both Horsham and Mid Sussex are contemplating strategic urban extensions to Crawley as part of their current plan-making²³. Accordingly, we consider the Plan is justified in setting out the position of Crawley Borough Council, as a local planning authority, with regards to development 'At Crawley'. Prudently, the Council recognises that it cannot set policy in its Plan to materially affect what would be a decision for another local planning authority. However, given any strategic growth on the edge of Crawley would give rise to impacts on Crawley it is justified that the submitted Plan sets

²³ As articulated by both Horsham and Mid Sussex at the duty to cooperate and spatial strategy hearing sessions and subsequently confirmed in their Regulation 19 Plans.

out content on “Urban Extensions at Crawley” including Crawley-centric considerations.

59. These considerations are set out at paragraph 12.23 of the submitted Plan. As submitted the Plan articulates what would be required for Crawley to support adjacent growth proposals, that is not the same as setting policy requirements. Nonetheless, they comprise reasonable expectations for sustainable development given the immediate impact of wider growth ‘At Crawley’, particularly on matters such as character and infrastructure, would be keenly experienced by communities in Crawley. On this issue, we find the Plan’s approach to likely peripheral growth in neighbouring authorities to be sound.

Safeguarding for Gatwick Airport

Existing Airport and Northern Runway Project (NRP)

60. The number of flights and passenger numbers at Gatwick Airport is not restricted by any extant planning permission. Nonetheless, the Airport has entered into a Section 106 (S106) agreement in terms of commitments to environmental and other matters. The latest S106 was updated and signed in May 2022 with the Council and WSCC. As such the airport can continue to maximise the existing single runway airport to increase passenger numbers, principally through operational changes and the scope of permitted development (PD) rights. Accordingly, Policy GAT1 would provide a justified and effective mechanism to enable the Council to carefully assess proposals when consulted on as part of PD process and for those proposals that would require planning permission.
61. The Examination for the proposed Development Consent Order (DCO) for the NRP was completed in August 2024, with the outcome awaited in 2025. Justifiably, the Local Plan does not assume an expanded airport on the basis of a non-concluded DCO process. Nonetheless, Policy GAT1 judiciously recognises the potential of the NRP. Additionally, transport modelling work has prudently incorporated sensitivity testing for the NRP alongside the growth in the Plan. We consider plan preparation and content has appropriately considered the DCO proposal insofar as it reasonably can. If the DCO process is consented in whatever form, that may trigger a need to consider reviewing the Plan policies for Gatwick. Critically, it would not affect the overall spatial strategy in this Plan including any area required for safeguarding or otherwise. The evidence to this examination is that NRP would be operational by 2029 at the earliest, ratcheting up to its full potential by 2047.

Context and Principle of Safeguarding at Gatwick

62. The National Aviation Framework 2013 states at paragraph 5.9 the following. “Land outside existing airports that may be required for airport development in the future needs to be protected against incompatible development until the

Government has established any relevant policies and proposals in response to the findings of the Airports Commission, which is due to report in Summer 2015.” The Airports Commission reported in July 2015, concluding that an additional runway at Heathrow presented the strongest option to meet the need for additional airport capacity in the South East.

63. The ‘Airports National Policy Statement (ANPS): new runway capacity and infrastructure at airports in the South East of England’ was finalised in 2018. This confirmed a need to increase capacity in the South East by constructing one runway, with Heathrow identified as the government’s preferred scheme. As resolved at the Supreme Court in 2020, the decision to support a third runway at Heathrow remains lawful and the ANPS remains valid.
64. Parallel to this, the government produced in 2018, the document ‘Beyond the horizon: The future of UK aviation: Making best use of existing runways’. This identified that recent aviation forecasts were exceeding the growth taken into account by the Airports Commission work. A draft aviation strategy was published at the end of 2018 “Aviation 2050: the Future of UK Aviation.” This draft document stated that forecast aviation demand to 2030 could be best met through expansion at Heathrow and by other airports making best use of their existing runways subject to environmental issues being addressed. In addressing long term need (the case for further runways beyond 2030) the document states that the Government proposes to ask the National Infrastructure Commission to include airport capacity in future national infrastructure assessments. The draft Strategy confirmed that it was prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements and to ensure that inappropriate developments do not hinder sustainable aviation growth.
65. In May 2022 the Government published ‘Flightpath to the future’, to enable consideration of wider changes to aviation as a result of Covid-19 and Brexit. It supports airport growth where justified and clarifies that the ANPS and “Beyond the Horizon” provide the most up to date policy on planning for airport development.
66. The Gatwick Airport Master Plan (GAMP) was published in July 2019. It presents various scenarios for growth including optimising capacity on the existing single runway, bringing into operational use the existing standby runway and continuing to safeguard land for a second wide spaced runway to the south of the airport. The second scenario is currently progressing as the NRP through the DCO process. If successful the DCO would enable capacity of the airport to increase to over 75 million passengers per annum (mppa) by 2038, stepping up to around 80 mppa by 2047.
67. Land was first safeguarded for Gatwick in the 2007 Core Strategy following the 2003 Aviation White Paper. As such there is an understandable frustration that significant parts of the Borough’s potential land supply have long been held in

abeyance. Whilst the GAMP states that Gatwick is no longer actively pursuing plans for an additional southern runway it nonetheless confirms that there remains a possibility that the airport may wish to implement one in the future. The GAMP does not rule out the possibility. Accordingly, it seeks a continuation of land being safeguarded in accordance with a boundary identified at Plan 21 in the document.

68. Whilst there have been more recent policy documents and statements on aviation, the audit trail stretches back to the 2013 National Aviation Framework as the key source requiring safeguarding for future runways as well as and the 2018 draft aviation strategy. The National Infrastructure Commission has not yet included airport capacity due to the current uncertainty around the future demand for air travel and the approach to expanding runway capacity in the South East. Overall, there is appreciable uncertainty in national policy regarding the requirement for safeguarding. In this context we consider the Plan has taken a suitably precautionary approach in retaining the vast majority of safeguarded land whilst seeking to allocate land to address the Borough's economic needs.
69. We deal with Plan Review under Matter 11 of this Report but emphasise here that any changes to national aviation policy affecting the Plan's approach to Gatwick would likely trigger a plan review. At this time, it is appropriate that the authority gets a new Local Plan in place in terms of the positive policy framework for the town centre, water neutrality and employment provision and to provide some certainty for other authorities within the NWSHMA. There is no persuasive reason to delay plan adoption in Crawley for further deliberations on where or how future aviation policy may evolve.
70. The rationale for continuing to safeguard is that the draft national Aviation Strategy (Aviation 2050) still supports the principle of safeguarding land for airports, when looking at the longer-term picture. As such removing safeguarding of land likely to be critical to delivering a second wide spaced runway in this Plan could constrain longer term national policy decisions on aviation requirements. NPPF paragraph 106c on protecting sites is phrased as "could be" critical where there is robust evidence.
71. What comprises robust evidence is a matter of judgment and the combination of current national aviation policy, and the GAMP, would meet the threshold in our assessment. We are, however, of a firm view, that perpetuating this circa 20-year situation is not without harm given the scarcity of developable land in the Borough, the pressing need for development and the wider objective to foster sustainable patterns of development in both the FEMA and NWSHMA. If there is no firm movement, in respect of updated government policy on longer term aviation needs, to indicate additional wide-spaced runway capacity is required in the South-East, then the Plan review should, in our view, revisit this matter.
72. Whilst the principle of safeguarding for airport expansion is a national policy for aviation, whether land is safeguarded for a specific airport and the subsequent

delineation of any safeguarded area is squarely an issue for local level plan-making in accordance with NPPF paragraph 106(c). Whilst the Aviation Policy Framework (2013) requires airports to provide Master Plans (and supports the identification and protection of land that should be safeguarded) there is nothing before us in terms of national aviation policy that says land at Gatwick Airport must be safeguarded and that this must be in rigorous accordance with the Airport's latest masterplan. Given the criticality of Gatwick in the Borough, to the sub-regional economy, and to the transport infrastructure of the country, the GAMP is among the chief evidence documents that should inform plan preparation. That does not mean the Council is required to slavishly reflect the Masterplan in the Local Plan, including the ultimate action of safeguarding land. Indeed, on the evidence before us, safeguarding for airports is not commonplace, although we recognise that some Local Plans have positively reflected airport masterplans within their policy framework²⁴.

73. Land has been safeguarded at Gatwick for the past circa 20 years. With no positive indication at a national level that a second wide-spaced runway at Gatwick will be greenlighted it is entirely understandable that the Council has sought to carefully consider as part of this Plan whether reaffirming the significant extent of land previously safeguarded in the 2015 Plan would remain justified in accordance with NPPF paragraph 106c. In terms of the parameters for determining the extent of safeguarded land we find that such land should be focussed to those areas that are critical and demonstrated to be such by an airport master plan. As such we do not consider that safeguarding should include land that is not essential to the implementation of future expansion.
74. Moreover, the Council has a duty in the wider public interest to balance the objectives for the Airport against the over-arching obligation of the Plan to contribute to the achievement of sustainable development. This means promoting a sustainable pattern of development that should aim to meet, as a minimum, the assessed needs for housing and other uses. On the other hand, regard must also be given to the fact that the area of largely undeveloped land to the south of the current airport is the only practicable option for a second wide spaced runway, if required.
75. Safeguarding the full extent of land identified in the GAMP would mean that minimum housing and employment needs could not be met within the Borough. This would be significant because as the preceding DtC section in this report illustrates, accommodating displaced housing and employment needs from Crawley would not be straightforward. We accept that not safeguarding land for the airport does not necessarily mean that housing needs could be met in full

²⁴ As set out in GALs response to the proposed main modifications.

because of existing environmental conditions (aircraft noise) on land proximate to the existing airport. The same would not apply for employment.

76. Therefore, we are concerned that not meeting employment needs within the Borough would be especially negative on two dimensions. Firstly, in terms of maintaining a strong and competitive economy in the Borough, consistent with the evidence that Crawley is the major employment centre within the FEMA. Secondly, the potential to generate commuting patterns at odds with otherwise reducing the need to travel. Dispersing economic development away from the Borough is something which would only be sound when shown to be demonstrably necessary. It is therefore entirely justified as part of plan-making that the Council reconsidered whether safeguarding land for a second wide-spaced runway and the various associated land uses remained a sound approach based on the available evidence.
77. As part of the plan preparation process, the Council promoted the concept of a North Crawley Area Action Plan to look at the justification for safeguarding at Gatwick and the scope to accommodate strategic employment development. The Council has considered the alternative option of a more flexible approach through an area action plan mechanism as part of the SA (including in relation to employment land provision). The SA sets out cogent reasoning as to why the option has not been taken forward as part of an appropriate strategy for this Plan. As set out elsewhere, if circumstances change on the need to safeguard land that would be a matter for a plan review.

The extent of safeguarded land

78. In determining the extent of safeguarded land in the Plan, the GAMP is an important consideration. Much will hinge on the basis, age and quality of the evidence informing the masterplan. Guidance at Annex B of the 2013 Aviation Policy Framework says that airport masterplans are to “be given due consideration in local planning processes” (paragraph 4.11). Accordingly, the GAMP is not binding on the extent of safeguarded land.
79. The fundamental and clear test for plan-makers is at NPPF paragraph 106c and it requires consideration of whether there is robust evidence to identify and protect sites that would be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development. Rather than simply rolling forward safeguarding because it was considered appropriate in 2007 and subsequently in 2015, we consider the test is now heightened in respect of Gatwick for those areas of land where it is questionable as to whether the intended land use in the latest master plan would be “critical” to the development. Consequently, and given the circumstances described above (in terms of the pressures on land resources and the need to secure sustainable development more widely), it was entirely appropriate that the Council scrutinised the latest 2019 airport master plan and the evidence behind it.

80. Clearly land required for the second-wide spaced runway, aircraft manoeuvre and passenger facilities, safety buffers and essential highway and watercourse diversions, would be critical, and so warrants being protected. The area proposed for safeguarding in the Plan would protect those areas identified in Plan 20 of the GAMP covering these critical elements. The main issue is the extent to which land needs to be safeguarded to the east of the existing airport as shown in the GAMP. This area is shown for long stay surface car parking.
81. We are cognisant of the Airport's recent and significant measures to promote modal shift (for example the multi £million upgrade of Gatwick train station) and for this to continue during the plan period through the iterative Airport Surface Access Strategy and S106 processes. Nonetheless, we agree with the Airport that, notwithstanding good progress on modal shift, car borne passenger numbers are likely to remain significant and should be catered for. As such additional car parking will be critical to an expanded airport.
82. It is confirmed that the GAMP draws on evidence for car parking provision from 2014 to the Airports Commission. This includes at Appendix A5 an Operational Efficiency Master Plan (OEMP). The OEMP shows at Figure 4.6.6.1 the proposed Gatwick Green site within long stay surface parking (labelled No.6 in the legend). Section 3.7 of this document summarises what is described "Eastern area developments". This is the area to the east of the railway line. It states the area "has been designated to accommodate a consolidated surface car parking zone which feeds all terminal buildings as well as providing a safeguard for commercial developments should these be required."
83. We have strong reservations about the continuing validity of this evidence, which appears to be, until this examination, the kernel of the robust evidence relied upon by the Airport for potentially safeguarding approximately 138ha of land to the east of the airport for car parking (including in the 2021 Arup update note). Table 3.7.1 of the OEMP identifies a requirement for some 95,750 parking spaces to support the expanded airport operating at 95mppa. There is relatively little detail before us to explain how these figures were arrived at in terms of either demand or design solutions. Given this lack of evidence, the increasing use of alternative modes of surface access and the emerging alternatives to traditional surface car parking, it is questionable whether all of the land east of the airport would be critical to the delivery of an additional wide-spaced southern runway. As such the Council was justified in scrutinising the robustness of the GAMP evidence as required by NPPF paragraph 106c.
84. Moreover, GAL in response to the York Aviation Paper (during the examination) have updated their assessment of parking to support the implementation of the GAMP which results in a parking demand of 76,315 spaces of which 68,015 would be long stay or staff spaces. It is not our role to determine precisely what amount of car parking would be needed to support a second wide spaced runway (due to reach the 95mppa within 20-25 years from opening) but the

examination hearings reasonably coalesced around a figure of circa 68,000-70,000 spaces.

85. Whilst GAL maintain that they still require the full 138ha to be safeguarded to deliver this quantum of parking, there is not the robust evidence to support this. Taking a figure of 69,000 parking spaces, at an average surface car parking space density of 20sqm (including circulation space), would equate precisely to 138ha. However, the trend for airport parking, at Gatwick and elsewhere, has been to advance more efficient ways of parking such as blocked parking, automated (robotic) parking models, decking and multi-storey car park (MSCP) provision. This trend for efficient parking is likely to continue and intensify during the plan period as technology advances. The full use of the 138ha for car parking, including potentially elements of surface parking, would not be an efficient use of land in a highly constrained Borough.
86. Whilst we understand GAL wishes to offer consumer choice for those desiring larger surface parking spaces, we are nonetheless satisfied that various options exist to secure more efficient parking including MSCPs, decked provision and block parking including robotic or mechanical solutions. There is very little to indicate that the cost of such options would not be viable. Recent growth in car parking demand at Gatwick has been consistently met on-airport though a mixture of decking and multi-storey parking solutions onsite. This indicates such forms of parking provision are likely to be viable. Whilst the NRP DCO is not yet determined, it nonetheless shows that more efficient parking could be secured at Gatwick (parking spaces per million passengers) compared to the 2014 work. Indeed, block parking at Gatwick (45%) is already in excess of that forecast around the time of the 2014 work (33%).
87. Of the 138ha of land shown in the GAMP to the east of the airport, 94ha would be safeguarded in the Plan once 44ha is removed for the Gatwick Green allocation. There is very little to demonstrate that this 94ha, or even a reduced area of 81ha²⁵, could not accommodate the long-term car parking needs associated with an airport operating at c.95mppa. To some extent the onus is on the airport to provide to the Council (and to us as examiners) the robust evidence that these residual areas could not provide critical amounts of car parking and so demonstrate that the full 138ha should be protected. That has not happened and instead we have largely been presented with assertions on consumer choice and the practicalities and impacts of decked and MSCP provision in this part of the Borough.
88. There are MSCPs at Gatwick relatively close to the existing runway. Subject to location there is no compelling evidence that additional MSCP provision would not be feasible having regard to aerodrome safeguarding. In terms of character, there are already existing bulky buildings associated with the airport. Subject to

²⁵ Deducting circa 13ha which, as submitted by GAL, may not be operationally suitable for car parking.

layout, design and landscaping there are no reasons why additional large-scale development for parking associated with the operation of the airport would be incompatible with the character to the east of the airport. If the Gatwick Green allocation is delivered, MSCP and decked provision would likely occur close to large logistics units. The submitted spatial strategy anticipates significant change in the character in this part of the Borough, a location that is already divorced from the wider countryside by the existing airport, the M23 and the M23 spur road. GAL's concerns that MSCPs or decked provision would not be supported on land east of the airport are overstated and speculative.

89. In conclusion on this matter, we find that parking demand (per million passengers) is likely to be lower than when envisaged at the time of the 2014 work for the Airports Commission. This is consistent with the ongoing and sustained efforts of the Airport to support modal shift for passengers and staff, such that we consider that the number of parking spaces determined through the 2014 work would represent a significant overprovision. There is ample scope with more efficient parking formats and methods to accommodate the likely parking demand within the extent of the 94ha of safeguarded land proposed. As such there is not the robust evidence required to safeguard the full extent of land east of the airport as shown in the GAMP.
90. We understand land to the east of the airport is an optimum location to consolidate parking provision, forming part of the planned, incremental growth for the airport. However, a very significant area of safeguarded land would remain to enable this. Whilst the shape and location of the Gatwick Green site would intrude into the safeguarded area, we are nonetheless satisfied most of the residual areas could logically come forward for parking. The worst-case scenario leaves 81ha but we consider that a very pessimistic situation given the size of the land remaining between the Gatwick Green site and the M23 could accommodate an appreciable number of parking spaces. Whilst this location would feel slightly detached from the remainder of the airport, due to the intervening Gatwick Green site, it would not be that remote (it would be closer than a number of existing off-airport parking sites). Moreover, masterplanning of the Gatwick Green site would have regard to inter-relationships to this area, including the extent to which connectivity to safeguarded land east of the site could be secured through and around it.
91. We note the previous examination into the 2015 Local Plan was not particularly positive regarding the extent of land safeguarded to the east of the airport, with the Inspector describing that a large area of land for surface car parking represented a sub-optimal use given the general scarcity of land in the Borough. Nonetheless, safeguarding in this location was found sound on a precautionary basis and the need for some flexibility to implement a major infrastructure project. Matters have now moved on such that the balance of evidence on both the land required for car parking to support an expanded airport and the need for employment land tips firmly in favour of the submitted Plan's reasonable approach to modestly amend the overall extent of safeguarded land to facilitate

a new strategic employment site. It would do so in a location that would not fundamentally prejudice the ability to implement a second wide-spaced runway.

92. Continuing to safeguard the full extent of this peripheral area primarily for surface car parking would be a profligate approach given the scarcity of land and the competing demands for it, particularly in terms of securing wider sustainable patterns of development in the Borough. We do not consider it has been sufficiently demonstrated that alternative, and more land efficient, forms of parking provision would be unviable, unattractive and otherwise detrimental to the successful implementation of an enlarged airport operation based on a second wide spaced runway. Accordingly, we consider the approach to safeguarding based on removing part of the area for surface car parking and focusing on protecting the core but extensive areas for the second wide-spaced runway to be an effective and justified approach, and entirely consistent with NPPF paragraph 106c.
93. Section 3.7 of the OEMP also refers to 35ha of land that may be needed to relocate commercial uses displaced from the southern runway. Ultimately, safeguarded land is for critical infrastructure. The 35ha relates to notional businesses that may still exist in the affected area by the time the second wide spaced runway is to be implemented. Relocated employment land is not critical infrastructure as it would be principally compensatory provision, likely to fall outwith any DCO for a Nationally Significant Infrastructure Project in terms of the legal powers to secure land for relocating uses.
94. Bringing this all together, we find the over-arching approach to continue safeguarding land that would be critical for an expanded Gatwick Airport to be justified. The proposed extent of the area to be safeguarded in the Plan appropriately reflects this. Excluding the proposed Gatwick Green site from safeguarded land would be part of an appropriate strategy that can sustainably meet the Borough's employment needs without fundamentally inhibiting those areas necessary for critical infrastructure for the airport's potential expansion for a second wide-spaced runway.

Plan Period

95. The Plan as submitted is titled the Borough Local Plan 2024-2040. The Plan was submitted for examination in July 2023 and contains housing and employment land trajectories with a base date of 31 March 2023. To ensure clarity and consistency with the evidence base, the Plan period should be clearly identified as 1 April 2023 to 31 March 2040. In accordance with NPPF paragraph 22, on adoption in 2024, the strategic policies of the Plan would look ahead over a minimum 15-year period. **MM1** would clarify the Plan period in various parts of the Plan and we recommend it for effectiveness and so that the Plan would be justified.

Conclusion

96. Subject to the MMs identified above the Plan's Spatial Strategy and approach to safeguarding for Gatwick Airport is based on robust evidence and would be justified, effective and consistent with national planning policy.

Issue 2 – Whether the housing need for Crawley is soundly based and the supply-based housing requirement justified and positively prepared?

Housing Need

97. The housing need for the Borough has been established using the standard method. It applies the 2022 work placed-based affordability ratio (published in March 2023) and average annual net changes in households from the 2014-based projections in accordance with the methodology set out in the PPG. Having regard to the PPG²⁶, and considering the ongoing, but yet to be determined NRP at Gatwick, it would not be necessary for soundness to plan for a higher housing need figure than the standard method indicates. Accordingly, the minimum housing need for Crawley of 755dpa is soundly based.
98. In light of the findings above on the Plan period (extending from 16 years to 17 years), the overall housing need for the Borough should be adjusted upwards from 12,080 to 12,835 homes. **MM4** would make the required changes and we recommend it for effectiveness and so that the Plan is positively prepared.

Principle of a supply-based housing requirement

99. As set out above under our consideration of the DtC, the Borough is a geographically small area, and as such it is widely recognised that it is not possible to accommodate the full extent of the Borough's housing need. Given the influence of Gatwick Airport on remaining greenfield land to the north of the Borough (by virtue of safeguarding and noise), land supply for housing is focussed within the existing urban area of Crawley and at the remaining capacity at the Forge Wood allocation from the 2015 Local Plan. At submission, it was assessed that the Plan could accommodate only 42% of its housing need.
100. The NPPF at paragraph 11b) states that strategic policies should, as a minimum, provide for objectively assessed needs for housing. Given the geographical limitations of the Borough and the need to safeguard land for Gatwick Airport, there is little dispute that land supply in the Borough for new

²⁶ PPG Paragraph 2a-010-20201216

housing is limited. As such there are strong and practicable reasons why the overall scale of housing development in the plan area would be restricted.

101. We are mindful, however, that given the significant sustainability benefits of delivering homes in Crawley, that the Plan should nonetheless set an ambitious but realistic housing requirement. There are relatively few new housing sites allocated in the plan. Given the grain and character of a largely planned new town it is logical that there are relatively few sites that remain clearly anticipated for development. Those that are identified in Policy H2 and on the Policies Map have been appropriately identified and assessed through the SHLAA and SA processes following various calls for sites and assessments of publicly owned land. There are no obvious omission sites that should be additionally allocated to increase the supply and in turn the housing requirement.
102. In terms of the capacity of sites identified as part of the 2015 Local Plan we are satisfied that the latest housing trajectory [PS/H/HD/14] has increased them where sustainable to do so and this has been accounted for (a net gain of some 1,170 dwellings)²⁷. For the small number of allocated sites under Policy H2, we find the capacities of these sites and their anticipated timeframes for delivery to be robustly considered through the SHLAA and housing trajectory processes. This includes a more positive re-assessment of the Desmond Anderson site at Tilgate (increased from 100 in the 2015 Local Plan to an indicative capacity of 205 homes) and at Breezehurst Drive (moderately increased from 65 to 85 dwellings).
103. One of the principal housing allocations in the Plan is the Tinsley Lane site, which was previously allocated in the 2015 Local Plan, with an indicative capacity for at least 120 homes. The site is subject to a development brief published in 2017. Whilst there is local concern regarding existing football pitch provision at the site, Policy H2 sets out what is required of the development, including replacement provision and additional publicly accessible green space. Whilst the land budget at the Tinsley Lane site would need to be carefully overseen, there is no persuasive evidence before us that the site cannot sustainably accommodate the mix of uses for which it has been allocated, including improvements to sport pitch provision such as 3G artificial grass pitch provision. The Council has sought to make some changes to the policy in terms of expressing the various open space and green infrastructure elements as “at least” and to clarify the 3G pitch provision. Whilst that may add clarity to the policy, they are not changes that we need to recommend for plan soundness.
104. The submitted policy for the site requires allotment provision (compared to previously seeking “consideration should also be given to the provision of

²⁷ Paragraph 3.4.1 of Topic Paper 4

allotments.”). We are not advocating that the policy should be modified for soundness given the development brief for the site identifies a deficiency in allotment provision in this part of the Borough. We note that progress in developing outline schemes for the site has not been able to accommodate allotment provision due to asserted viability issues within the tight land budget available. However, that does not persuade us that the ambition to secure some form of allotment provision should be dropped from the policy given there may be some flexibility to balance competing policy requirements.

105. Land is allocated at East of Balcombe Road/Street Hill, Pound Hill for a maximum of 15 dwellings. This site was allocated in the 2015 Local Plan notwithstanding the site being then a Site of Nature Conservation Importance (now a Local Wildlife Site) for meadow grassland habitat. The site has not been maintained and is currently predominantly scrub and young trees, which in themselves will have biodiversity value. Whilst the Council have prepared a draft Supplementary Planning Brief for the site [PS/H/HD/16] this has not been adopted. As such, there has not been a concerted effort to deliver the existing allocation. Nonetheless, given the acute housing need in the Borough and the opportunity to achieve an appropriate balance between a modest amount of additional housing and securing an appropriate long-term biodiversity management regimen for most of the site, we conclude that the allocation of the site (as a mixed use site for ‘Housing, Biodiversity and Heritage’) is justified, consistent with national planning policy and therefore sound. Given the constraints, it is also justified that Policy H2 expresses the site allocation capacity as a maximum figure.
106. From the evidence before us, including the Crawley Compact Residential Development Study 2023, we find that the submitted plan has set a policy framework in Policies H3a-f and CL4 that carefully consider character areas and provide a positively prepared basis for optimising windfall delivery. The capacity work is consistent with the findings of the SHMA in terms of the housing mix required in the Borough. The submitted plan roughly doubles the windfall allowance from 55 to 100²⁸. We consider this in more detail under Issue 7 below but find for this issue that windfall has been realistically and appropriately factored into a supply-led housing requirement.
107. The plan has taken a positive approach to identified town centre redevelopment opportunities, including around the railway station, and this is reflected in key opportunity sites and the town centre being identified as a ‘broad location’ for additional housing. The Plan also contains a policy framework to support a significant increase in the residential population of the town centre. From the evidence before us we are satisfied that town centre capacity has not been under-estimated, including the cumulative indicative capacity of Town Centre key opportunity sites at 1,500 dwellings over the plan period. Reference is made

²⁸ As detailed in the Windfall Statement 2023 [document H/HD/06]

to 'estate regeneration' being an underestimated source of capacity but there are no large-scale regeneration initiatives or schemes being contemplated that could justifiably feed into the Local Plan as a 'broad location' in accordance with NPPF paragraph 68b.

108. As a purposefully planned New Town there is a clear demarcation between residential and the main employment areas. Consequently, mixed use developments within the main employment areas are not an option for increasing the housing capacity within the Borough. Notwithstanding the need to maintain the provision of employment land and premises²⁹, the incursion of housing into main employment areas would create challenging issues for living conditions and the 'Agent of Change' principle³⁰. Several main employment areas are subject to Article 4 directions restricting PD, including Class MA.
109. Overall, we consider that the Plan has sought to accommodate as much of the housing need as reasonably practicable and that no stone has been left unturned. The Plan takes a positively prepared approach to town centre redevelopment and to windfall capacity such that we are satisfied that it is justified and effective that the housing requirement in the Plan reflects the likely supply.
110. As a consequence of clarifying the plan period it would be necessary to extrapolate the housing requirement by an additional year to increase the overall minimum requirement from 5,030 to 5,330 dwellings. **MM2** and **MM24** would do this, and we recommend them so that the Plan would be effective. Allied to this, the extent of unmet housing need would increase from 7,050 to 7,505 dwellings. **MM5** and **MM26** would clarify this figure within the Plan and again we recommend them for effectiveness.

Conclusion

111. Subject to the MMs identified above the housing need would be soundly based and the supply-based housing requirement would be justified and positively prepared.

Issue 3 – Does the Plan positively and proactively encourage sustainable economic growth through its policies and the identification of Gatwick Green as a strategic employment location, to flexibly meet anticipated needs over the plan period?

²⁹ As assessed in the review of existing employment stock and premises in the EGA

³⁰ NPPF paragraph 187

Employment Land Requirement

112. In terms of the context for determining the employment land requirement, the NPPF at paragraph 81 states that planning policies should help create the conditions in which businesses can invest, expand and adapt. Account should be taken of local business needs and wider opportunities for development. In assessing business needs, PPG paragraph 2a-026-20190220 advises that strategic policy making authorities will need to liaise closely with the business community and take account of the Local Industrial Strategy.
113. Crawley, because of the sub-regional significance of the Manor Royal employment estate and the presence of Gatwick Airport, is a key part of the Northern West Sussex Functional Economic Market Area (FEMA). Consequently, the Coast to Capital LEP Gatwick 360 Strategic Economic Plan 2018-2030 [DS/LEP/01] and the Gatwick Diamond Local Strategic Statement 2016 [DS/GD/01], both of which are documents produced within the local business community, identify Crawley as a key location for economic growth, including new sites. Proximity to Gatwick Airport is clearly a key factor.
114. At a more local level, the Borough Council's 'One Town Crawley Economic Recovery Plan' (2021) [PS/EGSM/EG/11] reflects local intelligence and knowledge, identifying what needs to be done to support the Borough's post-Covid economic recovery. The Recovery Plan includes delivering sufficient suitable land for new sites to both support various economic sectors and enhance the Borough's economic resilience to changes in circumstances.
115. Overall, from our assessment, four things are very clear from the various economic plans and strategies. Firstly, Crawley currently is, and will continue to be regarded over the plan period, by the LEP and others, as the largest and one of the most significant economic centres in the sub-region. Secondly, a lack of land supply is consistently recognised as one of the key risks and inhibitors to the expansion of existing businesses and securing inward investment. Thirdly, Crawley has significant locational strengths including proximity to Gatwick Airport, rail connections to London and the M23 and nearby M25. Fourthly, whilst there is some variability in the quality of existing employment land and premises in Crawley, they are highly utilised, reflected in strong market demand, high rents and limited vacant properties³¹. Underpinning this, it is evident that Crawley is not immune from wider re-structuring in the economy that is seeing increasing demand for industrial and logistics floorspace, typically through large hub buildings that can facilitate strategic storage. Accordingly, and as a starting point, we are satisfied that submitted Policy EC1, as the strategic policy on

³¹ The exception is the trend of office space lost to residential under recent PD rights.

sustainable economic growth, is consistent with economic priorities for the LEP and Gatwick Diamond.

116. Plan preparation has been informed, amongst other things, by the Northern West Sussex Economic Growth Assessment (January 2020) (NWSEGA) which considered employment and economic development needs over the period to 2036 across a wider FEMA. Whilst this evidence has provided a consistent baseline for plan preparation in this part of Sussex, it is nonetheless justified that various supplementary updates of the Economic Growth Assessment (EGA) specific to Crawley were prepared in September 2020 and January 2023 [EGSM/EG/05]. This approach has ensured that the submitted Plan is accompanied by up-to-date evidence, not least in respect of circumstances which have had a particular bearing on the local economy including the impact of the Covid-19 pandemic and the degree of recovery³². The updates, including the estimates of floorspace requirements, are in broad conformity with the initial wider NWSEGA methodology, allowing for the plan period to 2040. As part of the examination further submissions have been provided by the NWSEGA authors on market signals for industrial and warehousing needs.
117. In headline terms the EGA process has considered a range of economic growth forecasts for the Borough. This approach is in accordance with the PPG at paragraph 2a-027-20190220. These forecasts produce a broad range of net employment land requirements extending from 21.4 hectares (ha) to 69ha.
118. The advised forecast in the EGA is the Experian baseline labour demand projections in terms of meeting labour demand, which derives a minimum employment land requirement of 26.2ha over the period to 2040. The Experian outlook, particularly with regards to transportation and storage more closely reflects recent circumstances in the Borough and so it is appropriate that this has been used to inform a labour demand figure.
119. These outputs are closely aligned to the labour supply approach utilising the supply-led housing growth in the Plan (modelled at 314dpa) which generates a requirement of 26.1ha. The labour demand forecast generates a minimum requirement for 113,390sqm new floorspace for business purposes over the period to 2040. This is predominantly in the warehouse and distribution and manufacturing sectors. At least 26.2ha of land would be required to deliver the minimum floorspace. This is supported by market feedback and analysis³³, including within the wider FEMA, which indicates a strong demand being experienced in the industrial and logistics sectors to locate in Crawley, but this is being frustrated by a lack of land supply particularly for larger footplates. Whilst the Council's monitoring evidence reveals a supply of mid-size

³² Not least the significance of Gatwick Airport, both directly and indirectly, on the Borough's economy

³³ NWSEGA [EGSM/EG/07] and Manor Royal Economic Impact Study 2018 [EGSM/EG/09]

warehouse units are coming forward in Manor Royal, it is evident that typical plot sizes at this location will constrain the ability to deliver larger units on the estate. As such existing employment areas will not meet the needs for modern warehousing and logistics developments.

120. The EGA identifies a modest need for additional office and research and development uses at 3.3ha. There is an existing quantitative land supply to meet this need although it is recognised that new development may seek qualitative alternatives to Crawley's existing offer. In this regard, the sub-regional Horley Strategic Business Park site in adjacent RBBC would assist in accommodating Class E(g)(i) and (ii) development within this part of the FEMA close to Crawley and Gatwick. As such Crawley's employment land requirements fundamentally relate to accommodating "industrial" space, in particular storage and distribution uses. This is consistently reflected in the labour demand, labour supply and past development rate scenarios.
121. The 26.2ha broadly aligns with historic take-up trends³⁴ and projections on this basis (32ha). We recognise past take up in the Borough has been influenced by the extent of land safeguarded for Gatwick Airport and to a degree by the impact of Covid-19 towards the end of the assessment period. As such there may have been some suppression such that past take-up rates, whilst useful, should be treated with some caution in Crawley. Nonetheless, the PPG confirms that past development rates (amongst other things) are reflective of market signals. In our view, the past trends evidence for Crawley, reaffirms that the 26.2ha to accommodate labour demand should be firmly treated as a minimum figure.
122. The historically constrained employment land supply in the Borough is reflected in the market signals evidence which indicates that there is a significant unmet demand for logistics floorspace at Crawley. Whilst some sites have been reconfigured on the Manor Royal estate to provide for storage and distribution uses, we share the Council's concern that without a new strategic employment site for warehouse and distribution uses, there is a risk that the mixed-use nature of Manor Royal, as a reasonably high density employment area, could be detrimentally unbalanced by further churn and redevelopment of sites.
123. The market signals for warehouse and distribution uses clearly exceeds the scale identified under the labour demand scenario in the EGA. Submissions to the examination seek to quantify the figure for these uses over the plan period as being somewhere between 48ha to 118ha. To assist matters the Council commissioned a separate Market Signals Assessment (MSA) for Industrial and Warehousing Needs (November 2023)³⁵. The methodology has looked at net

³⁴ In the period 2011-2021

³⁵ Prepared by Lichfields [PS/EGSM/EG/12]

take-up over time (floorspace occupied and vacated) and latent demand (factoring in a vacancy rate) to generate a market signals requirement for Crawley. Such a methodology is not embedded within national policy or guidance, albeit PPG paragraph 2a-031-20190722 deals separately with the need for space for logistics and this can be informed by, amongst other things, an analysis of market signals, including trends in take up and the availability of logistics land and floorspace across the relevant market areas. As such we have treated the MSA as a further sensitivity test of the EGA work. The MSA identifies a total land requirement for industrial/warehousing uses of 48.7ha. This is within the range of the outputs in the EGA. In our assessment it reaffirms that the 26.2ha figure would be sound subject to being presented as a minimum figure. Additionally, land releases moderately above this figure are likely to align with market signals whilst remaining reasonably related to the likely workforce arising from the planned scale of housing growth at Crawley.

124. In broad terms, across the wider sub-region, the Coast to Capital LEP Strategic Economic Plan identifies that demand for new business land outstrips available supply. Whilst new employment sites are planned within the Gatwick Diamond, these are primarily aimed at office, research and development and incubation/starter premises³⁶. These sites would not meet the identified need for additional storage and distribution uses in Crawley.
125. We recognise that the economy in Crawley was particularly affected by the Covid-19 pandemic, due to the significance of the aviation sector. However, that was 3 years ago such that there has been a period for stabilisation and the start of recalibrating the local economy on a more diverse footing. In support of this the Council has produced an Economic Recovery Plan 2022-2037, which seeks, amongst other things, to renew Crawley as a diverse and resilient economic centre. As set out elsewhere in this report, market signals evidence points to a strong, latent demand for new floorspaces for growing sectors such as logistics and warehousing, in part due to the past constrained land supply. As such we are not persuaded that a more cautious approach, applying the more restrained Oxford Econometrics forecast, which anticipates a slower recovery from Covid and more modest economic growth thereafter (61 jobs per annum), would be an appropriate strategy for employment needs over the plan period. Such an approach would, in our view, harmfully suppress the economic potential of both the Borough and the wider Gatwick Diamond area over the 15 year plan period. It would also be contrary to the need for a clear economic vision and strategy at NPPF paragraphs 81 and 82a as well as the flexibility advocated in the NPPF at paragraph 82d. The identified employment land requirement would be consistent with the need to create conditions in which businesses can invest, expand and adapt, in particular, allowing areas to build on their strengths. Given the proximity to Gatwick and the strategic road

³⁶ Horley, Burgess Hill & North Horsham/Novartis [SA Report, page 440]

network³⁷, there is a clear demand and attractiveness for storage and distribution at Crawley.

126. Positively planning for storage and distribution uses at Crawley would also be consistent with NPPF paragraph 83 in terms of recognising and addressing specific locational requirements of different sectors, including specifically for storage and distribution operations at a variety of scales and in suitably accessible locations. It would also reflect the One Town Crawley Economic Recovery Plan 2021 which seeks to diversify the Borough's economy and curb its reliance on the aviation sectors. Failing to provide sufficient land for industrial and logistics uses would, in our view, result in dispersal of provision, potentially to sub-optimal locations.
127. Overall, we find applying a labour demand scenario would comprise part of an appropriate strategy for the Borough. The 26.2ha factors in a modest allowance at 10% buffer, based on a general lag period between any permission and implementation. There is little before us on the scale of lost (non-replaced stock) as a trend and projecting this forward to provide sufficient flexibility in the land requirement. The evidence is generally mixed (high demand for existing employment areas versus loss of office floorspace to other uses, including residential). For this Plan we accept the 10% allowance as providing a reasonable degree of headroom within a minimum land requirement in accordance with NPPF paragraph 82d), but future monitoring may inform an alternative figure.
128. In adopting the labour demand forecasts we are satisfied that the existing pipeline of supply (principally within the Manor Royal Estate) is likely to meet most needs for manufacturing and light industrial uses over the plan period. Additionally, a combination of Manor Royal, opportunity sites within the town centre and at the Horley Strategic Business Park allocation in RBBC would meet quantitative needs for additional office floorspace to support Crawley's economy. As such, we find that when the existing supply of available employment land is accounted for, the need for new land release would be principally for warehouse and distribution uses.
129. Whilst opportunities within Manor Royal may enable some additional warehouse and distribution floorspace to come forward this would not in itself be sufficient to meet the minimum quantitative need or provide the qualitative offer for larger footplate demands. As such plan preparation was justified in considering options for new strategic employment locations. When subtracting the available land supply for industrial/storage and distribution uses, there remains a net need for a minimum additional supply of 17.93ha over the plan period.

³⁷ Described in the "One Town" Economic Recovery Plan as being "hyper-connected"

130. In contrast to the previous Local Plan, the submitted Plan seeks to meet employment needs in full. These would be met in part by the protection and positive policy framework for existing main employment areas. This is particularly the case for Manor Royal where policies (supported by the Manor Royal SPD) will allow for investment and flexibility at this location without harmfully diluting its core mixed used business function. However, Manor Royal, including any minor peripheral areas not covered by safeguarding for Gatwick will not be sufficient to meet employment land needs over the plan period.
131. In using the labour demand scenario to forecast employment land, this is in the context of the Plan only meeting 42% of its housing need and therefore suppressing population growth within the Borough that would otherwise occur and generate demand for employment. The EGA has considered a higher labour supply figure factoring in wider 'At Crawley' housing growth at 544dpa for potential urban extensions to the town in Horsham and Mid Sussex. This scenario generates a significantly higher employment land requirement for 69ha. Whilst it remains to be seen whether urban extensions would be allocated and found sound 'At Crawley' (including potentially some employment related land/uses), we do not consider it necessary for soundness that this Plan contains an employment land requirement above that needed for the labour demand scenario associated with the Plan's housing growth. There remains appreciable uncertainty around wider growth 'At Crawley'. Through the DtC process neither Horsham nor Mid Sussex are confirming that any planned growth adjacent to Crawley would be meeting Crawley's unmet housing need. Nonetheless, the higher labour supply figure reaffirms in our minds that the 26.2ha employment land requirement in the submitted Plan should be treated as a firm minimum, so as to potentially provide some flexibility to meet employment needs which may arise and to do so as part of a wider pattern of sustainable growth 'At Crawley'. We return to this matter when considering the extent to which the 44ha allocated at the proposed Gatwick Green site is available in this plan period to meet employment needs.
132. Furthermore, the DtC process has established that other than the Horley Business Park site, there are limited signals that unmet employment land associated with Crawley's full local housing need of 755dpa (potentially up to 113ha) could be accommodated in adjoining authority areas. As such, were the Plan not to release new strategic employment land, we consider there would be a significant risk of employment needs not being met, with significant harm to the sub-regional economy and Crawley's vital role within it.
133. In addition to the EGA and ELAA evidence, matters relating to employment land provision have been appropriately considered as part of the SA process. This includes three alternatives for Policy EC1³⁸: (1) do nothing and rely on the NPPF; (2) seek to accommodate growth in existing employment areas and in

³⁸ Submission SA May 2023 [KD/SA/01] pages 230-233

neighbouring authority areas; and (3) plan positively for growth through a combination of existing employment areas and a new strategic allocation to meet industrial and warehouse requirements. The assessment and rationale contained in the SA for selecting the preferred approach to employment land as an appropriate strategy for the Borough is cogently set out.

134. The SA has also specifically assessed the option of a strategy that does not allocate new strategic employment land in the Borough (effectively the 'do nothing option' for SEA purposes (and a continuation of the 2015 Local Plan))³⁹. We concur with the analysis in the SA that not releasing additional land for storage and distribution uses as part of this Plan would have a significant negative impact on the economies of Crawley and the wider Gatwick Diamond for the reasons given above.
135. On the issue of the employment land requirement, we find the proposed minimum net requirement of 26.2ha, principally for storage and distribution uses, and the objective of seeking to positively accommodate this within the Borough, as set out in submitted Policy EC1, to be an appropriate strategy.
136. As submitted the Plan would not appropriately reflect the employment land trajectory as of 31 March 2023. As a consequence of further monitoring, the available employment land supply is less than as identified in the submitted Plan and so the minimum residual need for employment land over the plan period would need to be increased from 13.73ha to 17.93ha. **MM3**, **MM13** and **MM14** would do this in respect of the spatial strategy, the relevant parts of the economic growth section of the Plan and Policy EC1 respectively. As such we recommend them so that the Plan would be justified and positively prepared.

Main Employment Areas

137. As submitted the Plan identifies 11 main employment areas of varying scale and character. However, this broad-brush approach would not appropriately make a necessary distinction between four employment areas of strategic significance and the other areas. These four areas including Manor Royal, Gatwick Airport, the town centre and the proposed strategic employment site at Gatwick Green would provide for a variety of employment and land uses which are recognised in location-specific policies elsewhere in the Plan. As such Policy EC2 as submitted could result in undesirable internal tensions in decision-making and so be ineffective. Accordingly, we recommend that the Policy makes an appropriate distinction between the four strategic employment locations and other main employment areas. **MM15** would do this, and we recommend it for effectiveness.

³⁹ Submission SA/SEA May 2023 pages 439-441

138. The principal established employment area in Crawley is the Manor Royal estate. We are satisfied that submitted Policy EC3, in combination with the Manor Royal Design Guide SPD, provides an appropriately protective but flexible approach in ensuring the economic vitality and viability of this sub-regionally significant employment location. This includes a justifiable balance between protecting the area from an incursion of non-business uses likely to erode the principal employment function of the area whilst allowing ancillary uses likely to support the area including the needs of employees. We recognise there are concerns regarding flexibility within Use Class E and potential impacts this may have on the character and mix of employment uses at Manor Royal. However, such flexibility within Class E is purposefully deemed not to comprise a change of use and so it would not be justified to amend Policy EC3 to set a more restrictive approach.

Gatwick Green – Proposed Strategic Employment Site

139. As set out elsewhere in this report, the Plan's over-arching approach to safeguarded land is sound. As such the area proposed to be allocated for strategic employment land at Gatwick Green would not fundamentally prevent the implementation of the core elements of 2019 Airport Masterplan including areas critical to delivering a second wide spaced runway. In the context of the circa 523ha land safeguarded in the 2015 Local Plan, the proposed Gatwick Green site at 44ha would represent just over 8% of this land.
140. The Gatwick Green site has been suitably assessed as part of both the SA⁴⁰ and ELAA processes. These documents provide an appropriately high-level assessment that the proposed allocation would be both deliverable and capable of meeting employment land requirements in the Borough during the plan period. This includes the borough's need for large-format warehouse and distribution uses and other industrial uses. There are limited alternatives for such provision within the borough. Allied to this, as set out above, there is a clear market demand for larger-scale warehousing units, which cannot be accommodated within the existing employment sites including Manor Royal. Accordingly, a new, unconstrained strategic greenfield site of a sufficient scale would accommodate a market that currently struggles to find suitable provision within the FEMA.
141. The proposed shape of the Gatwick Green allocation is distinctive, reflecting the land promoted. Nonetheless, we are satisfied that the extent and configuration of the proposed 44ha could come forward as a coherent employment site, in accordance with the requirements set out in the site allocation policy, without relying on any additional adjacent land. This includes the land at 'Fernlands' which was promoted as either an alternative to or a consolidation of the Gatwick Green site. As set out elsewhere there would be no strict need in quantitative

⁴⁰ Document KD/SA/01 Appendix H pages 397-399

terms to allocate additional employment land beyond the Gatwick Green site as part of this Plan to meet identified minimum land requirements. SA of the Fernlands site assesses the site at 8.8ha such that on its own it would not be of sufficient scale to meet strategic employment land requirements. Additionally, the Fernlands site is adjacent to operational land at Gatwick Airport and so it is justified that the area remains safeguarded as part of this Plan. Overall, it would not be necessary for the soundness of this plan to extend or amend the proposed Gatwick Green allocation to include the Fernlands site.

142. Land around the Gatwick Green allocation would remain safeguarded for Gatwick Airport including areas of land between the allocation and the M23 and the M23 spur road. This is land identified within the 2019 Airport masterplan. We accept that the Gatwick Green allocation would limit the practical use of these small residual areas close to the M23, although we do not consider it necessary for soundness that safeguarding is removed from these areas of land. Whilst hypothetical alternative propositions have been presented, which the Airport considers would be a more efficient land arrangement, the land that has been allocated for employment would be deliverable. There is not the persuasive evidence that the Gatwick Green allocation should be reconfigured to include alternative land. Overall, we are satisfied that the proposed Gatwick Green allocation accords with the requirements in the PPG at paragraph 3-001-20190722 for employment land to be suitable, available and achievable.

143. The alternatives for strategic employment land provision within the Borough, have been appropriately assessed as part of the ELAA and SA⁴¹. This includes land at the edge of the Manor Royal main employment area at Rowley Farm, Jersey Farm and Hydehurst Lane. We recognise that consolidating the sub-regional role of Manor Royal through adjacent land releases would align with local industrial strategies and bring significant economic benefits contributing to sustainable development in the Borough. However, having found the principle of safeguarding to remain sound, all of these alternative sites have been appropriately discounted due to being within an area that is required to be safeguarded for the physical land take of a second wide-spaced runway and essential highway diversions, amongst other reasons. This is demonstrated by reference to the work to the Airports Commission in 2014, and the OEMP [PS/EGSM/GA/16] (Appendix A5) which sets out operational requirements for a southern runway including safety distances from the runway and noise attenuation infrastructure. Consequently, we are not persuaded there are reasonable options to narrow the extent of safeguarded area adjacent to the proposed second wide-spaced runway thus potentially releasing land for employment adjacent to Manor Royal and/or at County Oak.

144. In terms of alternative options that would avoid the area previously safeguarded for Gatwick Airport there are few in the Borough. Most are generally small in

⁴¹ Document KD/SA/01, pages 400-438

scale, such that they would not in themselves be of a sufficient size to meet the identified employment land requirements. Potentially disaggregating supply across multiple smaller sites would not meet the identified need for larger warehousing premises. The largest single alternative site outside of current safeguarded land is Land East of Brighton Road, to the south of the town, adjacent to the A23. The site has been considered as part of the SA and reasonably discounted due to various issues, not least ancient woodland, biodiversity, and disconnection from Manor Royal and Gatwick Airport. Accordingly, plan preparation has not overlooked or irrationally discounted a better performing alternative to the Gatwick Green site.

145. As submitted the Plan seeks to allocate a wider strategic site of 44ha but to then make a distinction within the site allocation policy between the land required to meet the minimum net employment land requirement for the plan period and the remainder of the site. In respect of any development for employment floorspace beyond 13.73ha (modified to 17.93ha) Policy EC4 as submitted requires it to be justified. In light of the evidence that the employment land requirement (based on the constrained housing requirement) is lower than past development rates and other forecasting scenarios and the Council's emphasis that the Gatwick Green site provides flexibility⁴², we find this distinction is neither justified or positively prepared and therefore would not be sound.
146. It is clear, that the whole site at 44ha is proposed to be allocated in the Plan. The balance of the site is not described or identified as a reserve site. Moreover, the Council's latest market signals evidence on warehousing and distribution, together with the potential for wider housing growth 'At Crawley', points to a quantum of employment land slightly higher than 44ha potentially being required over the plan period. Whilst we do not consider it necessary for soundness to modify the minimum 26.2ha employment land requirement in submitted Policy EC1, taking a more positive approach to the Gatwick Green allocation, in terms of its full 44ha capacity would provide a more flexible approach in response to wider market signals amongst other things.
147. Accordingly, we recommend **MM16** which would clarify that in light of the updated employment trajectory and residual land supply over the plan period, the minimum amount of employment land required at the site would be 17.93ha. This would ensure that the policy would be justified. Furthermore, we recommend through **MM16** the deletion of that part of the policy requiring any additional floorspace beyond this amount to be demonstrated as being necessary through appropriate evidence. This would ensure the policy is effective in light of market signals evidence of a stronger demand for logistics and warehouse development above the jobs demand forecast used and

⁴² CBC Matter 4 statement, response to MIQs 4.1, 4.4 and 4.5

providing headroom for any jobs demand arising from planned housing growth immediately adjacent to Crawley.

148. Notwithstanding its location in the north-east corner of the Borough, the Gatwick Green site would be sustainably located. It can be served by bus from Crawley and Horley including enhancements to existing services already on Balcombe Road. The site would also be accessible by modes of active travel, being within easy cycle distances of most of Crawley and nearby communities such as Horley. In this regard the site would benefit from identified routes in the Crawley Local Cycling and Walking Infrastructure Plan 2021, aimed at improving links from Crawley north to Gatwick Airport. Additionally, should the NRP DCO come to fruition, this would provide improved connectivity from Balcombe Road to Gatwick train station, further improving accessibility to Gatwick Green. Initial evidence, including an Outline Transport and Access Appraisal⁴³ shows positive signs of a collaborative outlook with WSCC, National Highways and Metrobus (current operators of the Fastway network) that the site could be sustainably brought forward.
149. Transport modelling for the Plan considered an area of 24.1ha (equivalent to 77,000sqm). We recognise that the potential impacts associated with the full 44ha have not been directly modelled, albeit the indication is that the net site area would be closer to 30ha once other site requirements are accounted for⁴⁴. That said, the principle of allocating the 44ha site is established through this Plan. In doing so, both National Highways and WSCC are cognisant of the allocation, including the additional modelling sensitivity testing work for trip generation comparisons at Gatwick Green. Neither has requested additional modelling work (including in response to the proposed main modifications). Proposed policy content in respect of securing modal shift would reflect the principles of vision-led transport planning embedded in Dft Circular 01/22 ('Vision and Validate'), which is supported by National Highways.
150. Subject to the relevant criteria in the allocation policy and strategic transport policy in the submitted Plan, we are satisfied that the Gatwick Green allocation would come forward in accordance with the objective of accelerating the shift to more sustainable patterns of development as set out in Dft Circular 01/22 and the West Sussex Transport Plan 2022. The general 'monitor and manage' approach is supported by National Highways and WSCC as set out in the latest SoCGs.
151. The transport modelling work for the Local Plan, overseen by WSCC, is based on types and amounts of employment use, which vary in terms of traffic generation. Depending on the future detailed development of Gatwick Green, in

⁴³ Appendix 2 to Gatwick Green Limited Regulation 19 representations REP055(2023).

⁴⁴ Gatwick Green Limited Matter 4 Statement in response to MIQ4.22

terms of precise types of development and floorspace, further analysis would be required as part of any detailed transport assessment. To mitigate impacts, the policy for the site appropriately details that HGV traffic would not be permitted to enter or exit the site to the north.

152. The transport assessment work for the Plan (Scenario 2) does not identify the need for significant (strategic) highway mitigation arising from the Gatwick Green proposal, such that off-site highway mitigation measures are likely to be only relatively minor in scale. Highways access to the site would be from the B2036 Balcombe Road. A new link connection from the B2036 to the A2011 (and then the M23) is committed to and funded as part of the Forge Wood development and expected to be completed in 2025/26 as identified in the Infrastructure Delivery Schedule (IDS) [CBC/KD/IP/07, page 4]. The IDS also identifies known mitigations relating to the merge/diverge at M23 Junctions 10 and 11 to support growth in the North East Sector of the Borough. The site allocation policy requires contributions to off-site highway mitigation where required. We consider this a sound approach and that industrial and warehousing development at Gatwick Green could be safely and adequately accessed from the M23 strategic road network.
153. Delivery and earliest completions at Gatwick Green are anticipated in 2026/27 following delivery of the link road at Forge Wood and associated improvements at M23 Junction 10. As such we are satisfied that the Gatwick Green site could deliver in line with the overall employment trajectory [EGSM/EG/01] and that the minimum land requirement is capable of being met within the plan period. In respect of any changes in the circumstances to the off-site highway works identified above and the transport consequences of positively allocating the balance of the site above the 17.93ha minimum, the policy requires further transport work at various early stages.
154. Concern is raised by GAL regarding the impact of Gatwick Green on the ability to deliver future surface access improvements for the Airport. From the evidence before us⁴⁵ we are satisfied that the allocation has been devised so as to enable the re-alignment of the A23 and the re-routing of the Balcombe Road. The extent of the allocation would not preclude the provision of new slip roads to the M23 Spur Road. There will need to be close alignment between the details of how the Gatwick Green proposal comes forward and the Airport's future operations. In this regard and following consultation on the proposed MMs, we recommend various refinements below to the proposed MMs to ensure a genuinely coordinated approach.
155. To ensure that the detailed planning of Gatwick Green secures effective outcomes in relation to sustainable transport, we consider the policy as

⁴⁵ Including Appendix 1 to the SoCG between GGL and CBC [PS/CBC/SoCG/20 – January 2024]

submitted would not be sound in ensuring a necessary sequence of activity. This approach has become more important in light of DfT Circular 01/22 and the scope to set a robust transport vision for the development to secure modal shift rather than the increasingly uncertain approach of predict and provide transport planning. As such we recommend **MM16** which would require a vision-led approach to transport planning as part of the master planning for the site. We also recommend through **MM16** additional policy content requiring a Construction Management and Phasing Plan to be submitted to ensure that impacts on the local and strategic road networks are taken into account and where necessary mitigated during the construction phase(s). This would ensure the policy would be effective for what would be a major development.

156. In terms of sequencing and implementation, we consider the policy is justified in requiring both a master plan and a mobility strategy prior to the submission of a planning application. It is not necessary that a full transport assessment is required at the master planning stage. The mobility strategy, encompassing the modified requirement for a vision-led approach to transport, would be sufficient at the early stages of developing the details for the Gatwick Green site. Processes around the Local Plan and the concurrent DCO process for the NRP have already to some extent considered the inter-relationship between plans for the airport and the Gatwick Green site. We are not persuaded that there are any fundamental conflicts but accept that matters of detail will be important to ensure that the precise layout and highway arrangements for Gatwick Green dovetail with the ability to deliver potential growth at the airport. As such the policy remains justified in requiring the detailed Transport Assessment at the planning application stage when there is more certainty on mix of uses and scale and layout of development.
157. As a consequence of the consultation process on the proposed MMs we have amended the structure and wording of Policy EC4 in **MM16** so that it is clear that the mobility strategy is to be prepared first and that a transport assessment is submitted as part of the initial outline planning application. This would aid the effectiveness of the policy. It would not fundamentally alter the policy as previously consulted on. We do agree, however, that it should be clarified that the early Mobility Strategy is prepared in consultation with Gatwick Airport and transport stakeholders including National Highways, WSCC, public transport operators and accessibility groups. This would ensure the complementary development of major employment growth and airport expansion in this part of the Borough. Again, we consider no one would be prejudiced by this further clarification, which does not alter the substance of the policy.
158. Finally, in respect of the sequencing of policy requirements for the site, in light of the responses to the MM consultation, we consider additional text in the final paragraph of the policy would be necessary to clarify how the master plan will be prepared, who will be engaged in its preparation and its status. Accordingly,

we have modified the text as part of **MM16** and again these changes aid the effectiveness of the policy rather than change its substance. In respect of the status of the master plan, we do not consider it necessary for soundness that this must be approved by the Planning Committee prior to the submission of any planning application. The requirements more generally for masterplans, including the need for consultation, are set out in other policies of the Plan such that, as for other strategic sites in the Plan, delegated agreement would be appropriate.

159. On submission, the Plan anticipated that the Gatwick Green site would be built out over the latter part of the plan period to 2040. Given the likely pent-up demand for warehousing and logistics uses and the evidence from the site promoter on its anticipated timeframe for delivery, the timeframe in the policy and trajectory for the site is not sound. As such we recommend **MM17** which would make clear that the site is likely to come forward sooner rather than later within the plan period.
160. Overall, there would be no significant adverse impact on accessibility for current plans for the airport (DCO NRP and in the long-term the southern runway). With the various MMs recommend above, as modified, the policy framework for a strategic employment site at Gatwick Green would be sound.

Employment Uses at Gatwick Airport

161. Policy GAT4 would provide a flexible approach for employment floorspace at Gatwick Airport enabling the re-use of vacant or surplus airport-related floorspace within the airport boundary. It would also allow for new non-airport related employment floorspace within the airport boundary provided it would be compatible with the long-term plans for the airport and not have an unacceptable impact on the role and function of other main employment areas and town centres within the Borough and beyond its boundaries. We consider this to be a pragmatic approach considering the declining demand for airline related office accommodation and increasing efficiencies for other airport related operations within the airport boundary. It would not be sustainable to allow existing buildings and sites at the Airport to not be in active use. Accordingly, it would not be justified to impose a restrictive policy. Similar to hotel accommodation and retail, the policy framework of the Plan should positively respond to the particular circumstances of Gatwick as a significant centre within the Borough.

Employment Policies

162. Policy EC5 requires major developments to contribute towards the most up-to-date Crawley Employment and Skills Programme [PS/EGSM/EG/13]. The intention is that this would comprise a proportionate financial contribution, with

the details of how that would be calculated set out in the Planning Obligations Annex. There is a clear disparity between the qualifications of the resident workforce and those in-commuting to Crawley which is reflected in the fact that the Borough ranks as one of the lowest local authority areas for social mobility (304 out of 324). Enabling local residents to attain qualifications and access higher skilled (and higher paid) employment is a key priority reflected in local economic strategies for the LEP area and Gatwick Diamond. As such the principle of a policy seeking contributions for enhancing employment and skills is justified and consistent with NPPF paragraphs 57 and 81.

163. In terms of the contributions sought these are set out in the Planning Obligations Annex to the Plan. In accordance with NPPF paragraph 58 this has been considered as part of the Plan-wide viability assessment. As submitted, the intended implementation of the policy would not flexibly allow for other mechanisms, which could secure greater benefits than a financial contribution, for example, a bespoke skills programme as part of a particular major development. As such we do not find the sole focus on financial contributions would be effective in securing skills and employment opportunities for Crawley residents that would arise through new developments taking place in the Borough. **MM18** would introduce necessary flexibility to the reasoned justification of Policy EC5 to clarify that measures in lieu of a financial contribution that would demonstrably secure greater skills and employment benefits would be supported. **MM39** would make corresponding changes within the Planning Obligations Annex where it relates to implementing Policy EC5. Accordingly, we recommend these modifications so that the Plan would be effective.

164. The Planning Obligations Annex sets out a formula for calculating a contribution towards employment and skills. Given the Council's aim is to target the share of workers at a major development who live in Crawley, it is the employment self-containment rate that should be used, not the resident self-containment rate. This should be the definition of "c" in Box 5 of the Planning Obligations Annex, which based on the latest 2021 Census data would be 52% (not the 65.7% resident self-containment rate submitted). **MM40** would update the Annex accordingly and we recommend it for effectiveness.

Conclusion

165. Subject to the MMs identified above the Plan would positively and proactively encourage sustainable economic growth through its policies and the identification of Gatwick Green as a strategic employment location, to flexibly meet anticipated needs over the plan period.

Issue 4 – Is the Plan's policy framework for Gatwick Airport, including within the safeguarded area, justified and effective?

Gatwick Airport

166. The Plan identifies a 'Local Plan Airport Boundary' (LPAB). This is not intended to define operational land⁴⁶ or the extent of GAL's ownership. It is a planning policy designation identifying where airport related uses should be located, and where specific Gatwick Airport policies in the Plan would apply. The boundary is drawn relatively tightly to include land which is clearly identifiable as part of the existing airport. On this basis it is justified that areas included in the LPAB in the 2015 Local Plan which are not essential to the operation of the airport because they are not in airport related uses are excluded from the proposed LPAB in the submitted Plan. We recognise that the change for some sites from previously being within the LPAB to now being in safeguarded land for the airport would result in a potentially more restrictive approach. However, the Plan's policy framework within the LPAB still requires compatibility with the safe, secure and efficient operation of the airport, such that wholesale redevelopment and intensification of sites within the LPAB could not be assumed. The general policy framework in the Plan would support the continued use of sites that were previously in the LPAB including the scope for some changes of use and adaptation and refurbishment.
167. Alternative approaches to defining a boundary have been appropriately considered and discounted in the SA on wider sustainability grounds. It is not necessary for soundness that the boundary should be consistent with the 'airport boundary' in the GAMP (at Plan 4) which would entail wider areas of land in GAL's ownership, including areas of countryside close to the airport. A wider LPAB would potentially dilute necessary focus for efficient and sustainable on-airport development. If matters change in terms of the configuration of the airport, either through the NRP DCO or positive movement to implement a second wide spaced runway, then plan review would provide an appropriate mechanism to revisit the delineation of the planning policy boundary.
168. Policy GAT1 is necessarily a strategic policy for development of the Airport. The policy addresses the Airport in terms of its current single runway operation. Whilst the Airport is concurrently pursuing the NRP to create additional capacity, the DCO application was accepted shortly after the Plan was submitted for examination. The DCO process remains to be determined with the Examination period taking place from February to August 2024. Accordingly, the submitted Plan is justified in setting out a policy framework on the basis of a single

⁴⁶ As per the 2019 Lowfield Heath Inquiry APP/Q3820/W/17/3173443 [PS/EGSM/GA/24]

runway, two terminal airport and to provide some contingent flexibility that the criteria in Policy GAT1 would similarly apply to the DCO proposal. If circumstances change, and the DCO is approved (in whatever form), that would be a matter for Plan review.

169. The airport operator benefits from various permitted development rights but nonetheless the principle of Policy GAT1 is justified in ensuring that where development does require planning permission and in responding to prior approval consultations, the development plan seeks to secure an appropriate balance between minimising and mitigating impacts and maximising opportunities. This is entirely consistent with national planning policy (including NPPF paragraphs 106e) and 185) and wider national aviation policy.
170. Criterion iii) of Policy GAT1 supports proposals at the Airport that would provide for biodiversity net gain and then sets out a sequential approach where this cannot be secured ensuring impacts are mitigated and then, as a last resort, compensated. As submitted the Plan seeks compensation on a “like for like” basis. This may not be practicable, and compensation is not expressed as such at paragraph 180a of the NPPF. As such the approach to securing compensation would not be sound. **MM19** would remedy this by stating that equivalent or greater value for biodiversity compensation would be secured and we recommend this for effectiveness and consistency with national planning policy.

Development within the safeguarded area

171. Development would not be precluded within the safeguarded area but necessarily there needs to be an appropriate balance between ensuring the area remains as unfettered as possible to enable the implementation of a second wide-spaced runway, if required. There is also the sustainability of constructing development that may well need to be demolished short of a reasonable building lifespan. Policy GAT2 would allow for small-scale development within the safeguarded area. As submitted, the Policy lacks clarity on what would comprise ‘small-scale’ and paragraph 10.19 would not provide sufficient clarity on proposals that would refurbish or seek to improve existing employment sites within the safeguarded area. As such we find the overall approach to enabling appropriate small-scale development within the safeguarded area would not be effective.
172. **MM20** would clarify in Policy GAT2 that small-scale would comprise, but not be limited to, changes of use, minor building works and residential extensions. It would widen the policy to confirm that improvements to existing employment buildings would also be acceptable by way of small-scale extensions and refurbishment provided it would not lead to a significant intensification or increase in scale of development. This would require decision-makers to

exercise judgements on what would amount to “significant” but this is a commonplace practice that should not impede effective or timely decision-making. Additionally, the proposed modification would helpfully clarify that temporary planning permissions may be appropriate. To reflect these recommended changes to the Policy, **MM21** would provide corresponding amendments to paragraph 10.19 of the Plan in terms of what may comprise minor building works and in the case of employment uses what may constitute small-scale improvements. In recommending **MM20** and **MM21** we consider the Plan would be effective in terms of the balance needed between avoiding undue constraints to implementing a second wide-spaced runway whilst enabling appropriate investment in existing employment sites and premises within the area.

173. There are multiple existing employment areas and uses within the safeguarding area proposed within this Plan, including the main employment area at Lowfield Heath. These areas are currently within the safeguarded area in the 2015 Local Plan. There is no compelling evidence that safeguarding has been detrimental to the vitality of existing employment uses and areas proximate to the airport or inhibited the continued occupation of employment buildings or land. As such there is no soundness issue in identifying Lowfield Heath as a main employment area subject to the provisions of Policy GAT2 (as modified), which would still allow for proportionate investment in the employment stock at this location.

Hotel Accommodation and Airport related car parking

174. Hotels are a main town centre use as defined in the NPPF and so should be ordinarily subject to a sequential test of town centre locations first, and then edge of site, and only if suitable sites are not available should out of centre sites be considered. The situation in Crawley is strongly influenced by the presence of a major international airport, which generates significant demand for hotel accommodation for both passengers and aircrew. The airport already has existing hotels that can be readily accessed from the terminals and by those arriving by train, coach and car.
175. As such there is a locally specific logic that the Airport be identified, together with the town centre, as a starting point for locating proposals for additional hotel accommodation in the Borough. Policy EC7 would also enable the long-term operational needs of the airport to be assessed when looking at individual accommodation proposals at the airport. Importantly, the policy would enable a consistent approach that any car parking provided either at on-airport hotel developments or at sequentially acceptable hotel and visitor accommodation proposals outside of the town centre or Gatwick Airport accords with the need to

control the amount of airport related parking. This would encourage modal shift⁴⁷ and to necessarily restrict unsustainably located off-site parking provision.

176. Policy GAT3 in relation to Gatwick Airport Related Parking is fundamentally a continuation of the restrictive policy approach found sound for the 2015 Local Plan, with the Inspector concluding the airport was the most sustainable location for parking provision and there was “obvious logic” to providing car parking as close as possible to the airport terminals. Latest 2023 monitoring outputs⁴⁸ show appreciable levels of existing authorised and unauthorised off-airport parking within the Borough and neighbouring local authority areas. Given the scale of existing off-airport provision we consider this should represent something closer to a high tide mark rather than a foundation from which to further disperse parking provision. Various appeal decisions in the Borough, including at Inquiry, have upheld the approach of focusing airport related parking at the airport as an appropriate strategy. The policy has been amended since the 2015 Local Plan to insert the word ‘and’ to clarify that both limbs of the policy need to be satisfied. This necessarily clarifies matters following the 2016 High Court challenge and 2019 Lowfield Heath inquiry and would ensure the submitted Policy would be effective.
177. We have been referred to various decisions in support of the sustainability of off-site parking for airports and providing consumer choice. These decisions generally date back to 2012/13, predating the policies of the 2015 Local Plan, and are therefore of very limited applicability. In terms of the general effectiveness of the policy requiring airport related parking to be justified by a demonstrable need within the wider context of achieving a sustainable approach to surface transport access to the airport, we consider this a reasonable and valid approach in avoiding a harmful dispersal of parking provision and securing the bold modal shift targets sought for the airport.
178. In terms of the effectiveness of the policy we recognise that much of the land within the LPAB will be operational land where the airport operator benefits from PD rights including for their car parking. It is important to note that the rights only apply to the ‘*relevant airport operator*’ and not third parties such as hotel operators at the airport. Additionally, PD rights would not apply to any land within the LPAB which was not ‘*operational land*’. Accordingly, and having regard to the evidence of how parking proposals have been assessed by way of “demonstrable need” in the context of the 2015 Local Plan, we do not consider the second limb of Policy GAT3 would be ineffective. This matter was comprehensively dealt with as part of the Lowfield Heath inquiry in 2019⁴⁹ and we share the conclusions of that Inspector that enforcing Policy GAT3 is a

⁴⁷ As per targets set out in the Airport Surface Access Strategy

⁴⁸ Document PS/EGSM/GA/26

⁴⁹ APP/Q3280/W/17/3173443 Appeal by Holiday Extras Ltd [document PS/EGSM/GA/24]

matter for the LPA “in a manner they consider appropriate”⁵⁰. The overall approach in Policy GAT3 would enable a greater share of airport car parking within the LPAB so as to necessarily secure sustainable patterns of parking proximate to the airport.

179. We are not persuaded that circumstances have changed in the Borough to indicate that an alternative, more permissive approach to off-airport parking provision is necessary as part of an appropriate strategy for the Borough. On the contrary, the latest Airport Surface Access Strategy of 2022 requires the Airport operator to manage how passengers and staff access the airport, including an ambitious target of 52% of passenger journeys by public transport by 2030. Moreover, the latest S106 agreement with the Airport (2022)⁵¹ requires ‘sufficient but no more on-airport car parking spaces than necessary to achieve a combined on- and off-airport supply that is proportionate to 48% of non-transfer passengers choosing to use public transport for their journeys to and from the airport by end of 2024’. Accordingly, we find that the principle of the policy approach of carefully controlling the location and amount of airport related parking is justified.
180. We accept that additional parking at the airport may well require shuttle transport to get passengers and baggage to the terminals. However, consolidation of parking around the airport would provide scope for a more efficient, reliable and sustainable shuttle services as opposed to alternative meet and greet or park and ride services ferrying passengers to and from dispersed sites, over likely longer distances. This is notwithstanding more innovative technology and business models (for example ride-sharing and ride-hailing services, electric vehicles and connected and autonomous vehicles). These general concerns with the sustainability of off-site airport parking provision have been echoed in a recent Bristol Airport appeal decision⁵² and similarly apply to Gatwick. As such focusing, long stay parking provision at the airport, in our view, presents the best option for meeting important modal split targets and avoiding the potential for the harmful over-provision of car parking.

Other Matters

181. Noise related to Gatwick Airport, including under the scenario were a second wide spaced runway implemented, is a significant environmental issue for the Borough. The Plan largely addresses it under Environmental Protection policies and so we address noise principally at Issue 9 below and further in relation to gypsy and traveller accommodation in Issue 5.

⁵⁰ Paragraph 14 of the decision, citing the judgment in 2016 EWHC 3246 admin

⁵¹ Document EGSM/GA/05 – Obligation 5.6

⁵² APP/D0121/W/22/3293919 – [document PS.EGSM.GA.25]

182. The Plan introduces Policy DD5 on Aerodrome Safeguarding to ensure that the safe operation of Gatwick is taken into account in the design of development. This also includes minimising risk of death or injury in the event of an aircraft accident on take-off or landing. As submitted the policy is sound and consistent with evidence⁵³ that Aerodrome Safeguarding should be embedded within Local Plan policy rather than applied ad hoc through DfT Circular 01/2003 at the development management stage.

Conclusion

183. Subject to the MMs identified above the Plan's policy framework for Gatwick Airport, including within the safeguarded area, would be justified and effective.

Issue 5 – Is the Plan justified and effective in its approach to meeting the housing needs for different groups in the community, including provision for affordable housing and the accommodation needs of gypsies and travellers?

Affordable Housing

184. There is a pressing need for affordable housing for the Borough, with the 2019 SHMA [H/HN/01] identifying a need for 739 affordable homes a year. In addition to the Council's active programme to deliver affordable homes on land that it owns it is justified that the Plan sets out a demanding but pragmatic policy approach to securing affordable housing as part of new residential developments. Consequently, all new residential development is required to contribute to the delivery of affordable housing. The Plan Wide Viability Assessment shows that 40% provision would not harm the delivery of the Plan in combination with other policy costs and CIL across most of the Borough. The exception is the town centre where higher development costs associated with sites, a need for denser development and a nascent market justifies the application of a lower headline requirement of 25% affordable housing. To aid delivery the Plan also justifiably varies affordable housing tenure by these two locations by reducing social rented and increasing intermediate provision at the town centre.
185. On this basis, the Council calculates that across all sites, including small sites and windfalls, approximately 15% of the affordable housing need would be met through the anticipated housing supply during the plan period. As such there would remain a severe unmet need for affordable housing. The SA process has considered a number of alternative policy options (blends of thresholds and mixes) but none are to be reasonably preferred to the submitted policy. It would be challenging on viability grounds to increase the Borough 40% requirement

⁵³ Safely Landed. Is the Current Aerodrome Safeguarding Process fit for purpose? Lichfields 2018

and town centre 25% requirement without denting overall housing delivery. Increasing the Borough's housing requirement to meet affordable housing needs as a proportion of new development (it would take 1,848dpa to deliver the 739 affordable dpa at 40%) would be ineffective in our view, given the DtC process has already identified the significant unmet housing need for Crawley (based on the LHN of 755dpa) is unlikely to be accommodated by neighbouring authorities. That said, we consider the evidence of an acute unmet affordable housing need supports the case that any strategic housing growth at the edge of Crawley should seek to positively respond to this issue if growth 'At Crawley' is to be genuinely sustainable for the town and its immediate hinterland.

186. Policy H5 as submitted seeks affordable housing on all residential developments resulting in a net increase of at least one dwelling with a general presumption of financial contributions for sites of 10 dwellings or less. Given the acute scale of the affordable housing need in the Borough and the significance of smaller sites to the overall delivery of housing in a land constrained Borough we consider the policy is justified and effective notwithstanding NPPF paragraph 64. The policy would be a continuation of 2015 Local Plan policy found sound in the context of the NPPF and subsequently upheld in various appeal decisions.
187. In terms of the practical application, the policy needs to be clearer that on site provision is the default expectation, with off-site contributions in lieu to be considered in exceptional circumstances. **MM30** would address this for effectiveness, and we return to this below. For smaller schemes of 10 dwellings or less, the policy recognises that a financial contribution would be the more practical approach. The Plan appropriately recognises that there is a need to avoid placing a disproportionate burden on smaller sites such that a tapered approach on sites of 1-10 dwellings is fairly applied. This has been viability tested in accordance with NPPF paragraph 58.

Self-Build and Custom Housing, Housing for older persons and Build to rent

188. Policy H4 sets out a housing mix test for major residential developments. This is supported by a recommended mix for market and affordable tenures for the town centre and the rest of the Borough. The evidence in the SHMA and through annual monitoring of recent completions shows that there has been an over-provision of smaller properties (especially 1 bed) and a shortfall of larger units (3 & 4 beds). Consequently, the Plan is justified in seeking larger units (3 beds) as part of town centre and flatted developments. Whilst some in the market appear resistant to this, the Plan Wide viability assessment of residential typologies has nonetheless demonstrated that such provision would be viable. In the context of the current over-provision of smaller 1 bed and studio flats (which may well be meeting (in part) a wider housing need outside of the Borough), we do not consider that a moderate re-balancing to include a greater element of family sized accommodation, including in the town centre, would be

detrimental to the housing market or affordability for younger households forming in the Borough.

189. It is recognised that the Plan would result in unmet needs for those seeking to self-build or custom-build their own homes. In a Borough where land supply is severely limited, required for other forms of housing (particularly affordable housing) and otherwise in town centre locations where there is a sustainability imperative for higher density development, this is perhaps unsurprising. The Council has identified the unmet need in self-build through the DtC process. Consequently, it would be reasonable that authorities within the wider housing market area consider the potential to meet this element of Crawley's unmet housing need, particularly in any greenfield urban extensions to Crawley.
190. There is clear evidence in the SHMA of a significant need for specialist housing for older persons, including sheltered and extra care housing and care bedspaces. Two sites are purposefully identified in the Plan at Policy H2 for older persons housing (Oakhurst Grange and the St Catherine's Hospice site). For similar reasons as for self-build, the constrained nature of land supply in the Borough severely limits the scope to allocate sites for older persons housing. As such we are satisfied that the Plan is justified and positively prepared in identifying two specific sites. Having regard to the SHLAA, we note that there are consented proposals that include provision for older persons accommodation which gives us confidence that there is likely to be further windfall provision for older persons housing over the plan period, including through the change of use and adaptation of existing buildings. We do not consider a specific policy on older persons housing would be necessary for soundness that would meaningfully add to the policy framework in the Plan that generally supports housing delivery where proposals would comprise sustainable development.
191. Policy H5 on affordable housing specifically addresses provision in relation to older persons' housing and accommodation. This includes both housing schemes likely to comprise residential use (Class C3) including sheltered housing and extra care housing where there is a degree of self-containment and in respect of what the Plan describes as "traditional care homes", which are likely to be more institutional facilities (Class C2). As submitted the policy requires 40% and 25% affordable provision for the wider Borough and town centre respectively for older persons' accommodation.
192. With regards to an older persons' development that is likely to comprise a residential use (Class C3), as the recent Rectory Homes judgment [PS/H/HN/10] and the PPG advises at paragraph 63-014, matters are not straightforward and so it will largely be left to the judgement of the Local Planning Authority, dependent on the specifics of the proposed development. As such we do not consider the policy requires modification to contain

prescription on what schemes would comprise a C3 use or to specifically exclude forms of specialist older persons' housing. There is wide variation in the types of schemes that come forward, including blends of provision on larger proposals. It is not for the policy to countenance all conceivable development scenarios or for these to be individually viability tested. Accordingly, as a starting point, the policy should remain flexibly worded as submitted to enable assessment on all older persons' housing proposals.

193. In terms of seeking affordable housing provision on older persons' schemes including retirement living, sheltered housing and extra care housing where there is a degree of independent living, the Plan-wide viability assessment has assessed this. This includes in relation to the St Catherine's Hospice allocation and more generally to sheltered flats and extra care flats typologies (assessed at Appendix IIIa of the Local Plan & CIL Viability Assessment (LPCVA)). The plan-wide evidence shows that viability is likely to be variable resulting in a more frequent use of viability review and negotiation [LPCVA para 3.7.21, p76]. To devise a policy that sought to deal with the wide variation in the nature of such schemes would result in an overly complex approach. As such it remains justified that the policy starts from a position of seeking a requirement with the provision that in exceptional circumstances, on a case-by-case basis, this could be relaxed.
194. In terms of the principle of seeking an element of affordable care provision within care/nursing homes schemes, this is justified by the circumstances in the Borough. This includes the evidence in the SHMA that confirmed a significantly higher proportion of older households in Crawley in tenures other than owner occupation. Accordingly, a significant proportion of the need for care home accommodation arising from Crawley is from households that do not have existing equity to fund their care.
195. The Plan seeks affordable care provision in terms of an equivalent percentage in affordable care beds. The viability and practicality of delivering this within the Borough has been contested by the sector. We note that the Plan wide viability assessment has tested a nursing home scheme as a commercial typology (at Appendix IIIc) with broad ranging outcomes reflecting that care home developments in the Borough are likely to come forward on previously developed sites with varying existing use values. Whilst the assessment did not specifically factor in the requirements and likely costs of Policy H5 we nonetheless note the residual land value when compared with likely benchmark values creates a potential viability 'headroom'. Additionally, the LPCVA in respect of sheltered and extra care schemes has factored in the costs of CIL, which would not apply in the case of schemes that fell squarely into the C2 use

class. In this regard we share the Council's assessment⁵⁴ that a likely cost using the commuted sums calculator could be accommodated within this buffer.

196. In terms of aiding viability, an approach of basing the requirement on the net sales area and excluding communal areas is likely to result in beneficial outcomes, particularly for care/nursing home schemes. We see no serious difficulties in implementing this, with communal areas being distinct from individual room provision. The practical application of a net sales area through the commuted sum calculator is likely to result in a significant reduction on the respective 40% or 25% requirements sought by policy⁵⁵. The starting point for such provision should be on-site in the form of affordable care beds and Policy H5 and the Obligations Annex need to be modified to reflect this to ensure that the policy is effective. That does not preclude financial contributions as set out elsewhere in the policy, where justified as an exception. The submitted Plan needs to be modified to introduce necessary clarity on the net sales area approach. **MM31** would do this in terms of supporting text to Policy H5 and **MM41** would make the required changes to the Planning Obligations Annex. We recommend both MMs for effectiveness.
197. On-site provision for affordable bed space capacity or financial contributions generated for 'affordable care' would meet the necessary tests. Similar to other forms of affordable accommodation where there is no local authority (WSCC) acceptance to the spaces available, private occupancy would be the fallback and a commuted sum payment sought. The commuted sum payment would need to be used for capital rather than revenue expenditure. In determining the formula for a capital contribution this would reflect the cost to the development had affordable housing been provided on site in the form of a floorspace levy to be applied to the net sale area of the gross internal area. The amount of the levy would vary dependent on the location, with a lower levy reflecting viability issues within the town centre.
198. Bringing together the various issues on Policy H5 and 'affordable care' we consider the Policy requires modifying to provide a clearer approach and additional assurance that it can be implemented viably in order for the policy to be sound. As such, various modifications are needed for Policy H5 and the related parts of the Planning Obligations Annex. This includes improving the structure of the policy to remove unnecessary repetition. The policy also needs to be amended to clarify that financial contributions for off-site provision would be determined using the Commuted Sums Calculator for the town centre and outside of town centre zones, and this would be formulated on net sales areas excluding communal areas. Finally, additional content is required in the Plan regarding on-site provision of affordable care, including the role of West Sussex County Council in supporting any package and whether that would inform

⁵⁴ Further explained in response to our post MM consultation correspondence

⁵⁵ Illustrated in examples presented in CBC Matter 6 Statement, response to MIQ6.17

exceptional circumstances for a commuted sum, with any such sum being tapered on sites of 10 or less. **MM30**, **MM31** and **MM41** would make the necessary changes to address these matters and so we recommend them so that the Plan would be justified and effective.

199. The Plan positively addresses the emerging Build to Rent sector in accordance with the PPG and as defined in the NPPF. There are already some sizeable schemes built in the town centre. Policy H6 sets out specific requirements in relation to affordable private rent provision by location (town centre/rest of Borough) which is appropriately supported by the Plan wide viability assessment. Overall, the Plan's approach to Build to Rent is sound.

Gypsies and Travellers

200. On submission the Plan was not accompanied by an up-to-date Gypsy & Traveller Accommodation Assessment (GTAA). The final GTAA was provided in November 2023 and as such various parts of the Plan as they relate to gypsies and travellers are no longer justified or effective in light of the latest evidence. The national Planning Policy for Traveller Sites (PPTS) was also updated in December 2023.
201. Whilst we have some reservations about the GTAA in terms of the extent to which there has been engagement with those households in bricks and mortar, we do not consider that this necessitates further examination or potential delays in adopting this Plan. Whilst the situation regarding households in bricks and mortar is not conclusive and would benefit from further face-to-face survey work, the evidence from other indicators does not point to a pressing need for forms of culturally appropriate accommodation from households within bricks and mortar in the short term. As with the previous 2015 Local Plan, which applied an assumed growth calculator, if a need does materialise from within bricks and mortar, a reserve allocation would provide an appropriate option during the plan period.
202. We note the other methodological concerns that the GTAA may have potentially under-estimated existing need in the Borough, as well as potential in-migration from elsewhere in the south-east from public to private sites. There is no evidence through the DtC statements that neighbouring authorities are looking to Crawley to assist in accommodating any unmet needs for gypsy and traveller accommodation. Given the proposed Broadfield Kennels allocation we do not consider that the Plan needs to identify or allocate additional sites for plan soundness. Further private site provision can continue to be managed through the application of submitted Policy H8. Following the latest GTAA evidence post plan submission, various parts of the Plan would need to be updated to reflect its findings. **MM28** and **MM29** would do this, and we recommend them so that the Plan would be justified and effective.

203. Whilst the GTAA does not identify a short-term need for pitch provision within the first five years, should that arise we are satisfied that Policy H8 provides a positive basis for assessing individual proposals, subject to the MMs recommended below. In line with the latest PPTS Policy H8 does not limit itself by reference to the previous 'planning definition' and so would apply to those seeking culturally appropriate accommodation. Ultimately, the allocated site at Broadfield Kennels could generously accommodate up to 10 pitches including potential needs from existing Traveller households in the Borough, together with any need to relocate from sites within the safeguarded area for Gatwick Airport during the plan period, should that requirement materialise.
204. The Broadfield Kennels allocation was previously found sound as part of the 2015 Local Plan against a similar national planning policy framework. It is a sustainably located site, where, notwithstanding its position in the HWNL, the principle of the allocation is established, including with the nearby settled community. The site is owned by the Borough Council who have the control to bring it forward. The site is not in use and so is available. Works are required to improve access from the A264 in terms of upgrading the current layout. There are no detailed costs on this, but it is recognised that they would be significant. There is nothing at this stage to substantiate that such works are insurmountable (noting the highway authority did not object to the allocation). The Borough Council has indicated that it would seek grant support from national funding for gypsy and traveller site delivery, which we consider to be a reasonable approach. Overall, given the tightly constrained nature of the Borough, we find that the Broadfield Kennels site to be soundly allocated as a developable site for the period 2029-2040 and to have been appropriately assessed against the reasonable alternatives as part of the SA/SEA process.
205. Private individual site provision has focused on land between the northern edge of Crawley and Gatwick Airport, nearly all of which is covered by safeguarding for the airport. As such it is justified that temporary planning permission may be appropriate until such time that there is certainty regarding the second wide-spaced runway. Criterion f) of the Policy H8 requires proposals to meet an identified local need. We are mindful that paragraph 24 e) of the PPTS states that Local Planning Authorities should determine applications for sites from any travellers and not just those with local connections. Nonetheless, physical land supply in Crawley is highly constrained and so it is justified that the policy refers to meeting local need, which would include those households on existing sites in the Borough and any concealed need within bricks and mortar.
206. The evidence, similar to the 2015 Local Plan, demonstrates that caravan accommodation offers a notably lower level of acoustic attenuation compared to bricks and mortar. As such a precautionary approach is justified, including retaining the protection of a lower Unacceptable Adverse Effect Level for aviation noise and gypsy and traveller accommodation, as was found sound as

part of the 2015 Local Plan. The evidence is clear that sustained and frequent exposure beyond the 57 decibels threshold would be detrimental to day-to-day well-being, as well as child development and various long-term health conditions. There is little before us to demonstrate that caravan and other forms of culturally appropriate accommodation can be appropriately mitigated against the levels of noise associated with the intensity of operations at Gatwick Airport. Whilst the 57 decibels threshold may result in a more restrictive approach, the alternative of a more flexible policy approach (i.e. on a case-by-case basis or sequentially if no alternative sites are available beyond the 57decibels contour) could result in Gypsy, Traveller and Travelling Showpeople households experiencing environmental conditions that would otherwise be unacceptable, contrary to paragraph 13e) of the PPTS and the high standard of amenity sought at NPPF paragraph 130 f).

207. Consequently, for permanent sites (including those granted on a temporary basis within the safeguarded area) a noise level applied at the 57 decibel contour is justified in order to protect the health and wellbeing of traveller residents. For temporary and transit sites, higher levels of noise exposure would be acceptable strictly on the basis of the time-limited nature of residential occupation, so as to avoid long-term health impacts. The proposed approach of 60 decibel contour for longer term temporary sites and 66 decibel contour for overnight sites (potentially for up to just a few days) would be justified as set out in Appendix F in the GTAA. This is consistent with and supported by the technical evidence set out in the latest Topic Paper 7: Development and Noise Technical Appendix [PS/DS/TP/07b].

208. A recent planning appeal has illustrated difficulties regarding the terminology in the predecessor⁵⁶ to Policy H8 over temporary stay periods on the issue of noise (as opposed to temporary for the issue of airport safeguarding). **MM32** would provide necessary clarification on the distinction between permanent, long-term temporary and overnight and short-term temporary in respect of noise exposure. The distinction and gradation in levels of noise exposure is justified by the evidence and would be in accordance with paragraph 13e) of the PPTS. Accordingly, we recommend **MM32** to ensure the Plan would be effective.

Conclusion

209. In conclusion, subject to the MMs, the Plan would be justified and effective in its approach to meeting the housing needs for different groups in the community, including provision for affordable housing and the accommodation needs of gypsies and travellers.

⁵⁶ Policy H5 of the 2015 Borough Local Plan

Issue 6 – Does the Plan take a positive approach to the growth, management and adaptation of the town centre, including a justified and effective approach to opportunity sites?

Policy framework for the town centre

210. As set out elsewhere in this report, the submitted Plan sets out a positive framework to bolster and invigorate the town centre as a vibrant retail and visitor destination but also as a dynamic sustainable business growth hub and as a growing residential quarter. This approach aligns with and takes forward the existing programme of regeneration in the town centre which has been secured through a combination of significant funding (including from the Towns Fund and the LEP) and proactive Council work. Existing and committed schemes, reflected in the Crawley 'One Town' Economic Recovery Plan and Crawley Growth Programme, will see further investment in strengthening and diversifying the town centre. The submitted Plan will support the objectives of these plans and identified interventions, whilst providing a necessary degree of confidence to enable sustainable long term decision-making and investment, particularly for a number of high-profile, significant sites around the town centre.
211. There is a balance to be struck between the ambition to optimise the potential of the town centre whilst preserving its character, including heritage assets such as listed buildings and conservation areas (recently extended at Queens Square & The Broadway). We are satisfied that the plan's preparation and the policy framework for higher density development, including in Policy TC3, has taken appropriate account of the town centre character and that the scale of development envisaged in the Plan would be deliverable.
212. The Plan's 'town centre first' approach to development is justified and in line with national policy. We recognise the challenges of retaining the town centre's vitality in current and predicted market conditions and consider the approach taken in Policy TC5, which sets a 500 square metres threshold for requiring an impact assessment for competing uses outside the town centre is appropriate. This lower threshold, compared with the national default threshold of 2,500 square metres, is based on sound research of centres with similar characteristics to Crawley and will not unreasonably restrict suitable development from taking place in out-of-centre locations within the borough. Accordingly, we find the threshold to be justified and consistent with national planning policy at NPPF paragraph 90 in terms of identifying an appropriate locally set threshold.
213. The complementary measures set out within the town centre Policies are necessary to ensuring the town centre remains the primary focus for retail and commercial activity within the borough. These include the appropriately defined extent of primary and secondary shopping frontages together with appropriate

development restrictions and the encouragement of residential development on appropriate sites, to a reasonably high density.

214. The introduction of Use Class 'E' has occurred since the Plan's initial consultation and extends the range of permitted development changes of use for town centre uses. This potentially undermines the Plan's town centre first approach, and to this end the additional reasoned justification for Policy TC5, as set out in **MM23**, is necessary for effectiveness.

Town Centre Opportunity sites

215. Key opportunity sites are set out within Policy TC3 and whilst the majority of new town centre development is envisaged on these deliverable and developable sites, other development is not restricted, which would be accounted for within the Plan's windfall figure for residential use.
216. The Crawley College site is of strategic importance, being one of the largest developable sites and with unique challenges that include maintaining educational use accommodation during any redevelopment. Other constraints include flood risk and heritage considerations. Given the site's size and likely phased redevelopment, the requirement for a masterplanned approach will contribute to the optimisation of the site, in line with the Framework's guidance on such development. **MM22** ensures that this approach is included within the Plan and we recommend it for effectiveness and consistency with national planning policy.

Conclusion

217. Subject to the MMs identified above, the Plan's approach to development, including changes of use within the town centre and the 'town centre first' approach, is soundly based, justified and positively prepared.

Issue 7 – Would the Plan provide for a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against the housing requirement and a developable supply thereafter for the remainder of the plan period?

Housing Trajectory and application of a 10% buffer

218. On submission of the Plan, the Council's correspondence of 31 July 2023 confirmed that the authority was seeking to confirm, through the examination of this Local Plan, a five-year supply of deliverable housing sites under paragraph 74 of the NPPF. This was also made clear in the latest Regulation 19 consultation (May/June 2023). We have examined the Plan on this basis.

219. As submitted the Plan contained a stepped housing trajectory reflecting stronger delivery within the first five years of the plan period before stepping down moderately in years 6-10 and then further in years 10 onwards as the supply becomes more constrained and reliant on windfall provision. In principle, we consider such a stepped approach is justified by the SHLAA and housing trajectory evidence. However, in light of clarifying a 17-year plan period and the increased housing requirement, together with the latest monitoring data for 2022/2023, the housing trajectory as submitted would not be justified and would require amendment in order to be sound. **MM25** would prudently reprofile the trajectory so as to anticipate an average 386dpa being delivered over years 1-10, before reducing to 210dpa in years 11-17. On this basis the minimum 5,330 dwelling housing requirement would be met over the plan period. As such we recommend the MM for effectiveness.
220. In terms of the components of the trajectory, the clarified plan period does not affect the pipeline of supply from existing consents or from the small number of housing allocations identified in Policy H2. In the short term, housing delivery would be largely sustained on the remaining phases of the Forge Wood development and the adjacent Steers Lane site, together with various major housing developments in and around the town centre where there has been a resolution to grant planning permission subject to a mechanism to secure planning obligations (Crawley Station – 308 units; wider Town Hall redevelopment scheme – 182 units; Telford Place – 285 units; and Longley House – 121 units). We are also satisfied that proposed allocations in Policy H2 at Tinsley Lane and Breezehurst Drive are also included within the deliverable supply given the advances to secure planning permission on both sites in tandem to the Local Plan process.
221. In accordance with NPPF paragraph 69, at least 10% of the housing requirement would be met on sites no larger than one hectare. The reality in Crawley is that the confined housing land supply contains a significant proportion of small to medium sized sites.
222. Having regard to the SHLAA evidence and the Five-Year Housing Supply Statement, and the likely contributions from windfall, we are satisfied that the updated trajectory⁵⁷ would reflect the delivery of 2,381 net additional homes in the years 2023/24 to 2027/28. We are mindful that water neutrality has affected housing delivery rates in the Borough in the last few years, but we are satisfied that the housing trajectory has appropriately profiled site delivery to take account of this and the impact of offsetting. In applying the revised stepped trajectory and a 10% buffer, as sought on Plan submission in accordance with NPPF paragraph 74b, we are able to conclude that there would be a 5.6 years

⁵⁷ Document PS/H/HD/14

deliverable housing land supply on Plan adoption on a base date of 1 April 2023.

223. Given the nature of the land supply in the Borough, housing delivery in the mid and latter part of the plan period would be dependent to an appreciable degree on town centre opportunity sites and windfall provision. Approximately 750 units are forecast to be delivered on town centre opportunity sites in the mid part of the Plan period. These are identified as 'developable' sites in Policy H2 and have been appropriately assessed as such in the SHLAA. The sites generally comprise high profile locations at the edge of the town centre where redevelopment would be compatible with the surrounding character of the locality and would reflect the trend of recent residential developments, which have sought to appropriately optimise the use of previously developed sites in and around the town centre. The developable town centre opportunity sites are identified in the growth programme for Crawley Town Centre, which provides further confidence that they will be brought forward as part of the wider efforts to deliver sustainable growth in the town centre over the plan period.
224. The windfall allowance is generally 100 dwellings per annum from year three of the trajectory onwards. Whilst the SHLAA has sought to examine sites down to a relatively low threshold (five or more dwellings), there will inevitably be additional supply that cannot be specifically identified in the SHLAA including changes of use and in some parts of the Borough appreciable scales of development on relatively small site footprints. In recent years windfall delivery has been significantly higher than the anticipated 55dpa in the 2015 Local Plan, in large part due to permitted development rights (particularly office to residential)⁵⁸. To de-risk any future under-estimation of windfall the Council has comprehensively looked at the matter in its 2023 Windfall Statement [document H/HD/06].
225. In setting a new windfall allowance the Council has appropriately set the small sites threshold at four dwellings to align with the fact the SHLAA has looked at sites of five dwellings or more. Additionally, the approach has been revised to ensure that prior approval sites of five or more dwellings are treated consistently with other specific sites. Recent windfall consents and delivery have also been investigated together with an analysis of the likely future trend from office conversions (excluding Gatwick Airport and Manor Royal) applying an updated and reasonable ratio of office floorspace lost and new dwellings built (factoring in the Nationally Described Space Standards). Furthermore, appropriate consideration has been given to the evidence in the 2023 Compact Residential Development Study in terms of properly optimising yields on different site typologies as set out in submitted Plan at Policy H3 and H3a)-f). Bringing this altogether the significant uplift in windfall from 55dpa to 100dpa would be

⁵⁸ 746 dwellings delivered on prior approval schemes 2015-22, compared to 145 dwelling forecast for five-year period 2015-20 (para 5.1 of the 2023 Windfall Statement)

realistic and therefore justified. In accordance with NPPF paragraph 71, the 2023 Windfall Statement is the compelling evidence that there would be a reliable supply of windfall as forecast within the housing trajectory.

226. Whilst there are no recommended modifications to Policy H2 on key housing sites, the reasoned justification to the policy would need to be updated to ensure consistency on delivery over the clarified plan period and in the context of the amended housing requirement. **MM27** would make the necessary changes and we recommend it for effectiveness.

Conclusion

227. In conclusion, subject to the above-mentioned MMs, the Plan would provide for a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against the housing requirement and a developable supply thereafter for the remainder of the plan period.

Issue 8 – Is the Plan's policy framework for matters of character, design and heritage justified, effective and consistent with national policy?

Character, Landscape and Development Form

228. The plan supports a sustainable approach to development, specifying higher density ranges in appropriate locations, in recognition of the compact nature of the borough and its built-up area. The proposed densities would optimise site capacity whilst respecting the character of established areas and allow for the creation of spaces in which people will want to live and interact, also taking advantage of proximity to the town centre and good transport links, where appropriate, and movement networks. The borough's 2009 Area Character Assessments remain relevant. Appropriate parking standards would be applied across the borough in line with the approach adopted by West Sussex County Council.
229. In considering whether the proposed requirements of development applications would be fair when applied across all forms and sizes of schemes, the Council has specified various submission requirements. **MM6** would enable this by ensuring that whilst all proposals would adhere to the overall design principles of the Plan, larger schemes would be required to clearly demonstrate compliance with a design vision and available opportunities. We recommend this MM for the effectiveness and soundness of the plan.
230. Similarly, through the inclusion of **MM7**, major development would be required to consider movement networks within, as well as outside, sites. Masterplans

are recommended for larger sites with design codes to be included where relevant. The alteration of Policy CL5 through **MM8** would ensure that these would be proportionate to the size of the scheme, and we recommend both MMs for the Plan's effectiveness and soundness.

231. Other character policies such as those pertaining to local and wider views and landscaping have been tested and found appropriate. Although the possibility of a tall buildings policy was considered, this is unnecessary as the other policies of the Plan would allow for proportionate development on appropriate sites. Policy CL8 for development outside built-up areas, and Policy CL9 would effectively protect the borough's National Landscape area and protect land outside the built-up area from inappropriate development. Policy CL8 considers the protection of various areas rather than individual sites, whilst allowing sympathetic forms of development that take account of their rural fringe location and particular characteristics.

Design

232. The design and development requirements policies would provide more specific requirements for detailed design matters. Policies pertaining to localised urban design, inclusive design, aerodrome safeguarding, vehicular crossover provision and advertising are straightforward and relatively uncontroversial, and our examination has not resulted in any significant suggested alterations. The application of the Nationally Described Space Standard to new housing developments as set out in Policy DD3 is augmented by additional suggested standards for homes in larger schemes, including consideration of the needs of families living in flatted buildings. The policy is necessary to ensure that such development is attractive to a mix of residents, which in turn would contribute to balanced and vibrant areas and improve market choice.
233. Policy DD4 is no longer a strategic policy, as specified by **MM9**. Strategic landscape matters are covered by other policies in the Plan, and we recommend it for effectiveness.

Heritage

234. No MMs relevant to heritage are considered necessary for soundness. The strategic approach to the management of heritage assets is sound, together with the Council's treatment of statutory and archaeological assets. The Plan also sets out a detailed approach to the management of non-designated heritage assets, in its identification of areas of special local character, locally significant buildings, and historic parks and gardens. These designations are appropriate, having regard to assets that are important to local heritage but do not meet the criteria for statutory designation, nor benefit from the same level of protection as designated assets in terms of national policy.

Conclusion

235. In conclusion, subject to inclusion of the aforementioned MMs, the Plan would be justified and effective in its guiding of the overarching design and form of all new development and its relationship with existing character, approach to detailed development matters, and management of heritage assets.

Issue 9 – Is the Plan's policy framework for the environment, water resources and green infrastructure justified, effective and consistent with national policy, including in relation to water neutrality?

Green Infrastructure

236. No modifications are proposed to policies for open space, biodiversity and nature conservation, sport and recreation, including the provision of open space and recreational facilities, and the management of rights of way and access to the countryside. The Plan's approach to these matters is sound.

Water resources, water neutrality and flood risk.

237. Most of the built-up area within the borough lies within the Sussex North Water Resource Zone (SNWRZ), which is within a designated area of serious water stress. Plan Policy SDC3 sets standards for water use in areas outside the WRZ, which are generally on the northern and eastern fringes of the borough and includes Gatwick Airport. For development outside of the SNWRZ, the policy aligns levels for residential development with the Building Regulations optional requirement for tighter water efficiency (at 110 litres of mains-supplied water per person per day), and non-residential development to be designed to achieve BREEAM⁵⁹ 'excellent' as a minimum standard within the water use category. No MMs are proposed for this policy. The policy is necessary for reasons of environmental sustainability and so is soundly based.

238. Policy SDC4 would apply to development within the SNWRZ. This proposes the limitation of water use in residential development to a significantly lower rate than that set by national standards, including the level set in SDC3, together with stringent targets for other uses. Eventually it is intended that similarly restrictive targets will be adopted by other authorities within the SNWRZ. Given the environmental constraints facing development in the region, we consider that the standards set out within SDC4 are justified.

239. Within the SNWRZ, new residential development would be expected to utilise no more than 85 litres of mains-supplied water per person per day. New non-

⁵⁹ British Research Establishment Environmental Assessment Methodology

domestic buildings would also be expected to restrict water use. In addition, an offsetting scheme is to be applied across the region. We are satisfied that these standards have been properly tested by the Council and its partners regarding potential alternatives for more or less restrictive limits, and that any risk to economic viability⁶⁰ is balanced by the minimisation of additional harm to natural resources. Importantly, achieving neutrality through the proposed water efficiency targets, in combination with appropriate offsetting, will 'unblock' the development pipeline and enable the continued growth of the Borough and achievement of the aims of the Plan.

240. To this end, **MM33** proposes that Policy SDC4 be made a strategic policy. The policy text would be reordered, and additions made to the reasoned justification text to provide certainty in the development management process. Also necessary is the insertion of an additional criterion within the Policy text, to allow for the possibility of loosened restrictions in the event that a strategic solution to water neutrality is secured through forthcoming water resource improvements, and the need to demonstrate neutrality no longer required. Other minor changes within the policy are proposed for clarity, including the necessity to make the distinction between the constituent local authorities and the separate entity of the South Downs National Park Authority. This MM is necessary for effectiveness and consistency with national planning policy.
241. There is some concern that the onus on achieving water neutrality in the short to medium term rests with the development industry by constructing in accordance with development plan policy, rather than water neutrality being wholly the responsibility of the abstracting water companies. The issue of water neutrality in the Arun catchment first arose in 2020, when this Plan was already in preparation. Whilst longer term water resource management planning should establish a strategic solution to the issue, it is imperative that a policy framework is established in this Plan that will enable and facilitate growth in the short to medium term rather than development being held in a moratorium. Ultimately, the policy approach needs to ensure that there would be no harm on the qualifying features of the protected hydrological sites in order to be lawful under the Habitats Regulations. As such, the proposed policy approach of water efficient design and offsetting is necessary, and this has been endorsed by Natural England in terms of navigating the Habitats Regulations.
242. Part C of the Water Neutrality Study states that offsetting must be in place before water demand is generated. We are assured by the evidence before us of progress being made on a local authority-led water offsetting scheme⁶¹. A particular factor for Crawley is the ongoing progress in retrofitting existing housing stock in the Borough with flow regulators to help create the water

⁶⁰ Costs identified through the Part C Water Neutrality Study and considered in the Plan Wide Viability Assessment

⁶¹ Including October 2023 Update [Document PS.DS.TP.001c]

demand headroom to facilitate some additional development within the SNWRZ part of the Borough. This gives us confidence that some development would still proceed in the Borough in the event that a more strategic offsetting scheme is delayed. Notably, the Gatwick Green site is not within the SNWRZ. **MM33** would introduce further clarifications on the timing of securing offsetting, that the commitment needs to be obtained through the development management process. We recommend this part of the MM so that the Plan would be effective.

Flood Risk

243. The Council's Strategic Flood Risk Assessment was updated during the examination. Plan Policies EP1 and EP2 follow national guidance in avoiding flood risk to development, and **MM34** proposes alterations for clarification and additions in line with the borough's water neutrality aspirations. This MM is justified for the soundness of the Plan.
244. During the MM consultation period, the Environment Agency requested additional changes to the policy, in respect of the Water Framework Directive mitigation measures, together with the inclusion of a new appendix to the Plan which would set out specific projects along watercourses in the borough. The Council was offered the opportunity to comment and suggested additional text within Policy EP1 together with inclusion of the appendix. These alterations are not required for soundness or legal compliance.

Noise

245. The Plan proposes to recognise the upper equivalent sound level of the Significant Observed Adverse Effect Level (SOAEL) for aviation noise as 60 decibels (dB LAeq.16hr), with an unacceptable adverse effect above this level. We recognise that the SOAEL is significantly below the 66db in the previous Plan. However, we consider this level to be appropriate in light of various research within the evidence base identifying noise constraints for development, including the design and use of outdoor spaces, the general nature of aviation noise, and circumstances specific to the operation of Gatwick Airport and its surrounding land.
246. The alternative of not having suggested levels and a bespoke approach to determining the appropriateness of applications for development would affect plan soundness. We consider the inclusion of the levels in Policy EP4 (and carried into Policy H8) provides clarity and certainty for decision-making.
247. Changes to noise levels above 60 dB LAeq.16hr are significant, with each additional 3 dB LAeq.16hr representing the noise equivalent of a doubling of aircraft movements. The Council's evidence advised that mitigation against

noise within residential development, and particularly in outdoor spaces, can result in poor design with limited attenuation opportunities, and have a significant impact on lifestyle.

248. Guidance and advice on setting noise contours for aircraft noise within the plan-making process, and its effects, has been published by various bodies including the Government and World Health Organisation. Research continues to be published indicating a direction of travel in which noise contours would set lower noise levels as aircraft fleets are renewed with modern, quieter vehicles. Taking account of the specific characteristics of Gatwick Airport, such as its setting within rural land and the operation of night flights, the lower levels proposed by the Plan, in comparison with the 2015 Plan, represent a balanced approach between various matters and interests including airport viability, health and the local economy. They do not unreasonably restrict sites allocated for development within the Plan and would continue to provide scope for appropriate development within the SOAEL. We note the collaboration of the Council with surrounding local planning areas in which similar levels are expected to be included in Plans as they are reviewed.

249. In this regard, **MM35** clarifies development parameters within the SOAEL as part of Plan Policy EP4. **MM43** and **MM44** set out changes to the Plan's Noise Annex to align with the Policy and reflect the revised noise contours. We recommend these clarifications as being necessary so that the Plan would be justified and effective and therefore sound.

Other Environmental Sustainability Policies

250. No MMs relevant to other environmental sustainability policies are required for soundness. These include air quality, land and water quality, and external lighting policies, all of which are sound.

Conclusion

251. In conclusion, subject to inclusion of the aforementioned MMs, the Plan's policy framework for the environment, water resources and green infrastructure would be justified, effective and consistent with national policy, including in relation to water neutrality.

Issue 10 – Is the Plan effective and justified in relation to Transport and Infrastructure?

Transport

252. As set out elsewhere in this report, the Plan has taken account of and positively responds to the New Directions for Crawley and the Local Cycling and Walking

Infrastructure Plan. The Borough benefits from a good bus network, rail stations in the town centre, Gatwick, Three Bridges and Ifield and an expanding network of safe cycle routes and parking. The policies of the Plan support further modal shift, consistent with NPPF paragraphs 105, 106 and 152. A key element of this will be the coordinated plans to strengthen the town centre as a focus for the Borough, including as a vibrant residential community.

253. In terms of understanding the highways impacts of the Plan, including in combination with other anticipated growth (Gatwick DCO and west of Crawley), transport modelling work has been undertaken. The approach and outputs of the final transport modelling study (2022) are agreed through statements of common ground with WSCC and National Highways. On the whole, we find the modelling work to be robust and to appropriately reflect the likely impacts arising from the Plan's policies and proposals, in the context of wider background traffic growth. A number of interventions are identified for the highway network, and these are reflected in the latest IDS. Most of the junctions identified where overcapacity is predicted to occur are signal controlled. Various solutions to optimise the performance of these junctions are identified and would be relatively low-cost. There is nothing in the transport modelling work which demonstrates a highways-related 'showstopper' that would impede the delivery of the spatial strategy.
254. Additionally, existing consented growth (largely from the 2015 Local Plan) is required to deliver various highway improvements, including in the early part of this Plan period. The IP also reflects this, including timescales and costs where known.
255. As submitted the Plan contains detailed parking standards, required by Policy ST2 with the detail set out in an annex. In light of the recent amendments to Part S of the Building Regulations it would not be justified or effective for the Plan to prescribe separate local standards for electric vehicle charging infrastructure. **MM36** would amend Policy ST2 and **MM42** would remove unnecessary detail from the Parking Standards Annex and insert new text seeking accordance with the latest Building Regulations. Both modifications would be necessary for effectiveness.

Crawley Western Multi-Modal Transport Link

256. Transport modelling of the Plan's growth, in combination with potential expansion at Gatwick⁶² and a prospective >3,000 home strategic urban extension to the west of the town in Horsham District⁶³ shows that the road

⁶² Additional sensitivity testing to factor in the NRP DCO in document ES/ST/01w

⁶³ Document ES/ST/01a – 3,750 homes West of Ifield and an additional 1,546 homes west of Kilnwood Vale, plus 50,000sqm of employment.

network within the Borough would experience capacity issues. Some junction improvements are identified in the IP during the plan period which would mitigate impacts arising from growth in traffic associated with the Plan's proposals but a longer-term strategic transport solution, in the form of a potential Western Multi-Modal Transport Link is being contemplated. The principle of the road (including shared transport and active travel facilities) is identified in the West Sussex Transport Plan 2022-2036 as a medium term priority for both Crawley and Horsham.

257. The issue of a western multi-modal link comes into particular focus should strategic growth be allocated to the west of the town in Horsham District. Without a strategic transport solution connecting the A23 to the north of Crawley with the A264 near Kilnwood Vale, growth around Crawley would be restricted. The benefits of delivering a strategic multi-modal link are positively identified in the DtC SoCGs with WSCC and Horsham District Council. The long-term potential to reduce demand on Junctions 10 and 11 of the M23 has National Highways' support. Importantly, the link also offers the potential to improve and prioritise other modes of transport around and within Crawley.
258. The Plan does not delineate a specific route alignment and only goes so far to identify an area of search and set out the criteria which the design and route of any link should have regard to from a Crawley Borough perspective. Having regard to NPPF paragraph 106 we consider this to be a reasonable and justified approach in advance of growth being established in other Local Plans. In the interim, Policy ST4 and the associated area of search on the Policies Map is as reasonably far as this Plan can progress the matter at this stage. This is positively reflected in the DtC SoCGs with WSCC and Horsham District. The issue of delivering a multi-modal link to the west of Crawley, across administrative boundaries with attendant improvements for walking, cycling and public transport connectivity on the western side of the town is clearly a strategic matter as per NPPF paragraph 20. As such we recommend that part of **MM37** which would identify Policy ST4 as a strategic policy. This would be necessary for consistency with national planning policy.
259. In terms of the area of search for the link this partially overlaps with land safeguarded for Gatwick. It should be stressed that the area of search is just that, further assessment work would be required dependent on plans for West of Crawley in Horsham District. Initial route assessments are to be regarded as indicative only. Optioneering of route alignments to date has had regard to the need to minimise any encroachment into the safeguarding area, including the potential of avoiding the safeguarded area altogether, should this be necessary. Matters are complex at the eastern end of the area of search at the A23 at County Oak. This location may necessitate an alternative area of search for the interim period until the second wide-spaced runway is pursued by Gatwick. This

interim option requires further assessment, but we consider it justified that it remains an option within the Area of Search in the Plan.

260. The further assessment of the northern section of the link (Systra [ESS/ST/02a]) has examined options to minimise encroachment into safeguarded land to that which would be unavoidable. Again, we have looked at the Systra work as part of the justification for an Area of Search rather than determining a specific route, given Policy ST4 does not seek to safeguard land for a specific route option. The Systra work is clearly a step towards further detailed work and assessment, which would largely be required to support growth outside of Crawley.
261. In identifying interim options (ES3 and ES3a) in land safeguarded for a southern runway we consider these remain reasonable options to explore. Whilst we accept the door has not closed on the possibility of a second wide spaced runway, there is the potential of the NRP accommodating additional capacity (if approved) such that implementation of a southern runway (if required) could be a very long-term prospect. The Plan as submitted (at paragraph 17.30) recognises that interim options are not straightforward, and that agreement would be required with GAL on any solution. On this basis, we consider the Plan would provide a justified and effective approach in attempting to secure the strategic benefits of a western multi-modal link.
262. However, the Plan policy as currently submitted would not appropriately recognise the potential tensions between delivering a western link and the extent of safeguarding for a potential second wide-spaced runway and associated safety buffers and perimeters. As such we consider it necessary that an additional criterion is added to the policy requiring account to be taken of safeguarded land. We therefore recommend that part of **MM37** as being necessary for effectiveness.
263. The area of search within the Borough for the link largely goes through countryside and crosses the River Mole including, potentially or proximate to, protected sites and habitats⁶⁴. This is not reflected in the Policy as one of the factors which the design and route of the link should take into account. To remedy this omission, **MM37** would insert a new criterion into the policy and **MM38** would include new supporting text to the policy related to the new criterion. Accordingly, we recommend both modifications for effectiveness and consistency with NPPF paragraphs 174 and 179.

⁶⁴ River Mole floodplain, ancient woodland, biodiversity opportunity areas, local nature reserves and local wildlife sites.

Infrastructure

264. Policy IN1 of the submitted Plan requires, amongst other things, that development is supported by necessary infrastructure and provides for mitigation where there would be impacts on existing infrastructure and services. The Borough is a CIL charging authority and in terms of site-specific contributions for infrastructure, the Plan contains a detailed Planning Obligations Annex to set out how certain contributions would be calculated.
265. The Plan is accompanied by a comprehensive Infrastructure Delivery Schedule (IDS), as part of the overall Infrastructure Plan (IP), which identifies various infrastructure projects to support the delivery of sustainable growth over the plan period, including in relation to transport. Whilst it is not necessary for soundness to transpose the details from the IDS, as a living document, into the Plan, the lack of a reference to the IDS in Policy IN1, as the key infrastructure policy, may result in a potential disconnect in the formulation of development proposals, including in accompanying transport assessments, and the infrastructure necessary to make the development acceptable in planning terms. As such the Plan as submitted would not be effective. Accordingly, we recommend that part of **MM10** would which identify the IDS at Policy IN1 and in the reasoned justification. Similarly, **MM12** would add a necessary cross-reference to the IDS in Policy IN2 in respect of the provision of new infrastructure, which we recommend for effectiveness.
266. Additionally, the IDS has been developed at time when matters in relation to the strategic road network are now subject to DfT Circular 01/22. This introduces a move away from 'predict and provide' on mitigatory interventions to a 'monitor and manage' process in relation to travel demand. As such, the extent and timing of highways infrastructure identified in the IDS may change. Consequently, we recommend that part of **MM10** which would provide a caveat in relation to the 'monitor and manage' process in relation to the need and timing for improved transport infrastructure. Overall, the various changes in **MM10** would make Policy IN1 effective.
267. We are satisfied that the highway modelling underpinning the Plan is robust, including the further sensitivity testing. The impact arising from growth in the Plan compared to wider background traffic growth is relatively modest although we recognise that certain road junctions, including M23 junctions 10 and 11 are identified as requiring capacity improvements during the plan period, in part because of the envisaged growth in Crawley. To support delivery of the Plan and to coordinate funding and additional evidence, including as part of the ongoing 'monitor and manage' process, the Borough Council intends to convene a Transport and Infrastructure Management Group, which would include WSCC and National Highways. It would not be necessary for soundness to set a policy requirement to establish the group. However, we do consider that the Plan should identify that the Group will be established, and that part of its

role will be to inform updates to the IP and IDS in terms of the deliverability and phasing of transport infrastructure. **MM11** would provide additional content to the Plan in this regard, and we recommend it for effectiveness.

Conclusion

268. Subject to the MMs identified above the Plan would be effective and justified in relation to transport and infrastructure.

Issue 11 – Monitoring and Review

Monitoring

269. The Plan is accompanied by a Monitoring and Implementation Framework [CBC/MC/KD/MIF/01] which contains various indicators to measure the implementation of the Local Plan. These monitoring indicators clearly have synergy with indicators identified in the SA report for assessing performance against the SA objectives that have underpinned plan preparation. It prudently identifies key indicators on critical elements of the plan (economic growth, housing delivery, climate change and water resources) where unsatisfactory performance would stimulate intervention, including potentially policy review. Overall, we find the Monitoring and Implementation Framework would be effective in meeting the Council's regulatory requirements to monitor the implementation of the Local Plan objectives and policies as part of a required annual monitoring report.

Plan Review

270. As set out above we see no cogent basis as to why it would be necessary for plan soundness to include a policy or mechanism requiring plan review within a specific time period or for a review to be triggered by a particular factor known at this time. There are issues that could well evolve in a relatively short time frame, such as an outcome to Gatwick Airport's Northern Runway Project or progress on a strategic solution to water resources as part of the next round of water utility company asset management planning, for example. In large part, we consider the submitted Plan contains necessary flexibility and foresight, for example at Policy GAT1, to deal with potential changes in circumstance in the short term. Overall, we consider the legal requirement on the Council to consider whether to review the plan⁶⁵ on a whole or partial basis within the required five year period, as part of ongoing monitoring on the up-to-datedness and effectiveness of the plan, would be effective in responding to changing circumstances.

⁶⁵ Regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

Conclusion

271. In conclusion, the Plan's approach to monitoring and review is sound and so no MMs are required.

Overall Conclusion and Recommendation

272. The Plan has various deficiencies in respect of soundness for the reasons set out above, which mean that we recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.

273. The Council has requested that we recommend MMs to make the Plan sound and capable of adoption. We conclude that the duty to cooperate has been met and that with the recommended main modifications set out in the Appendix the Crawley Borough Local Plan 2024-2040 satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

274. We conclude that if adopted promptly (with the recommended MMs) the Plan establishes a five-year supply of deliverable housing sites on 1 April 2023. Accordingly, we recommend that in these circumstances the LPA will be able to confirm that a five-year housing land supply has been demonstrated in a recently adopted plan in accordance with paragraph 75 and footnote 40 of the NPPF.

Glen Rollings David Spencer

INSPECTORS

This report is accompanied by an Appendix containing the Main Modifications.

16 June 2011

Douglas C B Bond
Woolf Bond Planning
The Mitfords, Basingstoke Road
Three Mile Cross
Reading
RG7 1AT

Our Ref: APP/H1705/V/10/2124548
Your Ref:

Dear Sir,

**TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 77
APPLICATION BY CALA HOMES (SOUTH) LTD
BOUNDARY HALL SITE, ALDERMASTON ROAD, TADLEY, RG26 4QH
APPLICATION REFERENCE: BDB/67609**

1. I am directed by the Secretary of State to say that consideration has been given to the report of the Inspector, Phillip J G Ware BSc DipTP MRTPI, who held a public local inquiry which sat for 14 days between 12 October 2010 and 13 January 2011 into your client's application for *'the demolition of the existing hall, the relocation of the existing substation and redevelopment of the land to provide approximately 945 square metres of B1 commercial space, 115 dwellings, new public open space, car parking, new footpaths, landscaping and 2 new access roads off Almswood Road and improvements to the existing access point off Aldermaston Road'* at the Boundary Hall Site, Aldermaston Road, Tadley, RG26 4QH in accordance with application reference BDB/67609, dated 28 November 2007.
2. On 4 March 2010 the Secretary of State directed, in pursuance of section 77 of the Town and Country Planning Act 1990, that the application be referred to him instead of being dealt with by the relevant planning authority, Basingstoke and Deane Borough Council (the Council).

Inspector's recommendation and summary of the decision

3. The Inspector recommended that planning permission be refused. For the reasons given below, the Secretary of State disagrees with his recommendation, and grants planning permission. A copy of the Inspector's report (IR) is enclosed. All references to paragraph numbers, unless otherwise stated, are to that report.

Jean Nowak, Decision Officer
Planning Casework Division
Department for Communities and Local Government
1/J1, Eland House
Bressenden Place
London
SW1E 5DU

Tel: 0303 444 1626
Email: PCC@communities.gsi.gov.uk

Procedural matters

4. In reaching his decision the Secretary of State has taken into account the Environmental Statement (ES) submitted under the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999. The Secretary of State considers that the ES complies with these regulations and that sufficient information has been provided for him to assess the environmental impact of the application. In coming to this conclusion, the Secretary of State has taken account of the Inspector's comments (IR294) that the extent of a radiation dose that would be received by occupiers of the development arising from a radiation emergency was not directly addressed in the ES. However, he is satisfied that the arguments put forward by the HSE at the Inquiry (IR187) made it clear that a dose of 30mSv would be significantly harmful and that this was not challenged by any other party. The Secretary of State does not therefore consider it necessary to pursue this matter further with the parties before taking account of it in the overall planning balance (see paragraphs 13 and 22 below).

Matters arising after the close of the inquiry

5. The Secretary of State has taken account of the Written Ministerial Statement (WMS) of the Rt Hon Greg Clark MP, dated 23 March 2011, which emphasises that significant weight should be attached to the need to secure economic growth and employment. However, he does not consider it necessary to refer back to the parties to this case on the WMS as he has already addressed economic growth and employment issues (in so far as they relate to this case) in determining this application, and he is satisfied that it raises no new issues which would affect his decision.
6. The Secretary of State has also taken account of a representation dated 9 March 2011 from Mr Brian Spray. As this did not raise any new matters that would affect his decision, he has not considered it necessary to circulate it to all parties, but copies of this representation can be made available upon written request to the address at the foot of the first page of this letter.

Policy considerations

7. In deciding the application, the Secretary of State has had regard to section 38(6) of the Planning and Compulsory Purchase Act 2004 which requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. In this case, the development plan comprises the 2009 South East Plan (the RS) and saved policies of the 2006 Basingstoke and Deane Local Plan (LP). The Secretary of State agrees with the Inspector that the main relevance of the RS in this case relates to the housing land requirement set out at policies H1 and WCV3 (IR21 and IR23) and that the most relevant saved LP policies are those set out at paragraph 4.4 of the Planning Statement of Common Ground (document 8 listed on IR page 68 under "Documents handed in at the Inquiry").
8. The Secretary of State notes that the Local Development Framework Core Strategy is at a very early stage (IR27), and he attaches very little weight to it. He considers that the Supplementary Planning Guidance and Supplementary

Planning Documents set out at paragraph 4.4 of the Planning Statement of Common Ground are also material considerations.

9. The Secretary of State has made it clear, following the judgment of the Court on 10 November 2010 in *Cala Homes (South) Ltd v Secretary of State for Communities and Local Government and Winchester City Council* [2010] EWHC 2886 (Admin), that it is the Government's intention to revoke RSs, and the provisions of the Localism Bill which is now before Parliament reflect this intention. The Secretary of State has taken the Government's intention to revoke RSs into account in determining this case, although he gives it limited weight at this stage of the parliamentary process.
10. Other material considerations which the Secretary of State has taken into account include: Planning Policy Statement (PPS) 1: *Delivering Sustainable Development* and its Supplement: *Planning and Climate Change*; PPS3: *Housing*; PPS4: *Planning for Sustainable Economic Growth*; Planning Policy Guidance note (PPG) 13: *Transport*; PPG17: *Planning for Open Space, Sport and Recreation*; PPS23: *Planning and Pollution Control*; Circular 11/1995: *Use of Conditions in Planning Permission*; Circular 04/2000: *Planning controls for hazardous substances*; Circular 05/2005: *Planning Conditions*; and the Community Infrastructure Levy (CIL) Regulations. Like the Inspector (IR314-321), the Secretary of State accepts that the policy sources relied on by the HSE have been regularly used in relation to non-reactor sites, and he has therefore taken account of: the 'Fourth Report on Compliance with the Convention on Nuclear Safety Obligations'(IR30); the Statement by the Secretary of State for Energy in March 1988 dealing with demographic criteria (IR30); and the Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPIR), which includes the requirement for the production of an Off Site Plan (IR31).

Main issues

The relationship of the proposal to the development plan

11. The Secretary of State has had particular regard to the saved LP policies referred to in paragraph 7 above. He agrees with the Inspector (IR395) that the site is identified for the type of development currently proposed. He has taken account of the fact that the health consequences of the proximity of the site to the Aldermaston Atomic Weapons Establishment (AWE) were not considered when the LP was adopted, or as part of the 'saving' process (IR264), but he agrees with the Inspector (IR267) that information and evidence emerging after the adoption of a plan may properly be dealt with as a material consideration in dealing with particular proposals, and he has proceeded on that basis in this case. He has also had regard to the general policies in the LP relating to minimising pollution and to environmental well-being.

The effect on human health

12. With regard to the risk of a nuclear accident (IR271-284 and 348-349), while observing that there is no historical evidence of any previous incidents at the AWE site involving the release of material to the open environment, the Secretary of State agrees with the Inspector that it is essential to consider the

possibility of future incidents (IR272). He also agrees with the Inspector (IR276-281 and 284) that, although the REPPiR approach towards 'reasonably foreseeable' events does not give a clear definition of the likelihood of an event occurring, it has the benefit of being the tried and tested statutory approach which is applied to the entire nuclear industry. Taking all this into account, the Secretary of State agrees with the Inspector at IR283 that the best description of the risk that an event at AWE would impinge on those living and working outside the site would be 'extremely remote', while acknowledging that some weight should be given to the potential for a "reasonably foreseeable" emergency at AWE.

13. For the reasons given at IR285-298, the Secretary of State agrees with the Inspector's conclusion (IR299 and 350) that the potential for a person to receive a 30mSv dose is an important material consideration (IR299). He also agrees with the Inspector that the fact that the HSE did not object to other housing developments in the area, most notably Kestrel Mead which is located slightly closer to the AWE, adds very little to the applicant's argument in this case (IR297). The Secretary of State further agrees with the Inspector (IR300-313 and 351) that the Off Site Plan is designed to be flexible and extendable and that, while it is possible that the implementation of the application scheme would necessitate changes to the Plan, the evidence does not lead to the conclusion that the Plan would fail (IR351). In coming to this conclusion, the Secretary of State has noted in particular (IR311) that West Berkshire Council (who chair the Off Site Plan Working Group) consider that the Plan could be adapted to allow for the proposed development.
14. The Secretary of State also agrees with the Inspector (IR322-344 and 352) with regard to population density criteria. He agrees that the demographic criteria in national policy are specifically intended to be used only for guidance, and that a breach in the policy and the semi-urban criterion should not, in itself, be a reason to refuse planning permission. However, he agrees with the Inspector that the semi-urban criterion is already breached in this location, and that the breach would be worsened by the proposal (IR341).
15. In conclusion on health matters (IR348-353), the Secretary of State agrees with the Inspector that each application must be treated on its own merits (IR347), that the risk of a nuclear accident at AWE occurring at all is very low and that there is no clear definition of the likelihood of an off-site event occurring (IR349). He accepts (IR350) that if such an event were to occur, the potential that those on the application site could receive a materially harmful dose of the order of 30mSv is an important consideration, but he agrees with the Inspector (IR352) that the evidence does not lead to the conclusion that the Off Site Plan would fail. Therefore, although the Inspector goes on to conclude (IR353) that the HSE's "Advise Against" position is justified, the Secretary of State considers that, whilst it is the specific role of the HSE to advise Ministers - including emphasising the potential implications of an event occurring at AWE - it is his role to weigh that advice in the planning balance against the allocation of the site for housing in the LP and other material considerations.

Other material considerations

The improvement of the site, density and sustainability

16. For the reasons given at IR355-357, the Secretary of State agrees with the Inspector that, while the site is currently visually unattractive and under-utilised, it is clearly sustainable and its development would be in accordance with LP policies D5 and D2 as well as with national policy by making efficient use of previously developed land. He also agrees that both the proposed density of the residential element and the layout and scale of the commercial element would represent an efficient use of the site.

General housing need and supply, affordable housing and dwelling mix

17. For the reasons given at IR358-364, the Secretary of State agrees with the Inspector that the figure set in the RS of a requirement for 945 dwellings per annum for the period 2006-2026 is the only one which has gone through a full needs assessment and has been adopted (IR358). He also agrees that the applicant's assessment of deliverable land supply is more realistic than the Council's (IR362); and that this demonstrates a deficiency in the five year supply regardless of which housing requirement figure is used (IR363). The Secretary of State therefore agrees with the Inspector (IR365) that the proposed scheme should be considered favourably as being in line with national policy. He considers that the lack of a 5 year housing supply is a factor which weighs significantly in favour of development.
18. The Secretary of State also agrees with the Inspector (IR366-372) that there is a significant under-provision of affordable housing locally, with a clearly identified need in Tadley against which the proposal would deliver 46 units (IR368). Therefore, given the lack of evidence of other deliverable and available sites in Tadley (IR369), he agrees that the application would accord with LP policy C2 and the Affordable Housing Supplementary Planning Document (IR366). The Secretary of State also agrees with the Inspector (IR373) that the proposal would create a mixed and inclusive community and would accord with the requirements of LP policy C3, and he gives this significant weight.

Employment floorspace

19. The Secretary of State agrees with the Inspector (IR374) that the employment provided by the scheme would be in a sustainable location, would enhance the existing commercial provision in Tadley, and would be in accordance with LP policy EC4 and the LP site allocation.

Design, layout, open space and footpath improvements

20. The Secretary of State agrees with the Inspector at IR377 that the improvements to the existing footpath along the southern boundary of the site would improve surveillance and the overall quality of the path and would provide access to the proposed open space, thereby complying with LP policy C9. He also agrees (IR378-379) that the scheme complies with the requirements for high quality and inclusive design and that the proposed central

open space would be accessible both to residents of the development and to other local people, thereby according with LP policy C9 (IR379).

The planning balance

21. Taking account of the Inspector's comments at IR394-403, the Secretary of State agrees with him that, with the exception of those general LP policies dealing with pollution and environmental well-being, the application accords with the development plan including the site being identified in a saved LP policy for the type of development currently proposed (IR395). Furthermore, the site is in a sustainable location, the proposal would make good use of the land in both visual and sustainability terms and would provide planning benefits (IR396) including the provision of affordable housing and the replacement of community facilities (see paragraph 25 below). The Secretary of State also attaches significant weight to the support gained from paragraphs 69 and 71 of PPS3.
22. Against these benefits, the Secretary of State agrees with the Inspector (IR398) that the sole objection relates to the potential effect on human health of a materially harmful radiation dose. However, while he does not seek to minimise the potential impact of any individual dose, the Secretary of State considers that this should be placed in the context of the probability of such a dose arising which, while unquantified, has been described as 'extremely remote' (see paragraph 13 above). Added to this, he has taken account of the fact that there is no evidence that the Off Site Plan for dealing with such emergencies would fail; and he is satisfied that the intensification of population density is not, in itself, a reason to refuse planning permission.
23. The Secretary of State considers that these factors temper the weight to be attached to the risk of a materially harmful radiation dose relative to the benefits of the proposed scheme. No activity can ever be regarded as being risk free, each case has to be considered on its own merits, and the Secretary of State concludes that the potential benefits of this scheme, coupled with the fact that is generally in accordance with the development plan, outweigh the real, but very small, risks attached.

Conditions

24. The Secretary of State is satisfied that the conditions recommended in the Inspector's schedule (IR380-390) and reproduced at Annex A to this letter are reasonable and necessary and meet the other tests of Circular 11/1995.

Obligation

25. The Secretary of State has considered the executed unilateral planning obligation dated 15 November 2010 and the Inspector's comments at IR391-393. He agrees with the Inspector that the obligation meets the tests set out in Circular 05/2005 and accords with the CIL Regulations; and he considers that the matters contained in the obligation are additional factors which weigh in favour of the proposal. In particular, the Secretary of State agrees with the Inspector (IR376) that the provision of a new Scout Hut facility, or contributions towards it, will be of greater benefit to the community than the retention of the existing building, and that the objectives of LP policy C8 would thereby be met.

Overall Conclusions

26. The Secretary of State concludes that, with the exception of those general LP policies dealing with pollution and environmental well-being, the application accords with the development plan and the Council's Affordable Housing Supplementary Planning Document and that it gains further support from national policy in PPS3. Against this, he attaches significant weight to the risk that those on the application site could receive a materially harmful radiation dose but, having carefully considered all relevant considerations, he concludes that the support from development plan policy and factors which weigh in favour of the proposed development together outweigh the limited conflict with development plan policy and the extremely remote possibility of the type of incident occurring which could give rise to the factors weighing against the scheme. He does not therefore consider that there are material considerations of sufficient weight to justify refusing planning permission.

Formal Decision

27. Accordingly, for the reasons given above, the Secretary of State disagrees with the Inspector's recommendation. He hereby grants planning permission for the *'the demolition of the existing hall, the relocation of the existing substation and redevelopment of the land to provide approximately 945 square metres of B1 commercial space, 115 dwellings, new public open space, car parking, new footpaths, landscaping and 2 new access roads off Almswood Road and improvements to the existing access point off Aldermaston Road'* at the Boundary Hall Site, Aldermaston Road, Tadley, RG26 4QH in accordance with application reference BDB/67609, dated 28 November 2007, subject to the conditions set out in Annex A to this letter.
28. An applicant for any consent, agreement or approval required by a condition of this permission for agreement of reserved matters has a statutory right of appeal to the Secretary of State if consent, agreement or approval is refused or granted conditionally or if the Local Planning Authority fail to give notice of their decision within the prescribed period.
29. This letter does not convey any approval or consent which may be required under any enactment, bye-law, order or regulation other than section 57 of the Town and Country Planning Act 1990.
30. This letter serves as the Secretary of State's statement under regulation 21(2) of the Town and Country (Environmental Impact Assessment) (England and Wales) Regulations 1999.

Right to challenge the decision

31. A separate note is attached setting out the circumstances in which the validity of the Secretary of State's decision may be challenged by making an application to the High Court within six weeks from the date of this letter.

32. A copy of this letter has been sent to Basingstoke and Deane Borough Council.
A notification letter has been sent to all other parties who asked to be informed of the decision.

Yours faithfully

Jean Nowak

Authorised by Secretary of State to sign in that behalf

Conditions

- 1 The development hereby permitted shall be carried out in accordance with the following approved plans:

<u>Plan Name/No</u>	<u>Received On</u>
Site Location Plan @ 1:1250	11th December 2007
12D	5th February 2008
29B	5th February 2008
28B	5th February 2008
26A	11th December 2007
27A	11th December 2007
3272-F-106	7th April 2008
11	28th November 2007
13B	5th February 2008
14B	5th February 2008
15B	5th February 2008
16A	5th February 2008
17B	5th February 2008
18A	5th February 2008
19A	5th February 2008
20B	5th February 2008
21A	5th February 2008
22B	5th February 2008
23B	5th February 2008
24B	5th February 2008
30	28th November 2007
31A	11th December 2007
32	28th November 2007
33B	7th April 2008
34	5th February 2008
Elevations 4B, 4C, 4D, 4A, 4, 3B, 3A, 2B, 2C, 3, 2, 2A, and 1, A1.	11th December 2007

- 2 The development hereby permitted shall be begun before the expiration of 3 years from the date of this planning permission.
- 3 No development shall commence on site until samples of all the external materials to be used (including hard surfacing materials) have been submitted to and approved by the Local Planning Authority in writing. Development shall be carried out in accordance with the approved details.
- 4 Notwithstanding the approved plans, no development shall take place until there has been submitted to and approved in writing by the Local Planning Authority a plan indicating the positions, design, materials and type of screen walls/fences/hedges to be erected/planted. The approved screen walls/fences shall be erected and the hedges planted in accordance with the approved details before the relevant buildings hereby approved are first occupied, and shall subsequently be retained.

- 5 Notwithstanding the provisions of Article 3 of the Town and Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) no building, structure or other alteration permitted by Class A, B or C of Part 1 of Schedule 2 of the Order or Class A of Part 2 of Schedule 2 of the Order is permitted.
- 6 No work relating to the construction of the development hereby approved, including works of demolition or site preparation prior to building works, shall take place before the hours of 0730 nor after 1800 on Monday to Friday, before the hours of 0800 nor after 1300 on Saturdays, nor on Sundays or recognised public holidays.
- 7 The approved bathroom windows at first floor level shall be glazed with obscured glass and shall be permanently retained in that condition.
- 8 The dwellings and commercial building hereby permitted shall not be occupied until the relevant vehicle parking and turning space has been constructed, surfaced and marked out, and cycle parking and secure storage constructed in accordance with the approved details. Those facilities shall not thereafter be used for any purpose other than parking, turning, loading and unloading of vehicles and parking/storage of cycles.
- 9 No development shall take place until details of provision to be made for the parking and turning on site of operatives' and construction vehicles during the contract period together with storage on site of construction materials has been submitted to and approved in writing by the Local Planning Authority. The approved measures shall be fully implemented before development commences and retained and used only for the intended purpose for the duration of the construction period.
- 10 No works shall take place on site until a measured survey of the site has been undertaken and a plan prepared to a scale of not less than 1:500 showing details of existing and intended final ground and finished floor levels from a specified bench mark has been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.
- 11 No works pursuant to this permission shall commence until there has been submitted to and approved in writing by the Local Planning Authority:-
 - (a) a desktop study carried out by a competent person documenting all the previous and existing land uses of the site and adjacent land in accordance with national guidance as set out in Contaminated Land Research Report Nos. 2 and 3 and BS10175:2001; and
 - (b) a site investigation report documenting the ground conditions of the site and incorporating chemical and gas analysis identified as being appropriate by the desk study in accordance with BS10175:2001- Investigation of Potentially Contaminated Sites - Code of Practice; and

- (c) a detailed scheme for remedial works and measures to be undertaken to avoid risk from contaminants/or gases when the site is developed and proposals for future maintenance and monitoring. Such scheme shall include nomination of a competent person to oversee the implementation of the works.

If during any works contamination is encountered which has not been previously identified then the additional contamination shall be fully assessed and an appropriate remediation scheme, including details of its implementation, shall be submitted to and approved in writing by the Local Planning Authority.

- 12 The development hereby permitted shall not be occupied/brought into use until there has been submitted to the Local Planning Authority verification by the competent person approved under the provisions of condition 11(c) that any remediation scheme required and approved under the provisions of condition 11(c) has been fully implemented in accordance with the approved details (unless varied with the written agreement of the Local Planning Authority in advance of implementation). Such verification shall comprise:
 - (a) as built drawings of the implemented scheme; and
 - (b) photographs of the remediation works in progress; and
 - (c) certificates demonstrating that imported and/or material left in situ is free of contamination.

Thereafter the scheme shall be monitored and maintained in accordance with the scheme approved under condition 11(c).

- 13 No deliveries of construction materials or plant and machinery shall take place before the hours of 0730 nor after 1800 on Monday to Friday, before the hours of 0800 nor after 1300 on Saturdays, nor on Sundays or recognised public holidays.
- 14 No development shall take place until there has been submitted to and approved by the Local Planning Authority a scheme of hard and soft landscaping works which shall specify species, planting sizes, spacing and numbers of trees/shrubs to be planted, and the layout, contouring and surfacing of all open space areas. The works approved shall be carried out in the first planting and seeding seasons following the occupation of the buildings or the completion of the development whichever is the sooner, in accordance with a phased programme agreed with the Local Planning Authority in writing prior to commencement of planting. Any trees or plants which, within a period of 5 years from the date of planting, die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species.
- 15 The commencement of the development shall not take place until a detailed scheme for protecting the development from road traffic noise has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include full details of noise mitigation measures, including window glazing and room ventilation provisions, of the dwellings which shall be used to

achieve the good internal ambient noise levels within habitable rooms (bedrooms and living rooms) set out in Table 5 of BS8233:1999 and to achieve noise levels in the garden area/outdoor living space not exceeding 55dB(A) (16 hour free field). All works which form part of the approved scheme shall be implemented in full prior to the first occupation of any of the relevant buildings hereby permitted.

- 16 No part of the development shall commence until the details of the highway works in Almswood Road and at the junction of Almswood Road and the A340 as shown coloured yellow on drawing 29 Rev B have been submitted to and approved in writing by the Local Planning Authority. The approved works shall be implemented in full prior to the occupation of the development hereby permitted.
- 17 Development shall not begin until drainage details, incorporating sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development, have been submitted to and approved by the Local Planning Authority in writing. The approved scheme shall be implemented in accordance with the approved details before the development is completed.
- 18 Prior to the occupation of the development hereby approved, details of all external lighting and details of the timing of illumination shall be submitted to and approved in writing by the Local Planning Authority. Development shall be carried out and be thereafter retained in accordance with the approved details and used in accordance with the agreed hours of illumination.
- 19 The commercial building shall be used only for purposes within Class B1 of the Schedule to the Town and Country Planning (Use Classes) Order 1987 or in any statutory instrument revoking and re-enacting that Order (with or without modification).
- 20 No development shall take place on site until a method statement for works affecting trees (Arboricultural Method Statement) to include a Tree Protection Plan has been submitted to and approved in writing by the Local Planning Authority. The tree protection works shall be carried out before any demolition or building work is undertaken, and shall be retained in situ for the entire construction period.
- 21 Prior to the commencement of development a temporary 2 metre high perimeter fence shall be erected in accordance with details to be submitted to and approved in writing by the Local Planning Authority. The approved fence shall be fully implemented before development commences and retained for the duration of the construction period.
- 22 Details of the width, alignment, gradient and type of construction proposed for the roads, footways, paths and accesses, including all relevant horizontal cross sections and longitudinal sections showing the existing and proposed levels, together with details of visibility splays, signage and the method of disposing of surface water shall be submitted to and approved in writing by the Local Planning Authority before development is commenced. The agreed details

shall be implemented before occupation of the dwellings and commercial building.

- 23 All garages constructed shall not be converted or used for any residential purpose other than as a domestic garage for the parking of vehicles.
- 24 The accesses shall be provided with splays to the highway at an angle of 45 degrees for a distance of 2 metres.
- 25 No gates shall be installed at the accesses from the highway into the site at any time.
- 26 On completion and first use of the approved accesses, the former accesses from Aldermaston Road (west) and Almswood Road shall be permanently closed and reinstated in accordance with details to be submitted to and approved by the Local Planning Authority.
- 27 No pedestrian or vehicular access, other than as shown on the approved plans, shall be formed into the site.
- 28 Prior to the development being brought into use the footway/cycleway fronting the site along the A340 Mulfords Hill, southwards from the Falcon Gyratory to the existing site access, shall be provided with dropped kerbs and tactile paving across the existing access. The works shall be constructed in accordance with drawings that shall be submitted to and approved in writing by the Local Planning Authority.
- 29 The dwellings shall achieve Code Level 3 of the Code For Sustainable Homes. No dwelling shall be occupied until a final Code Certificate has been issued for it certifying that Code Level 3 has been achieved.
- 30 15% of the dwellings hereby approved shall be built to Lifetime Mobility standards.

RIGHT TO CHALLENGE THE DECISION IN THE HIGH COURT

These notes are provided for guidance only and apply only to challenges under the legislation specified. If you require further advice on making any High Court challenge, or making an application for Judicial review, you should consult a solicitor or other advisor or contact the Crown Office at the Royal Courts of Justice, Queens Bench Division, Strand, London, WC2 2LL (0207 947 6000).

The attached decision is final unless it is successfully challenged in the Courts. The Secretary of State cannot amend or interpret the decision. It may be redetermined by the Secretary of State only if the decision is quashed by the Courts. However, if it is redetermined, it does not necessarily follow that the original decision will be reversed.

SECTION 1: PLANNING APPEALS AND CALLED-IN PLANNING APPLICATIONS;

The decision may be challenged by making an application to the High Court under Section 288 of the Town and Country Planning Act 1990 (the TCP Act).

Challenges under Section 288 of the TCP Act

Decisions on called-in applications under section 77 of the TCP Act (planning), appeals under section 78 (planning) may be challenged under this section. Any person aggrieved by the decision may question the validity of the decision on the grounds that it is not within the powers of the Act or that any of the relevant requirements have not been complied with in relation to the decision. An application under this section must be made within six weeks from the date of the decision.

SECTION 2: AWARDS OF COSTS

There is no statutory provision for challenging the decision on an application for an award of costs. The procedure is to make an application for Judicial Review.

SECTION 3: INSPECTION OF DOCUMENTS

Where an inquiry or hearing has been held any person who is entitled to be notified of the decision has a statutory right to view the documents, photographs and plans listed in the appendix to the report of the Inspector's report of the inquiry or hearing within 6 weeks of the date of the decision. If you are such a person and you wish to view the documents you should get in touch with the office at the address from which the decision was issued, as shown on the letterhead on the decision letter, quoting the reference number and stating the day and time you wish to visit. At least 3 days notice should be given, if possible.



Report to the Secretary of State for Communities and Local Government

by Phillip J G Ware BSc DipTP MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 22 March 2011

TOWN AND COUNTRY PLANNING ACT 1990

BASINGSTOKE AND DEANE BOROUGH COUNCIL

BOUNDARY HALL SITE, ALDERMASTON ROAD, TADLEY

APPLICATION BY CALA HOMES (SOUTH) LTD

Inquiry opened on 12 October 2010

Boundary Hall site, Aldermaston Road, Tadley RG26 4QH

File Refs: APP/H1705/V/10/2124548

File Ref: APP/H1705/V/10/2124548

Boundary Hall site, Aldermaston Road, Tadley RG26 4QH

- The application was called in for decision by the Secretary of State by a Direction, made under section 77 of the Town and Country Planning Act 1990, on 4 March 2010.
- The application is made by Cala Homes (South) Ltd to Basingstoke & Deane Borough Council.
- The application Ref BDB/67609 is dated 28 November 2007.
- The development proposed is the demolition of the existing hall, the relocation of the existing substation and redevelopment of the land to provide approximately 945 sq.m. of B1 commercial space, 115 dwellings, new public open space, car parking, new footpaths, landscaping and 2 new access roads off Almswood Road and improvements to the existing access point off Aldermaston Road.
- The reason given for making the Direction was that the Secretary of State is of the opinion that the application was one which he ought to decide himself.
- On the information available at the time of making the Direction, the following were the matters on which the Secretary of State particularly wished to be informed for the purpose of his consideration of the application:
 - a) The extent to which the proposed development is in accordance with the development plan for the area, having regard in particular to Regional Spatial Strategy for the South East – the South East Plan, published 6 May 2009, and the Basingstoke and Deane Local Plan 1996-2011 (saved policies);
 - b) The extent to which the proposed development is consistent with policies to ensure that any unacceptable risks to human health are identified and properly dealt with;
 - c) Whether there are any other material planning considerations relevant to the Secretary of State's consideration;
 - d) Whether any permission granted for the proposed development should be subject to any conditions and, if so, the form these should take;
 - e) Whether any planning permission granted should be accompanied by any planning obligations under section 106 of the 1990 Act and, if so, whether the terms of such obligations are acceptable.

Summary of Recommendation: The application be refused.

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Abbreviations	
The Applicant	Cala Homes (South) Ltd
The Council	Basingstoke and Deane Borough Council
The HSE	Health and Safety Executive, Nuclear Directorate
AWE	Aldermaston Atomic Weapons Establishment
C04/00	Circular 04/00 ' <i>Planning controls for hazardous substances</i> '
C11/95	Circular 11/95 ' <i>The use of conditions in planning permissions</i> '
C05/05	Circular 05/05 ' <i>Planning Obligations</i> '
PPS23	Planning Policy Statement 23 ' <i>Planning and Pollution Control</i> '
Planning SOCG	Planning Statement of Common Ground (agreed between the Applicant and the Council)
Population SOCG	Local Population Estimation Statement of Common Ground (agreed between the Applicant and the Council ¹)
DPD	Development Plan Document
CIL	Community Infrastructure Levy
DEPZ	Detailed Emergency Planning Zone
HIRE	Hazard Identification and Risk Evaluation assessment
REPPIR	Radiation (Emergency Preparedness and Public Information) Regulations 2001
The Hansard Policy	Statement by the Secretary of State for Energy, 11 March 1988, dealing with demographic siting criteria for nuclear power stations
Off Site Plan	Atomic Weapons Establishments Off-Site Contingency Arrangements (Version 1/2009)
AGR	Advanced Gas cooled Reactor
ALARP	(Risk) As Low As Reasonably Practicable
mSv	Milli-Sieverts (The unit of measurement of radiation dose)
PDL	Previously Developed Land
NuSAC	Nuclear Safety Advisory Committee

¹ With Council caveats at paras 1.3.3.4 & 1.3.3.5

PROCEDURAL MATTERS

1. The Inquiry sat for 14 days, on 12 – 14 October, 19 – 22 October; 16 – 19 December; 6 December 2010 and 13 January 2011.
2. Unaccompanied visits to the site and the surrounding area were undertaken before the Inquiry opened and on 7 December 2011. In the latter case, guided by requests from all parties, an extensive tour of Tadley and around the AWE boundary was undertaken.
3. On 21 October 2010 a visit was undertaken to the AWE facility itself. This was with representatives of the three main parties. The purpose of the visit was to observe the general layout of the AWE site and its relationship to the application site. As was announced at the Inquiry, a limited amount of evidence was given during this visit. Specifically, the representative of AWE was able (subject to national security constraints) to explain some of the activities which took place on the site within existing buildings and to identify areas of future intended development and the broad nature of the uses which would take place there. This visit was undertaken during the course of the Inquiry and all parties had the opportunity to subsequently comment on this evidence.
4. The proposal is supported by the Council, the Applicant and others who appeared at the Inquiry, and opposed by HSE.
5. This report includes a description of the application site and its surroundings, an outline of the proposal and its history, the relevant policy context, a summary of other agreed facts, and the gist of the representations made at the Inquiry and in writing. The report includes conclusions and recommendation, along with a schedule of conditions to be considered in the event that planning permission is granted.

THE SITE AND ITS SURROUNDINGS²

6. The application site (2.78 hectares) was formerly occupied by Ministry of Defence residential accommodation and is now a substantial area of overgrown scrubland. The only structures on the site are an electricity substation and a former cinema, which is now used as a Scout Hut³.
7. The site is accessed at two points off Aldermaston Road, and from Almswood Road. There are a series of informal paths across the site, and a formal footpath on the southern boundary.
8. The site is within the defined settlement of Tadley, and is bounded by Aldermaston Road (the A340) to the north and northeast⁴. There are residential areas to the west and southwest of the site, and bank premises to the southeast⁵. The Tadley District Centre (including a supermarket) is to the south of the site.

² More fully described in the Planning SOCG Section 2

³ Photographs of the site at APP/12 Annex 4

⁴ Plan APP/4 shows the site in its context, including AWE

⁵ Incorrectly referred to as southwest in the Planning SOCG

9. Immediately beyond the A340, and extending for a considerable distance, is the AWE site. There are comparatively new housing developments on the opposite side of the A340, known as Kestrel Mead and Falcon Fields. These are slightly closer to AWE than the application site.⁶
10. Aside from AWE itself (which employs 5,530 people⁷), the wider area includes other employment uses, most notably at Calleva Business Park further along the A340 to the west. Public transport access to the Business Park, and to Basingstoke to the south, is by way of buses which run along the A340.

RELEVANT PLANNING HISTORY AND THE SITE ALLOCATION⁸

11. The Planning SOCG sets out the detailed planning history of the site. There have been a number of applications which have been withdrawn, including proposals for residential development and a foodstore. There are no extant permissions affecting the site.
12. Following the release of the land by the Ministry of Defence and the demolition of the former residential accommodation, the site was identified for residential development in a Brief adopted in December 1996⁹.
13. Following several years of preparation and consultation, the LP was adopted in July 2006. The site was allocated for mixed residential and employment use¹⁰. This policy was 'saved' by Direction in June 2009¹¹.

THE APPLICATION AND ITS HISTORY¹²

14. The proposal is for the demolition of the electricity substation and the former cinema (now the Scout Hut) and the redevelopment of the site for residential and commercial purposes. The substation would be relocated on the western side of the site, close to Almswood Road¹³. Planning permission was granted¹⁴ in September 2009 for a new scout den off the site in Southdown Road, and this would be implemented under the terms of a Planning Obligation (November 2010) submitted with the current proposal¹⁵.
15. The residential development would comprise 115 dwellings, including 40% affordable housing. The density of the development equates to c.41 dwellings per hectare, and 185 car parking spaces would be provided. The parties agreed that a reasonable assumption was that the resident population would be 268 people, and this figure was used throughout the Inquiry. The access to the majority of the residential element would be by way of two new access roads off Almswood Road.

⁶ Framework Plan at end of LPA/6 bundle shows the extent of AWE, and Opportunities and Constraints Plan shows the location of the new Pegasus project

⁷ HSE/11

⁸ More fully described in the Planning SOCG Section 2

⁹ Core Document 15

¹⁰ Core Document 3 Policy D3.17

¹¹ Core Document 4

¹² More fully described in the Planning SOCG Sections 4 (proposal) and 5 (consideration to date)

¹³ Plan no.189A60 12 D

¹⁴ Core Document 19

¹⁵ Doc 9, Section 10

16. The commercial floorspace would comprise 945 sq.m. of Class B1 accommodation, in the form of a 3-storey linked block, with 26 parking spaces. The access to the commercial development would be from Aldermaston Road, by way of the existing entrance – which would also serve the apartment blocks and some existing uses adjacent to the site.
17. There would be a new public open space (1,600 sq.m.) in the central part of the site and a local area for play (400 sq.m.) The existing footpath along the southern boundary of the site would be upgraded.
18. The application was submitted in November 2007 and registered as valid in the next month. It was reported to the relevant Committee in July 2009, and was recommended for refusal by officers for reasons related to public safety and the absence of a legal agreement related to financial contributions and affordable housing¹⁶. The Committee was minded to approve the application, and notice was duly given to HSE (who had Advised Against the proposal). The Secretary of State issued an Article 14 letter in July 2009, advising the Council that it could not approve the application at that stage.
19. The application was reported back to the Committee in February 2010¹⁷. Officers recommended refusal for essentially the same reasons. The Committee determined that it was minded to approve the application, subject to the completion of a Section 106 agreement covering specified matters. Putative reasons for approval were set out¹⁸.
20. The application was 'called in' for the Secretary of State's decision on 4 March 2010, by a determination under section 77 of the Town and Country Planning Act 1990.

POLICY CONTEXT¹⁹

21. The development plan comprises the South East Plan (2009)²⁰ and the saved policies in the Basingstoke and Deane Local Plan (LP)²¹. During the course of the Inquiry the South East Plan reverted to development plan status following the judgement of the High Court, although the Secretary of State's intention to abolish Regional Strategies is a material consideration. The main relevance of the South East Plan in this case relates to housing land requirement²².
22. Planning policy related to the proposal is reviewed in the Planning SOCG. Along with the allocation of the application site, to which reference was made above, the main policies are summarised below.

¹⁶ Core Document 32

¹⁷ Core Document 32 – NB the reports are dated January 2010, but the meeting was postponed due to bad weather

¹⁸ Planning SOCG para 6.6

¹⁹ More fully described in the Planning SOCG Section 2

²⁰ Core Document 6

²¹ Core Document 4

²² Other South East Plan policies set out in APP/12 Appendix 1

South East Plan

23. The housing land requirement is set out at policies H1 and WCBV3²³ at 945 dwellings per annum for the period 2006-2026. There is no phasing of the delivery of the housing numbers over the plan period.

Basingstoke and Deane Local Plan

24. The LP includes a range of relevant policies dealing largely with uncontentious matters (as will be discussed below)²⁴. The phasing of residential development is dealt with at policy D2, whilst policy D3.17 deals specifically with the application site. Affordable housing and infrastructure contributions are covered largely by policies C2 and C1. Other policies deal with the built environment, community facilities, employment, accessibility, and infrastructure.
25. In relation to the risks to human health, the recommended reasons for refusal put forward by Council officers referred to LP policies E1 and D5. These deal in general terms with the need to minimise pollution and for development to contribute to environmental well-being.

Supplementary Planning Guidance/Documents

26. There are a range of Supplementary documents²⁵, dealing with issues including affordable housing and infrastructure contributions. None of these deal with the health issue, which is the key matter in dispute in this case.

Emerging local planning policy

27. Emerging local planning policy is at an early stage, and the Local Development Framework Core Strategy has yet to reach the stage of a pre-submission draft. There are currently no material policies²⁶, as was accepted by the Applicant and the Council.

Policy and guidance related to hazardous substances

28. It is common ground between the three main parties that PPS23 '*Planning and pollution control*' is relevant. This sets out that the impact on health is capable of being a material consideration, and deals with the commitment to the precautionary principle²⁷.
29. Circular 04/00 '*Planning controls for hazardous substances*' is also directly relevant. Amongst other matters, this sets out consultation arrangements²⁸ and deals with the role of HSE²⁹.
30. HSE placed weight on a number of national nuclear policies. In particular reference was made to the '*Fourth Report on Compliance with the Convention on Nuclear Safety Obligations*³⁰', and the Statement by the Secretary of State

²³ Core Document Sections 7 and 21

²⁴ Planning SOCG paragraph 4.4

²⁵ Planning SOCG paragraph 4.4

²⁶ LPA/9 para 3.6 and LPA/11 para 115

²⁷ Paragraphs 2 and 5

²⁸ Annex A12-A18

²⁹ Annex A1-A9

³⁰ APP 9 Appendix 8 Esp. Paragraph 17.28

for Energy in March 1988 dealing with demographic criteria – the 'Hansard Policy'³¹. The Applicant and the Council both noted that these documents refer to nuclear power stations (as accepted by HSE) and argued that the policies are not directly applicable to sites such as AWE.

31. The Off Site Plan³² sets out the contingency arrangements for a multi-agency response should a radiation emergency occur at AWE and pose a hazard to the public outside the site boundary. The production of this Plan is a requirement of the Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPiR).

OTHER AGREED FACTS

32. There are a range of agreed matters between the Council and the Applicant³³. These include the principle of residential/commercial development and the fact that the scheme accords with the LP site allocation, the acceptability of the replacement community facility and the open space provision, noise issues, biodiversity considerations, drainage and flooding issues, sustainability, design and layout, the effect on neighbouring properties, and vehicle and pedestrian access. HSE have also agreed certain planning issues³⁴. There is also agreement (between the Applicant, the Council and HSE) on the factors relating to the derivation and generation of population numbers for the area around the AWE³⁵.
33. There is also agreement³⁶ between the Applicant and the Council on the housing mix and affordable housing provision, along with infrastructure contributions. These matters had formed a reason for refusal as recommended by Council officers, but the issue has subsequently been resolved to the Council's satisfaction by the Unilateral Undertaking³⁷.

THE CASE FOR THE APPLICANT³⁸

Overview

34. The effect on human health is clearly a material consideration. C04/00 states that HSE's role is specific to its area of expertise. It is an advisory role which does not extend to broad planning matters, which are the responsibility of the planning authority and ultimately the Secretary of State³⁹. Its advice is limited to the nature and severity of the risks. However in this case HSE sought to question the Council's evaluation of housing matters – in doing so it exceeded its role.
35. The decision maker must give careful consideration to HSE's advice. If that is done, HSE should consider its role to be discharged. There was detailed consideration of HSE advice at the Inquiry and, despite that, the Council's view

³¹ HSE/21 Appendix A.2

³² Core Doc 33

³³ Planning SOCG paragraphs 7.21 - 7.46

³⁴ HSE/2

³⁵ Population SOCG

³⁶ Planning SOCG paragraphs 7.23 - 7.26, 7.47 – 7.64

³⁷ Doc 9

³⁸ The case given here is an edited version of the closing submissions at APP/13

³⁹ C04/00 Annex A

remained the same - that the advice is not such as to justify refusing planning permission.

36. C04/00 deals with the general principles for development in the vicinity of hazardous installations⁴⁰.

Risk and hazard

37. The relevant risk is the residual risk which remains after all reasonable practicable measures have been taken to ensure that the installation is safe. Specifically, the requirement on AWE is to make the risk as low as reasonably practicable (ALARP).
38. Some HSE witnesses seemed initially reluctant to accept that the current operations at Aldermaston were ALARP, on the basis that improvements to the facility are being considered. But the ALARP obligation is currently met and for the purposes of land use planning the relevant risk is therefore that which remains after ALARP⁴¹.
39. HSE's approach focussed entirely on consequences not risk. HSE accepted that the 'reasonable foreseeability' test was consequence based and not risk based⁴². This is an obvious omission from the advice which HSE has given. It is necessary to consider both the risk of the initiating event and the risk of the consequences of the event. The REPPIR approach is designed to put emergency procedures in place, and should not be confused with the primary consideration of the likelihood of the event.
40. There can be no doubt that the residual risk is a very low one. HSE say the risk of the hazard occurring is a "very low probability.....because of the rigorous safety precautions taken on site"⁴³. AWE state that it is unlikely that there will ever be a major release of radioactivity⁴⁴.
41. There are appreciable risks of various kinds in the environment which contribute to a background level of risk⁴⁵. It is in this context that the very low level of residual risk at AWE should be considered.
42. The risk in this case does not relate to a potentially large number of casualties, but is a remote risk to a small number of people over their lifetime⁴⁶. It is not numbers but the proximity to the installation that is the material consideration⁴⁷. There is nothing vulnerable about the occupiers of the proposed development, other than that they would live close to the installation – they are not a 'vulnerable group' as defined in the Off Site Plan.

⁴⁰ C04/00 Annex A4

⁴¹ Accepted by Dr Highton in XX, although he accepted that this exercise had not been carried out

⁴² Accepted by Dr Highton in XX

⁴³ HSE/18 Paragraph 7.3

⁴⁴ HSE/8 Section 7

⁴⁵ As demonstrated in HSE's publication *Reducing Risks and Protecting People APP/8*

⁴⁶ Dr Lacy in XX

⁴⁷ Mr Saunders in XX

The safety of AWE

43. AWE operates on the basis of the twin approaches of Defence in Depth and the application of the Precautionary Principle. The emergency plans at AWE are approved through the HIRE as adequate to deal with all reasonably foreseeable events⁴⁸. Most identified potential faults at AWE would not result in any release of particulate radioactivity to the air, by virtue of the prevention, mitigation and protection measures in place⁴⁹.
44. Only a major fire engulfing a whole building or areas which store significant quantities of nuclear material would have consequences triggering emergency arrangements off the AWE site⁵⁰. Such fires are within the concept of accidents considered to be "reasonably foreseeable", being initiated by lightning strikes, drops, impacts or human errors. However it is extremely unlikely that there will ever be a major release of radioactivity from AWE⁵¹.
45. The emergency plan has the capacity to deal even with extremely unlikely accidents which could have consequences beyond the boundary of the DEPZ – this is the principle of extendibility. The plan can therefore deal with radiation emergencies that are not reasonably foreseeable⁵².

'The Rules are the Rules'

46. This was a recurring theme of HSE which resulted in paradoxical conclusions.
47. Part of HSE's approach sought to establish a numerical breach of the semi-urban criterion, and HSE put forward the argument that this was, in itself, a sufficient reason for objecting. But this strict quantitative analysis is not the approach that should be adopted, especially as HSE agrees that there is no bespoke Government policy applying to installations like AWE and other legacy sites. It also conflicts with HSE's acknowledgement that the Hansard criteria should be applied flexibly and is only for guidance.
48. HSE uses multiple points of origin for their calculations⁵³. But this makes no sense when there are specific known locations for the existing installations and where future development at AWE would not be located so as to put the existing residents near the site perimeter at a significantly greater risk.

Fear of the unknown

49. HSE knows where the sources of potential radioactive emissions are at present at AWE and where they are likely to be in future, but has not released this information on grounds of national security. It has not chosen to present this evidence in camera as was the case at the Oval Inquiry. He who asserts must prove, and HSE must accept the consequences of not doing so.

⁴⁸ HSE/8 2008 HIRE Page 3

⁴⁹ HSE/8 2008 HIRE Page 11

⁵⁰ HSE/8 2008 HIRE Pages 11/12

⁵¹ HSE/8 2008 HIRE Page 13

⁵² Core Doc 34 Paragraph 8

⁵³ HSE/21 Appendix K

50. A great deal more was known by the end of the Inquiry about the particular location of the nuclear activities at AWE. This was first discovered at the interim site visit both visually and from what AWE willingly disclosed. In addition, planning applications and permissions already in the public domain have revealed more detail.
51. This new information was analysed by the Applicant⁵⁴. Even apart from the fundamental point that the weighted population analysis is not risk informed, the Applicant's supplementary evidence demonstrated that HSE's multiple points of origin approach is wholly unrealistic.
52. In addition, if proposed new installations (especially the Pegasus project) are treated in accordance with Hansard policy, and given that HSE's approach is normally not to allow a new installation to breach those criteria, then HSE must have concluded that the new installations could go ahead without unacceptable risk to the existing population. Any future installations would also have to pass the same safety test. There is an existing population closer to the site than the proposed development and this provides a safety net for any further development.

Evacuation and dosage

53. The evidence is that evacuation might take place up to 400 metres from any breach, but that beyond this the dose drops and would not justify evacuation. It follows that the maximum distance at which one could get 30mSv would be 400 metres, and beyond that distance countermeasures will need to be taken but evacuation would not normally be needed. This is stated in the Off Site Plan⁵⁵.
54. Largely based on the facts obtained from the visit to AWE, the minimum distance between the nuclear area and the proposed development was calculated to be 740 metres. If the maximum effective dose that could be received at 400 metres is 30mSv, the maximum that could be received at 740 metres is 11.9mSv or less. The concern about the 30mSv dose would therefore not apply to the proposed development.

The extent of the DEPZ

55. HSE argued that the Applicant's case was at fault because it cast doubt on the justification for the size of DEPZ. HSE argued that if the Applicant's assertions about dose were correct, this would be at odds with the 3km DEPZ, which they say has been properly set and reviewed with reference to reasonably foreseeable radiation emergencies⁵⁶.
56. However the 3km DEPZ was defined historically and there is no evidence that it was determined by the REPPIR definition of a radiation emergency. The DEPZ was agreed with the Ministry of Defence in 1993 but there is no evidence as to how it was determined. In 2002 a HSE report⁵⁷ stated that there was a clear margin between the foreseeable scenario 5mSv zone and the quoted DEPZ. The

⁵⁴ APP/9 – first and second supplemental proofs

⁵⁵ Core Doc 33 Esp. Paragraphs 3.6.3b; 5.4.1; 5.4.2b

⁵⁶ HSE/20 Second rebuttal Paras 2.24/2.25

⁵⁷ HSE/13

report referred back to 1998 documents which concluded that the DEPZ could be reduced to 1.5km.

57. In any case, the Applicant's position does not depend upon showing that the DEPZ is too extensive, as the DEPZ serves a different purpose and is there to deal with emergency procedures. It does not deal with the probability of the risk. Consequently it is HSE'S case which is dependent on the extent of the DEPZ.
58. Analysis⁵⁸ of a 2008 Review of AWE Accident Fault Sequences⁵⁹ deals with a review of the major off-site releases which could give rise to an off-site dose exceeding 5mSv. The conclusion of that analysis was that the total frequency of reasonably foreseeable events may be substantially higher than once in 100,000 years, but this would be due to the inclusion of events with lower (or negligible) off-site consequences.
59. The largest effective dose that might be incurred 400m downwind of a reasonably foreseeable accident, with a frequency of around once every 100,000 years, is approximately 30mSv. The dose varies with distance⁶⁰. The shortest distances between southernmost points of facilities 1 and 2 and the nearest residence on the proposed development are 606m and 787m – the corresponding doses would be only 16mSv and 11mSv.

Summary of the Applicant's case

60. This sustainably located, LP allocated, previously developed site should be released. The proposed redevelopment would result in very substantial planning benefits, and be entirely in accordance with development plan policy. Without HSE's objection, planning permission would long since have been granted and the development would have been built.
61. The proposal is entirely in keeping with such Government policy as exists regarding siting around a nuclear facility such as AWE. It would:
 - Preserve the general characteristics of the population around AWE.
 - Not infringe any applicable limitations on population density.
 - Not prejudice the operation or effectiveness of the Off Site Plan.
 - Bring very substantial planning benefits.
 - Not create a precedent.

HSE's objection

62. It is Government policy that the general characteristics of the population around a licensed nuclear facility such as AWE should be preserved for the life of the facility.

⁵⁸ Set out in HSE/23 Paragraphs 51-55

⁵⁹ HSE/14

⁶⁰ Table at HSE/23 Page 16

63. This is a broad and generally qualitative objective which does not require the refusal of new development in the vicinity. This broad objective is not infringed in the present case because:
- The site is an infill site within Tadley, whose proposed re-development will be broadly consistent with land use in the immediate area. It previously housed an MoD hostel.
 - Once the reduction in household size over the next few years is taken into account, the application scheme will, at most, result in only a very minor increase in the population of the DEPZ⁶¹ - about 0.5% in the population in this part of the DEPZ. Even this assumes that the other allocated site in Tadley (between Mulfords Hill and Silchester Road) is delivered – but it is not in fact available⁶².
 - The Council's evidence⁶³, which was scarcely challenged, was that the population of the DEPZ has barely changed in the 12 or more years since licensing. The development would result in a very modest increase in population of the total DEPZ population - about 1.5%⁶⁴.
 - Natural growth in the relevant area will lead to an additional 383 people in the period to 2016, which generates a need for an additional 25 or so new homes in each of the 7 years being considered⁶⁵.
 - The site currently accommodates between 30 and 80 people a day – in the form of visitors to the Scout Hut. These people would be relocated more than 500 metres to the south of the site.
 - HSE is correct that the broad objective of preserving general site characteristics would be infringed in the event of what is called 'uncontrolled residential development'⁶⁶. But that is not the historical position or a description of the consequences of the current proposal. The Applicant and the Council agree that the general characteristics of the population around AWE have barely changed since licensing in 1997 and will not materially alter if the development goes ahead.
64. It is important to put the risk which forms the basis of HSE's concerns into context. Once this is appreciated, it is clear that it is grossly disproportionate to suggest that the development would be unsafe. It is common ground that the main safeguards to the public are derived from the design, construction and operation of the relevant nuclear facilities, and that there is no chance at AWE of either a nuclear explosion or a reactor meltdown.

⁶¹ Detailed analysis at HSE/23 Paragraphs 61 (2)

⁶² APP/12 Annex 2 Pages 14/15

⁶³ LPA/7 Appendices 4 and 5

⁶⁴ Details at APP/23 Paragraph 61 (4)

⁶⁵ LPA/7 Paragraph 5.8

⁶⁶ HSE 21 Paragraph 35

65. HSE'S case is based on consequences and does not accept that the level of risk is relevant. HSE hides behind the concept of "reasonable foreseeability". As was accepted⁶⁷, a general benchmark for reasonable foreseeability is an initiating event occurring once in 100,000 years. This is a risk which can be described as miniscule.
66. This miniscule risk is further reduced (to around 1 in 1,000,000 years) when account is taken of prevailing wind direction and mean wind speeds. The consequences of an accidental release would be likely to be experienced elsewhere than at the application site. The prevailing wind blows away from the application site and the mean wind speed is well above the 2 m/s assumed in most calculations. This would increase plume dilution⁶⁸.
67. In addition, the current position of HSE is very different to their approach for many years after licensing, when they took a relaxed view and their consultation criteria only covered applications likely to result in 20 new residents or more. Although proposals were referred to them, none led to a public safety objection. For example, there was no objection to the Kestrel Meads development, which is nearer AWE than the application site.
68. HSE's new stance reflects a review of demographics which it conducted following adoption of the LP⁶⁹. It does not reflect a revised judgement of the safety of AWE, a revised risk profile, or concerns from an emergency preparedness perspective.
69. It is surprising that HSE began to try to distance itself at the Inquiry from the REPPiR leaflets which AWE has been distributing to residents of the DEPZ in recent years. HSE has seen these leaflets and at no time prior to the Inquiry has it sought to suggest that they were inaccurate. In any event the general message in these leaflets – that residents are safe and that there is a very low risk of any harmful event at AWE – was not disputed by HSE⁷⁰.
70. HSE used the "reasonably foreseeable" benchmark in order to characterise the level of risk. But this says nothing about the assumed frequency of an event. "Reasonably foreseeable" is not defined numerically in REPPiR, but it is described as an event "which was less than likely but realistically possible"⁷¹.
71. It is not helpful to attempt to make comparisons about the relative risk of other nuclear installations having regard to the extent of their DEPZs.

Consequences of an incident

72. It would plainly be undesirable for people to receive a 30mSv dose of radiation. However it is important to consider that:
 - The figure assumes that no countermeasures are taken, whereas it is common ground that sheltering will substantially reduce the dose⁷².

⁶⁷ Dr Lacey accepted in xx

⁶⁸ APP/9 Section 5.6

⁶⁹ HSE/21 Paragraphs 13/14

⁷⁰ Dr Lacey in xx

⁷¹ Core Doc 34 Paragraph 50

⁷² APP/5 Page 5

- A dose of 20mSv is the annual legal worker dose limit⁷³.
73. When this is combined with the very low risk of an accident, it is apparent that the risk to an individual living on the site of developing a fatal cancer because of a radiological release from AWE is miniscule in terms of all the carcinogenic exposures of ordinary life⁷⁴. The substantial planning benefits of this proposal clearly outweigh the risks and their consequences.

Population density and the Hansard policy

74. HSE argues that the application should be assessed with reference to the population density criteria set out in the Hansard policy. However this is directed only at nuclear power stations and there is no government statement applying the policy to other nuclear installations. HSE agreed⁷⁵ that there is no specific Government policy dealing with a legacy site such as AWE.
75. HSE misquoted⁷⁶ the Minister's 6 June 1961 letter by substituting the words "a nuclear facility" for "the stations"⁷⁷. This is clear evidence of a belated appreciation by HSE that the alleged sources of Government policy on which they rely in fact relate only to nuclear power stations. In addition, the passage from the Draft National Policy Statement quoted by HSE⁷⁸ only deals with nuclear power stations⁷⁹. Other documents put forward by HSE do not support the use of the Hansard policy in the current case⁸⁰.
76. There are good reasons why it would be unreasonable for the full rigour of the Hansard policy (in particular, the population density criteria) to be applied in the current case. In particular, the consequences of a major accident at a nuclear power reactor would be very considerably worse than the worst accident that can be imagined at AWE. This justifies a less rigorous approach to population densities.
77. In any event there is no proper basis on which it can be said that the application scheme will result in, or exacerbate, a breach of the population density criteria in Hansard. There is no calculation based on a point of origin at the centre of the DEPZ - which was the approach used by HSE in its first consultation responses to the Council, and which was used in relation to the Shyshack Lane appeal⁸¹ - which shows the Hansard criteria being infringed.
78. HSE then changed tack and used a "multiple point of origin" analysis. But there is no Government policy supporting the use of this approach.
79. AWE is entitled to hold radioactive material anywhere within the site boundary and HSE argues that the location of potential radioactive source areas effectively amounts to the whole of the licensed site. However AWE's current and future activities are all subject to limitations imposed through its regulatory

⁷³ APP/5 Page 8

⁷⁴ APP/8 Appendix 4

⁷⁵ Dr Lacey in xx

⁷⁶ HSE/21 Paragraph 28

⁷⁷ Full text at HSE/21 Appendix C

⁷⁸ HSE/21 Paragraph 34

⁷⁹ Full text at HSE/21 Appendix F

⁸⁰ Details at APP/13 Paragraphs 67d-f

⁸¹ Doc 10

licences. Such limitations have no doubt been devised having regard to the location of existing population around the site, and it is impossible to see how development of the application site would alter the approach in any way.

80. In any event the Hansard Policy clearly states that its numerical criteria are “only for guidance” and that “other unquantifiable factors” would also need to be “taken into account”⁸². This type of numerical analysis may be guidance which informs decision making, but it cannot be the single and determinative consideration.

Planning for off-site emergencies

81. The Off Site Plan is fit for purpose and has been endorsed by all the organisations involved – including HSE⁸³. At the Inquiry HSE appeared to distance itself from the Off Site Plan⁸⁴. However HSE is a member of the Off Site Plan Working Group and observes exercises⁸⁵. If the Off Site Plan was inadequate, this would likely contravene both REPPIR and the AWE site licence, both of which HSE is charged with policing.
82. The Off Site Plan is designed for both resident and transient populations within the DEPZ⁸⁶, and would not be compromised by fluctuations in population levels. Accordingly an increase of 268 people will not compromise it⁸⁷. The Plan addresses the “extendibility” scenario whereby an incident might impact on the community beyond the DEPZ⁸⁸. This is accepted by HSE⁸⁹ and the Council⁹⁰, and it is noted that there is no maximum population beyond which the Plan ceases to be functional.
83. A further key consideration on these matters arises from the Applicant’s population counts⁹¹. There is a population of 3,695 people in sector J where the application site is located, and 4,865 in adjoining sector H. The application site is therefore not located in the highest population sector. If the Off Site Plan will work for sector H there is no reason to think that it will not work for a sector which contains materially fewer people.
84. It is common ground that an evacuation would not be called during an active release of radiation⁹². The most effective early counter-measure is to shelter indoors⁹³. Evacuation would normally be considered either prior to any exposure risk⁹⁴ or following the ‘active plume’ phase, once the pollutants have stabilised⁹⁵. In any event there is nothing to show why or how any planned evacuation would be prejudiced by the development.

⁸² HSE/21 Appendix A2

⁸³ APP/10 Paragraphs 3.21 and 4.23

⁸⁴ HSE/20 Paragraphs 3.2.9 and 4.2.1

⁸⁵ HSE/20 Paragraphs 3.2.5 and 3.28

⁸⁶ APP/10 Paragraph 3.10

⁸⁷ APP/10 Paragraph 4.30

⁸⁸ APP/10 Paragraph 3.19

⁸⁹ HSE/20 Paragraph 3.1.2

⁹⁰ LPA/8 Paragraphs 2.10.8 and 2.11

⁹¹ APP/11 2 x A3 sheets. 22.5 degree emergency planning sectors, not 30 degree Hansard sectors

⁹² APP/10 Paragraphs 3.13, 4.33 and 4.35; HSE/20 Paragraph 4.4.2

⁹³ Core Doc 33 Paragraph 3.6.3

⁹⁴ HSE/19 Paragraph 41

⁹⁵ APP/10 Paragraph 4.38

85. 'Spontaneous self-evacuation', by persons who want to leave the area despite the advice to shelter, is catered for within the Off Site Plan⁹⁶. Given that the development as a whole will only increase traffic flows in the local road network by about 2%⁹⁷, such self-evacuation will not hamper the emergency services, who are very familiar with the logistics of evacuation.
86. (Submissions were made on the representations from members of the Off Site Plan Working Group⁹⁸.)

Precedent

87. HSE's letter which secured the call-in of the application alleged that it would have "serious precedential implications", but this argument appears to have vanished entirely, and there was no challenge to the Applicant's evidence on this issue⁹⁹.
88. There would be no precedent set due to the particular benefits and wide public advantages of this scheme, which would outweigh the miniscule risks to which HSE points. It is impossible to identify any other site within Tadley that would be capable of delivering the scale of planning benefits which the scheme will provide.
89. The only other allocated site in Tadley has a capacity of around 40 units, but it is unavailable and undeliverable¹⁰⁰. Other sites have very serious suitability/availability/deliverability problems¹⁰¹. Tadley has a very tightly drawn development boundary and any development outside the area would be contrary to development plan countryside policies¹⁰².

Alleged prejudice to future operations at AWE

90. HSE put the suggestion to the Applicant (though not to the Council) that the current proposal would prejudice AWE's future operations. No weight should be given to this suggestion which was not raised by AWE in their consultation response.
91. AWE is a 267 hectare site, and it is far fetched to suggest that AWE's future operations would be hampered by the current proposal, especially as there are residents closer to the AWE boundary than the application site.

The development plan and planning benefits

92. (Submissions were made regarding the status of the South East Plan, as matters stood at that time, emphasising that it remains part of the development plan¹⁰³.)

⁹⁶ Core Doc 33 Paragraph 5.7.4

⁹⁷ Transport Assessment Paragraph 9.4

⁹⁸ APP/13 Paragraph 71

⁹⁹ APP/12 Section 11

¹⁰⁰ APP/12 Annex 2 Pages 14/15

¹⁰¹ APP/12 Paragraph 11.9 and Annex 3

¹⁰² APP/12 Plan DB1 and Paragraph 11.12

¹⁰³ APP/13 Paragraphs 77-79

93. The proposal is a mixed use scheme which would make efficient use of an underutilised, sustainable PDL site. It accords with the LP allocation in policy D3.13. HSE suggests that little weight should be given to this allocation, as the current detailed objections of HSE were not considered at the time of initial allocation or subsequent 'saving'¹⁰⁴. However HSE has only itself to blame as it appeared to have taken the view that it was unnecessary to respond when consulted during the LP process¹⁰⁵. The Council and the LP Inspector approached the allocation on the basis that HSE did not have objections.
94. The application scheme complies fully with the relevant design, transport, housing mix and density policies. Notably:
- Tadley generally and the site itself are sustainably located – LP policy D5¹⁰⁶. There is a good bus service to Basingstoke and the site is close to employment¹⁰⁷. It is the best site for sustainable development in Tadley¹⁰⁸.
 - The development of this PDL site entirely accords with national and local policy¹⁰⁹.
 - The scheme complies with the requirements for a high quality and inclusive design.
 - The proposed density (41 dwellings per hectare) is wholly appropriate and would be an efficient use of the site.
95. The application scheme would deliver a range of community benefits, which will not be achieved without the comprehensive redevelopment of the site:
- The proposal will redevelop a longstanding derelict site close to the centre of Tadley¹¹⁰.
 - The proposal will ensure the replacement of the existing Scouts facility, which is of "relatively poor quality"¹¹¹, with a new community facility¹¹².
 - The proposed employment provision will enhance the existing provision of commercial property in Tadley¹¹³.
 - The proposal will secure the significant enhancement of a public footpath¹¹⁴.
 - There will be two new areas of Public Open Space within the site, accessible both to residents of the scheme and other local residents. There are no such facilities in this part of North Tadley¹¹⁵.

¹⁰⁴ HSE/21 Paragraph 6.13

¹⁰⁵ HSE/21 Paragraph 6.9

¹⁰⁶ Core Document 3 Policy D5

¹⁰⁷ APP/12 Plan DB1

¹⁰⁸ APP/12 Paragraph 7.10

¹⁰⁹ Core Document 3 Policy D2

¹¹⁰ Photographs at APP/12 Annex 4

¹¹¹ Doc 8 Planning SOCG Paragraph 7.65

¹¹² APP/12 Paragraphs 7.21 – 7.23

¹¹³ Doc 8 Planning SOCG Paragraph 7.7

¹¹⁴ APP/12 Paragraphs 7.37

¹¹⁵ Doc 8 Planning SOCG Paragraph 7.35

Market housing

96. The application scheme will contribute towards the provision of market housing in the second largest settlement in the Borough. In light of the potential revocation of the RSS, it is not possible to identify a single housing requirement figure – a range of different possible figures have to be considered, with weight attached to each¹¹⁶.
97. The range of possible requirement figures are:
- The South East Plan requirement of 945 p.a. for 2006-2027. This figure derives from a plan which was 'sound' when it was published. It is evidence based and significant weight should be attached to this figure.
 - A requirement of 825 p.a. for 2006-2027. This is referenced in the GOSE letter¹¹⁷ and was an initial figure which was subsequently uplifted.
 - A locally generated need based requirement of 790 p.a. The July 2010 Planning and Infrastructure Overview and Scrutiny Committee Report is an up to date analysis which supports this figure¹¹⁸.
 - 740 p.a. - whether over the period 2011-2027 or 2006-2027. This is the bottom end of the possible range, and the figure to which least weight should be given. It reflects an officer recommendation for the proposed adoption of an 'interim' requirement. But it is unknown whether this recommendation would survive the gathering of an evidence base, public consultation, and independent scrutiny during examination of the relevant DPD¹¹⁹. This figure can be given no material weight.
98. The Council suggests that there is a housing land supply of 3,331 in the relevant 5 year period, whilst the Applicant suggests it is 2,583 (excluding the application site). The differences relate to 5 sites¹²⁰.
99. When comparing requirements and realistic supply, there is a deficit no matter what requirement figure is considered¹²¹. If the Applicant's supply figure of 2,583 is used, the extent of the shortfall ranges from 1,917 using 945 p.a. (equating to only 2.87 years supply) to a deficit of 572 using 740 p.a. for the whole period 2006-2027 (equating to 4.09 years supply). Even if the Council's supply figure of 3,331 is used, there would be a deficit in all cases, other than if using a requirement of 740 p.a. for the whole 2006-27 period. This requirement can be given no weight.
100. Leaving aside the 740 p.a. figure for 2006-27 period, on any other basis there is a substantial deficit as against the 5 year requirement, and the only issue for debate is the extent of the deficit. This is a clear case where favourable consideration is advised in PPS3.

¹¹⁶ APP/12 Annex 2 update

¹¹⁷ Core Doc 28

¹¹⁸ APP/12 Rebuttal Appendix 3

¹¹⁹ Further commentary on this figure at APP/13 Paragraph 88 (4)

¹²⁰ Details at APP/12

¹²¹ APP/12 Annex 2 update

Affordable housing

101. The application scheme will provide 46 units (40%) of affordable housing in line with the LP¹²²:
- There is a massive unmet need of between 580 and 920 affordable units in the Borough¹²³. There is a shortfall in affordable provision over the last 5 years of 972 units, as against the lowest end of the range¹²⁴.
 - There is no prospect that completions in the short and medium term will address this shortfall or the identified level of need for future years¹²⁵.
 - Within Tadley, the position is worse. There have been no affordable housing completions since 2005/6¹²⁶ and extant planning permissions (as at April 2009) do not include any sites that will provide affordable units¹²⁷. There is an annual need for 23 units in Tadley¹²⁸. Aside from the application site, there is only one site in Tadley which is large enough to attract a requirement for affordable housing provision (land between Mulfords Hill and Silchester Road) - this is unavailable and undeliverable¹²⁹.
102. HSE states that the Council has substantially exceeded its 'objective' of providing at least 300 affordable units a year in each of the last two years¹³⁰. But this objective is a policy constrained figure and does not reflect the agreed actual level of affordable housing need in the District. It would also be wrong to place undue weight on the numbers of affordable units completed in 2007-2009. This was a time when developers prioritised affordable units to aid cashflow, and when significant additional funds were available to help offset the decline in the private housing market¹³¹.
103. The opportunity to deliver much needed affordable housing in Tadley, the second largest settlement in the Borough, is a material consideration to which very significant weight should be attached.

THE CASE FOR THE COUNCIL¹³²

Initial contextual points

104. The Council supports this application. The site is located within the defined settlement boundary of Tadley and is sustainably located. The development would provide much needed market and affordable homes, small scale employment opportunities and new community facilities, whilst improving visual and environmental amenity¹³³.

¹²² Core Document 3 Policy C2

¹²³ Doc 8 Planning SOCG Paragraph 7.58 and Core Documents 21-23

¹²⁴ APP/12 Table 8.1 and Planning SOCG

¹²⁵ Summarised at ARR/13 Paragraph 92(2)

¹²⁶ APP/12 Table 8.2

¹²⁷ APP/12 Paragraph 8.18

¹²⁸ Doc 8 Planning SOCG Paragraphs 7.61/7.62

¹²⁹ APP/12 Annex 2 Pages 14/15

¹³⁰ HSE/21 Paragraph 11.2 referring to Core Doc 4

¹³¹ APP/12 Paragraph 8.9 and rebuttal Paragraph 9.2

¹³² The case given here is an edited version of the closing submissions at Doc LPA/11

¹³³ LPA/9 Paragraph 3.13

105. The appropriateness of the site for residential development has been recognised for many years¹³⁴. After extensive consultation¹³⁵, the site was allocated (2006) for mixed use development under LP policy D3.17. The policy and allocation was 'saved' in 2009.
106. The role of HSE is limited to providing evidence on what it considers to be safety issues. HSE have not dealt with such concerns in the context of other planning considerations¹³⁶. However the Council has carefully considered HSE'S arguments as part of the overall planning balance, in the context of development plan policy and relevant material planning considerations.

The approach of HSE

107. There are essentially four arguments from HSE. First, that it would not be sensible to put a substantial number of people in harm's way. Second, that the development would be harmful to the proper operation of emergency preparedness. Third, that the development would be contrary to principles of nuclear siting policy, and fourth that the development would breach population density criteria. There was also some limited criticism of the LP site allocation.
108. Even before consideration of the numerous substantial planning benefits, HSE's own assessment of the safety/risk arguments does not suggest that all areas in the vicinity of AWE should be development free zones¹³⁷.
109. HSE confirmed that the science and policy they relied on to support their opposition to the current application has remained exactly the same since at least 1997 when the AWE site received a licence¹³⁸. But HSE, when considering the Kestrel Mead proposal – some 46 dwellings located closer to AWE than the application site – chose not to object. In addition, in 2001 HSE considered that there was no basis for objecting on nuclear safety grounds for a large new food store on the current application site – and it was confirmed at the Inquiry that this would still be their position today¹³⁹. Until 2007 HSE did not even wish to be consulted on any development likely to involve less than 20 people¹⁴⁰.
110. HSE is not saying that if the proposal is built the Off Site Plan will not work. It is accepted as being fit for purpose and extendable¹⁴¹.
111. HSE has not ruled out the possibility of further facilities being allowed at AWE – even if such facilities were placed near existing housing outside the AWE boundary. That approach only makes sense if it is based on an understanding that the risks and consequences associated with such operations are not in fact so severe as to preclude the existence of residential development nearby.

¹³⁴ Doc 8 Planning SOCG Paragraph 3.1-3.3

¹³⁵ LPA/9 Paragraph 3.5

¹³⁶ Ms Jones and Dr Lacey in xx

¹³⁷ Dr Lacey in xx

¹³⁸ Dr Lacey in xx

¹³⁹ Dr Lacey in xx

¹⁴⁰ HSE/21 Appendix J1 Page J-2

¹⁴¹ HSE/18 Paragraph 8.3c and HSE/20 Second Rebuttal Paragraph 4.4

REPPIR, 'reasonably foreseeable' and risk

112. There are two related but distinct issues - the risk of an event taking place at all, and the nature of the hazard (i.e. if such an event takes place whether it is likely that a materially harmful radiation dose would be received by the public). HSE accepted that these must be evaluated as distinct issues, but HSE'S case was based solely on a consideration of consequences after an event rather than including the likelihood of an event¹⁴².
113. Potential confusion arises because the term 'radiation emergency' - which is central to the interpretation of the main REPPIR requirements - focuses on the consequences of an event and assumes that it is likely a member of the public will be exposed to ionising radiation in excess of any of the doses set out in the Regulations¹⁴³. The need for emergency plans derives from an assessment that a 'radiation emergency' is 'reasonably foreseeable', so these definitions are linked¹⁴⁴. The nature of the Regulations is that they deal with events that are highly unlikely to occur, and even if they did would be equally unlikely to cause any harm¹⁴⁵. The Regulations also require consideration of the consequences of an event based on the assumption that no health protection measures are taken for 24 hours afterwards¹⁴⁶.
114. Much of the difficulty arises due to HSE'S reliance on REPPIR, and an attempt to transpose it into a planning decision context. Overall, in the world of REPPIR, the assessment of consequences of potential events is not based on what will happen to prevent the event or any subsequent radiation exposure.
115. The REPPIR approach of 'reasonable foreseeability' does not assist in understanding the likelihood of the initial event. The HIRE has identified a major fire which engulfed a whole building as an event that might have consequences leading to the instigation of off-site emergency measures - but it indicates that such an event could only ever be considered a 'remote possibility'¹⁴⁷. Most accidents could not result in any release of radioactivity to the open environment and an accident that could cause this is 'extremely unlikely'¹⁴⁸.
116. It is essential to consider the likelihood of such an event ever taking place. It is not disputed that AWE operates in a way which is as safe as possible. The facilities on the site are carefully designed, built and operated in a manner that assures safe operation¹⁴⁹. There are numerous layers of protection on site which apply even before any off-site measures are contemplated¹⁵⁰.

¹⁴² Dr Lacey in xx

¹⁴³ Core Doc 34 Regulation 2(1)

¹⁴⁴ Core Doc 34 Regulations 7, 8, 9

¹⁴⁵ Core Doc 34 Paragraphs 97 and 102

¹⁴⁶ Core Doc 34 Regulation 2 (1) and Paragraph 103

¹⁴⁷ HSE/8 Section 6

¹⁴⁸ HSE/8 Sections 5 and 7

¹⁴⁹ HSE/8 Section 7

¹⁵⁰ HSE/8 Section 4

117. There is no dispute that such a residual risk is very low indeed and the possibility of a relevant event might properly be described as being extremely remote¹⁵¹.

The risk of harmful consequences

118. Even if such an extremely unlikely event takes place, the Off Site Plan states that "even the most serious incident that can be envisaged at....AWE....should not require the urgent evacuation of areas outside the site fence"¹⁵². Exceptionally "evacuation within the first twenty four hours might be necessary for areas up to 400 metres downwind from the site of the incident. Most of this area would likely be within the AWE site boundary"¹⁵³.
119. If such an event ever impacted on the application site, the REPPiR Handbook states that "there would be no immediate health effect caused by a release of radioactive material on members of the public following a serious incident at AWE. Staying indoors with the doors and windows closed would remove almost all the risk"¹⁵⁴. It was accepted by HSE that the contents of the Handbook – approved by the Off Site Working Group in the light of REPPiR requirements¹⁵⁵ – were 'not incorrect'¹⁵⁶.
120. In contrast HSE's position relies on various assumptions to paint a picture of what it describes as a 'reasonably foreseeable' dose of radioactive material to a member of the public - around 30mSv. This is said to be 'very hazardous to health'. Regrettable language was used which suggests that in a radiation emergency there would be serious radiological consequences to people in surrounding areas¹⁵⁷.
121. The 30mSv dose is what HSE uses to find unacceptable harm¹⁵⁸. But that dose is no more than the REPPiR Handbook confirms that a worker could legally receive in an 18 month period¹⁵⁹. The calculation of a 30mSv dose assumes no countermeasures were taken pursuant to the Off Site Plan – and HSE conceded that preventative measures would reduce the dose¹⁶⁰. It also assumes that persons would be downwind of any release. The dose could be significantly less if the wind was blowing the other way¹⁶¹.

Impact on emergency preparedness

122. HSE does not suggest that, if the development goes ahead, the Off Site Plan will not work, but rather that the development would provide additional challenges. However HSE accepts that the Off Site Plan is fit for purpose¹⁶² and fully REPPiR

¹⁵¹ APP/5 Page 1

¹⁵² Core Doc 33 Paragraph 3.6.3

¹⁵³ Core Doc 33 Paragraph 5.4.1

¹⁵⁴ APP/5 Page 5

¹⁵⁵ Doc 34 Regulation 16(1) and Schedule 9

¹⁵⁶ Dr Lacey in xx

¹⁵⁷ HSE/18 Paragraph 4.2

¹⁵⁸ Dr Lacey in xx

¹⁵⁹ APP/5 Page 8

¹⁶⁰ Dr Lacey in XX

¹⁶¹ Mr Robinson in xx

¹⁶² HSE/20 Rebuttal Paragraph 4.4

compliant¹⁶³. With that background, HSE'S case might have been assumed to be that the addition of some 268 persons would fundamentally undermine the emergency planning for the area even after any relevant review has taken place. But this cannot be the case because:

- An additional 268 persons represents only about a 2% increase in the population of the area in emergency planning terms.
- HSE has made it clear that they would not object to a development of a substantial supermarket, with a petrol station and over 200 car parking spaces on the site¹⁶⁴. That would obviously attract as many and probably more than 268 people onto the site.
- HSE confirmed that it was not their case that the additional persons would prevent the Off Site Plan from working¹⁶⁵.
- The Offsite Plan is already able to provide a basis for dealing with radiation emergencies that are not even reasonably foreseeable by being extendable¹⁶⁶.

123. The Benchmark Review of the Off Site Plan confirmed that it is a thorough piece of work which compares well with other plans that had been assessed¹⁶⁷.

124. The Off Site Plan has been regularly reviewed, tested and updated¹⁶⁸ as required by REPIR¹⁶⁹. It has very recently been tested and HSE confirmed that it met REPIR requirements¹⁷⁰. There is a statutory process in place which ensures that if, adaptation is necessary, the Off Site Plan would be reviewed and updated.

125. The Off Site Plan is only one of several layers of defence and must be viewed in that context. Defence in depth includes on site measures which are quite independent of the Plan and may themselves be adapted. In fact there will be no need for material change to the Off Site Plan or other arrangements if this proposal is allowed.

126. The Off Site Plan deliberately does not identify a maximum population above which it ceases to function, as it has a degree of flexibility already built in. That is because no one can say how many people are in the area at a given time – as large numbers of people regularly travel into and through the area on a daily basis. In that context an additional 268 persons will make no material difference to the Off Site Plan.

127. HSE's case appears to rest largely on the argument that the unpredictable nature of an emergency means that it is possible that countermeasures may not

¹⁶³ HSE 18 Paragraph 8.3(c)

¹⁶⁴ Dr Lacey in xx

¹⁶⁵ Dr Lacey in xx

¹⁶⁶ Core Doc 34 Paragraph 138

¹⁶⁷ LPA/5 Appendix A

¹⁶⁸ Last reviewed in July 2009, next review in Jan 2012. Tested in 2007 and Nov 2010.

¹⁶⁹ Core Doc 34 Regulation 10 and Paragraphs 250-291

¹⁷⁰ Mr Saunders in xx

work as planned¹⁷¹. But that would mean that even when one has in place off-site emergency planning, defence in depth measures on site, regular review and testing, all of which are capable of dealing with even more remote emergencies, there might still be some other reason that emergency planning is inadequate. That is not a helpful approach.

128. (Submissions were made on the representations from members of the Off Site Plan Working Group¹⁷².)

Nuclear siting 'policy'

129. There is no specific nuclear policy that directly applies to AWE, as it is almost unique as a facility and as a 'legacy' site.
130. However HSE contends that the development will contravene the Hansard 'policy' that seeks to preserve the 'general characteristics' of a nuclear site. This is not akin to development plan policy but, at best, provides no more than broad guidance and refers to general rather than specific characteristics¹⁷³. Furthermore HSE's publication '*The UK's fourth national report on compliance with the Convention on Nuclear Safety Obligations*' indicates that the issue of judgement in a planning context is whether there is significant and unacceptable population growth after a site is licensed¹⁷⁴.
131. In any case, HSE'S policy argument is entirely dependant on being able to demonstrate either that there will be harm to emergency preparedness or that the risk/consequences of an event are such that the development should not be allowed. The objective of such policy is to limit radiological consequences in the unlikely event of a nuclear incident and it is not based on any assessment of risk as to whether a nuclear incident would occur.
132. Such a policy, even if it applies, does not provide any strict limit on population numbers and does not preclude population growth.
133. The Council does not consider that the emerging national policy on nuclear power generation is relevant to this application, as that emerging policy relates to site selection considerations for new nuclear power stations.

Population levels and density criteria

134. Putting aside the debate as to the relevance of the policy and the criteria therein, and whether there was any breach of such criteria, the policy is, in any event, only intended to be used for guidance¹⁷⁵. The Hansard policy refers to 'other unquantifiable factors' which are to be taken into account. In this case such factors could no doubt include the benefits that would be delivered if the application is allowed.
135. This case should not be determined purely in relation to compliance or otherwise with criteria. Any breach of the criteria would not necessarily

¹⁷¹ HSE/18 Paragraph 4.3

¹⁷² Summarised at LPA/11 Paragraph 66

¹⁷³ HSE/21 Appendix A.2

¹⁷⁴ APP/9 Siting Considerations Paragraph 17.29

¹⁷⁵ HSE/21 Appendix A.2

demonstrate any harm. It was conceded by HSE that, for this point to have any weight, some harm would have to be shown¹⁷⁶.

136. There has been a consistent lack of objection by HSE to substantial developments even nearer to AWE in the period 2000-2006. No objection was raised to the LP site allocation despite several consultations with both HSE and AWE over a 2 year period. There had been no objection by HSE to any development before 2006. This lack of objection was despite the underlying science relating to radiation releases and the policy/criteria now relied upon by HSE being the same¹⁷⁷. There was no basis on which the Council or the Local Plan Inspector could have concluded there was any issue relating to nuclear safety that would preclude the allocation of the application site.
137. Even if the policy/criteria apply, the 'general characteristics' of the area around AWE has remained much the same since 1997 when the site was licensed, and would remain similar if the application were allowed:
- The population in the near vicinity of the site falling within the 3km DEPZ increased by only 57 people in the period 1997-2009, an average rate of less than 0.03% per annum¹⁷⁸.
 - Even if the application were allowed, the overall level of population increase since 1997 would not exceed that attributed to natural growth within the area¹⁷⁹.
 - Experienced Council officers¹⁸⁰ are of the view that the general characteristics of the area have remained the same since at least 1997 (and probably for years before) and would not be materially altered if the development were allowed.
138. HSE explained¹⁸¹ that it was only in late 2009 that it was appreciated that earlier work by WS Atkins (which had estimated population numbers in 1995) had significantly underestimated population numbers at that time¹⁸². HSE had, until late 2009, assumed that there had been much larger increases in population growth in the vicinity of AWE than in fact there had been.
139. That erroneous approach was adopted by HSE in the appeal relating to proposed development at Shyshack Lane¹⁸³, where HSE argument was based primarily on a perceived significant increase in population growth of around 300%. That Inspector mainly relied on this flawed argument when deciding to dismiss the appeal¹⁸⁴, and that appeal decision therefore provides no material support to HSE case.

¹⁷⁶ Dr Highton in xx

¹⁷⁷ Accepted by Dr Lacey and Dr Highton in xx

¹⁷⁸ LPA/7 Paragraphs 2.6 and Section 4

¹⁷⁹ LPA/7 Paragraph 5.2 and LPA/9 Appendix 4

¹⁸⁰ Mr Gosling and Ms Linihan

¹⁸¹ Dr Highton

¹⁸² Core Document 32 Appendix 16 to the 13 January 2010 for critique

¹⁸³ Doc 10

¹⁸⁴ Doc 10 Paragraphs 11-16

140. Such an incorrect approach had also been taken by HSE in their initial objection to the current application¹⁸⁵. This solely concerned the implications of such an assumed large percentage increase in population.
141. HSE appears to have been forced into an about turn in late 2009. HSE now argue that the semi urban criteria would have been breached even in 1997, so that there would be a clear breach now if the development were allowed. But:
- Given that HSE was aware of the existing population levels they nevertheless have not objected to a range of developments near AWE. HSE knew about general characteristics, density criteria and extant population levels yet did not think it right to object to other developments.
 - Even in the Shyshack Lane appeal it was not the existing levels of population that concerned HSE, but rather the incorrectly perceived huge percentage increase from 1997.
 - HSE'S argument is founded on a breach of semi urban density criteria (or other more restrictive criteria) and is not underpinned by any assessment of real on the ground harm, but is merely a set of calculations and a pure criteria based assessment of acceptability. That was clear at the Inquiry¹⁸⁶.
 - The true nature of HSE'S position¹⁸⁷ is that, even if there were no change in demographic circumstances and general characteristics as a result of this proposal, and even if the trends suggested that no population increase would occur in the future, HSE would still advise against on the basis of a breach of the criteria. That is not an approach that should be given any support.
 - HSE has not given any consideration to the other unquantifiable factors referred to in the Hansard policy - the assessment was devoid of any consideration of the benefits to Tadley.
142. The remaining HSE population increase argument¹⁸⁸ purported to show percentage increases from 1991 of around 15-17% in the sector including the application site. But these figures cannot be relied upon because they are based on average household sizes derived from the 2001 census data, when in fact average sizes have reduced materially since then¹⁸⁹. In addition, the relevant start date was not 1991, but should have been 1997 - any material increase in population had been in the period before 1997¹⁹⁰. Accordingly, the figures relied upon by HSE do not provide a realistic picture of population levels and were bound to significantly overestimate the percentage increase.
143. The Council has also clearly demonstrated that a level of net out migration from the area had occurred which would in fact exceed the capacity of the application site¹⁹¹.

¹⁸⁵ Core Doc 32 Page 19

¹⁸⁶ XX of Highton

¹⁸⁷ Dr Highton in xx

¹⁸⁸ HSE/21 Figures 13 & 14

¹⁸⁹ LPA/7 Section 5

¹⁹⁰ LPA/7 Paragraph 4.5 and Appendix 4

¹⁹¹ LPA/7 Paragraph 1.4

144. There was a late suggestion from HSE that there had been a change in the terms of the '*Safety Assessment Principles*' from 1992¹⁹² to the current 2006 edition¹⁹³ which provided some support to their position on population growth. However, a comparison of the editions in fact reveals that the 2006 wording was less restrictive and which, in the context of off-site emergency response considerations, indicated there should be an allowance for growth.

The development plan and material planning considerations

145. The application complies with a range of relevant development plan policies¹⁹⁴.

146. A range of matters are secured by the Unilateral Undertaking¹⁹⁵ and the suggested conditions. The matters contained in the Undertaking comply with the terms of Regulation 122 of the CIL Regulations and the tests in C05/05.

147. The site is allocated for this type of development in the LP¹⁹⁶. The suggestion by HSE that the Council were aware of HSE's objection to the potential for housing development on the site is wrong. At the time of LP allocation in July 2006 HSE had not objected to any development in the DEPZ, and did not even wish to be consulted unless a development would generate 20 or more people¹⁹⁷.

148. No precedent will be set if permission is granted, due to the individual merits and the specific characteristics of the case.

149. The scheme includes substantial benefits¹⁹⁸, as recognised by local residents¹⁹⁹. In summary it provides:

- A redevelopment, that accords with development plan and national policy, of a vacant and derelict site close to the centre of Tadley. It would make efficient use of previously developed land with a well designed scheme in a sustainable location.
- A new facility to replace the existing scout hut²⁰⁰.
- Improvements to a public footpath link and highway contributions so as to integrate the development with Tadley, along with a Travel Plan²⁰¹.
- New areas of public open space, a Landscape Management Plan and contributions to relevant off-site improvements²⁰².
- The provision of market and affordable housing. The need for affordable housing is particularly acute in Tadley²⁰³ and would accord with policy²⁰⁴.

¹⁹² HSE/9 Paragraph 98

¹⁹³ APP/8 Siting Considerations Appendix 7 Paragraph 112

¹⁹⁴ Doc 8 Planning SOCG Section 7 and the evidence of Mr Bond in relation to the South East Plan

¹⁹⁵ Doc 9

¹⁹⁶ Core Doc 3 Policy D3.17

¹⁹⁷ HSE/21 Appendix J1 page J2

¹⁹⁸ LPA/9 especially paragraphs 3.7-3.15

¹⁹⁹ Core Doc 32 Letters of support in July 2009 report Page.15

²⁰⁰ Core Doc 3 Policy C8, LPA/10 paragraphs 3.12 – 3.21

²⁰¹ LPA/10, LPA/10 paragraphs 3.42 – 3.62

²⁰² Core Doc 3 Policy CS9, LPA /10 paragraphs 3.22 – 3.38

²⁰³ LPA/10 Paragraphs 3.1-3.11, LPA/10 paragraphs 3.39 – 3.41

- The affordable and general housing mix would accord with policy²⁰⁵.

In contrast a refusal of planning permission would send a negative signal to residents and businesses in the area and impact on the wellbeing of the local community²⁰⁶.

Housing land supply and delivery

150. The Council has a 5 year land supply of 3,331 dwellings. There was a debate with the Applicant about the deliverability of some of the sites, but the Council's evidence is clear and accurate²⁰⁷.
151. As a result of the Cala Homes decision the South East Plan continues to be part of the development plan. The starting point remains the development plan and the policies that relate to housing provision remain relevant.
152. The South East Plan requires the provision of 945 dwellings p.a.²⁰⁸. In development plan terms, there is a deficit in the five year deliverable supply of housing land and the application should therefore be considered favourably. The exact extent of the deficit depends upon which scenario is chosen²⁰⁹.
153. The Council is undertaking consultation with local communities regarding future housing provision. This will inform a new housing figure to be contained in a pre-submission Core Strategy (summer 2011).
154. The Council has not adopted an 'interim' figure to use when the South East Plan is abolished. A proposed interim figure of 740 dwellings p.a. was to be considered on 11 November 2010 but this was not done in the light of the Cala Homes RSS judgement. Even if the 740 dwellings p.a. figure were used, the Council would only just meet the 5 year housing land supply requirement²¹⁰. Even in that scenario, the application site would make an important contribution.
155. The Council do not consider that emerging policy is of relevance to this application²¹¹.

Planning balance

156. The proposal complies with relevant development plan policy and provides a range of material benefits. HSE'S concerns should be considered alongside other material considerations.
157. The evidence demonstrates that the risk of any radiation 'event' taking place at all is minute. Even in the worst imaginable scenario there is realistically no

²⁰⁴ Core Doc 3 Policy C2 and Core Doc 8, LPA/10 paragraphs 3.1 – 3.11

²⁰⁵ Core Doc 8 and Core Doc 3 Policies C2 and C3

²⁰⁶ LPA/9 Paragraph 3.13

²⁰⁷ LPA/10 Boundary Hall Note Appendix 1

²⁰⁸ Core Doc 6 Policies H1 (Table H1b), H2, H3, and WCBV3

²⁰⁹ Various scenarios are set out in APP/12 Annex 2 (Using the Applicant's supply figure of 2,683 rather than the Council's 3,331)

²¹⁰ 5.3 years supply if Boundary Hall (100 units) included. Without Boundary Hall, 5.1 years supply – with a 76 unit surplus.

²¹¹ Details at LPA/11 Paragraph 115

prospect of any immediate health risks from an incident and, assuming safety measures are followed, any long term risk would be extremely small.

158. The Off Site Plan is clearly fit for purpose and there is no substantiated evidence to indicate that it will be materially prejudiced or compromised by the scheme.
159. The development would preserve the general characteristics of the population around AWE, whilst securing material improvements for Tadley.
160. Even when HSE'S concerns are considered in isolation, they do not provide a sensible or realistic basis upon which to reject the development.
161. The release of the site is entirely in accordance with the development plan and national policy and will provide material and substantial benefits that are much needed in Tadley.

THE CASE FOR SUPPORTERS WHO APPEARED AT THE INQUIRY

162. Mrs M Weston has been a local resident for 15 years. She pointed out that AWE has been there for around 60 years, during which period Tadley had grown and become a town. No objection has been raised to housing development before – including the recent housing at Kestrel Mead. There have been very few minor safety incidents over the years, and it would be unfair to resist housing development.
163. Mr B Spray is the Chairman of Tadley Scout Group. The Group, which is one of the largest in Hampshire, has been waiting 17 years to relocate. The group encompasses 100 Scouts and 50 in a group of older members. The building on the site is long past its sell by date, and the Group has a pressing need for new accommodation so they can provide good facilities for the Group and others who would be interested in using the new building. The Applicant's proposal is a first class scheme. Mr Spray has lived in Tadley since 1954, and his family would like to do the same, but cannot afford local house prices. Many local employees need affordable housing.
164. Mr A Jeffrey has lived in Tadley for 53 years and has worked at AWE for 44 years. There is a real need for low cost housing in the area. There has never been an airborne release from AWE and, even if there were, the prevailing southwest winds would disperse any plume away from most residents.

THE CASE FOR THE HEALTH AND SAFETY EXECUTIVE²¹²

165. HSE objects in the strongest terms to the proposal. Its reasons are based on first principles related to the effect on human health and because the proposal would breach longstanding Government policy on the siting of housing in proximity to nuclear facilities.
166. There are four parts to the objection:
 - It would be incorrect as a matter of principle to place a significant new population in harm's way given the consequences of a reasonably foreseeable nuclear emergency. This, by itself, is sufficient to mean that permission should not be granted.

²¹² The case given here is an edited version of the closing submissions at HSE/23

- HSE and the vast majority of the other multi-agency emergency planners and responders take the view that the proposal would significantly harm a safe and efficient emergency response in the event of a reasonably foreseeable incident.
- The proposal would fail to preserve the characteristics of the site when looked at in a public safety context. The introduction of a significant new community so close to the boundary of an establishment in an area which, for historic pre-regulation reasons, is already heavily populated cannot correctly be characterised as “preservation”.
- In terms of demographic criteria, even the least restrictive semi-urban criterion is significantly breached in the vicinity of the proposed development. This criterion is a conservative benchmark, as the activities at AWE give rise to a reasonable likelihood of more significant consequences than that for which the semi-urban criterion was designed.

167. The strength of HSE’s objection can be judged in several ways:

- This is the first application which HSE’s Nuclear Directorate has requested be called-in and the first Inquiry which it has felt it necessary to attend. HSE has had specific regard to the advice contained in C04/00. It appeared at the Inquiry because it believes the case to be one of exceptional concern and one where important policy or safety issues are at stake.
- The Nuclear Directorate is internationally renowned as one of the world’s foremost nuclear regulators, and has chosen to be represented by its most senior and qualified members of staff. The Inquiry heard from those who have been instrumental in forming the relevant policy, who in a national emergency would liaise directly with Ministers, and from internationally renowned experts in the field of radiological protection.

168. Set against this is the case advanced by a housing developer who has had the misfortune of purchasing the freehold of the site in the absence of any knowledge of the consequences of the existence of an atomic weapons establishment on its doorstep. The developer has been forced to construct a retrospective argument in defence of the application.

169. HSE’S case is based around a series of propositions.

Proposition 1. AWE has a large inventory of radioactive isotopes which are associated with the work it undertakes in the national interest in the maintenance of an independent nuclear deterrent.

170. AWE has been central to the defence of the United Kingdom for more than 50 years. It developed as a nuclear facility in the shadow of the Cold War. As a Ministry of Defence establishment operating in that international climate it grew outside normal land use planning and health and safety systems.

171. Today, it handles high explosives and radioactive substances required for the production of nuclear warheads. Such radioactive substances include plutonium, tritium and enriched uranium. Plutonium is the most hazardous of these isotopes but all are dangerous.

172. The exact inventory at AWE and its location within the site is classified. But it is public knowledge that up to 7.6 tonnes of plutonium are capable of being stored on the site at any one time.
173. Not all of the radioactive material is contained within the inner security cordon. For operational and historic reasons, there are significant facilities outside the inner fence which have their own particular security provisions. The exact location of these facilities is mostly classified, but at least one significant facility lies to the south of the inner security fence and thus closer to the application site.
174. There is also a requirement for the transport of radioactive material across the site. Such transit forms a component of the reasonably foreseeable hazard on the site²¹³.
175. The continued future use of AWE for purposes associated with the maintenance of a nuclear deterrent is clear, with the recent Anglo-French accord on research, development and construction of the nuclear deterrent.

Proposition 2. Significant radiation emergencies caused by activities at AWE are reasonably foreseeable. Such reasonably foreseeable incidents include, but are not limited to, incidents instigated by fire.

176. Parliament has created a regulatory regime which seeks to protect members of the public who live in the vicinity of nuclear facilities. "*The Radiation (Emergency Preparedness and Public Information) Regulations 2001*" (REPPIR), seek to produce a comprehensive and proportionate response to the protection of the public from the threat of accidental nuclear release.
177. REPPIR requires all potential accidents and their consequences to be identified by AWE. This identification of hazard and risk is then scrutinised by HSE.
178. The Regulations require the system to identify reasonably foreseeable radiation emergencies and to prepare for such events by way of off-site emergency arrangements. A reasonably foreseeable radiological emergency is one which is "less than likely" but which is still "realistically possible". Unlike other areas of public protection, Parliament has deliberately chosen not to identify the nature of the risk by reference to a quantitative descriptor. It is not productive to seek to reintroduce a quantitative descriptor into the debate (e.g. 1 in 1,000) when statute has deliberately avoided that approach.
179. Once a reasonably foreseeable radiation emergency is identified, HSE has the role of identifying a Detailed Emergency Preparedness Zone (DEPZ) within which arrangements are required to be put into effect. The furthest edge of this area is defined by the definition of a radiation emergency and is set with reference to a 5mSv radiation dose.
180. AWE has produced a Hazard Identification and Risk Evaluation assessment (HIRE), which seeks to identify all potential hazards of an escape of material beyond the AWE boundary, and to identify those hazards which are reasonably foreseeable. The redacted HIRE²¹⁴ establishes that reasonably foreseeable

²¹³ Redacted HIRE

²¹⁴ HSE/8

emergencies could arise from fire, human error, drops of material in transit and other accidents. The HIRE has been considered by HSE, which has consistently concluded since licensing that there are reasonably foreseeable radiation emergencies which could be caused by activities at AWE. At no time has there been any challenge to the conclusion that there is the prospect of a reasonably foreseeable radiation emergency at AWE, nor is there any good reason to doubt the accuracy of the analysis done pursuant to the statutory machinery.

181. It would be irrational for the planning system to adopt a different approach to determining the risk of an emergency from REPPIR²¹⁵. Despite the varying description used by others of the extent of risk ('small', 'remote' etc), the overall conclusion remains that there is the potential for a reasonably foreseeable emergency at AWE. Neither does the fact that the site is operating at or towards ALARP alter the position. Notwithstanding ALARP operating procedures a reasonably foreseeable emergency is identified through the HIRE process.
182. The test of reasonable foreseeability is the correct one to be considered in determining the appropriateness of granting permission for new development in the vicinity of AWE.

Proposition 3. The reasonably foreseeable consequence of such an accident is the delivery of a 5mSv dose of radiation at a radius of 3km from the nominal centre of the site - this has resulted in the setting of a DEPZ of 3 km for AWE. The dose received by those closer to the site would be higher and it is accepted that at 1km the effective dose could be in the region of 30mSv.

183. A radiation emergency is defined in REPPIR by reference to a dose intake of 5mSv. At all times since licensing the 5mSv contour has been set at 3 km from a notional point towards the centre of AWE.
184. The fact that other smaller DEPZ zones have been considered, but rejected, over the years only strengthens the statutory position that has been reached. The DEPZ has been properly reviewed.
185. Radiation consequences attenuate with distance - the closer a person is to the source of release, the higher the dose he is likely to receive. It follows (applying the Gaussian Plume model to the atmospheric dispersion of released radioactive particulates) that, if it is reasonably foreseeable that at 3km the dose is 5mSv, then at 1km the reasonably foreseeable dose would be c.30mSv. There is no challenge to this calculation.
186. This is a most significant dose - in excess of 30 times the statutory limit. This was not addressed in the Applicant's Environmental Statement or the evidence. This is a hugely significant omission.

Proposition 4. Receipt of such doses would be dangerous and harmful.

187. There is no serious argument but that this level of dose (30mSv) is significantly harmful and should be avoided. It would constitute putting people unnecessarily in harm's way. The evidence from the UK's foremost analyst of

²¹⁵ Accepted by Mr Bond in xx

the aetiological impact of radiological doses was quite clear that such doses would be unacceptably harmful and would lead to an increased risk of cancer²¹⁶. On this ground alone it is clear that planning permission should be refused.

188. It is true that in the early days of regulation, HSE did not object to residential development on a smaller scale at Falcon Fields/Kestrel Mead, which is located a similar distance from the fence. But this failure to object was an error - which should not be repeated in this case²¹⁷.
189. The Applicant did not take a seriously different approach on the harmful dose issue. It was accepted that it was "no part of [their] case that doses in the tens of mSvs were not unacceptably harmful". It was also agreed that such doses, which would be experienced by residents of the proposed development, were "significant" if not "catastrophic", and that all residents of the new development would be right to be "legitimately concerned" about such consequences²¹⁸.
190. REPIR regulations make it clear that for the first 24 hours after a release, an assumption should be made that persons within the DEPZ are outdoors and would be unable to achieve the mitigation afforded by shelter. The reasoning is clear – "the effectiveness of urgent early health protection countermeasures such as sheltering... is hard to guarantee..."²¹⁹. The logic behind this assumption clearly applies with more force the closer a potential recipient of dose is to the point of release.
191. Even for those who are able to shelter, the impact of a release will still be likely to significantly exceed 10mSv, which all experts agree is a harmful dose which should be avoided if possible.

Proposition 5. Any suggestion that the use of AWE is sufficiently benign as to mean that there is no reason to limit residential development anywhere near its boundary is incorrect, uninformed and unsafe.

192. The Applicant suggests that AWE is a relatively benign use, akin to a research reactor in a university laboratory. There is no support for this assertion at all, which is made without knowledge of the nature, extent or actual inventory of AWE.
193. Research reactors are also the subject of REPIR and the requirement to define a DEPZ - if they carry sufficient inventory and if there is (following a HIRE assessment) a reasonably foreseeable risk of a radiation emergency. But neither of the research reactors presently operating in the UK has a DEPZ.
194. The greater the consequences of a reasonably foreseeable radiation emergency, the larger would be the DEPZ²²⁰. The Applicant's assessment of the risk at AWE (which is based on absence of knowledge) is thus wholly inconsistent with the entire REPIR regime.

²¹⁶ Dr Robinson

²¹⁷ Accepted by Dr Lacey, Mr Robinson, Dr Highton, Mr Saunders

²¹⁸ Dr Thorne in xx

²¹⁹ Core Doc 34 Paragraphs 57/58

²²⁰ Accepted by Mr Dillon in xx

195. The Secretary of State is entitled to assume that, in the absence of any evidence to the contrary, the REPPIR regime operates efficiently across the UK and at AWE. HSE²²¹ has actual knowledge of the processes at AWE, and can confirm that the nature of the operations which have led to a 3 km DEPZ are not benign or akin to a research reactor.
196. The Applicant is content to build in the shadow of a facility which they say is akin to a research reactor. But they have wholly failed to consider the true magnitude of the reasonably foreseeable radiation emergency and its consequences for the future residents.

Proposition 6. The nature and extent of the consequence of a reasonably foreseeable radiation emergency at the application site (which is just c.200m away from the AWE fence) is such that it would be inconsistent with the precautionary principle and with good planning to allow significant new residential dwellings to be sited there.

197. All parties with the relevant technical knowledge of the processes at AWE take the view that such a REPPIR-type emergency is reasonably foreseeable. The only two parties with the entire knowledge of what processes occur and where they are on the site (HSE and AWE) both oppose this development as a matter of principle.
198. Where the risk can and has been identified by a relevant mechanism as being realistically possible, and where the consequences are so potentially harmful to members of the public, it would be contrary to good planning to place significant additional residents in harm's way.
199. The precautionary principle operates where knowledge is uncertain and no mechanism exists to render the knowledge certain. In this case, even in the absence of the REPPIR regime, there would be clear and compelling grounds for refusing permission on purely precautionary grounds. However the REPPIR process takes the assessment of risk beyond uncertainty, as the radiation emergency is reasonably foreseeable. The state of knowledge is well beyond that required to invoke the precautionary approach. On the basis of known facts and risk assessments, the development should not proceed.
200. The fact that there is already housing in the area is a function of the particular history of AWE and is not an argument to allow further development.

Proposition 7. For these reasons, the grant of planning permission for over 250 persons to live within 200 metres of the AWE fence is not appropriate on public health and safety grounds.

Proposition 8. HSE and the vast majority of the emergency planners and responders take the further view that significant development of the type proposed would be harmful to the proper operation of emergency preparedness for existing and potential future residents of the DEPZ.

²²¹ Mr Saunders

201. REPIR requires an emergency plan to be in place in relation to AWE. This has been done. The lead authority responsible for that plan is West Berkshire Council, which has the statutory responsibility for ensuring that in any reasonably foreseeable radiation emergency the exposure of persons to ionising radiation is restricted. It opposes the application and this is a weighty consideration²²².
202. This is not an isolated concern. Hampshire County Council emergency planners object to the grant of permission, as do Hampshire Constabulary, the Royal Berkshire Ambulance Trust and others. In a field where a multi-agency response is critical to the proper operation of an off-site plan, the fact that the vast majority of the key responders have objected is hugely telling.
203. The issue is not whether, following any grant of permission, the Off Site Plan can be retained and operated. As a matter of law, it would have to be put in place. Rather the questions are whether the proposal would lead to an inappropriate increase in the potential exposure of persons to ionising radiation.
204. There would be an inevitable increase in the exposure of persons to ionising radiation and significantly increased strain on the emergency services. It would give rise to additional potential for evacuation. There can be no accurate scientific analysis of the consequences of increasing the number of residents very close to a potential release of radioactivity. Human reactions to emergency situations are impossible to predict with accuracy.
205. At c.1 km from the centre of the DEPZ, there is the potential for a dose in excess of 30mSv to be received. Radiation at that level triggers the requirement for the consideration of evacuation applying the NRPB guidance²²³. At this level of exposure the potential for evacuation would have to be very much in the minds of responders.
206. The REPIR assessment which gives rise to a potential for a 30msv dose assumes given wind and atmospheric conditions²²⁴. However the position could be up to seven times worse if atmospheric conditions were less favourable²²⁵, and this would make the potential for evacuation even greater.
207. The Off Site Plan²²⁶ expresses the general view that there will normally be no need for the urgent evacuation of areas outside AWE. But this applies throughout the DEPZ and is not meant to be absolute. There is the potential for subsequent evacuation for clean up work²²⁷.
208. The Off Site Plan also deals with self-evacuation²²⁸. The likelihood of this happening increases with proximity to the perceived point of danger²²⁹. Self evidently this would bring the public into contact with the full outdoor dose, and

²²² Doc 2

²²³ Issued by the Health Protection Agency

²²⁴ Pasqual Category D

²²⁵ Dr Thorne in xx

²²⁶ Core Doc 33

²²⁷ Core Doc 33 Paragraph 5.5.1

²²⁸ Core Doc 33 Paragraph 5.4.2 b

²²⁹ Mr Dillon in xx

should not be countenanced. It also has the potential to result in traffic congestion adjacent to the AWE entrance.

209. The proximity of the site to AWE means that any plume release would reach the site before any meaningful warning could be given to residents. The Applicant avoided answering this question, but HSE²³⁰ advised that it would be a matter of only 3-5 minutes between the event and the plume reaching the application site. In that time, it is unlikely that all (or even a significant number) of residents would be sufficiently warned of the release to get themselves and their family indoors and to secure doors and windows.
210. It is also clear that the Off Site Plan envisages the potential for emergency responders to have to enter the DEPZ close to AWE. The proposal would mean that emergency responders would be more likely to have to enter an area where dose levels were significantly above safe levels. The emergency services should not be put at such additional risk. In addition, there is no guarantee that emergency responders would feel it appropriate to put themselves at risk – the Applicant confirmed that neither the Hampshire nor the Thames Valley Police have specifically trained nuclear police officers. The decision as to whether to take the risk would be a judgement for individual officers²³¹.

Proposition 9. The proposal breaches longstanding government siting policy on the location of significant new development near to nuclear facilities.

211. The most recent and the clearest exposition of national policy is the Fourth National Report on Compliance with the Convention on Nuclear Safety Obligations²³². The following elements of the policy are clear:
- It is the characteristics of the licensed site which are relevant to the consideration.
 - It is the size, nature and, importantly, the distribution of development which is relevant to a consideration of the merits of a proposal.
 - It is for HSE to consider these matters.
 - The policy was initially written for nuclear reactor sites, but the Forward to the Fourth National Report makes it clear that the same policy considerations apply to non-convention sites such as AWE (though it must be the case that the policy should be applied with care to such sites to reflect their differing contexts).
212. This policy forms part of a Defence in Depth philosophy which applies to all elements of the relationship of nuclear facilities with the general public. It is important to note that locational policy is the only non-engineered element of this defence in depth policy. AWE is a legacy site where the earlier stages of defence in depth could not have been brought to bear. This places more emphasis on the need for the non-engineered part of the policy to be robust.

²³⁰ Mr Robinson in chief

²³¹ APP/10 Paragraph 3.12

²³² APP/9 Siting Considerations Appendix 8 Paragraph 7.28

213. Greater weight is given to developments which are very close to a nuclear site – this is reflected in the weightings which are applied to populations close to the site as part of the demographic criteria. Increasing the resident population very close to a nuclear site is hardly ever likely to be consistent with the aim of the policy. The Council and the Applicant have sought to portray this element of the policy in a way which is inconsistent with its proper construction – they have characterised the development as no more than ‘infill’ and have argued that the overall character of the area would not have altered between licensing and now.
214. But their approach is not required by the policy. It is to miss the purpose of the policy as part of the defence in depth concept:
- It is the characteristics of the site in safety terms that need to be considered. The policy does not refer to an infill test, but sets a test of health and safety.
 - The Applicant’s approach fails to give appropriate weight to the proximity of the development to the potential source of release.
 - This approach pays no attention to the dose implications for those at the application site, or the reasonably foreseeable risk of receiving a potentially dangerous dose of ionising radiation.
215. The proposal would introduce in excess of 250 persons within 1km of the nominal centre of the DEPZ. These people would potentially receive in excess of 30 times the statutory dose limit of radiation in the event of a reasonably foreseeable emergency. It is the role of REPPIR to restrict such exposure.
216. The proposal is in a sector of the DEPZ which is already well beyond even the least restrictive demographic criteria for nuclear facilities. It follows that significant net additions to the population are likely to be even less acceptable. If the relevant sector already has too many people to comply with the least restrictive criteria, it is a paradox to argue that because there are already so many residents you can allow more.
217. The addition of fewer than 10 persons on a site further away from the centre of the DEPZ was sufficient to persuade an Inspector that there had been a significant breach of this policy²³³. That decision and other material considerations led to a clear and unambiguous officer’s recommendation to refuse planning permission for the current application, on the basis that the relevant policy was breached. The Council’s shift in position is wholly inexplicable, and reliance upon the population count error included in the Shyshack Lane appeal decision is not a valid explanation, as this was known at the time of the recommendation to refuse planning permission for the current proposal.

Proposition 10. The proposed development is not even able to pass the least restrictive population density criterion applicable to nuclear facilities.

218. The development would result in a clear breach of even the least restrictive demographic criteria applicable to nuclear facilities. Three demographic criteria exist to guide the siting of nuclear facilities - semi-urban, remote and new build.

²³³ Doc 10

Of the three, the semi-urban criterion is the least restrictive - that is, it allows a greater population density closer to the facility.

219. The semi-urban criterion is associated with the risks and hazards that might be reasonably foreseeable in the context of an AGR reactor. DEPZs for AGRs are characteristically smaller than that at AWE, because the hazard at AWE has been calculated to be higher than for a reasonably foreseeable emergency at an AGR. This is due to the nature of the inventory and the operations at AWE.
220. When comparing the nature and consequence of hazard, it is appropriate to consider the identified reasonably foreseeable risks at various nuclear facilities²³⁴. But part of the Applicant's case ignores this logic and concludes that an AGR is more hazardous than AWE with reference to the worst case potential accident. This is a wholly misleading comparison since the risk of a worse case nuclear reactor accident is infinitesimally smaller than the reasonably foreseeable emergency at AWE. In addition the Applicant's case is not, and cannot be, based on any proper understanding of the operations at AWE.
221. This approach to the ranking of hazard, based on the size of the respective DEPZs for an AGR and AWE, is not new. It was raised at an early stage by HSE and was part of HSE's evidence at the Shyshack Lane appeal. The identification of AWE as potentially more hazardous than the AGRs is also further reflected by the fact that, at licensing, it was thought appropriate to treat AWE as an even more sensitive "remote" site. Thus the REPPIR regime works on the basis that a reasonably foreseeable radiation emergency would have greater consequences at AWE than a reasonably foreseeable incident at an AGR.
222. Since AWE is a legacy site the normal siting considerations (including the surrounding population characteristics) did not occur when it was established. Therefore control of further intensification of the surrounding population is even more important.
223. HSE is the only party to accurately apply the semi-urban criterion. The Applicant does not believe that the criterion is even applicable and does not apply it. The Applicant's technical case consisted almost entirely of an attack on this part of HSE's case.
224. When the criterion is applied correctly, it is clear that, as a result of the existing population, the semi-urban criterion is already breached by a significant margin²³⁵. In general terms the further south within the site is the assessment position, the greater the breach.
225. This breach is clear even when only the night-time residents are considered. Daytime occupiers and those passing through the area should be added to the calculation, and this would obviously worsen the situation.
226. The Applicant suggested that HSE had 'moved the goal posts' by changing from a single point of origin approach to a multi origin assessment when considering whether the semi urban criterion had been breached. This suggestion was clearly based on a misunderstanding of the information provided to the

²³⁴ Accepted by Mr Bond in xx

²³⁵ HSE/21 Paragraph 63 onwards, Figures 10 and 11 and Appendix K

Applicant in good faith by HSE. HSE has always considered multi origin analysis. In seeking to explain this methodology to the Applicant, HSE provided them with a data set for one assessment square, but only as representative of the methodology adopted.

227. As to whether a multi origin approach is appropriate:

- Transfers of material across the AWE site are an important element in the HIRE²³⁶. These transfers are not point sources and cannot be accurately modelled as such.
- The exact location of every facility which is relevant to the calculation of the DEPZ for AWE is not known and is not knowable. An accurate fixed point analysis is not possible, as it would be for a fixed reactor site.
- The future development plans at AWE for the lifetime of the proposed residential development are not knowable. The entire site is a nuclear licensed site.
- HSE does not, in any event, need to rely on outlying areas of the site to establish a clear breach of the semi-urban criterion. Neither does it need to assume that all squares are potential sources of release. This is because all squares from the central area and southwards give rise to a clear breach. This is particularly relevant because a significant nuclear facility (Pegasus) is to be placed on the squares which show a clear breach of the criteria.
- The use of a single point 'average' location against which to test compliance with the criteria as suggested by the Applicant is flawed. It spreads the potential location of a release and distorts the true position by including large areas to the north of AWE which have no nuclear facilities in them.

228. The Applicant does not believe that the semi-urban criterion is relevant and considers that an alternative criterion should be adopted. However no alternative criterion was produced, but instead a manipulation was performed on the weighted calculation which defines the semi-urban criterion²³⁷. But this is a meaningless exercise because it removes any meaningful judgmental criterion from the equation. The remodelled equation could be used to justify any increase in population close to AWE, however large, because what has been done is to remove any limiting criteria from the equation. This is entirely inconsistent with the policy to seek to maintain the general characteristics of the site, which is an approach accepted by the Applicant²³⁸.

229. Finally, the Applicant put forward the approach that if AWE wish to develop further areas in future within their licensed site for nuclear purposes, and this is held to be inconsistent with adjacent residential development, then this should limit the nuclear requirements of AWE. This potential fettering of a nationally important licensed nuclear site has no policy support and reemphasises the inappropriateness of the close juxtaposition of uses.

²³⁶ HSE/8

²³⁷ APP/9 Section 5.2

²³⁸ APP/9 Section 5 and Dr Thorne in xx

230. The Applicant submitted two rebuttals²³⁹ following the interim visit to AWE and in relation to the AWE Context Plan – included in the Pegasus application documents. The Applicant sought to establish (at least initially) that all relevant nuclear facilities were contained within the inner security fence, and that within or adjacent to that fence the areas which were in excess of the semi-urban criteria were either unused or used as a car park. However these rebuttals were seriously flawed:

- Not all nuclear facilities are within the inner security fence²⁴⁰. There is at least one significant facility south of this security fence – closer to the application site – as noted in the letter from AWE giving additional details.
- There was a basic error in the assertion that a number of squares which seemed to be in breach of the semi-urban criterion could be ignored because the breach was generated from within the site. This was accepted as a mistake by the Applicant. The squares which were suggested could be ignored were in fact in breach of the semi-urban criterion not only in one rotational sector but for the entire site - a much more serious matter since it involves breaches in at least 3 sectors.
- There was an error in the suggestion that some squares in breach of the criterion could be disregarded because they were open space or car park. It is clear from the Pegasus application documents (and accepted in the Applicant's second rebuttal) that these locations are the site of an important enriched uranium facility. This facility will make a significant contribution to any new DEPZ and is likely to result in the nominal centre of the DEPZ moving further to the south towards the application site²⁴¹.

231. Various points about population growth/change were made by the Applicant and the Council, namely:

- It was suggested that the population of the DEPZ had remained broadly the same since licensing.

The Council's assessment²⁴² sought to establish that there has been little change in the overall population of the DEPZ since licensing. This may or may not be the case but is of little relevance.

The DEPZ has a radius of 3km and is a huge area. There will inevitably be shifts in population within such an area. The issue is not the overall population, as emergency responders deal with sectors which reflect the likely path of any release, but the disposition of the population within the DEPZ. This is especially important as there is significant additional weighting afforded to those who live closest to the potential release to reflect their significantly enhanced prospect of a higher dose.

The Council's data does not help with this issue since their figures are all DEPZ wide figures. In contrast HSE's figures establish a clear trend for an

²³⁹ APP/9

²⁴⁰ Mr Saunders in Chief and AWE letter appended to HSE/20 Second Rebuttal

²⁴¹ Unchallenged evidence of Mr Saunders

²⁴² LPA/7

increase in population close to the site which is partly cancelled out by a decrease in population further from the site²⁴³.

- It was suggested that, in practice, an allowance for natural growth had been included in previous cases involving nuclear power stations and the semi-urban criterion.

There is no justification in the documents to support further growth in excess of the semi-urban criterion – it is not part of the stated Hansard policy for semi-urban sites²⁴⁴. The Council asserted that it is something which emerged as a matter of custom and practice, but in those cases (especially at Connah's Quay²⁴⁵) the actual ceilings for population including natural growth were set significantly below the semi-urban criterion. It was always accepted that the semi-urban criterion was a ceiling which included the potential for natural growth²⁴⁶. Additional allowance for natural growth would be perverse as it would mean that the greater the breach of the criterion, the more additional breach would be accepted to accommodate natural growth.

- The Applicant sought to establish that other population sectors have higher populations than the sector including the application site²⁴⁷. But the sectors chosen by the Applicant were DEPZ sectors and not the Hansard population sectors, and the Applicant was not even aware of the important difference for the purposes of the demographic calculation. Furthermore the analysis had not been the subject of an appropriate rotation as required by the criteria. In addition, no weighting had been applied to reflect proximity, and the Applicant was not even aware that weighting factors (to represent enhanced doses) even existed. In the Applicant's approach a person living at the extremity of the DEPZ was given exactly the same weight as one living by the fence.

Proposition 11. No appropriate consideration of the public safety issues was undertaken in relation to the historic allocation of the site. HSE cannot see how the site could have reasonably been allocated if such consideration had been given.

232. The original identification of the site as being potentially suitable for housing came by way of an early Planning Brief. Unsurprisingly, given the age of the Brief, there is no evidence that the proximity of the site to AWE was taken into account.
233. At the time of the LP allocation neither the issue of the relationship to AWE or the consequences of that relationship were considered. There was nothing in the Inspector's report on the LP which came close to considering the current issues.
234. The LP allocation only continues to exist by reason of a statutory saving by the Secretary of State. By that stage, it would have been clear to the Council that

²⁴³ HSE/21 Figure 13

²⁴⁴ HSE/21 Appendix A2

²⁴⁵ HSE/21 Appendix B1

²⁴⁶ Dr Highton unchallenged evidence

²⁴⁷ Plans submitted by Mr Brookes APP/11

HSE had significant objections to housing development on the application site. The Council was under a duty when asking the Secretary of State to save the allocation to highlight these concerns, but it did not.

235. It is clear that the important issue of the public safety of those who might live on the site has not been considered in relation to the LP allocation.
236. For these reasons, if the Secretary of State believes there is validity to the concerns expressed by HSE, then very little weight can be given to an allocation where such concerns were not even considered during the process²⁴⁸. The existence of an allocation which did not consider the issue of public safety cannot justify the grant of a consent which would place people in harm's way.
237. The Applicant also relies upon the existence of a general and affordable housing need and other planning matters to off-set any harm caused by health and safety issues. HSE would find it surprising if the wish to provide housing could come close to justifying the risks to health associated with putting people in those houses. This would be the case even if it were found that there were an absence of a 5 year housing supply in area.
238. The Applicant places significant weight upon the regional housing requirement contained in the South East Plan. But in the real world the Secretary of State is not likely to place great weight on these regional housing figures. This is particularly the case where the Council has consistently taken the formal (and local) view that the present South East Plan figures represent an over-requirement in housing terms. The Secretary of State would thus be perfectly entitled to take the view that limited weight ought to be given to the South East Plan requirement.
239. In any event, the Council would, if planning permission is refused, be obliged through its emerging development plan process to meet any requirement for housing or affordable housing in the usual way. There is no evidence that the local planning process would be unable to meet any future housing requirement.

Proposition 12. The nature of the harm associated with the proposal is such that HSE strongly adheres to its "Advise Against" stance on the issue of the grant of planning permission in this case.

240. The grant of permission would put significant numbers of people unnecessarily in harm's way, would inappropriately harm the ability of the emergency responders to undertake their statutory duties, and would breach Government policy and population criteria on the siting of development in close proximity to nuclear facilities.

WRITTEN REPRESENTATIONS²⁴⁹

241. The AWE Off Site Plan²⁵⁰ has been prepared by a Working Group, chaired by West Berkshire Council and comprising representatives of a range of organisations – including HSE. In view of the importance of the Off Site Plan to

²⁴⁸ Accepted by Mr Bond in xx

²⁴⁹ Written representations sent to the Council before the call-in are summarised in the Council's Committee reports (Doc 32) and the full text is on the file

²⁵⁰ Core Doc 33

the health issue, the representations below have been grouped in relation to membership of the Working Group.

Organisations who are members of the Off Site Plan Working Group

242. West Berkshire Council opposes the application on the basis of the impact on the Off Site Plan²⁵¹. If the application were approved, the Council notes that the responding agencies would have to review their processes and the Off Site Plan, at potentially substantial additional cost.
243. AWE object on the grounds of the effect on the Off Site Plan. AWE notes that the development is of a significant scale within the DEPZ, some 500 metres from AWE's southern boundary. The development would lead to congestion on the roads which may have an impact on the ability of emergency services to gain access to AWE²⁵².
244. Thames Valley Police state that they have no specific objection to the planning application. However they express concern that any additional houses within the DEPZ would increase the resources needed to meet the requirements of the Off Site Plan. The additional population would increase traffic out of the area in the event of an emergency, and this could lead to gridlock. This would increase the amount of time self-evacuees would spend in a potentially contaminated environment, as well as hindering emergency response. The development would be close to AWE and would increase potential fatalities and health problems in the event of an off-site incident²⁵³. More recently the Police restated that in isolation there were not sufficient grounds to object, but that the concerns should be taken into consideration²⁵⁴.
245. Hampshire Constabulary advise against the application²⁵⁵. Additional houses in the area would increase the resident population at risk if an off-site emergency should occur. There would be increased demand on the emergency services due to increased numbers requiring assistance, and increased traffic flows. Responders could be exposed to increased hazard due to extended duration in the affected area.
246. Royal Berkshire Fire and Rescue Service do not raise an objection but make comments that placing more people in the DEPZ places additional pressures on responders in the event of an incident. Concern is expressed that approval of this application would set a precedent²⁵⁶.
247. The Health Protection Agency do not raise objection as long as the suggested countermeasures in the Off Site Plan remain viable²⁵⁷.
248. Hampshire County Council object to the application on the basis of siting policy and population density²⁵⁸. The Council further state that, if the development were to go ahead, the Off Site Plan would need to be reviewed.

²⁵¹ Doc 2

²⁵² Objection 3 March 2008 (on file)

²⁵³ LPA/8 Appendix 4

²⁵⁴ Doc 3

²⁵⁵ Docs 4 and 7

²⁵⁶ LPA/8 Appendix 11

²⁵⁷ LPA/8 Appendix 8

²⁵⁸ LPA/8 Appendix 2

249. There have also been communications expressing no objection from West Berkshire Highways Officer, the Environment Agency, Thames Water, Natural England, Hampshire County Council (Education, ecology, highways), subject to conditions. These representations are summarised in the Council's Committee reports on the application²⁵⁹.

Other organisations

250. Hampshire Fire and Rescue Service made observations regarding access and water supplies²⁶⁰. (The Service appeared to align itself with the Council and with the Thames Valley Police, although those organisations take somewhat different positions²⁶¹.)
251. Other representations are summarised in the Council's Committee reports on the application²⁶². These include objections from Tadley Town Council, Baghurst Parish Council and Aldermaston Parish Council. Pamber Parish Council expressed no objection but registered concern over water and sewerage. There were also 15 letters of objection and 15 letters of support, all as summarised in the Committee report.

²⁵⁹ Core Doc 32 starting at page 4. (Full representations on the file).

²⁶⁰ Doc 6

²⁶¹ LPA 8 Appendix 6

²⁶² Core Doc 32 starting at page 4. (Full representations on file).

INSPECTOR'S CONCLUSIONS

[Numbers in square brackets denote source paragraphs]

Background

252. The proposal is the demolition of an electricity substation and a former cinema (now used as a scout hut) and the redevelopment of the site for residential (115 dwellings) and commercial (945 sq.m. of Class B1 floorspace) purposes. The substation and scout hut would be relocated. There would be a new public open space and a local area for play, together with the upgrading of a public footpath [14-17].
253. The site is within the defined settlement boundary of Tadley. To the north of the site, across the main road and extending for a considerable distance, is the AWE [6-10]. It is the proximity of AWE which has given rise to the main objection to this application – the effect on human health.
254. The details of the nuclear inventory at AWE, its precise location, the processes undertaken and details of any future projects are, for obvious reasons, matters of national security and were not available to the Inquiry. However a considerable amount of more general information which is within the public domain was included in the initial material before the Inquiry, especially in the evidence of HSE [170-175]. In addition the amount of available information increased during the course of the Inquiry, especially as a result of a visit to AWE (during which a representative of AWE identified the use of certain areas and buildings), consideration of material submitted by AWE as part of a planning application for the 'Pegasus project' [9], and in the form of a letter from AWE giving additional locational details [230].
255. There is no suggestion or evidence that the interests of any party were prejudiced by the lack of more precise details of the nuclear inventory or the processes involved. No party requested that evidence related to such matters be considered in closed session.

Planning considerations and the approach to the decision

256. The starting point for considering the application must be the development plan, followed by other material considerations. In this case one part of the development plan, the Basingstoke and Deane Local Plan (LP), includes general policies dealing with the need to minimise pollution and related to environmental well-being [25].
257. More specifically, national planning policy in the form of Planning Policy Statement 23 '*Planning and Pollution Control*' (PPS23) states that the impact on health is capable of being a material consideration, and deals with the precautionary principle. Health issues, arising from the proximity of the site to AWE, are material considerations in this case, and this is accepted by all parties [34, 106, 165].
258. C04/00 deals, amongst other matters, with the role of HSE [34, 106, 167]. Their role is to provide advice on the nature and severity of the risks presented by major hazards to people in surrounding areas, so that those risks can be given due weight when balanced against other relevant planning considerations.

It is not the role of HSE to consider wider planning matters, which are the province of the decision maker. The opposition of HSE to this application was related to health matters and, although a very small part of HSE's case dealt with criticism of more general planning arguments being put forward in support of the proposal [237-239], HSE's evidence was well within the terms of C04/00.

259. This report therefore considers the application in the light of the provisions of the development plan, the objections raised by HSE (and written submissions from emergency responders) on health matters, and other material considerations – including the largely uncontested benefits arising from the development. An overall planning balance is then reached.

Development plan policies

260. Following the judgement of the High Court in November 2010 (2010 EWHC 2866) the South East Plan remains part of the development plan, although the Secretary of State's intention to abolish such Regional Strategies is a material consideration. In this case the only relevance of the South East Plan is in relation to housing land requirements, as discussed below [21, 23].
261. In addition to policies dealing with pollution and well-being, the LP includes a range of policies largely dealing with uncontentious land use planning matters (as will be discussed below). It also covers affordable housing and infrastructure contributions [24].
262. An important consideration is the fact that the LP allocates this site for a mixed residential development (of a minimum of 100 dwellings), open space and employment uses [13, 24]. The LP allocation of the site, which reflects an earlier Planning Brief [12] identifying the site for predominantly residential use, was 'saved' in July 2009 by a Direction of the Secretary of State [13].
263. Emerging local planning policy is at an early stage and there are no draft policies which are material to this case. This was agreed by the parties [27, 155].
264. The lack of consideration of health issues in relation to the site allocation was raised by HSE [232-236]. It is clear that the health consequences of the proximity of AWE to the site were not considered at the time of the adoption of the Brief, at the LP Inquiry or when the LP was subsequently adopted, or as part of the 'saving' process. The potential health issues have therefore not been previously addressed in the planning context and the current application is the first time they have been considered in relation to this site.
265. It is not disputed that HSE was consulted, on a number of occasions, during the two year period leading to the adoption of the LP. However there was no objection to the proposed site allocation from HSE. It is also clear that HSE had not objected to any other proposal in the DEPZ at that time, and did not wish to be consulted on any development generating less than 20 people. All this was in the context of the same science and nuclear policy which is currently relied on by HSE.
266. With this background, it is not unreasonable for the Council to have assumed that there was no health concern related to the proximity of AWE. The position was somewhat different by the time the question of saving LP policies and allocations was considered, as the Council was by then aware of the concerns of

HSE - but the authority apparently did not take this into consideration or report the position to the Secretary of State.

267. In any event, whatever the reason for the lack of consideration of the health issue – and it seems as though there has been fault on both sides – the LP allocation has the weight accorded by statute (S38(6) of the 2004 Act). It is not uncommon for information and evidence to emerge after the adoption of a plan, and this may properly be dealt with as a material consideration in dealing with particular proposals – as it is in this case. It can also be considered in emerging Development Plan Documents. However this is very different to any suggestion that little weight can be given to an adopted allocation because a particular issue was not even raised during the period when the allocation was being considered.

The effect on human health

Background

268. Following the Council's resolution to grant planning permission, HSE requested the Secretary of State to exercise his powers to call-in the application. C04/00 states that this power will only be exercised very selectively, and only if there are safety issues of exceptional concern.
269. The general expertise of HSE is recognised in C04/00. In this particular field the expertise of the Health and Safety Executive, Nuclear Directorate was not challenged. In particular, the experience of HSE witnesses in relation to nuclear policy matters and giving direct advice to Ministers is not in dispute. This is the first time the Nuclear Directorate has requested a call-in and the first time it has attended a Public Inquiry [167]. The advice of HSE, especially under these circumstances, should not be overridden without the most careful consideration.
270. The approach to HSE's advice is set out in C04/00. In particular the guidance is that:
- The risk to be considered is the residual risk which remains after all reasonably practicable preventive measures have been taken.
 - Where it is beneficial to do so, HSE's advice takes account of risk as well as hazard – that is the likelihood of an accident as well as its consequences.
 - Account should be taken of the size and nature of the proposed development, the inherent vulnerability of the exposed population and the ease of evacuation or other emergency procedures.
 - The risk of serious injury, including fatality, is to be considered by HSE, attaching particular weight to the risk where a proposed development might result in a large number of casualties in the event of an accident.

The risk of a nuclear accident

271. The first consideration is the likelihood of an accident involving nuclear materials taking place at AWE - after all reasonable practicable measures have been taken to ensure that the installation is safe. The requirement on AWE as

the operator of the site is to make the risk 'As Low As Reasonably Practicable' (ALARP).

272. There is no historical evidence that there have been any incidents at AWE, or its Ministry of Defence predecessor on the site, involving the release of radioactive material to the open environment. From this historical perspective the operation has therefore been safe. However it is essential to consider the possibility of future incidents.
273. There are a range of events which could give rise to accidents - lightning strikes, fires, or human error being the most likely. However the evidence suggests that the only event likely to raise concerns about off-site safety would be a major fire which engulfed an entire building within which there was a nuclear inventory [44, 180].
274. Should any accidents or incidents occur there is protection in depth provided on the AWE site – there are a number of layers of defence before any off-site measures would be contemplated. The majority of potential faults identified in the Hazard Identification and Risk Evaluation assessment (HIRE) would not result in any release of particulate radioactivity to the open environment, due to the layers of prevention, mitigation and protection in each facility [43-45, 125, 127, 212, 214].
275. In this context there is no dispute that AWE operates in a manner which is as safe as possible, and HSE accepted that AWE operates in an ALARP fashion [38, 181]. Indeed, given the role of HSE in regulating the AWE operation, it would be surprising if HSE took a different view.
276. There was much debate at the Inquiry regarding the way in which the residual risk analysis should be considered. The Applicant and the Council both asserted that HSE's evidence focussed entirely on consequences (considered in the next section of this report) not on the initial risk of an event taking place [39, 65, 112-115].
277. The approach of HSE to risk was based on the Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPPIR). These Regulations reflect the fact that there is a long history of nuclear facilities in the UK. REPPPIR is an established regulatory regime aimed at (amongst other matters) protecting the public who live near to such sites. REPPPIR requires all potential accidents and their consequences to be identified by (in this case) AWE, and this identification of hazard and risk is then scrutinised by the regulator (in this case) HSE [176-180].
278. REPPPIR requires the identification of "reasonably foreseeable radiation emergencies" – defined as emergencies which are "less than likely" but which are still "realistically possible" [178]. The regime specifically does not quantify the risk. It is reasonable to assume that this was a conscious choice on the part of those preparing and approving the Regulations. This approach sets the nuclear regime apart from other types of emergencies, such as flooding, where quantitative descriptors of risk (such as 1 in 100 years) are used.
279. Since the first issue of a licence to AWE, it has been consistently concluded, through the well established statutory process, that there are such reasonably foreseeable radiation emergencies which could arise from the activities at AWE.

This type of emergency and the acceptance that it is reasonably foreseeable is evident in the HIRE [180]. This is the approach of HSE to risk in this case.

280. There is nothing to doubt the accuracy of the work done within the REPPIR system or the system itself. However the concern of the Applicant and the Council is that the main purpose of REPPIR is to deal with a situation where an event has already occurred and control measures have failed. It then deals with the emergency planning arrangements to deal with that radiation emergency. There is an assumption in REPPIR that no health protection measures at all are taken for 24 hours after such an event.
281. It might be tempting to consider that saying that an event is 'reasonably foreseeable' does not provide a useful tool in the context of deciding a planning application, when the likelihood of the risk of a harmful event taking place needs to be considered. However there are two persuasive reasons for adopting the REPPIR approach. Firstly, it is the system which statute has deliberately established for dealing with sites such as AWE – and this is a system which has deliberately avoided quantifying the extent of the risk. Secondly, even if there was a reason for going behind REPPIR and substituting a quantifiable measure of risk, it is far from clear what that measure should be.
282. The Applicant has addressed this matter in comparison with events and activities of various kinds which contribute to a normal background level of risk, and has concluded that the residual risk is less than of one event in 1,000,000 years [66]. However this is not based on any detailed knowledge of the processes or nuclear inventory at AWE, and such comparisons are of limited assistance.
283. Various terms have been used to describe the risk that an event at AWE would impinge on those living and working outside the site. Perhaps the best is contained within the REPPIR Leaflet (2010) distributed to the public which describes the risk as 'extremely remote' [117]. The key point remains that, regardless of which of the various descriptors is used, there remains the potential for a reasonably foreseeable emergency at AWE – despite the fact that the site is operating at ALARP.
284. In this context, although the REPPIR approach towards 'reasonably foreseeable' events does not give a clear definition of the likelihood of an event occurring, it has the benefit of being the tried and tested statutory approach – which is applied to the entire nuclear industry. To go behind that and adopt a different test would not be justified, and it was accepted by the Applicant [181] that this would be irrational.

The consequences of a nuclear accident

285. REPPIR requires the operator (AWE) to produce a hazard analysis (HIRE) identifying potential accident scenarios and the possible extent of any release of radioactive materials. The HIRE is then scrutinised by the regulator (HSE).
286. A Detailed Emergency Planning Zone (DEPZ) is then fixed by HSE, as being an area within which detailed emergency preparedness is required. A radiation emergency is defined by REPPIR as a dose intake of 5mSv and the DEPZ is defined as being the area in which a member of the public might receive this dose or more in the event of a nuclear accident.

287. In the case of AWE, this DEPZ is a circle of 3 km radius from a nominal central point on the AWE site [183]. The extent of the DEPZ has not altered since the site was first licensed, although it is not clear how that figure was initially determined [56]. Consideration has been given by HSE to reducing the DEPZ but this consideration has not resulted in any change, and is part of the normal process of monitoring and review [56, 184]. The fact that alternatives have been considered should not be accorded any significant weight, as the adopted DEPZ has not been altered.
288. The application site is about 1 km from this nominal central point on the AWE site. The dose received by those closer to AWE would clearly be higher than those at the edge of the DEPZ, and HSE clearly calculated (on the basis of a Gaussian Plume model) that at 1 km the effective dose would be in the region of 30mSv [185]. This would be a significant dose, as accepted by the Applicant.
289. The methodology assumes that the application site would be downwind of any release. Clearly the dose could be less than 30mSv if the wind was blowing in the other direction [121]. However to assume a more favourable wind direction as part of the rationale for allowing the proposal would be most unwise.
290. However the Applicant put forward an analysis [54, 59] which suggested that the dose received at the application site would be significantly lower (no more than 16mSv). But this analysis was partly based on calculations subsequently accepted to be in error [228, 230]. It addressed only the current situation and the proposed Pegasus development, and did not allow for the possibility of future development at AWE closer to the application site. The calculation by HSE of the likely dose at the application site is more robust.
291. Turning to the consequences of such exposure, the REPPIR public leaflet states that there would be no immediate health effect for members of the public following a serious nuclear incident and release at AWE. It states that staying indoors with doors and windows closed would remove almost all the risk [69, 119]. There is no evidence that this is incorrect, but there has to be a question as to whether those potentially affected would be notified in time and be able to take shelter.
292. REPPIR makes the assumption that, for the first 24 hours after an event, persons within the DEPZ are outdoors and unable to achieve the mitigation afforded by sheltering. This is due to the uncertainty of guaranteeing that warning could be given or received, or that shelter would be immediately available [113, 120, 121].
293. Doubtless some sheltering would take place, and other emergency measures would be implemented. However the method of warning residents would be by way of telephone calls, and for those who were outside at the time of the incident, this could lead to a delay in notification. Given the evidence that the radioactive plume could reach the application site in around 3 – 5 minutes [209], the REPPIR assumption that no sheltering would initially occur is reasonable.
294. If the potential 30mSv dosage was received by occupiers of the development, this would be very significant. The extent of such a dose, arising from a reasonably foreseeable event, was not addressed in the Applicant's Environmental Statement or written evidence. The persuasive evidence of HSE,

given by an acknowledged expert on the impact of radiological doses was that such an exposure would be unacceptably harmful and would lead to an increased risk of cancer [187-191]. The concern is therefore not related to a societal risk, but a risk to a small number of people over a lifetime.

295. The Applicant's position at the Inquiry on the consequences of this dose proved not to be significantly different to that of HSE. It was accepted by the Applicant that such doses were "significant" if not "catastrophic", and that residents of the proposed development would be right to be "legitimately concerned" about such consequences [72, 189].
296. The Council compared this dose with other exposures to radiation. For example some medical procedures (such as CT scans) involved around a 10mSv dose [121]. However such comparisons are not especially helpful when considering the unwilling exposure of those who happen to live or work near the AWE site.
297. In dealing with the consequences of an accident, it is noted that HSE did not object to other housing developments in the area, most notably Kestrel Mead, which is located slightly closer to AWE [67, 136, 141]. This was despite the fact that the science and nuclear policy which HSE currently applies has not changed. However it was accepted at the Inquiry by HSE that this was a mistake [188]. Although this inconsistency is to be regretted, it adds very little to the Applicant's argument in this case.
298. However one defines the likelihood of a nuclear emergency of the type dealt with by the REPPiR process, it remains a possibility – albeit unlikely. The only two parties (HSE and AWE) with the full knowledge of the inventory and processes at AWE consider that such an emergency is reasonably foreseeable in the terms defined by REPPiR. The fact that one of these parties is the statutory regulator of the site is of considerable significance.
299. Should a nuclear accident take place, and have consequences off the AWE site, there remains the potential, even after preventative measures have been taken, that a materially harmful radiation dose would be received by occupiers of the proposed development. The potential that a person could receive a 30mSV dose cannot be disregarded, and is clearly an important material consideration.

The effect on off-site preparedness

300. As explained above, the DEPZ is determined by HSE, within which area a detailed emergency plan is required by REPPiR. In the case of AWE, this is the Off-Site Contingency Arrangements (the Off Site Plan). The current Plan was agreed in July 2009 and is to be formally reviewed in January 2012.
301. The Off Site Plan was prepared by a Working Group, chaired by West Berkshire Council and consisting of representatives of a wide range of organisations, including HSE. The Off Site Plan sets out the contingency arrangements for a multi-agency response should there be a release of radioactive material which poses a hazard outside the AWE boundary.
302. There was some discussion at the Inquiry as to whether HSE had formally approved the Off Site Plan, or indeed whether it was required to do so. That is to a large extent academic, as it is clear that HSE played an important role in the production of the Off Site Plan and that, had they considered the document to be deficient and not fit for purpose, they would have at the very least altered

the Working Group to that fact. The evidence of HSE did not significantly criticise the contents of the Off Site Plan, which was accepted to be fit for purpose and REPPIR compliant [81, 122, 201].

303. The Off Site Plan has been regularly reviewed and tested as required by REPPIR. The last test was in November 2010, and HSE (who were actively involved in the test) confirmed that it then met REPPIR requirements. The Off Site Plan has also been the subject of a Benchmarking Review [123] which confirmed its robustness.
304. HSE's concern in relation to the Off Site Plan was not that it would fail, but that the proposal would provide additional challenges and reduce emergency preparedness. However the limited increase (268) in the resident population of the emergency planning area (i.e. around 2%) would seem unlikely to have a significant impact on the effectiveness of the Off Site Plan [122, 131]. This is against the background that the Off Site Plan does not include a maximum population beyond which it would not work. In addition, the area already accommodates widely fluctuating numbers of people as a result of those travelling through and working within the area.
305. REPPIR requires [82, 121] that the Off Site Plan should be 'extendable' to provide effective mitigation against extremely unlikely accidents which could have consequences even beyond the DEPZ. This type of extendability planning is an important part of nuclear emergency response arrangements. The built in flexibility and extendability demonstrates that the Off Site Plan is capable of adjusting to changing circumstances, and that the process of review and modification could cope with the increase in population envisaged in the current application.
306. The Off Site Plan deals with the need for evacuation, and states that even the most serious incident that can be envisaged at AWE should not require the urgent evacuation of areas outside the AWE fence. Exceptionally, evacuation within the first 24 hours might be necessary for areas up to 400 metres downwind from the site of the incident, but most of this area would be within the AWE boundary [53]. This approach towards evacuation is reflected in the REPPIR public leaflet. In this context, the potential need to evacuate those living on the application site is limited.
307. If an evacuation were necessary, this would normally be carried out either before any release (on a precautionary basis), or following the initial phase once the pollutants had settled. There is no reason to suppose that the addition of those living and working on the application site would render any such evacuation impossible or significantly more challenging, although it would require additional resources and commitments from emergency responders.
308. Concern was also raised by HSE about those who chose, despite the published advice, to self-evacuate when an incident occurred. This possibility is recognised in the Off Site Plan [85]. However it is reasonable to assume that the majority of residents and workers would follow the advice to stay indoors and thereby limit their exposure. Those few who might self-evacuate are unlikely to pose the sort of traffic difficulties suggested – without any detailed evidence – by HSE. The Applicant's Transport Assessment [85] states that the entire development would only increase traffic flows by around 2%. In this context the very small increase in traffic brought about by any self-evacuation

would be unlikely to impact in any material respect on the emergency services. In any event, initially emergency vehicles would generally be going towards the incident, whereas any self-evacuees would be travelling away.

309. Some of the agencies who would be involved in responding to an emergency have objected to or raised concerns about the proposal [242, 249]. The fact that there have been varying responses is perhaps inevitable given the different roles of the organisations. However, although a number of them state that the Off Site Plan may need to be amended, they generally stop short of suggesting that this could not be done.
310. Particular attention should be given to the response from West Berkshire Council (who chair the Working Group) and Thames Valley Police (who are charged with leading the co-ordination and management of the emergency response) [242, 244].
311. West Berkshire Council, although objecting to the proposal, explains that, should the application be approved, the responding agencies would review their processes and the Off Site Plan, and adapt accordingly. Although concern is expressed at the financial consequences, it is clear that the Off Site Plan could be adapted to allow for the proposed development.
312. Thames Valley Police have concerns about development in an area where people may potentially be put at risk. However they state that there is nothing to indicate that the increase in population would result in the failure of the current Off Site Plan or a breakdown in the police response.
313. Overall, it is far from certain that the proposal would necessitate any significant changes to the Off Site Plan, which has built in flexibility and extendibility. But even if such changes were required, there is no persuasive evidence that they could not be accommodated within the statutory REPPiR process or that the proposal would unnecessarily impact on the effectiveness of emergency responders.

The applicability of nuclear siting policy

314. There is a disagreement between the parties as to the relevance of certain national nuclear policy statements [74-76, 129-130, 211].
315. HSE placed particular weight on two main sources of policy. These are the 'Fourth Report on Compliance with the Convention on Nuclear Safety Obligations' (the Fifth Report is very similar), and the Statement by the Secretary of State for Energy in March 1988 dealing with demographic criteria – the 'Hansard policy'.
316. It is clear that the policies were written for nuclear reactor sites, where all aspects of the design, planning and construction have been the subject of licensing control. Self-evidently the AWE site is neither a nuclear reactor nor a potential location for a complete new nuclear facility. It is a legacy site which has developed over many decades, and which has only recently been the subject of the licensing process.
317. In the light of this, it was accepted by HSE that there is no specific Government policy dealing with a legacy site such as AWE, and no HSE document in which

the applicable siting policy was specifically set out. Nonetheless, HSE gave weight to these national nuclear policies for a number of reasons.

318. In particular the Forward to the Fourth National Report states that, although the report only covers land based civil nuclear plant, the “safety of other UK nuclear facilities that fall outside the scope of this Convention are also regulated to the same standards, so as to ensure that they are operated in a manner that maintains a high level of safety” [211]. Although this refers to standards and not locational issues it is nevertheless a good indication of the applicability of the Report.
319. Several HSE witnesses, including those who directly advise Ministers on nuclear matters, explained how the policy is applied in practice to sites such as AWE. This evidence of the manner in which national policy has been applied was persuasive.
320. HSE referred to 1998 and 2008 papers dealing with proposals for demographic siting criteria to be applied to both reactor and non-reactor nuclear sites. Although these were discussion papers and not statements of policy, they add weight to the argument that the policy is applicable to non-reactor sites. Similarly considerations by NuSAC did not formally adopt a policy for sites such as AWE, but again these reinforce the use of the policies on the basis of custom and practice [75].
321. It is clear from the evidence that the policy sources relied on by HSE have been regularly used in relation to non-reactor sites, and is reasonable to consider them in this case.

Population density criteria

322. The overall policy approach is to preserve the ‘general characteristics’ of a nuclear site, and the Hansard policy specifically confirms the use of weighted population figures [213]. The Applicant accepts this general statement of government policy, though not the way in which it has been applied by HSE [61, 63].
323. This policy is by way of general guidance rather than being proscriptive. This is made particularly clear in the Hansard policy, and by the use of such subjective terms as ‘significant’ when considering whether there has been population growth after a site was licensed [47, 132].
324. The policy itself does not provide a finite limit on population numbers in the area. This is accepted by HSE. The issue is therefore not the principle of population growth in general, but rather the consequences of the location of the application site close to AWE. The limiting criteria in the policy are in the form of cumulative weighted populations to various distances around the site and in any 30 degree sector.
325. Three demographic criteria guide the siting of nuclear reactors - semi-urban, remote and new build. Of these, the semi-urban criterion is the least restrictive, and therefore allows a greater population density closer to the facility than the others. Although these criteria apply to reactors and not sites such as AWE, there is a persuasive logic which suggests that they should be applied in this case – the issue is therefore which criterion should be used.

326. The criterion to be applied can best be considered in relation to the extent of the hazard. DEPZs have been calculated for each appropriate nuclear site, and the DEPZ at AWE is wider than that for AGRs [219-220]. HSE persuasively explained that this is because the hazard associated with AWE has been calculated to be higher for a reasonably foreseeable emergency than that at AGRs. This level of hazard is also reflected in the fact that at licensing, it was apparently thought appropriate to treat AWE as an even more sensitive "remote" site [221].
327. As the semi-urban criterion is applicable to AGRs, at least the same criteria should logically be applied to AWE. This logic was accepted by the Applicant. Careful consideration of the criterion is especially important as the normal siting issues were not considered when AWE was established as a Ministry of Defence operation. This makes the consideration of the surrounding population characteristics even more important.
328. There was much debate as to the way in which the semi-urban criterion should be considered, but the overwhelming evidence was that, due to the existing population around the AWE site, the semi-urban criterion is already significantly breached for large parts of the AWE site [224]. In general, the further south one goes within AWE (i.e. towards the application site) the greater the breach. HSE's evidence on this matter did not allow for day time visitors to the area and, self-evidently, if they were included the breach of the semi-urban criterion would be greater.
329. Given this existing situation, significant population growth in the relevant sectors would not comply with the semi-urban criterion. It cannot reasonably be argued that because a sector already includes too many people, a growth in population may be allowed simply because the criteria are already breached.
330. The Applicant's approach was not to use the semi-urban criterion but to suggest an alternative by manipulating the weighted calculation which defines the criterion. This resulted in what was called a 'limiting population density'. However this is not a recognised approach and is not a useful concept because the consequence of the manipulation is to remove any limiting criterion – in other words the population could rise to any level and still meet the terms of the new equation. This would be at odds with the policy need, accepted by all parties, to maintain the general characteristics of the site.
331. There was considerable debate at the Inquiry as to the population of the area at the time of licensing and at present. This obviously bears on whether there has been population growth after the site was licensed.
332. The Council convincingly demonstrated that the population of the entire DEPZ has remained broadly the same since licensing (an average change of less than 0.03% per annum) [137]. This was supplemented by the personal knowledge of Council witnesses.
333. However this evidence dealt with the whole of the DEPZ and did not address changes within the area or with the more detailed situation close to the point of potential release within AWE. It was agreed by the Applicant and the Council that it is only cumulative weighted populations and moving averages that have direct relevance to HSE's demographic model [33]. In this respect HSE

evidence showed an increase in population close to the application site, which was balanced by a decrease in sectors further away [231].

334. HSE's population evidence is not without flaws, in that it relied on an average household size based on 2001 census data, when it was demonstrated that the average household size has reduced since that time [142]. In addition, the relevant start date should have been the licence date (1997), but 1991 was in fact used – and the Council demonstrated that most material increase in population had taken place before that [142]. Despite these issues, HSE's population evidence is the most useful in that it was produced in a manner appropriate to the consideration of the semi-urban criterion.
335. There is nothing to suggest that the current HSE evidence on population is incorrect, but there was a previous flaw in their approach which has led to an anomaly in their position. In 2009 it became apparent to HSE that the earlier work by WS Atkins – estimating population numbers around the time of licensing – had significantly underestimated the population at that time [138-141]. This seriously skewed the subsequent estimates of population increase in the area. On that basis, working under the misapprehension of very large population increase in the area, the fact that HSE did not object to most earlier proposals in the DEPZ is anomalous.
336. This misapprehension did feature in one objection by HSE, in relation to an appeal at Shyshack Lane [139, 217]. The incorrect evidence by HSE at this appeal was based on a population growth of around 300% in the relevant sector since licensing.
337. It was suggested that HSE had initially based its objection to the current proposal on this incorrect assumption of population growth in the area. When it discovered that this was not the case, the suggestion was that HSE had changed tack and adopted the position that the semi-urban criterion would have been breached even in 1997, so that there would also be a breach now if the application scheme went ahead. There is some evidence that the primary focus of HSE did shift in this manner, but that is not to imply that the existing breach of the criterion was not initially considered. In any event, the convincing evidence now is that the criterion was and is breached.
338. The Applicant stated that other sectors within the DEPZ are more heavily populated than the sector containing the application site [83, 231]. However this evidence considered DEPZ sectors and not Hansard policy sectors, and had not been rotated as required by the criterion. In addition, the data had not been weighted to reflect proximity to the potential release site. The Applicant accepted these shortcomings in the data, which therefore adds very little to the current considerations.
339. It was also suggested that an allowance for natural growth should be made in this case. However there is no evidence that this approach is based on any policy and, where such an allowance had been made in the past, the actual ceilings for population including natural growth were below the semi-urban criterion. In any event, HSE's convincing evidence was that the semi-urban criterion already allows for natural growth [231]. It would therefore be double counting to include this for a second time. To make an additional allowance for natural growth where the semi-urban criterion had already been breached would be illogical.

340. There was some discussion at the Inquiry of the way in which future development within the AWE site might be constrained by existing and future development outside the site [52, 79, 229]. Development of a nationally important nuclear site should not be unreasonably fettered by proposals outside the site (although this point was not made by AWE). In any event, given the fact that there is existing housing closer to AWE than the application site, it is reasonable to assume that this existing population would be the limiting factor rather than the proposed development. The constraining effect of the current proposal would therefore be very slight, and is not an argument of any real significance in this case.
341. In conclusion on this issue, it is noted that the criteria are specifically intended to be used only for guidance. A breach in the policy and the semi-urban criterion should not, in itself, be a reason why planning permission should be refused. That said, the balance of the evidence is that the policy and criteria are applicable to AWE and its surroundings, and that the semi-urban criterion is already breached in this location. That breach would be worsened by the proposal.
342. Although the character of the overall DEPZ has probably not changed significantly since licensing, this ignores the weight to be accorded to the proximity of the site to the potential source of release and the population changes close to the source of the release. This is an important factor when considering a site as close to AWE as the application site.
343. The alternative approach adopted by the Applicant does not have any backing in policy. It would fail to control population in the area around AWE – which is the clear objective of policy.
344. On balance, the general characteristics of the site would not be preserved by this proposal, and the semi-urban criterion would be breached.

Other health matters

345. The only nuclear appeal decision to which the parties referred and which could in any way be comparable to the current situation is that at Shyshack Lane, to which reference has already been made. In this case an Inspector dismissed an appeal for a much smaller housing development on a site within the DEPZ but further from AWE.
346. However, as noted above, HSE's case in that instance was erroneously based primarily on a perceived significant increase in population growth since licensing. The parties to the current application disagreed as to the amount of weight which that Inspector would have accorded to the apparent population growth. The Inspector's reasoning can only be assessed by what she wrote in the decision, but it appears as though she regarded it as an important material consideration. What the decision would have been in the absence of that (inadvertently) misleading evidence can only be a matter of speculation, but it would be unwise to place any significant weight on the decision.
347. The question of the precedent which granting planning permission for the current proposal would set was an argument raised by HSE in the letter which secured the call-in of the application. The letter referred to "serious precedential implications". However this was not pursued at the Inquiry. Each

application must be treated on its merits, and the alleged precedent which a decision on this site would set is not a major consideration. In any event, the Applicant's largely unchallenged evidence [88, 89] was that the application site is the last available development site of any size in the area, and it is therefore unlikely that any decision in this case would set a significant precedent.

Conclusion on health matters

- 348. The risk of a nuclear accident at AWE occurring at all is very low, given that the site is operating at ALARP. Should there be an accident, there are a number of levels of defence in depth before there would be any consequences for the general population outside the AWE site.
- 349. The likelihood of this residual risk occurring, although low, is nevertheless 'reasonably foreseeable' in the terms of REPPiR. Although this does not provide a clear definition of the likelihood of an off-site event occurring, as the Applicant sought to provide, it has the benefit of being the tried and tested statutory approach which is applied across the nuclear industry.
- 350. Should such a reasonably foreseeable event take place, there is the potential that those on the application site could receive a materially harmful radiation dose of the order of 30mSv. All parties accept that this is not something which should be disregarded, and it is an important material consideration.
- 351. The Off Site Plan, which sets out the response arrangements should there be a release of radioactive material outside the AWE boundary, is accepted by all to be fit for purpose. It is designed to be flexible and extendable. It is possible that the implementation of the application scheme would necessitate changes to the Plan, but the evidence does not lead to the conclusion that the Plan would fail. The representations of the key emergency responders generally support this conclusion.
- 352. There is no specific Government policy dealing with a site such as AWE, but the evidence is that the national policy relied on by HSE has been used for non-reactor sites, and this policy should be considered in this case. The overall policy seeks to preserve the 'general characteristics' of a nuclear site, which is an approach accepted in principle by the Applicant. The best evidence is that the general characteristics of the site would not be preserved by the proposal, and that the semi-urban criterion would be breached.
- 353. HSE has a specific role as set out in C04/00, and its opposition to the proposal needs to be carefully considered. There are a range of factors which suggest that the risk of an event occurring and having off-site consequences is of a very low order of probability. However the health consequences for those on the site, who could receive a materially harmful radiation dose, are such that HSE's Advise Against position is justified.

Other material considerations

- 354. There are a number of material considerations which weigh in favour of the application. This is in addition to the LP allocation of the site for residential, open space and employment uses. These material considerations are almost entirely uncontested and, where applicable, are supported by the development plan – for that reason the consideration of these matters is comparatively brief, but this does not imply that they have correspondingly limited weight.

The improvement of the site, density and sustainability

355. The site is currently visually unattractive and does not contribute to the character of the area. Aside from the activities at the scout hut the site is only used for local walking, and may therefore be regarded as under-utilised.
356. The general location of the site is clearly sustainable, being close to the centre of the second largest settlement in the Borough, and the principle of developing such sites is recognised by LP policy D5. There is a good quality bus service to Basingstoke, and the site is close to local employment opportunities in the District Centre, at Calleva Business Park and at AWE itself [10].
357. In principle the redevelopment of such a site close to the centre of the settlement would accord with LP policy D2 and with national policy by making efficient use of previously developed land. The proposed density of the residential element [15, 61] represents an efficient use of the site, as does the layout and scale of the commercial element.

General housing need and supply

358. Dealing first with housing need, there are a range of possible requirement figures. The South East Plan, which remains part of the development plan, sets a requirement of 945 dwellings p.a. for the period 2006 - 2026. Although the intention to abolish Regional Strategies is a material consideration, significant weight must currently be attached to this figure. This figure is the only one which has gone through a full needs assessment and has been adopted [97, 151, 152, 238].
359. However there are three possible alternative figures, which must be given less weight than the development plan figure and do not, in any event, represent a fully tested and adopted locally generated requirement:
- 825 p.a. for 2006-2027. This is based on the Chief Planning Officer's letter as to the possibility of utilising such a requirement.
 - 790 p.a. The Council's Planning and Infrastructure Overview and Scrutiny Committee (July 2010) supported this figure. However this requirement was not pursued by the Council at the Inquiry.
 - 740 p.a. for the period 2011-2027 or for 2006-2027. An officer report dealing with these possible requirements was to have been considered by the Council's Committee in November 2010 but, in the light of the Court judgement related to the reinstatement of Regional Strategies, no consideration was given to this proposal. It must therefore be accorded very limited weight.
360. Set against these requirements, there is a disagreement between the Applicant and the Council as to the exact extent of the deliverable land supply.
361. The Council considers that there is a supply of 3,331 dwellings in the relevant 5 year period, whereas the Applicant considers it is 2,583 (excluding the application site). The difference relates to five sites, based on the 'deliverability tests' in PPS3. [98-100, 150].
362. The Applicant's detailed assessment of these sites [98, 150] casts considerable doubt on the Council's more optimistic land supply figure. Of particular note is

the Beech Down site, where 64 extra care affordable units appear to have been included in the supply figure (although all other such units have been excluded). In relation to land between Mulfords Hill and Silchester Road (the other allocated site in Tadley) the best evidence is that there are land ownership problems which seem likely to delay any development. For these and other reasons set out in the Applicant's evidence, the more realistic approach of the Applicant to land supply is preferred [98].

363. Balancing housing requirements and land supply, using the Applicant's figures, it is clear that there is a deficiency in the five year supply regardless of which housing requirement figure is used [99]. The extent of the supply ranges from 2.87 years (using the 945 p.a. figure) to a supply of 4.09 years (using 740 p.a. for 2006-2027).
364. Even using the Council's land supply figures, there would be a shortfall for all the housing requirement figures unless one were to use 740 p.a. for the whole 2006-2027 period. Even using that figure, leaving aside the fact that it should not be given any significant weight, there would be a 5.3 year supply if the application site were included. It is clear that the application site would make an important contribution to the extent of the 5 year land supply under these circumstances.
365. With this background, the only issue is the extent of the shortfall in housing land. Under these circumstances, favourable consideration should be given to planning applications, in line with national policy.

Affordable housing

366. Affordable housing would be provided by way of the Planning Obligation. The development would provide 40% affordable housing (i.e. 46 of the 115 units) with a tenure split of 63% social rented and 37% shared ownership. This provision would accord with LP policy C2 and with the Affordable Housing Supplementary Planning Document.
367. It is common ground between the Council and the Applicant that there is a need for between 580-920 affordable units each year across the Borough. This reflects the various Housing Market Assessments which have been undertaken over recent years.
368. More locally, there is a significant local under-provision of affordable housing. Set against a clear identified need in Tadley [32] the current proposal would deliver 46 units.
369. This is of particular importance bearing in mind the exceptionally low level of affordable completions in Tadley - none since 2005/6 [32]. There are no other deliverable and available sites to meet either the current or cumulative need in Tadley [32]. The only other site in the area large enough to deliver affordable housing is the land between Mulfords Hill and Silchester Road but, as mentioned above, land ownership issues look set to delay that development.
370. HSE stated that the Council has substantially exceeded its 'objective' of providing at least 300 affordable units p.a. [102]. However this figure does not reflect the actual level of affordable housing need in the Borough. In any event, the period considered (2007-2009) was a time when developers prioritised

affordable units in order to aid cashflow, and when significant additional funds were made available. It by no means represents an average period.

371. The mechanism for securing the affordable housing provision in the Planning Obligation is unexceptional, and the comment from HSE that the intermediate housing would be unrestricted if the owners purchased outright is an entirely normal provision. These units would contribute towards the current need for such accommodation.
372. The affordable housing provision, given the pressing need in Tadley and the Borough generally, is a consideration to which significant weight should be attached.

Dwelling mix

373. The proposal would provide a mix of unit sizes which would accord with the requirements of LP policy C3. This requires a mix of dwellings with a substantial proportion of 1 and 2 bedroom units (30-50% in the case of the open market housing). It would create a mixed and inclusive community, taking into account the scale of the development, its location, and housing needs.

Employment floorspace

374. The application includes 945 sq.m. of commercial floorspace – around 10% of the floorspace of the overall development. It would be in a sustainable location and would enhance the existing commercial provision in Tadley. This is in accordance with LP policy EC4 and the LP site allocation.

The replacement of the scout hut

375. The former cinema building, now occupied by the Scouts, is in poor condition, as accepted by all parties and as confirmed by the Scouts [163]. The loss of such a facility would normally be resisted by LP policy C8. However there is an extant permission for the construction of a new facility in a residential area east of Southdown Road [14]. The applicant proposes to implement this permission prior to the demolition of the former cinema building – this is included in the Planning Obligation [14]. Should this not happen, the Applicant would pay a financial contribution towards a replacement facility.
376. The provision of a new facility, or contributions towards it, would be of greater benefit to the community than the retention of the existing building, and the objectives of the policy would be met. The new building – which could be used for a range of activities - would complement the existing playground, basketball court, football pitch and open space.

Footpath improvements

377. The existing footpath along the southern boundary of the site would be improved in relation to surface and boundary treatment, and high and low level lighting. This would improve surveillance and the overall quality of the path, which links Aldermaston Road and Almswood Road, along with providing access to the proposed central open space. This would comply with LP policy C9.

Design, layout and open space

378. There is no dispute that the scheme complies with the requirements for high quality and inclusive design. The dwellings would have private amenity space and the layout would not appear cramped or contrived. The three storey apartment blocks would be set back from the road and would be perceived along with adjoining commercial buildings – they would also replace the former cinema, which is of considerable scale. The existing mature trees around the site would be maintained.
379. There would be a central open space, which would produce a legible environment and allow an open view through to Aldermaston Road. This central open space would be accessible to residents of the development and other local people - there are no equivalent facilities in this part of North Tadley. This would accord with LP policy C9.

Conditions and obligation

Conditions

380. If it is considered by the Secretary of State that planning permission should be granted, the conditions set out in Annex 1 to this report are recommended.
381. The conditions are closely based on those agreed between the Council and the Applicant, and were not the subject of objection by any other party. Some minor amendments have been made to align them more closely with national policy. All are necessary and reasonable and meet the other tests in C11/95.
382. Standard conditions should be imposed to prevent the accumulation of permissions and to limit the development to the application plans, for the avoidance of doubt (Conditions 1 and 2).
383. A number of details of the scheme would need to be submitted for subsequent approval, to ensure a high quality of development in the interests of the visual amenity of the area (Conditions 3, 4, 10, 14). To ensure the development would not add to any flood risk, details of drainage arrangements should be submitted for approval (Condition 17).
384. During demolition and construction work it would be necessary to restrict the hours of working and deliveries, in the interests of the living conditions of nearby residents. (Conditions 6 and 13). Also during this period a condition would be necessary to protect the existing trees on the site, in the interests of the amenity of the area (Condition 20). Conditions dealing with construction vehicles, a temporary turning area, and the enclosure of the site would be necessary during the construction period in the interests of highway safety (Conditions 9 and 21).
385. Although conditions restricting 'permitted development' rights should only be imposed exceptionally, it is necessary to do so in this case given the nature of the scheme, so as to avoid the appearance of an overdevelopment of the site (Condition 5).
386. In the interests of the amenity of future residents of the development, it is necessary to require the use of obscure glazing in the first floor bathrooms, to

protect the development from road traffic noise, and to control the details and timing of lighting (Conditions 7, 15 and 18).

387. For highway safety and sustainability reasons, conditions should ensure the provision and retention of vehicle and cycle parking/storage (Conditions 8 and 23). Conditions should also control the details of roads, footpaths and accesses, and also prevent gated access to the development (Conditions 22, 24, 25). Existing access points should be closed and no additional accesses formed (Conditions 26 and 27). Works to improve the footway/cycleway fronting the site should be undertaken to improve access for pedestrians and cyclists (Condition 28).
388. For sustainability reasons, the dwellings should be constructed to Code 3 of the Code For Sustainable Homes (Condition 29). In the light of Lifetime Mobility standards, a condition is necessary to require 15% of the development to achieve that level (Condition 30).
389. To deal with any potential contamination, a condition is necessary to ensure investigation and, if necessary, remediation (Conditions 11 and 12).
390. Finally, in the interests of the living conditions of residents, a condition is necessary to ensure that the commercial space is used for B1 purposes only – as was sought in the application (Condition 19). The suggested highway safety reason for this condition is not agreed, as there is no evidence that uses outside B1 would necessarily generate additional traffic.

Planning obligation

391. Along with the affordable housing element referred to above, the Planning Obligation provides financial contributions and other community/infrastructure improvements [14]. This is in line with LP policy C1, which requires developers to provide the infrastructure and community facilities necessary to allow the development to proceed where provision is inadequate. The matters covered by the Obligation comply with the relevant development plan policies and guidance.
392. The key elements are:
- The provision of affordable housing. This has been dealt with above, and is in line with LP policy C2 and would meet a clearly identified housing need [101-103, 149].
 - A highway contribution and a Travel Plan. The Council has set out detailed and persuasive evidence [149] as to the need for and the calculation of the contribution. The area already suffers from high levels of congestion, and to allow the development without measures to offset its effect would exacerbate the position. The Council has provided evidence of the schemes to which the contribution could be allocated and which are directly related to the site and the proposal.
 - The implementation of the scout hut permission, or an alternative contribution. This is required in the light of LP policy C2, in order to provide the replacement of an essential local service. The deficiencies in provision in the area have been clearly identified [149].

- A Landscape Management Plan is necessary to provide for continuing management and maintenance of hard and soft landscaping. This is particularly important as the application site includes a significant amount of mature vegetation around the site boundary [149].
- The provision of a kickabout area and play area, and commuted sums towards the maintenance of open space and play areas. This would accord with LP policy C9, together with interim guidance. It would meet the reasonable needs of the increased number of local residents on the basis of formulae relating open space provision to head of population [149].
- A playing field contribution similarly relates to the population increase arising from the proposal, in the light of a range of documents supporting the need for provision. The contribution would be allocated to one of a named list of sites in the area [149].

393. These provisions meet the tests in C05/05 on the use of planning obligations. They are relevant to planning, necessary to make the proposal acceptable in planning terms, directly related to the proposal, fairly and reasonably related in scale and kind to the proposal, and are reasonable in all other respects. They also accord with the Community Infrastructure Regulations, which set out requirements for obligations. The matters contained in the Obligation are material considerations which weigh heavily in favour of the proposal.

The planning balance

394. With the exception of those general LP policies dealing with pollution and environmental well-being, the application accords with the development plan. In addition, aside from health matters, all other material considerations are either neutral or, in the main, in favour of the proposal.
395. This is a previously developed site within a defined settlement boundary, which is identified in a saved LP policy for the type of development currently proposed. That must be the starting point for the consideration of the application – even allowing for the fact that at no time were the health aspects of that allocation considered.
396. The site itself is in a sustainable location, and the proposal would make good use of the land in both visual and sustainability terms. It would result in significant planning benefits, in particular the provision of affordable housing (for which there is an acknowledged need) and the replacement of community facilities.
397. The position regarding housing land requirement and supply is in a state of flux at the moment. However the overall position is that, almost regardless of the housing requirement or land supply adopted, a 5 year housing land supply does not exist. Under these circumstances, favourable consideration should be given to planning applications.
398. Set against these matters is the sole, but substantial, objection on the basis of the effect on human health. This is clearly a material consideration and is the subject of policy at the national and local level.
399. Although decisions must be made on the basis of evidence, it is of relevance to recognise the role and expertise of those giving the evidence. The expertise of

HSE is clear and is recognised in national policy, and it has a specific role to advise Ministers on a range of matters, including the type of health issues raised by this application.

400. As concluded above, there is the unquantified potential for a reasonably foreseeable radiation emergency at AWE, even though it is clear that the likelihood of such an event is remote. Under those circumstances a materially harmful radiation dose could be received by occupants of the proposed development. No party suggests that the potential that a person could receive such a dose should be disregarded, and the fact that the proposal would put a significant number of people in harm's way is clearly an important material consideration.
401. The national nuclear policy documents relied on by HSE, although on their face not directly applicable to this case, have clearly been used as a matter of custom and practice in relation to facilities such as AWE, and it would be wrong to set them aside. All parties, though in some cases expressing concern about the relevance of the policies, accept the general principle that the general characteristics of the site should be preserved. In this case the best evidence is that this would not be the case, that the semi-urban criterion would be breached, and the proposal would not be in compliance with national nuclear policy.
402. The evidence is that the Off Site Plan has flexibility and extendibility built into it. Even if changes were required, such changes could be accommodated and emergency preparedness maintained.
403. This is a finely balanced case, with one very significant but unlikely harm to be set against a range of more 'conventional' planning considerations. However the consequences of such an unlikely event would be so serious that it is considered that planning permission should not be granted.

RECOMMENDATION

404. It is recommended that planning permission be refused.

P. J. G. Ware

Inspector

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

Mr T Cosgrove of Counsel	instructed by the Head of Legal & Democratic Services
He called	
Mr G Gosling	Intelligence Officer
Cert Arch	
Ms P Hughes	Head of Property Services
BSc MSc MBA MCIEH	
Ms N Linihan	Head of Planning & Transport
BA DMS MRTPI	
Ms R Fenn-Tripp	Principal Planning Officer
MSc BSc LMRTPI	

FOR THE APPLICANT:

R Griffiths QC	both instructed by Mr D Bond
Mr Tabachnik of Counsel	
They called	
Dr Thorne	Director, Mike Thorne and Associates
FInstP FSRP CRadP	
Mr Dillon	Emergency Management Services Limited
MSc SBCI MIFSM	
Mr Brookes	Director, GIS & Design Solutions
BSc(Hons) MS	
Mr D Bond	Partner, Wolfe Bond Planning LLP
BA(Hons) MRTPI	

FOR THE HEALTH AND SAFETY EXECUTIVE:

R Harris QC	instructed by the Treasury Solicitor
He called	
Dr D Lacey	Deputy Chief Inspector of Nuclear Installations Directorate (NI)
Mr I Robinson	Superintending Inspector NI
Mr S Saunders	Principal Inspector NI
Dr J Highton	Principal Inspector NI
Ms V Jones	Planning Consultant

INTERESTED PERSONS:

Mrs M Weston	16 Silchester Road, Tadley
Mr B Spray	Chairman, Tadley Scout Group. 12 The Close, Monk Sherbourne, Tadley
Mr A Jeffrey	Resident of Tadley

DOCUMENTS

Documents handed in at the Inquiry

- 1 List of persons present at the Inquiry
- 2 Written statement from West Berkshire District Council
- 3 Email (6/10/10) from Thames Valley police
- 4 Emails (19/2/10 & 3/9/10) from Hampshire police
- 5 REPPiR Regulations (extract)
- 6 Hampshire Fire & Rescue Service letter (14/10/10)
- 7 Hampshire Constabulary letter (15/10/10)
- 8 Planning and Housing Statements of Common Ground
- 9 Unilateral Undertaking (15/11/10)
- 10 Appeal decision (10/11/09) 2009 relating to Shyshack Lane, Tadley

Core Documents (Prepared by the applicant)

- 1 Volume 1 Environmental Statement, including appendices Volumes 2a and 2b, June 2010
- 2 Planning application plans (listed in condition no.1) supporting documentation and planning officer's reports
- 3 Basingstoke and Deane Local Plan (adopted July 2006)
- 4 Saved policies from the Basingstoke and Deane Local Plan
- 5 Basingstoke and Deane annual monitoring report (2009)
- 6 South East Plan (2009)
- 7 Design and Sustainability SPD (2008) (extracts):
 - Overarching introduction document
 - Appendix 5 construction statement
 - Appendix 6 waste and recycling
 - Appendix 7 places to live
- 8 Affordable Housing SPD (2007) (as replaced by PPS3)
- 9 Housing Mix and Lifetime Mobility Standards SPD (2007)
- 10 Landscape and Biodiversity SPD (2009)
- 11 Residential Parking Standards (2008)
- 12 Tadley Design Statement SPG (2004)
- 13 Basingstoke & Deane Employment Land Review (2009)
- 14 Section 106 Planning Obligations and Community Infrastructure SPD (2006)
- 15 Boundary Hall site Development Brief (1996)
- 16 Development Framework Document: Boundary Hall site (2004)
- 17 Ram Brewery, Wandsworth Inspector's report and Secretary of State's decision (APP/H5960/V/09/2099671, 2099695, 2099698 and 2099672) 30/6/10
- 18 Brit Oval Inquiry Inspector's report and Secretary of State's decision (APP/N5660/V/081203001) (8/6/09)
- 19 Scout's Den at Southdown playing fields, Southdown Road, Tadley. Application no. BDB71012, application plans, planning officer's report and decision notice (21/9/09)
- 20 GOSE call in letter (4/3/10)
- 21 Borough Housing Market Assessment for Central Hampshire New Forest (November 2007)
- 22 Housing Market Assessment update for Central Hampshire New Forest (December 2008)

- 23 Housing Strategy for Basingstoke and Deane Borough Council (2008-2011)
- 24 Basingstoke and Deane Borough Rural Housing Study 2010
- 25 Email regarding affordable housing completions in the Tadley area since 1997/1998 (27/4/10)
- 26 DCLG letter (6/7/10) regarding the revocation of South East Plan
- 27 Planning and Infrastructure Overview and Scrutiny Committee (17/12/09) – Annual Housing Land Position Report and Annual Monitoring Report
- 28 GOSE letter to Basingstoke and Deane Borough Council regarding 5-year housing land supply calculation methodology 26 April 2010
- 29 Worting farm planning application officer's report (BDB71886) 12 May 2010 and officer update report
- 30 Basingstoke and Deane Borough Council Issues and Options Paper 2008
- 31 Basingstoke and Deane Borough Council Key Themes Paper 2010
- 32 Basingstoke and Deane Borough Council Committee Reports 1/7/09 & 13/1/10
- 33 Atomic Weapons Establishment off-site contingency arrangements 1/2009
- 34 A Guide to the Radiation (Emergency Preparedness and Public Information) Regulations 2001

Documents submitted by the Council

- LPA/1 Opening submissions
- LPA/2 Letter from HSE to the Council (6/6/2001)
- LPA/3 Letter from HSE to West Berkshire Council (16/6/2003)
- LPA/4 Note explaining outcome of 11/11/10 Committee meeting
- LPA/5 Atkins Benchmark Review of AWE Off-Site Plan (22/12/09)
- LPA/6 Planning application/permission for 'Pegasus' development
- LPA/7 Proof/Appendices of Mr Gosling
- LPA/8 Proof/Appendices of Ms Hughes
- LPA/9 Proof/Appendices of Ms Linihan
- LPA/10 Proof/Appendices of Ms Fenn-Tripp, Housing Requirement note and Rates of Housing Development table
- LPA/11 Council's Closing Submissions and Appendix dealing with RSS position

Documents submitted by the Applicant

- APP/1 Opening submissions
- APP/2 1990 ICRP recommendations
- APP/3 2007 ICRP recommendations
- APP/4 Plan showing facilities in the area
- APP/5 'What to do in the event of an emergency at AWE' leaflets (2007 and 2010 versions)
- APP/6 HIRE (11/07) for Associated British Ports Southampton
- APP/7 NRPB – R91 Model for short to medium range dispersion of radionuclides released into the atmosphere
- APP/8 HSE - 'Reducing Risks Protecting People'
- APP/9 Proof/Appendices of Dr Thorne, Siting Considerations Core Documents, additional Proof following interim site visit, additional Proof related to AWE Context Plan
- APP/10 Proof/Appendices of Mr Dillon, Schedule of Core Documents
- APP/11 Proof/Appendices of Mr Brookes
- APP/12 Proof/Appendices of Mr Bond, Housing Supply Statement
- APP/13 Applicant's Closing Submissions and Addendum

Documents submitted by the Health & Safety Executive

HSE/1	Opening submissions
HSE/2	Areas of agreement with Planning Statement of Common Ground
HSE/3	Extendibility Guidance (Chapter 9)
HSE/4	Health effects of plutonium (U.S. Environmental Protection Agency)
HSE/5	Hypothetical Multiple Facility Nuclear site
HSE/6	Site licence (29/3/00) for AWE
HSE/7	DECC Testing of Off-site Preparedness (Chapter 5)
HSE/8	Redacted HIRE for AWE (2008)
HSE/9	1992 Safety Assessment Principles
HSE/10	Statement by Dr Highton submitted to the Shyshack Lane appeal
HSE/11	Note on number of workers at AWE
HSE/12	Secretary of State's Statement on Localism Bill and Planning
HSE/13	HIRE Assessment (October 2002)
HSE/14	Review of AWE Accident Fault Sequences (June 2008)
HSE/15	HSE letter (16 September 2002) related to 3 km DEPZ
HSE/16	Redacted HIRE for AWE (2002)
HSE/17	Redacted HIRE for AWE (2005)
HSE/18	Proof/Appendices of Dr Lacey, Additional Proof
HSE/19	Proof/Appendices of Mr Robinson, Additional Proof
HSE/20	Proof/Appendices of Mr Saunders, Additional Proof, Second Additional Proof, Statement on REPPIR Leaflet
HSE/21	Proof/Appendices of Dr Highton, Additional Proof
HSE/22	Proof/Appendices of Ms Jones
HSE/23	HSE's Closing Submissions

ANNEX A

Conditions as agreed between Cala Homes (South) Ltd and Basingstoke and Deane Borough Council (with minor amendments as noted above)

- 1 The development hereby permitted shall be carried out in accordance with the following approved plans:

<u>Plan Name/No</u>	<u>Received On</u>
Site Location Plan @ 1:1250	11th December 2007
12D	5th February 2008
29B	5th February 2008
28B	5th February 2008
26A	11th December 2007
27A	11th December 2007
3272-F-106	7th April 2008
11	28th November 2007
13B	5th February 2008
14B	5th February 2008
15B	5th February 2008
16A	5th February 2008
17B	5th February 2008
18A	5th February 2008
19A	5th February 2008
20B	5th February 2008
21A	5th February 2008
22B	5th February 2008
23B	5th February 2008
24B	5th February 2008
30	28th November 2007
31A	11th December 2007
32	28th November 2007
33B	7th April 2008
34	5th February 2008
Elevations 4B, 4C, 4D, 4A, 4, 3B, 3A, 2B, 2C, 3, 2, 2A, and 1, A1.	11th December 2007

- 2 The development hereby permitted shall be begun before the expiration of 3 years from the date of this planning permission.
- 3 No development shall commence on site until samples of all the external materials to be used (including hard surfacing materials) have been submitted to and approved by the Local Planning Authority in writing. Development shall be carried out in accordance with the approved details.
- 4 Notwithstanding the approved plans, no development shall take place until there has been submitted to and approved in writing by the Local Planning Authority a plan indicating the positions, design, materials and type of screen walls/fences/hedges to be erected/planted. The approved screen walls/fences shall be erected and the hedges planted in accordance with the approved details before the relevant buildings hereby approved are first occupied, and shall subsequently be retained.

- 5 Notwithstanding the provisions of Article 3 of the Town and Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) no building, structure or other alteration permitted by Class A, B or C of Part 1 of Schedule 2 of the Order or Class A of Part 2 of Schedule 2 of the Order is permitted.
- 6 No work relating to the construction of the development hereby approved, including works of demolition or site preparation prior to building works, shall take place before the hours of 0730 nor after 1800 on Monday to Friday, before the hours of 0800 nor after 1300 on Saturdays, nor on Sundays or recognised public holidays.
- 7 The approved bathroom windows at first floor level shall be glazed with obscured glass and shall be permanently retained in that condition.
- 8 The dwellings and commercial building hereby permitted shall not be occupied until the relevant vehicle parking and turning space has been constructed, surfaced and marked out, and cycle parking and secure storage constructed in accordance with the approved details. Those facilities shall not thereafter be used for any purpose other than parking, turning, loading and unloading of vehicles and parking/storage of cycles.
- 9 No development shall take place until details of provision to be made for the parking and turning on site of operatives' and construction vehicles during the contract period together with storage on site of construction materials has been submitted to and approved in writing by the Local Planning Authority. The approved measures shall be fully implemented before development commences and retained and used only for the intended purpose for the duration of the construction period.
- 10 No works shall take place on site until a measured survey of the site has been undertaken and a plan prepared to a scale of not less than 1:500 showing details of existing and intended final ground and finished floor levels from a specified bench mark has been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.
- 11 No works pursuant to this permission shall commence until there has been submitted to and approved in writing by the Local Planning Authority:-
 - (a) a desktop study carried out by a competent person documenting all the previous and existing land uses of the site and adjacent land in accordance with national guidance as set out in Contaminated Land Research Report Nos. 2 and 3 and BS10175:2001; and
 - (b) a site investigation report documenting the ground conditions of the site and incorporating chemical and gas analysis identified as being appropriate by the desk study in accordance with BS10175:2001- Investigation of Potentially Contaminated Sites - Code of Practice; and

- (c) a detailed scheme for remedial works and measures to be undertaken to avoid risk from contaminants/or gases when the site is developed and proposals for future maintenance and monitoring. Such scheme shall include nomination of a competent person to oversee the implementation of the works.

If during any works contamination is encountered which has not been previously identified then the additional contamination shall be fully assessed and an appropriate remediation scheme, including details of its implementation, shall be submitted to and approved in writing by the Local Planning Authority.

- 12 The development hereby permitted shall not be occupied/brought into use until there has been submitted to the Local Planning Authority verification by the competent person approved under the provisions of condition 11(c) that any remediation scheme required and approved under the provisions of condition 11(c) has been fully implemented in accordance with the approved details (unless varied with the written agreement of the Local Planning Authority in advance of implementation). Such verification shall comprise:
 - (a) as built drawings of the implemented scheme; and
 - (b) photographs of the remediation works in progress; and
 - (c) certificates demonstrating that imported and/or material left in situ is free of contamination.

Thereafter the scheme shall be monitored and maintained in accordance with the scheme approved under condition 11(c).

- 13 No deliveries of construction materials or plant and machinery shall take place before the hours of 0730 nor after 1800 on Monday to Friday, before the hours of 0800 nor after 1300 on Saturdays, nor on Sundays or recognised public holidays.
- 14 No development shall take place until there has been submitted to and approved by the Local Planning Authority a scheme of hard and soft landscaping works which shall specify species, planting sizes, spacing and numbers of trees/shrubs to be planted, and the layout, contouring and surfacing of all open space areas. The works approved shall be carried out in the first planting and seeding seasons following the occupation of the buildings or the completion of the development whichever is the sooner, in accordance with a phased programme agreed with the Local Planning Authority in writing prior to commencement of planting. Any trees or plants which, within a period of 5 years from the date of planting, die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species.
- 15 The commencement of the development shall not take place until a detailed scheme for protecting the development from road traffic noise has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include full details of noise mitigation measures, including window glazing and room ventilation provisions, of the dwellings which shall be used to achieve the good internal ambient noise levels within habitable rooms

(bedrooms and living rooms) set out in Table 5 of BS8233:1999 and to achieve noise levels in the garden area/outdoor living space not exceeding 55dB(A) (16 hour free field). All works which form part of the approved scheme shall be implemented in full prior to the first occupation of any of the relevant buildings hereby permitted.

- 16 No part of the development shall commence until the details of the highway works in Almswood Road and at the junction of Almswood Road and the A340 as shown coloured yellow on drawing 29 Rev B have been submitted to and approved in writing by the Local Planning Authority. The approved works shall be implemented in full prior to the occupation of the development hereby permitted.
- 17 Development shall not begin until drainage details, incorporating sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development, have been submitted to and approved by the Local Planning Authority in writing. The approved scheme shall be implemented in accordance with the approved details before the development is completed.
- 18 Prior to the occupation of the development hereby approved, details of all external lighting and details of the timing of illumination shall be submitted to and approved in writing by the Local Planning Authority. Development shall be carried out and be thereafter retained in accordance with the approved details and used in accordance with the agreed hours of illumination.
- 19 The commercial building shall be used only for purposes within Class B1 of the Schedule to the Town and Country Planning (Use Classes) Order 1987 or in any statutory instrument revoking and re-enacting that Order (with or without modification).
- 20 No development shall take place on site until a method statement for works affecting trees (Arboricultural Method Statement) to include a Tree Protection Plan has been submitted to and approved in writing by the Local Planning Authority. The tree protection works shall be carried out before any demolition or building work is undertaken, and shall be retained in situ for the entire construction period.
- 21 Prior to the commencement of development a temporary 2 metre high perimeter fence shall be erected in accordance with details to be submitted to and approved in writing by the Local Planning Authority. The approved fence shall be fully implemented before development commences and retained for the duration of the construction period.
- 22 Details of the width, alignment, gradient and type of construction proposed for the roads, footways, paths and accesses, including all relevant horizontal cross sections and longitudinal sections showing the existing and proposed levels, together with details of visibility splays, signage and the method of disposing of surface water shall be submitted to and approved in writing by the Local Planning Authority before development is commenced. The agreed details shall be implemented before occupation of the dwellings and commercial building.
- 23 All garages constructed shall not be converted or used for any residential purpose other than as a domestic garage for the parking of vehicles.

- 24 The accesses shall be provided with splays to the highway at an angle of 45 degrees for a distance of 2 metres.
- 25 No gates shall be installed at the accesses from the highway into the site at any time.
- 26 On completion and first use of the approved accesses, the former accesses from Aldermaston Road (west) and Almswood Road shall be permanently closed and reinstated in accordance with details to be submitted to and approved by the Local Planning Authority.
- 27 No pedestrian or vehicular access, other than as shown on the approved plans, shall be formed into the site.
- 28 Prior to the development being brought into use the footway/cycleway fronting the site along the A340 Mulfords Hill, southwards from the Falcon Gyratory to the existing site access, shall be provided with dropped kerbs and tactile paving across the existing access. The works shall be constructed in accordance with drawings that shall be submitted to and approved in writing by the Local Planning Authority.
- 29 The dwellings shall achieve Code Level 3 of the Code For Sustainable Homes. No dwelling shall be occupied until a final Code Certificate has been issued for it certifying that Code Level 3 has been achieved.
- 30 15% of the dwellings hereby approved shall be built to Lifetime Mobility standards.



Appeal Decision

Inquiry held on 15-18, 22 and 24 November 2022

Site visit made on 17 November 2022

by G Rollings BA(Hons) MAUD MRTPI

an Inspector appointed by the Secretary of State

Decision date: 31st January 2023

Appeal Ref: APP/X0360/W/22/3304042

Land west of Kingfisher Grove, Three Mile Cross, Reading, Berkshire, RG7 1LZ

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a failure to give notice within the prescribed period of a decision on an application for outline planning permission
 - The appeal is made by JPP Land Ltd against Wokingham Borough Council.
 - The application, Ref: 201002, is dated 23 April 2020.
 - The development proposed is an outline planning application for the proposed erection of 49 affordable dwellings, with new publicly accessible open space and access (access to be considered).
-

Decision

1. The appeal is allowed and planning permission is granted for outline planning application for the proposed erection of 49 affordable dwellings with new publicly accessible open space and access, at land west of Kingfisher Grove, Reading, RG7 1LZ in accordance with the terms of the application, Ref 201002, dated 23 April 2020, subject to the schedule of conditions in Annex A of this decision.

Preliminary Matters

Change of development description

2. Prior to the Council's decision, the appellant requested a change to the description of development, altering the number of proposed affordable homes. The original description of development was: "Outline application for the proposed erection of 49 dwellings, including 22 units of affordable housing, with new publicly accessible open space and access from Grazeley Road." Prior to the Inquiry, the appellant consulted interested parties on the intended description, with three submissions received, which I have taken into account together with all other correspondence. The Council agreed to the change.
3. Having considered this issue at the Case Management Conference held on 6 October 2022, I advised in the note of the proceedings that the change to the description of development does not raise any new issues, that it would not prejudice any party, and that sufficient consultation on the change has been undertaken. As such, it is reflected in the description of development in this decision.

Other matters and appeal background

4. The appeal is submitted in outline form will all matters except access reserved for more detailed consideration at a later time. Parameter plans were submitted which are incorporated in the conditions at Annex A.
5. The development plan for the area includes the Council's *Adopted Core Strategy Development Plan Document (2010)*¹ (the Core Strategy) and the *Adopted Managing Development Delivery Local Plan (2014)*² (MDD), together with the *Shinfield Parish Neighbourhood Plan (2017)*³ (the Neighbourhood Plan). The Council's Local Plan review is at an early stage and is subject to further consultation and revision. I therefore accord it only minimal weight in my decision.
6. In its statement of case, the Council stated that had it decided the application, it would have been refused for several reasons. Several of these inform the main issues set out below. Others are addressed by the completed and signed Planning Agreement (s106 Agreement)⁴, which was submitted during the Inquiry. A highways-based reason for refusal was latterly the subject of discussions between the appellant and the Council, during which the parties achieved common ground, and was not subject to examination at the Inquiry.

Main Issues

7. The main issues are:
 - Whether the proposed development can be safely accommodated with regard to the proximity of the Atomic Weapons Establishment (AWE) site at Burghfield;
 - The effect of the proposal on the landscape character and appearance of the area; and
 - Whether the proposed development would provide appropriate accessibility for future occupiers.

Reasons

AWE Burghfield site

8. The appeal site is around 2.8 kilometres to the east/northeast of the AWE Burghfield site, which is subject to the *Radiation (Emergency Preparedness and Public Information) Regulations 2019* (REPPIR)⁵. An urgent protective area (UPA) with a radius of around 3.16km has been established around the AWE site, and the appeal site is within this. The UPA is wholly within a detailed emergency planning zone (DEPZ), The *AWE Off-site Emergency Plan (2022)*⁶ (the REPPIR plan) has been established for the DEPZ by West Berkshire District Council (WBDC). Should an incident occur, Wokingham Borough Council would have a role in managing and executing any emergency response.

¹ CD 5.1.

² CD 5.3.

³ CD 5.5.

⁴ ID 07.

⁵ CD 11.20.

⁶ CD 11.5.

9. MDD Policy TB04 states that development will only be permitted when the applicant demonstrates that the increase in the number of people living, working, shopping and/or visiting the proposal can be safely accommodated having regard to the needs of “blue light” services and the emergency off-site plan for the AWE site. It was agreed at the Inquiry that blue light services includes emergency services, such as ambulances, that would be required for the operation of the REPPIR plan in the event of an AWE site incident. *National Planning Policy Framework* (2021) (the Framework) paragraph 95 suggests, amongst other considerations, that operational sites for defence and security purposes should not be affected adversely by the impact of other development.
10. The AWE Burghfield site has a role in maintaining national security that includes manufacture and disposal services. Despite the small risk of any accident occurring, emergency planning must be in place. One of the risks is a serious event in which radioactive material could be released into the atmosphere and which would most likely take the form of a plume that would be carried along the atmosphere according to wind direction, eventually dispersing. The type of activity taking place at AWE Burghfield means that any release of material would not be sustained, and thus any event would likely happen over hours or a small number of days.
11. Were an incident to occur, the most likely composition of a plume would be plutonium particulates. The type of activity carried out at the AWE Burghfield site together with the distance of the appeal site from the former means that although there are additional risks of different material release or various possible types of exposure, the greatest risk would be from inhalation. For example, larger particulates would be likely to drop from the atmosphere after being carried and settle on the ground before the plume were to pass over a 2.8km radius from the site.
12. The Council and the appellant agree that such a risk, or the risk of an incident occurring, is very small. The appellant carried out an exercise that considered potential risk factors of previously calculated event frequencies and the AWE Burghfield on-site fault sequences that could trigger an event, concluding that such an event could occur on a 1 in 10,000-year basis. The consideration of additional factors such as meteorological and wind conditions and adherence to the REPPIR plan reduces the risk of a person on the appeal site being harmed by such an incident to a single event in many more thousands or millions of years.
13. The REPPIR plan recommends sheltering within buildings during an event as the primary method of protection to human health. The barrier of a building (with closed doors and windows) would afford the greatest and most immediate and accessible type of protection in the event of the type described above. The REPPIR plan also sets out measures for potential evacuation either during or after the event, but it is unlikely that this would be required for the appeal site should the shelter-in-place recommendation be followed. The same low risk factors mean that the requirement to shelter would be over a short period of no more than two days.
14. The consideration of risk was relevant to the Secretary of State’s agreement to allow 115 dwellings at Boundary Hall⁷ close to the AWE Aldermaston site, which performs similar work to that of AWE Burghfield and is also covered by the

⁷ CD 6.8.

REPPIR plan. The minimum distance between Boundary Hall and AWE Aldermaston was agreed to be 740 metres. He concluded in that case that the “extremely remote possibility” of an incident did not outweigh the other factors that led to him allowing the application.

15. The Council’s duties under the REPPIR plan include the protection of the public and the organisation of emergency services. Its concerns are predominantly based on the ability of the plan to be carried out should the appeal development occur. Although only 49 properties and around 117 people, this would add to the number already within the DEPZ and UPA. The surroundings of the AWE site are predominantly rural, but other parts of the area have also been developed, and these include Burghfield Common, a larger residential settlement than Three Mile Cross, and Green Park, a mixed-use business area. These are to the west/southwest and north/northeast, respectively, of the AWE site. Although low in risk, I acknowledge that an incident would have a high impact as set out in the Crest Nicholson judgement⁸.
16. The unidirectional nature of wind means that if a plume was to occur then it would disperse in a singular direction. This would be dependent on specific weather conditions and wind speeds, which are factors that inform the low risk of a plume passing over the appeal site. The REPPIR plan sectorises the DEPZ radially from the AWE site. The plan seeks to prioritise assistance within the sectors over which the plume would pass. Although I heard at the Inquiry that blue light and other relevant services would be working at capacity should an event occur, these are planned to address all areas within the DEPZ. The settlements elsewhere within the area that are larger than those in the appeal site sector (or a sector area comprising the sector and its neighbouring sectors) are in different directions. Given that the plan has the capacity to cover an incident in those sector areas, and that service resources would be predominantly focused on only one sector area, I consider that the addition of the proposed dwellings on the appeal site would not compromise the delivery of the plan.
17. Other implications for the safety of appeal site residents were presented to the Inquiry, including responses from WBDC and other agencies. In particular, the safety of home care workers entering the DEPZ during an incident was in issue, and it was mentioned that the potential for affordable housing to accommodate those with home care meant that this could occur. The Council would not send staff into the DEPZ in an emergency without being confident that staff would not be at risk.
18. Based on the appellant’s modelling, were an incident to occur, a person at the appeal site who was not sheltering might be exposed to a radiation dose of 1.5 milliSieverts (mSv). Advice from the Health and Safety Executive categorises the risk impact of such a dose to “minor”⁹. By comparison, WBDC’s public advice¹⁰ provides example levels of 0.02 mSv from a single chest X-ray, 1 mSv as the average annual dose in the UK from naturally occurring radon in homes and 2 mSv as the average total annual dose in the UK from natural radiation sources, 8 mSv as the average annual dose from all sources of radiation in Cornwall, and 500 mSv as the threshold for nausea and reduction in white blood cells. 20 mSv is listed as the annual legal worker dose limit.

⁸ CD 7.4.

⁹ CD 11.12 (appendix 2).

¹⁰ CD 11.21.

19. The effective dose received by anyone within the zone within the conditions set out previously would therefore be low, and lessened if REPPIR advice is followed. Although fear of contamination may prevent workers from entering the DEPZ, this could be disproportionate to the actual risk. Even in the event of plume particles settling on the ground in the appeal site, the risk from a dose following an incident would be lower than those occurring from the alternative sources set out above.
20. Should the REPPIR shelter-in-place advice be followed by those in the DEPZ, road traffic levels are unlikely to be greater than normal and the ability of services to access the zone would not be adversely affected. The possibility of self-evacuation by those within the zone was also raised as a potential safety issue, but this is addressed within the REPPIR plan and discouraged through the dissemination of public information. Other safety barriers such as being elsewhere on the appeal site away from shelter, travelling into the DEPZ, or not having access to a telephone landline (in the event of a safety announcement) are partly covered within the REPPIR plan. Alternatively, they are situations in which sufficient time would be available between the incident occurring and the plume passing over the site for people to become aware of the situation and gain access to shelter or other safety.
21. I have been made aware of other appeal decisions in which siting within the DEPZ have been factors in their dismissal¹¹. In each of these cases the evidence was considered by way of written representations. The Inspector in the Diana Close appeal adopted a precautionary approach in the absence of detailed evidence. In comparison, the evidence presented to me in this appeal has been examined and tested. 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.
22. I therefore conclude that the proposal would not present a barrier to the ability of blue light services to safely carry out their duties, and nor would it affect the Council's ability to execute and manage its obligations under the REPPIR plan. Furthermore, people living in or using the appeal site could be safely accommodated. Together, these considerations form the thrust of MDD Policy TB04 and, as such, I find no conflict with this policy. Additionally, the development would not adversely affect the continued operation of the AWE site, and there would be no conflict with the NPPF.

Landscape character and appearance

23. The site is to the west of the existing built-up area of Three Mile Cross, and to the east of the A33. Its sole road access is at its northernmost point, from the junction of Grazeley Road and Kingfisher Grove. The land slopes downward generally from a ridge close to the eastern boundary, and apart from a shed and some vehicles close to the entrance, is vacant, having been used for agriculture. It currently has a grassland appearance dotted with trees, particularly along ditches close to the western edge and on the southern portion of the site.
24. At least the southern part of the site is historically associated with a former stately home and this also adjoins an area of open grassland (known as a suitable alternative natural greenspace, or SANG, area). A footpath (known as

¹¹ CD 6.7, CD 6.20, CD 6.21.

a byway open to all traffic, or BOAT) runs along the length of the site's eastern boundary. Beyond this is the A33. I visited the site in late Autumn, when deciduous trees were not in leaf, and there was intervisibility between the site and the SANG and BOAT areas, although views were limited to glimpses. In both cases there were areas with no or very limited intervisibility due to vegetation, which would be exacerbated in the months when deciduous trees are in leaf. More distant views are gained beyond the A33 to the west, in which the uppermost part of the site is visible.

25. Of relevance to the consideration of landscape character are Core Strategy policies CP1, CP3 and CP11, which together seek sustainable development that maintains or enhances the high quality of the environment, has no detrimental impact on landscape features, and seeks to maintain development limits, amongst other considerations. MDD policies CC01, CC02, CC03 and TB21 are also relevant. These add the requirement to respect adopted development limits, green infrastructure and landscape character, amongst other considerations, with Neighbourhood Plan Policies 1 and 2 reflecting the boroughwide policies.
26. The Council has also referred to its *Wokingham Borough Landscape Character Assessment*¹² (2019) (the LCA), which characterises the borough into landscape zones sharing particular characteristics. The 'J3' categorisation into which the site falls identifies its undulating landscape of large fields, with changes to its character through settlement and urbanising influence of its proximity to Reading. Other relevant characteristics include remnant parkland and an intact hedgerow network. Issues for the area include pressure to develop the ridgelines and the encroachment of residential development changing the landscape character and increasing demand for associated infrastructure.
27. Although outside of the Council's defined development limit, the development would adjoin existing residential development within the limit. The proposed 49 homes would be concentrated in a group form running roughly parallel with the BOAT, with the remainder of the site as managed grassland to be used as open space.
28. The topography of the site as well as its surrounding vegetation limits unhindered views into the site. The site itself is in private ownership with restricted public access, and public views are therefore limited to the BOAT and the area around the Kingfisher Grove access, together with the SANG and areas beyond the A33 in which distant views are possible. Private views are possible from within the site itself and other surrounding land, such as the dwellings on Kingfisher Grove. New development would be visible to varying degrees in most of these views, but although direct views would be largely filtered by vegetation, viewers would be in no doubt that there were buildings on the site. This would be particularly noticeable in dynamic views in the context of a journey along the BOAT, in which (despite the existing heavy understorey of vegetation) they would appear closer and more distinct than existing development, and would periodically appear through vegetation gaps. I also that the verified views in the appellant's *Landscape and Visual Impact Assessment*¹³ (LIVIA) demonstrate that visibility of the proposal would be reduced over time as screening vegetation matures.

¹² CD 12.1A/B.

¹³ CD 1.6.

29. Viewers on MereOak Lane would notice buildings on the lower portion of the existing visible green swath of the site. This viewpoint is identified within the LIVIA as a low-value receptor and views from here are generally experienced in the context of a journey. Although building heights would be limited by the parameter plan and the line of the ridge would not be broken, there would still be visible signs of development. This is a form of urbanising development discouraged by the LCA.
30. Overall, despite the largely screened nature of the site, there would be a shift in some views from a rural to a partly suburban character. This would result in minor harm the landscape character of the area.
31. However, there are measures within the proposal that seek to mitigate this harm. The area to be developed immediately adjoins existing development and enables retention of the green space in more than half of the site, allowing for open zones around its other edges in which structural planting would filter outside views. The development would also enable the green space around the proposed built-up zone to be maintained as a recreational parkland and biodiverse resource, together with the formal management of three identified veteran trees, of which at least one is at risk of failure without intervention.
32. Concern was expressed from various parties that the development would close the existing strategic gap between Three Mile Cross and Spencers Wood. I do not consider that this would be the case. The development would enable the retention of a substantial amount of green space between the settlements, including land both on the appeal site and the existing land outside. I saw that there was a significantly narrower gap between the settlements on Basingstoke Road where the provision of a relatively narrow strip of green space between built-up areas was sufficient separation to ensure retention of both settlements' identities. The lack of direct access between the site and Spencers Wood, together with there being no intervisibility of the proposed buildings to or from Spencers Wood, as well as the existing topography and the existing and proposed vegetation, would not exacerbate any physical or perceived coalescence of the settlements.
33. Despite the minor level of harm, there would nonetheless be harm to the landscape character of the area. This would conflict Core Strategy policies CP1, CP3 and CP11, MDD policies CC01, CC02, CC03 and TB21 and Neighbourhood Plan Policies 1 and 2, for the reasons set out above.

Accessibility

34. The Council's putative reason for refusal on this issue expresses a concern that as a development outside settlement limits, with perceived poor accessibility to local facilities and services, a lack of good public transport links and poor quality of the walking and cycling environment, it would not encourage a shift towards sustainable modes of transport. These themes are reflected in Core Strategy Policies CP1, CP2, CP3, CP6 and CP11, MDD Policies CC01 and CC02 and Policy 4 of the Shinfield Neighbourhood Plan.
35. Both the Council's and appellant's evidence referred to an 800-metre distance being an indicator of whether a neighbourhood is 'walkable', this being a comfortable ten-minute walking time for most people to be able to access a

range of services¹⁴. This is not an upper limit and I heard that there may be factors that influence people to consider a longer walking distance to acceptable, such as the physical quality of the walking route. The supporting text to Core Strategy Policy CP6 states that the borough has one of the highest car ownership rates of any English local authority, and thus, in accordance with this policy, local conditions should offer choices through the provision of sustainable forms of transport.

36. The closest facilities and services to the site are concentrated on Basingstoke Road in Three Mile Cross. These include convenience stores, leisure facilities, schools and a post office counter within a range of 800m to two kilometres (a 25-minute walk)¹⁵. Other facilities including a wider range of employment are further afield. The *Manual for Streets* (MfS) recognises that walking trips under 2km offer the greatest potential to replace short car trips and whilst the walking time to all these facilities would be longer than the comfortable 10-minute walking time, I acknowledge the possibility that people could be encouraged to walk greater distances if the range of services was appropriately enticing, as set out in a previous appeal decision¹⁶.
37. The main walking route between the site and the concentration of facilities and services on Basingstoke Road is along Grazeley Road. I saw that although the route is legible along its full length, in many places the footpath is narrower than the MfS suggested accessible width of two metres and also is not overlooked for a short length close to Kingfisher Grove. As indicators of route quality, the absence of an appropriate width and passive surveillance from dwellings along sections of the route result in a substandard walking experience. The alternative available walking route using Tabby Drive is longer and as such, Grazeley Road is more likely to be used. Additionally, the Tabby Drive route uses part of Grazeley Road and does not wholly avoid substandard sections. Although improvements to junctions along Grazeley Road are planned, these would not alleviate the substandard sections.
38. Beyond the aforementioned closest services, walking routes to other destinations such as local schools are variable, including areas with no passive surveillance or lighting. Such conditions would discourage users from walking longer distances.
39. Cycling options would be improved with the proposed paving of the section of BOAT north of Grazeley Road. This would offer a route to the employment centres beyond Three Mile Cross. Although there is a good range of facilities and services within a 20-minute cycling distance from the site, are other few dedicated cycling facilities or lanes within the vicinity of Three Mile Cross, thereby affecting the attractiveness of cycling as a realistic travel mode choice.
40. A bus service operates to Reading along Basingstoke Road on a good frequency, with services into the evening. However, the absence of a Sunday service would reduce the attractiveness of the proposed housing for those who would rely on public transport, as would the absence of convenient links to alternative destinations, such as the borough centre at Wokingham. Access to the bus stops would be along the Grazeley Road route which, given my

¹⁴ As set out in *Manual for Streets* section 4.4 (CD 12.3) and the *National Design Guide* (CD 12.21).

¹⁵ Distances are calculated from the approximate centre of the proposed residential component of the appeal site and are as set out in the parties' proofs of evidence.

¹⁶ CD 6.15.

considerations set out above, would affect the attractiveness of public transport as a transport mode choice.

41. In conclusion on this main issue, despite some positive components, accessibility to and from the site when considered as a whole, would be poor. As such, future occupiers of the proposed development would not benefit from appropriate accessibility and there would be conflict with Core Strategy Policies CP1, CP2, CP3, CP6 and CP11, MDD Policies CC01 and CC02 and Policy 4 of the Shinfield Neighbourhood Plan, for the reasons set out above.

Other Matters

Housing supply

42. It is agreed between the appellant and the Council that the latter is not able to demonstrate that it has a deliverable five-year housing land supply. There is disagreement on the scale of the shortfall, with the appellant and Council claiming a supply of 4.66 and 4.83 years, respectively. I heard evidence at the Inquiry as to the varying methods resulting in the different outcomes but consider the difference to be so small as to be of minimal relevance. In any case, the housing land supply shortfall is minor. Although other factors raised in the evidence include local affordability and the previous supply/delivery of homes against the housing need, I have no need to refer to these in detail.
43. The calculation variances result in annual housing need figures, with a 5% buffer applied, of about 806 (Council's figure) or 835 (appellant's figure) dwellings. The development would provide approximately 6% of the Council's annual supply of homes, which I consider to be a sizeable proportion. Although the Housing Delivery Test indicates that the Council has delivered more homes than its targets in recent years, there is nonetheless a shortfall in the future five-year supply.

Affordable housing

44. The development would wholly comprise affordable dwellings, with the tenure split agreed by the Council. The relevant Strategic Housing Market Assessment¹⁷ (SHMA) estimates the borough's per annum affordable housing need as 441 dwellings with the Council's more recent Local Housing Needs Assessment¹⁸ (LHNA) stating a requirement for 407 affordable dwellings per annum.
45. The recent delivery of affordable housing, of around 1,700 homes over the past five years, has been stronger in some years but delivery in most has fallen short of the per annum requirement. The Council considers that the likely delivery of dwellings over the next five years (estimated to be at least 1,249 homes) would meet the housing requirement for those on the local Housing Needs Register with the most acute need and that this would include meeting around 87% of the local need within Shinfield. The fact that the site's proximity to employment sources could result in a high local need but this is tempered by the Council's assertion that the types of jobs to be created would not be those that would appeal to those residing in affordable housing. Nonetheless there are links between the site and the wider employment catchment area incorporating Reading.

¹⁷ CD 10.2.

¹⁸ CD 10.3.

46. No targeted local affordable housing needs surveys have been undertaken in Shinfield, although local housing register demand is strong. I am reticent to the rely on this source as an indication of local affordable housing need, given the potential for 'double counting' in demand for Shinfield and neighbouring borough areas. Nonetheless the SHMA and LHNA indicate strong demand for affordable housing within the borough, and despite the expected forthcoming local delivery of dwellings, unmet demand will remain in Shinfield and the wider borough area.

Rural exception site

47. Core Strategy Policy CP9 refers to the provision of affordable housing on rural exception sites. These are sites outside development limits, and the policy enables the provision of affordable housing adjoining the limits in specific instances, where a need is demonstrated for residents, workers or other people with family connections within the Parish Council's area. A rural exception site is defined in the Framework as a small site used for affordable housing in a site that would not normally be used for housing, which seeks to address the needs of the local community.
48. The Framework does not define what constitutes a small site. At 5.82 hectares with a development area of 1.63ha providing 49 dwellings, there is disagreement between the appellant and the Council that this is a small site. Without a definition, this becomes a matter of planning judgement. In comparison with the Council's Local Housing need for 2020/21 of 789 homes, 49 homes represents about 6% of the Council's annual need, which as I noted above would represent sizeable proportion to the borough's housing supply and therefore not small in this sense. Elsewhere in the Core Strategy (at appendix 3) small sites are defined as those less than 1ha with up to 9 dwellings. Although this is not a direct comparison to the absence of a definition with regard to rural exception sites, the Council's intention in describing small sites in regard to housing delivery is clear. Taking all these matters into consideration, I do not consider the appeal site to be a rural exception site.

Biodiversity

49. Core Strategy Policy CP8 requires development which alone or in combination is likely to have a significant effect on the Thames Basin Heaths Special Protection Area (the SPA) to demonstrate that adequate measures to avoid and mitigate any potential impacts are delivered. Thresholds for mitigation requirements are set out in the accompanying text. As a development of fewer than 50 dwellings and one between five and seven kilometres of the SPA, mitigation is not required.
50. Implementation of the appeal scheme would result in biodiversity net gain of 114% for habitats, 11% for hedgerows and 35% for ditches. Further benefits would be gained from additional planting and habitat management over the longer term. Phase 1 and Phase 2 surveys have been undertaken to protected species, with evidence of dormice in the hedgerow boundaries. The site was also found to be of value to foraging and commuting bats, with trees on the site of potential value to roosting. Paragraph 180 of the Framework encourages avoidance of significant harm to biodiversity. Together with the implementation of the features that would result in biodiversity net gain and the creation of new invertebrate habitats, as well as the suitable management of the site, I am satisfied that the development would avoid significant harm.

Highways

51. Whilst the Council initially presented a putative reason for refusal relating to access to the site and its potential effects on highway safety, discussions between the appellant and Council prior to the Inquiry resolved matters of difference. A theme within the objections from interested parties was the potential effects of traffic congestion on the local road network resulting from the additional vehicle trips generated by the development. The junction of Grazeley Road and Basingstoke Road was identified as a particularly congested spot. Forthcoming improvements to the junction have already been resourced and from the evidence provided it appears that this junction will provide for increased traffic levels resulting from the various developments in and around Three Mile Cross.

S106 Agreement

52. The heads of terms of the s106 Agreement were agreed between the main parties prior to the Inquiry. Given that an obligation may constitute a reason for granting planning permission only if it meets the tests set out in Regulation 122 of the *Community Infrastructure Regulations 2010* and paragraph 57 of the Framework, it falls to me to reach a finding on its acceptability.
53. Provision for affordable housing comprising 70% social rented and 30% shared ownership tenures is incorporated, with a nomination agreement for prospective residents. This is an appropriate method for ensuring fair placement according to local need. The proposal complies with Core Strategy Policy CP5 in that it contributes to mixed and balanced developments within the borough, and I am satisfied that it would meet a need for such accommodation.
54. The development/employment skills contribution would take the form of either a plan or a monetary contribution. I recognise that the Council's preference is for a plan but acknowledge that the agreement offers suitable choice in the event of a housing provider managing the scheme in the future. Based on benchmarked values, the contribution or plan would target the Council's identified shortfall of skills training in the area local to the application site and is therefore necessary.
55. The proposed transport-related contributions of a 'My Journey' travel plan payment and a contribution for upgrading the surface of Woodcock Lane would promote sustainable travel choices and improve local access. I am satisfied that these are required to make the development acceptable.
56. Open space on the site would be made available for use by residents, and although the agreement contains various closure clauses I am content that these would only be used as necessary and for reasonable purposes. Management of the space is necessary, particularly in relation to the veteran trees and to comply with Core Strategy Policy CP2 and MDD Policy TB08 with regard to meeting the needs of residents and providing appropriate spaces for recreation.
57. Monitoring fees are specified within the agreement and I am satisfied that due to the nature of the development, particularly with regard to the level of affordable housing and open space proposed, their inclusion makes the development acceptable in planning terms.

58. The various sums within the obligation are necessary and justified and I am satisfied that the Council could rely on the document to secure the contributions. Moreover, I am content that the obligations meet the requirements of the statutory and acceptability tests.

Planning balance

Policy and Framework considerations

59. Framework paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development. Paragraph 11d suggests that where the policies which are the most important for determining an application are out-of-date, permission should be granted unless any adverse impact of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework taken as a whole. There is no five-year housing land supply in Wokingham and therefore paragraph 11d is applicable to this appeal, and the policies that are the most important for determining this appeal are deemed to be out of date. I have no discretion within this purpose to consider whether specific policies are out of date. However, I must consider the weight to be given to policies including whether they are out of date in the context of the issues in this appeal.

60. Previous appeal decisions that have been brought to my attention¹⁹ have noted that in specific cases, although some of the Council's policies were considered to be out of date, the overall 'basket' of policies considered most important for determining the appeal was not out of date. In these cases, the Council was able to demonstrate that it had a suitable housing land supply at that time. This is not the case in this instance, where both the Council and the appellant agree that the 'tilted balance' is engaged. A further example²⁰ found the basket to be out of date in that specific instance, when the Council could not demonstrate a five-year housing land supply.

61. Core Strategy Policies CP1, CP2 and CP3 set the overall approach to sustainable and inclusive development in the borough and are broadly consistent with the Framework. Similarly, Policy CP6 which promotes sustainable travel choices and does not conflict with the Framework, These policies do conflict with the appeal proposal in terms of landscape and accessibility. My weighting on these issues is set out in the next section.

62. Policy CP5 sets the requirements for affordable housing provision by development scale and location but is not consistent with the Framework in that it seeks affordable housing on developments from five or more dwellings in urban areas, whereas paragraph 64 of the Framework states that provision should be sought only on such development of ten or more dwellings. However, there is no conflict with the appeal proposal and I have afforded only minimal weight to this consideration.

63. Core Strategy Policy CP7 requires conservation of biodiversity, veteran trees or features of the landscape that are important for flora and fauna, and MDD Policy TB21 requires proposals to address the requirements of the Council's Landscape Character Assessment, amongst other considerations. There are no conflicts with the Framework or the appeal scheme and thus no weight is allocated.

¹⁹ Including CDs 6.7 and 6.15.

²⁰ CD 6.1.

64. Core Strategy Policy CP17 provides housing figures based on the South East Plan which is no longer in force. Accordingly, Core Strategy policies CP9 and CP11, MDD Policy CC02, and Neighbourhood Plan Policy 1, which apply development limits throughout the borough, are out of date because these are based on out-of-date housing numbers, to which I give significant weight. A further out-of-date policy is MDD Policy TB04 which deals with development around the AWE Burghfield Site, due to the use of superseded measurements for the DEPZ radius, but as the general principles still apply only minimal weight is apportioned to this conflict.
65. MDD Policy CC01 which sets a presumption in favour of sustainable development is broadly comparable with the similar Framework presumption and does not conflict. Likewise, MDD Policies CC03 sets the Council's approach to developing and managing green areas and assets and does not conflict with the Framework, and MDD Policy TB08 which sets out the Council's approach to recreational facility provision is also generally in line with the Framework, despite the superseded reference to a previous version. The former policies conflict with the appeal scheme in the areas of landscape and accessibility, with weighting set out below.
66. Summarising the above, the Framework's tilted balance is applied as the Council cannot demonstrate a five-year housing land supply. The issues in which there are conflicts between out of date policies are AWE Burghfield, with the conflict attracting minimal weight, affordable housing provision in which the conflict attracts minimal weight, and conflict with the policies for the supply of housing more generally attracting significant weight.

Applying the balance

67. With regard to the main issues, the proposal demonstrates poor accessibility and this weighs heavily against the proposal, attracting significant weight. Landscape harm would be minor, but still conflicts with policy, and therefore this attracts moderate weight. I have found that there would be no harm with regard to the proximity of the AWE Burghfield site, which is a neutral factor in the balance.
68. Housing and affordable housing provision aside, other benefits of the scheme would include provision of new open space, net biodiversity gain, ongoing management of at-risk veteran trees, and local transport improvements. These would benefit those outside the site, and I give these considerations moderate weight. Other section 106 provisions are needed to make the development acceptable only and attract minimal weight, although there would be a wider benefit in regard to the improvement of Woodcock Lane and employment skills provisions, which attracts moderate weight.
69. The provision of new homes comprising 6% of the borough's annual supply attracts moderate weight. The provision of affordable housing that would assist the Council in meeting its shortfall in provision is significant, as is the presumption in favour of sustainable development triggered by the application of Framework paragraph 11.
70. The development plan policies that are the most important for the supply of housing are out of date, but those with which I have found conflict in this decision are not out of date and are generally consistent with the Framework.

The development would result in landscape harm and have poor accessibility. I find that the proposal conflicts with the development plan as a whole.

71. However, the weighting of the above factors is in favour of the scheme proceeding. I find that the adverse impacts of granting permission would not significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole. The development proposal benefits from the Framework's presumption in favour of sustainable development.
72. Applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Notwithstanding the conflict with the development plan, I have found that the development would deliver significant and demonstrative benefits. These are material considerations that lead me to the decision that planning permission should be granted, and the appeal should succeed.

Conditions

73. I have assessed the list of conditions proposed by the parties against the tests set out in the Planning Practice Guidance (PPG)²¹. These were discussed at the Inquiry and subsequently refined, and are included at Annex A. I have made minor changes for clarity. In accordance with section 100ZA(5) of the Act, the Appellant has agreed to those conditions which would be pre-commencement conditions.
74. Conditions 1 through 5 are applied for the absence of doubt, with conditions 3 and 5 also applied to ensure that the development proceeds in accordance with the outline plans. Conditions 6, 7, 8 and 18 are applied in the interests of satisfactory access and highway safety. Conditions 9, 10 and 17 are to preserve the living conditions of surrounding occupiers and minimise the effects of construction. Condition 11 is to ensure sustainable drainage is incorporated within the development, and 12 is applied to investigate and if necessary preserve the archaeological heritage of the appeal site. Conditions 13 and 14 are included to ensure the protection, conservation and management of landscape features. Conditions 15 and 16 are to preserve and improve the biodiversity of the appeal site, and conditions 19 and 20 are included to ensure the landscape character and appearance of the site is preserved.

Conclusion

75. For the reasons given above I conclude that the appeal should be allowed.

G Rollings

INSPECTOR

²¹ PPG reference ID: 21a-003-20190723; revision date: 23 07 2019.

ANNEX A: SCHEDULE OF CONDITIONS

- 1) Approval of the details of the siting, design and external appearance of the buildings, and the landscaping of the site (hereinafter called "the reserved matters") shall be obtained from the local planning authority in writing before any development is commenced.
- 2) Application for approval of the reserved matters shall be made to the local planning authority not later than 3 years from the date of this permission.
- 3) The number of dwellings hereby permitted shall not exceed 49.
- 4) The development hereby permitted shall take place not later than 2 years from the date of approval of the last of the reserved matters to be approved.
- 5) The development hereby permitted shall be carried out in accordance with the following approved plans: Location Plan in A2 (D2871_430 Rev A); Parameter Plan (D2871_423_Rev B); Site Access Arrangement (ITB15490-GA-002 Rev E).
- 6) No building shall be occupied until the accesses (pedestrian and vehicle) have been constructed in accordance with details to plan no. ITB15490-GA-002 Rev E.
- 7) Prior to the commencement of development, full details of the construction of the access, including levels, widths, construction materials, depths of construction, surface water drainage, boundary treatment, landscaping and lighting shall be submitted to and approved in writing by the local planning authority. Each dwelling shall not be occupied until the vehicle access to serve that dwelling has been constructed in accordance with the approved details to road base level and the final wearing course will be provided within 3 months of occupation, unless otherwise agreed in writing by the local planning authority.
- 8) No occupation of the development shall take place until:
 - (a) the approval by the local planning authority of a scheme that that provides for the visibility splays shown on plan no. ITB15490-GA-002 Rev E (to include also the removal of any obstruction above a height of 0.6 metres) and the maintenance of the same over the lifetime of the development; and,
 - (b) the full implementation of the aforementioned approved scheme.
- 9) No development shall take place, until a Construction Method Statement, including a CEMP (Construction Ecological Management Plan), has been submitted to, and approved in writing by, the local planning authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall provide for:
 - (a) construction of suitable works access;
 - (b) the parking of vehicles of site operatives and visitors;
 - (c) loading and unloading of plant and materials;
 - (d) storage of plant and materials used in constructing the development;
 - (e) the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
 - (f) wheel washing facilities;
 - (g) measures to control the emission of dust and dirt during construction;

- (h) a scheme for recycling/disposing of waste resulting from demolition and construction works;
 - (i) hours of construction;
 - (j) hours of delivery; and
 - (k) mitigation and avoidance measures for ecology and biodiversity.
- 10) No work relating to the development hereby approved, including works of demolition or preparation prior to building operations, shall take place other than between the hours of 08:00 and 18:00 Monday to Friday and 08:00 to 13:00 Saturdays and at no time on Sundays or Bank or National Holidays.
- 11) Prior to the commencement of development details for disposing of surface water by means of a sustainable drainage system (SuDS) shall be submitted to and approved in writing by the Local Planning Authority. No dwelling hereby permitted shall be occupied until the aforementioned approved details (in so far as they apply to that dwelling) have been implemented.
- 12) No development shall take place until the applicant or their agents or successors in title have secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation, which has been submitted by the applicant and approved by the planning authority. The development shall only take place in accordance with the detailed scheme approved pursuant to this condition.
- 13) No development shall take place until an Arboricultural Method Statement has been submitted to and approved in writing by the local planning authority, this shall include details of existing trees and hedges to be retained in the submitted Arboricultural Impact Assessment, in line with BS5837:2012, and shall include details of;
- (a) any proposed topping or lopping of any retained tree, or of any tree on land adjacent to the sub-phase;
 - (b) any proposed alterations to ground levels within the Root Protection Area or Crown Spread (whichever is the greater) of any retained tree, including trees on land adjacent to the site;
 - (c) the specification and position of fencing and of any other measures to be taken for the protection of any retained tree from damage before or during the course of development.
 - (d) the erection of fencing for the protection of any retained tree shall be undertaken in accordance with the approved plans and particulars before any equipment, machinery or materials are brought on to the site for the purposes of the development, and shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed in any area fenced in accordance with this condition and the ground levels within those areas shall not be altered, nor shall any excavation be made without the written consent of the local planning authority.
 - (e) Prior to occupation of the first dwelling, a Veteran Tree Management Plan shall be agreed in writing with the local planning authority. This Plan shall include:

- Specialist Survey Method assessment of the trees;
- Individual tree management programme geared towards maximising longevity;
- Provision and maintenance of knee-rail style fencing beyond crown driplines, enclosing access-deterrent planting; and
- Regular review by a competent person of veteran trees' condition, with follow-up management works being implemented as recommended.

The first three elements of the Plan shall be implemented also prior to first occupancy.

- 14) No trees, shrubs or hedges within the site which are shown as being retained on the plans approved under condition 13 shall be felled, uprooted wilfully damaged or destroyed, cut back in any way or removed without previous written consent of the local planning authority; any trees, shrubs or hedges removed without consent or dying or being severely damaged or becoming seriously diseased within 5 years from the completion of the development hereby permitted shall be replaced with trees, shrubs or hedge plants of similar size and species unless the local planning authority gives written consent to any variation.
- 15) Prior to the commencement of development, details of how the development will achieve a biodiversity net gain of 10 % for habitats shall be submitted to and approved in writing by the Local Planning Authority. The details thereby agreed shall be fully implemented in accordance with an agreed timetable.
- 16) Prior to the commencement of the development a Landscape Environmental Management Plan (LEMP), in accordance with the Update Biodiversity Report by Aspect Ecology dated October 2022, including long term design objectives, management responsibilities, timescales, and maintenance schedules for all landscape areas, other than privately owned domestic gardens, which delivers and demonstrates a habitat and hedgerow biodiversity net gain shall be submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved LEMP.
- 17) The development hereby approved shall not be occupied until the noise mitigation measures as set out in the Noise assessment report, project number 13390 dated 08/04/2020 submitted with the application, are implemented. The noise mitigation measures shall be retained and maintained thereafter.
- 18) The development hereby approved shall not be occupied until the pedestrian crossing improvements shown in principle on Drawing ITB15490-GA-017 have been completed to the written satisfaction of the Local Planning Authority.
- 19) No dwelling shall be more than 2 storeys in height, and no dwelling shall be higher than 61.5mAOD.
- 20) Prior to first occupation of the development hereby approved, details of any gate, fence or other means of enclosure within or around the public open space as shown on the Parameter Plan (D2871_423_Rev B), shall be submitted to and approved in writing by the Local Planning Authority.

End of schedule.

ANNEX 2: CORE DOCUMENTS REFERENCED IN THIS DECISION

CD 1.6	Appellant's <i>Landscape and Visual Impact Assessment</i> , April 2020.
CD 5.1	Adopted <i>Core Strategy Development Plan Document</i> (2010).
CD 5.3	Adopted <i>Managing Development Delivery Local Plan</i> (2014).
CD 5.5	Made <i>Shinfield Parish Neighbourhood Plan</i> (2017).
CD 6.1	Appeal decision, ref: APP/X0360/W/19/3275086, 18 February 2022.
CD 6.7	Appeal decision, ref: APP/X0360/W/19/3240232, 1 February 2021.
CD 6.8	SoS decision, ref: APP/H1705/V/10/2124548, 16 June 2011.
CD 6.15	Appeal decision, ref: APP/X0360/W/19/3235572, 25 August 2020.
CD 6.20	Appeal decision, ref: APP/X0360/W/21/3271917, 3 September 2021.
CD 6.21	Appeal decision, ref: APP/X0360/W/21/3269974, 31 August 2021.
CD 7.4	High Court judgment, <i>Crest Nicholson v West Berkshire Council</i> [2021] EWHC 289 (Admin).
CD 10.2	<i>Berkshire (including South Bucks) Strategic Housing Market Assessment</i> (February 2016).
CD 10.3	<i>Wokingham Borough Local Housing Needs Assessment 2019</i> (January 2020).
CD 11.5	<i>AWE Off-site Emergency Plan</i> , Joint Emergency Planning Unit, August 2022.
CD 11.12	<i>The Radiation (Emergency Preparedness and Public Information) Regulations 2019</i> , HSE/ONR.
CD 11.20	<i>The Radiation (Emergency Preparedness and Public Information) Regulations 2019</i> , SI 2019 No. 703.
CD 11.21	<i>REPPIR – What you should do if there is a radiation emergency at the AWE Aldermaston or Burghfield sites</i> , West Berkshire Council, 2020.
CD 12.1A/B	<i>Wokingham Borough Landscape Character Assessment</i> , LUC 2019.
CD 12.3	<i>Manual for Streets</i> , DoT/DCLG, 2007.
CD 12.21	<i>National Design Guide</i> , MHCLG, 2021.

ANNEX 3: DOCUMENTS SUBMITTED AT THE INQUIRY

ID 01	Appellant's opening submissions.
ID 02	Council's opening submissions.
ID 03	Shinfield Parish Council written statement.
ID 04	Site visit route map.
ID 05	Wokingham Draft Local Plan.
ID 06	Wokingham Employment Skills Plan Guidance for Developers.
ID 07	Section 106 Agreement Certified Copy.
ID 08	Agreed (final) schedule of conditions.
ID 09	<i>Hopkins Homes Ltd, Richborough Estates Partnership LLP v Cheshire East BC</i> , SSCLG [2017] UKSC 37.
ID 10	<i>Hallam Land Management Ltd c v Eastleigh BC</i> , SSCLG [2017] EWHC 2865 (Admin).
ID 11	<i>Old Hunstanton Parish Council v Hastoe Housing Association Ltd</i> , Kings Lynn & West Norfolk BC, SSCLG [2015] EWHC 1958 (Admin).
ID 12	Council's closing submissions.
ID 13	Appellant's closing submissions.

ANNEX 4: APPEARANCES

FOR THE APPELLANT

Andrew Tabachnik
of King's Counsel
and Katherine Barnes
of Counsel

Instructed by the appellant

They called

Michael C Thorne
BSc PhD FInstP FSRP CRadP
Tim Wall *BA MSc MCIHT CMILT*
Andrew Smith
BSc(Hons) MSc CMLI
Julian Forbes-Laird
BA(Hons) Dip.GR.Stud MICFor
MRICS MEWI Dip.Arb.(RFS)
Douglas Bond *BA(Hons) MRTPI*

Mike Thorne and Associates Ltd

Partner, i-Transport LLP
Joint Managing Director, fabrik

Senior Director, Forbes-Laird
Arboricultural Consultancy Ltd

Partner, Woolf Bond Planning LLP

FOR THE LOCAL PLANNING AUTHORITY (WBC)

Matt Lewin
of Counsel

Instructed by Lyndsay Jennings
of WBC

He called

Harry Williamson
BSc(Hons) Cert(CBCI)
Gordon Adam
BA DipEcon MA CGIHT MILT
Chris Hannington
BSc MPhil CMLI MRTPI
Catherine Brimble
BA(Hons) DipLA CMLI
Ian Church
BA(Hons) MTRP MRTPI
Mark Croucher *BA(Hons) MSc*

Emergency Planning Manager, WBC

Principal Development Control Engineer,
WBC
Team Manager, WBC

Senior Landscape Officer, WBC

Team Manager (Senior Specialist), WBC

Principal Planning Officer Team Leader,
WBC

INTERESTED PERSONS

Darrell Lias

Vice Chair (operations),
Shinfield Parish Council



ATOMIC WEAPONS ESTABLISHMENT

AWE ALDERMASTON

CONSEQUENCES REPORT

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Introduction

This document is the consequences report for the Aldermaston Site, as required under Regulation 7(1) of The Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPIR 2019).

The following information has been titled to relate specifically to the REPIR 2019 Schedule 4 items required to be included within this report.

Part 1 – Factual Information

1. ***Regulation 7(3) Schedule 4, paragraph 1(a) - Name and address of the operator:***
AWE plc, Aldermaston, Reading, Berkshire, RG7 4PR.
2. ***Regulation 7(3) Schedule 4, paragraph 1(b) - Postal address of the premises where the radioactive substance will be processed, manufactured, used or stored, or where the facilities for processing, manufacture, use of storage exist:***
AWE plc, Aldermaston, Reading, Berkshire, RG7 4PR.
3. ***Regulation 7(3) Schedule 4, paragraph 1(c) - The date on which it is anticipated that the work with ionising radiation will commence or, if it has already commenced, a statement to that effect:***

The Aldermaston Site has been occupied in support of the UK nuclear deterrent since 1950 and work with ionising radiation has been conducted on the site since that date.

Part 2 – Recommendations

1. ***Regulation 7(3) Schedule 4, paragraph 2(a) - The proposed minimum geographical extent from the premises to be covered by the local authority's off-site emergency plan:***
 - a. The proposed minimum geographical extent to be covered by the Local Authorities Off-Site Emergency Plan is an area extending to a radial distance of 1540m from the Aldermaston Site centre location.
This is illustrated on Map A in Appendix A.
 - b. In addition to the minimum geographical extent recommended above, an Outline Planning Zone, extending to a radial distance of 15km around the Aldermaston Site centre location, has been determined by the Secretary of State for Defence, in accordance with Regulation 9(1)(c).
This is illustrated on Map B in Appendix B.
2. ***Regulation 7(3) Schedule 4, paragraph 2(b) – The minimum distances to which urgent protective actions may need to be taken, marking against each distance the timescale for implementation of the relevant action; and Clause 3(a) – The recommended urgent protective actions to be taken within that zone, if any, together with timescales for the implementation of those actions.***
 - a. The following distance is recommended for the urgent protective action of sheltering. This is the largest distance determined by detailed consequence assessment of a range of source terms and include consideration of a range of weather conditions and vulnerable groups within the population.

- b. The minimum distance to which urgent protective actions should be taken corresponds to an area with radial distance of 1540m.
- c. It is recommended that people are instructed, as soon as is practical, to immediately take-cover in a suitable building and to stay inside with the windows and doors all properly shut. This 'sheltering' action may be necessary for a period of up to two days, or at least until the initial contaminated plume has passed and monitoring of the ground contamination has been undertaken to determine the level of groundshine; and subsequent potential for further dose uptake (e.g. from contaminated locally produced foodstuffs).
- d. For exposure to tritiated water vapour, the most vulnerable humans are those dependent on their mothers for sustenance. Immediate protective sheltering action will contribute to dose savings, but further protective action may be required to prevent contamination from the mother delivering a dose to their off-spring over the next month (e.g. use of uncontaminated formula milk). These further protective actions may be required until a time when active monitoring of the environment, particularly the air (inhalation dose) and the ground (re-suspension dose), can be undertaken to declare that there is no further danger.
- e. It is recommended that the declaration of a Radiation Emergency, by the operator, to the Local Authority, is the trigger for implementing the off-site emergency plan and initiating all of the above recommended urgent protective actions.
- f. Category F weather conditions typically has an associated mean wind speed of 2ms^{-1} . From the event site, there will be approximately 800 seconds (approx. 13 minutes) from the initiation of the event until the leading edge of the plume travels to the minimum distance recommended for urgent action. Assuming no early warning of the incident starting, and that the Site Response Group could take up to an estimated 15 minutes to set up and formally notify the Local Authority, there could be no time available to inform the public, and for the public to find suitable shelter to obtain any dose saving.
- g. The benefit from dose saving is likely to be greater if there is any advance warning of an incident.

3. *Regulation 7(3) Schedule 4, paragraph 3(b) – Details of the environmental pathways at risk in order to support the determination of food and water restrictions in the event of a radiation emergency:*

- a. The release of radioactivity from the Aldermaston Site as a result of a fault condition has the potential to result in doses to the public through a range of exposure pathways, including:
 - i. First-pass inhalation of air in the plume of contamination;
 - ii. Short-term external irradiation during passage of the plume – Cloudshine;
 - iii. Long-term inhalation after resuspension, from ground contaminated by the initial plume;

- iv. Long-term external irradiation from ground contamination by the initial plume – Groundshine;
 - v. Ingestion of food crops contaminated by the initial plume;
 - vi. Ingestion of breast milk that has been contaminated by the mother's intake of a particular radioactive material;
 - vii. Irradiation as a result of a criticality.
- b. The relative importance of the different exposure pathways is dependent on the type of accident and the potential radioactive isotopes which may be released.
- c. An emergency that results only in the emanation of radiation from the site without a Schedule 1 release of radioactive material (e.g. an accidental criticality event) does not lead to the need for local food and water restrictions.
- d. The accidents which have been identified as relevant to emergency planning are those which result in the spread of radioactive material by atmospheric dispersion and these can, in some instances, be driven by fire. These are non-fission incidents, where the dominant material will be plutonium (which is an Alpha emitting actinide) or tritium (a soft Beta emitter).
- e. For plutonium release emergencies, the consequences arise from fine particulates of plutonium oxide and the predominant exposure pathway to individuals outside the Aldermaston Site during the passage of the contaminated plume, would be by inhalation. As the contaminated plume travels downwind, deposition mechanisms would deplete particles from the plume and leave radioactive material on the ground. Most forms of plutonium are removed from biological pathways by being fixed in the soil and only small amounts are concentrated by biological processes into the food chain, primarily through grazing animals. However, the material can be resuspended by the action of the weather, or by farming practices, or any other disturbance processes, resulting in a potential for longer term inhalation doses. Minor dose contributions to the public, resulting from this type of scenario, may include cloudshine, long-term inhalation following resuspension, and groundshine.
- f. For tritium release emergencies, the tritium is conservatively assumed to be present as inhalable tritiated water vapour. The predominant exposure pathway to individuals outside the Aldermaston Site during the passage of the contaminated plume would be by inhalation. As the plume travels downwind, deposition mechanisms would deplete the plume and leave radioactive material on the ground. Tritiated water is readily taken-up into biological pathways and may be ingested. In terms of the significance of different food groups, tritium is absorbed more readily by leafy vegetables due to the large surface area of the crop and the already high internal water content. However, ingestion of contamination due to a mother's intake of tritium can be a more significant dose pathway for infants than the direct inhalation dose for those infants. Given the nature of radiation emitted from a tritium release, dose contributions are dominated by first-pass inhalation and ingestion.
- g. Overall, the primary concern for early response decision-making to radiation emergencies involving possible accidents at the Aldermaston Site only merits

consideration of the first-pass inhalation dose for exposure to actinides and therefore sheltering is the recommended urgent protective action. Given the properties of tritiated water releases, sheltering and finding uncontaminated milk substitutes, for vulnerable infants are recommended as a priority.

Part 3 - Rationale

1. *Regulation 7(3) Schedule 4, paragraph 4 – The rationale supporting each recommendation made:*

- a. The release of radioactive particles small enough to be readily transported in the open atmosphere also makes them respirable. Such particles have the potential to result in radiological doses to the public from a range of exposure routes, most notably:
 - First-pass inhalation of air from the plume of contamination;
 - Long-term inhalation after resuspension of ground contamination by the initial plume;
 - Ingestion of food crops contaminated by the initial plume;
 - Long-term external irradiation from ground contamination by the initial plume;
 - Ingestion of breast milk that has been contaminated by a mother's intake of a particular radioactive material.
- b. It has been assessed for the identified scenarios at the Aldermaston Site that the first-pass inhalation dose is the most significant by far, for initial emergency response purposes. This has resulted in the recommendation to shelter as the most appropriate urgent protective action. In the case of a scenario where tritiated water is released, urgent protective actions should also involve finding uncontaminated milk substitutes for vulnerable infants. This should be coupled with an immediate restriction on the consumption of all locally produced food, until the direction of the plume and the extent of the contamination has been fully investigated, examined and understood. Appropriate local instructions should then be made available to the public based on the prevailing conditions.
- c. The recommendation for the minimum emergency action distance at the Aldermaston Site originates from the Consequence Assessment carried out under REPPiR 2019. The guidance set out in the Approved Code of Practice is to use the largest candidate distances recommended for the urgent protective actions identified against the lower Emergency Reference Level. This 1540m distance about the Aldermaston Site Centre location is selected as the minimum geographical extent for urgent protective actions and is consistent with the established Detailed Emergency Planning Zone (See appendix C for definition).
- d. The REPPiR 2001 determination was based on a 5mSv dose contour using 55% Cat D weather conditions. Under REPPiR 2019, the minimum distance for urgent protective actions is based on a 7.5mSv dose contour. However, in accordance with the new requirements of REPPiR 2019, the 'reasonable foreseeability' argument is no longer allowed, and several different requirements have had to be taken into consideration, these being that the assessment must:

- Consider age, and other characteristics which would render specific members of the public especially vulnerable;
 - Include all relevant pathways;
 - Consider a representative range of source terms;
 - Consider a range of weather conditions to account for consequences that are less likely, but which have greater consequences.
- e. A further consideration is the geographical area around the site and the potentially significant period that these adverse weather conditions could be experienced.
- f. AWE has analysed the dose from a range of weather conditions and has decided to base its proposal on a weather category that is less likely, but which could provide significantly greater doses. Consideration of less likely weather categories, which occur around 12% of the time in the local geographical area provides the 7.5mSv dose contour at 1540m around the site centre location.

2. *Regulation 7(3) Schedule 4, paragraph 5(a) – The rationale for its recommendation on the minimum distances for which urgent protective action may need to be taken:*

- a. The minimum distances recommended are based on a full range of possible consequences from the identified radiation emergencies, evaluated in the Consequence Assessment made in accordance with Regulation 5(1) for the appropriate source terms, and is based on the requirement to identify a distance that has the potential to deliver a dose saving of 3mSv.
- b. The tritium source term released by a fire will release tritium in the form of tritiated water (HTO), which is readily absorbed through the skin by humans. Intakes of airborne HTO are dominated by inhalation with a lesser contribution by direct absorption. The HTO is rapidly distributed throughout the body and typically is excreted with a biological half-life close to 10 days.
- c. Sheltering from a plume of HTO will give some dose saving (40% is recommended by Public Health England (PHE) for emergency planning) to adults. This same ratio for the reduction in HTO intake will give larger dose savings for any humans dependent for sustenance on their mother. Some significant further protective action would be worthwhile in preventing tritium contamination being consumed via their mother (e.g. using uncontaminated formula milk).
- d. For the postulated accident in the main Aldermaston Site tritium facility the 3 mSv dose saving from prompt sheltering for pregnant women and the unborn child are at a distance of 1.35 km. The potential 3 mSv dose saving to a vulnerable infant from an effective ban on contaminated mother's milk would extend to 2.0 km.
- e. Given the relative proportions in the UK population of the two most vulnerable groups of humans (unborn child and vulnerable infant) dependent for sustenance on their mothers, it is considered proportionate to derive recommendations purely for sheltering providing immediate protection. The distance associated with the relevant vulnerable group, including the off-set from the tritium facility to the site

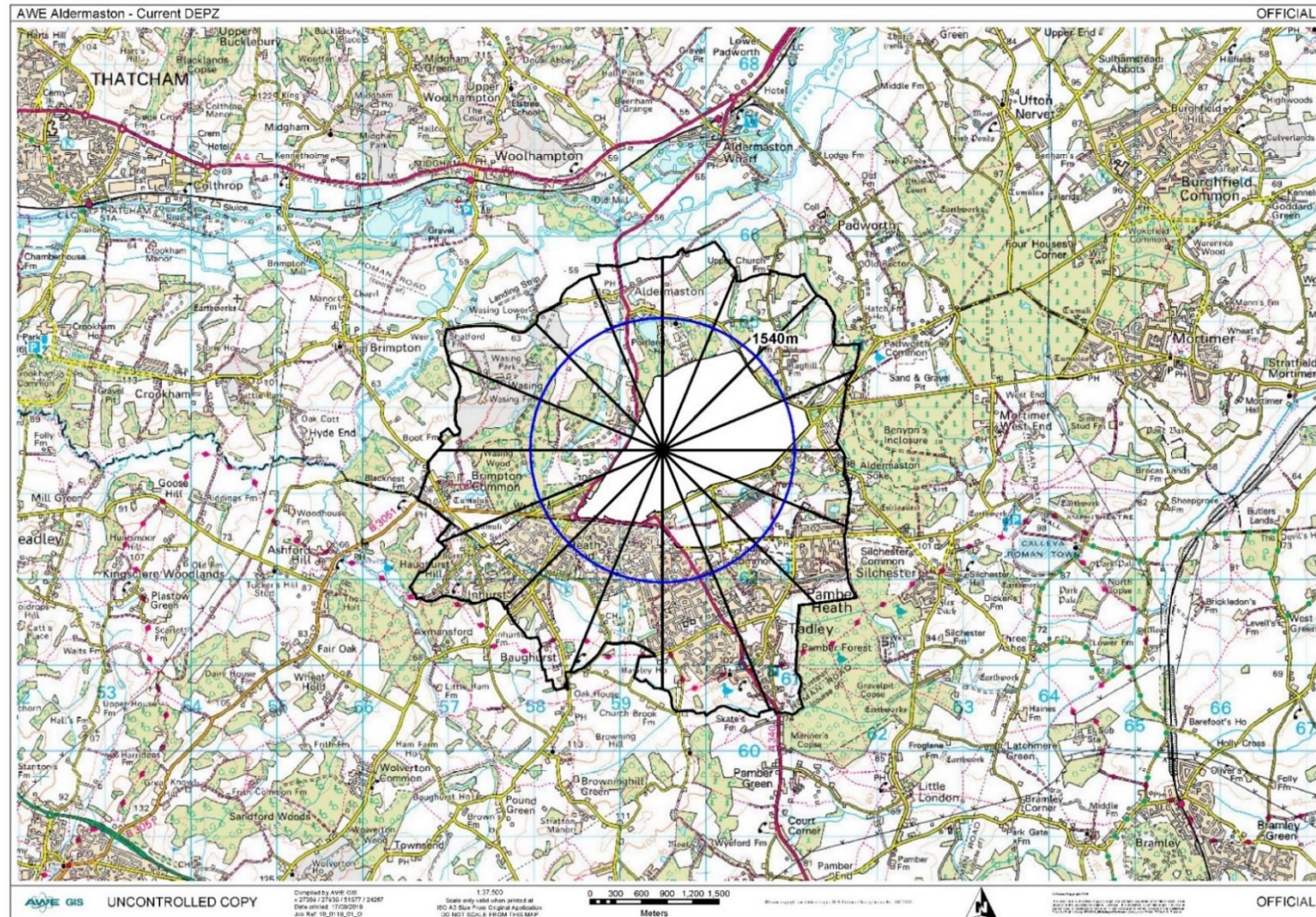
centre location, gives a nominal circle of radius 1.54 km, around the site centre location.

- f. This minimum distance for urgent action at the Aldermaston Site is wholly within the existing DEPZ boundary. Under these circumstances, this submission recommends that the current DEPZ is retained for AWE(A).

3. *Regulation 7(3) Schedule 4, paragraph 5(b) – The rationale for agreement that no off-site planning is required.*

- a. Given the content of this Consequences Report, this requirement does not apply to the Aldermaston Site.

Appendix A: Map A – The ragged bold black sector is the current boundary of the Detailed Emergency Planning Zone. The Proposed Urgent Protective Distance (blue circle), set at 1540m for the Aldermaston Site.



Appendix B: Map B – The Outline Planning Zone Boundary, set at 15Km for the Aldermaston Site.



Appendix C: Definitions

Detailed Emergency Planning Zone (DEPZ)	A zone determined in accordance with Regulation 8 of the REPPIR 2019 Regulations. This is now covered by the Local Authority's off-site emergency plan
Outline Planning Zone (OPZ)	A zone determined in accordance with Regulation 9 of the REPPIR 2019 Regulations and covered by the Local Authority's off-site emergency plan.



ATOMIC WEAPONS ESTABLISHMENT

AWE BURGHFIELD

CONSEQUENCES REPORT

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Introduction

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The following information has been titled to relate specifically to the REPPIR 2019 Schedule 4 items required to be included within this report.

Part 1 – Factual Information

1. *Regulation 7(3) Schedule 4, paragraph 1(a) - Name and address of the operator:*

AWE plc, Aldermaston, Reading, Berkshire, RG7 4PR.

2. *Regulation 7(3) Schedule 4, paragraph 1(b) - Postal address of the premises where the radioactive substance will be processed, manufactured, used or stored, or where the facilities for processing, manufacture, use of storage exist:*

AWE plc, Burghfield, Reading, Berkshire, RG7 2PQ.

3. *Regulation 7(3) Schedule 4, paragraph 1(c) - The date on which it is anticipated that the work with ionising radiation will commence or, if it has already commenced, a statement to that effect:*

The Burghfield Site has been occupied in support of the UK nuclear deterrent since 1950 and work with ionising radiation has been conducted on the site since that date.

Part 2 – Recommendations

1. *Regulation 7(3) Schedule 4, paragraph 2(a) - The proposed minimum geographical extent from the premises to be covered by the local authority's off-site emergency plan:*

- a. The proposed minimum geographical extent to be covered by the Local Authorities Off-Site Emergency plan is an area extending to a radial distance of 3160m from the Burghfield Site centre location.
This is illustrated on Map A in Appendix A.
- b. In addition to the minimum geographical extent recommended above, an Outline Planning Zone, extending to a radial distance of 12km around the Burghfield Site centre location, has been determined by the Secretary of State for Defence, in accordance with Regulation 9(1)(c).
This is illustrated on Map B in Appendix B.

2. *Regulation 7(3) Schedule 4, paragraph 2(b) – The minimum distances to which urgent protective actions may need to be taken, marking against each distance the timescale for implementation of the relevant action; and paragraph 3(a) – The recommended urgent protective actions to be taken within that zone, if any, together with timescales for the implementation of those actions.*

- a. The following distance is recommended for the urgent protective action of sheltering. This is the largest distance determined by detailed consequence assessment of a range of source terms and includes consideration of a range of weather conditions and vulnerable groups within the population.
- b. The minimum distance to which urgent protective actions should be taken corresponds to an area with radial distance of 3160m.
- c. It is recommended that people are instructed, as soon as is practical, to immediately take-cover in a suitable building and to stay inside with the windows and doors all properly shut. This 'sheltering' action may be necessary for a period of up to two days, or at least until the initial contaminated plume has passed and monitoring of the ground contamination has been undertaken to determine the level of groundshine; and subsequent potential for further dose uptake, (e.g. from contaminated locally produced foodstuffs).
- d. It is recommended that the declaration of a Radiation Emergency, by the operator, to the Local Authority is the trigger for implementing the off-site emergency plan and initiating all the above recommended urgent protective actions.
- e. Category F weather conditions typically has an associated mean wind speed of 2ms^{-1} . From the event site, there will be an average of approximately 1500 seconds (25 minutes) from the initiation of the event until the leading edge of any plume travels to the minimum distance recommended for urgent action. Assuming no early warning of the onset of any incident, and that the Site Response Group could take up to an estimated 15 minutes to set-up and formally notify the Local Authority, there remains approximately 10 minutes to inform the public, and for the public to find suitable shelter, in order to realise any substantive benefit from the sheltering action.

3. *Regulation 7(3) Schedule 4, paragraph 3(b) – Details of the environmental pathways at risk in order to support the determination of food and water restrictions in the event of a radiation emergency:*

- a. The release of radioactivity from the Burghfield Site as a result of a fault condition has the potential to result in doses to the public through a range of exposure pathways, including:
 - i. First-pass inhalation of air in the plume of contamination;
 - ii. Short-term external irradiation during passage of the plume – Cloudshine;
 - iii. Long-term inhalation after resuspension, from ground contaminated by the initial plume;
 - iv. Long-term external irradiation from ground contamination by the initial plume – Groundshine;
 - v. Ingestion of food crops contaminated by the initial plume.
- b. The relative importance of the different exposure pathways is dependent on the type of accident and the potential radioactive isotopes which may be released.

- c. The most likely predicted accidents would spread material by explosive distribution, these are non-fission incidents, where the material that would dominate in this type of release will be plutonium (which is an Alpha emitting actinide) in an inhalable particulate form.
- d. For potentially more energetic events, a range of fission products would be produced meaning that both internal (inhalation) as well as external exposure (irradiation) would dominate.
- e. For the majority of fault sequences, the material released would be in the form of fine particulates of plutonium oxide and the predominant exposure pathway to individuals outside the Burghfield Site during the passage of the plume would be by inhalation. As the plume travels downwind, deposition mechanisms would deplete the plume and leave radioactive material on the ground. Most forms of plutonium are removed from biological pathways by being fixed in the soil and only small amounts are concentrated by biological processes into the food chain, primarily through grazing animals. However, the material can be resuspended by the action of the weather, or by farming practices, or any other disturbance processes, resulting in a potential for longer term inhalation doses.
- f. Doses to the public resulting from this consequence may include contributions from cloudshine, first-pass inhalation, long-term inhalation following resuspension, and groundshine.
- g. Overall, the primary concern for early response decision-making to radiation emergencies involving possible accidents at the Burghfield Site only merits consideration of the first-pass inhalation dose and therefore sheltering is the recommended urgent protective action.

Part 3 - Rationale

1. ***Regulation 7(3) Schedule 4, paragraph 4 – The rationale supporting each recommendation made:***

- a. The release of radioactive particles small enough to be respirable have the potential to result in radiological doses to the public from a range of exposure routes, most notably:
 - First-pass inhalation of air from the plume of contamination;
 - Long-term inhalation after resuspension of ground contamination by the initial plume;
 - Ingestion of food crops contaminated by the initial plume;
 - Long-term external irradiation from ground contamination by the initial plume.
- b. It has been assessed that the first-pass inhalation dose is the most significant by far, for initial emergency response purposes, which has resulted in the recommendation to shelter as the most appropriate urgent protective action. This should be coupled with a restriction on the consumption of all locally produced food, until the direction of the plume and the extent of the contamination has been

fully investigated, examined and understood. Appropriate local instructions should then be made available to the public based on the prevailing conditions.

- c. The recommendation for the minimum emergency action distance at the Burghfield Site originates from the Consequence Assessment carried out under REPIR 2019. The guidance set out in the Approved Code of Practice is to use the largest candidate distances recommended for the urgent protective actions identified against the lower Emergency Reference Level. This 3160m distance is selected as the minimum geographical extent of the Detailed Emergency Planning Zone (see appendix C for definition) about the Burghfield Site Centre Location.
- d. This distance has increased from the REPIR 2001 ONR determination. The REPIR 2001 determination was based on a 5mSv dose contour using 55% Cat D weather conditions. Under REPIR 2019, the minimum distance for urgent protective actions is based on a 7.5mSv dose contour. However, in accordance with the new requirements of REPIR 2019, the 'reasonable foreseeability' argument is no longer allowed, and several different requirements have had to be taken into consideration, these being that the assessment must:
 - Consider age, and other characteristics which would render specific members of the public especially vulnerable;
 - Include all relevant pathways;
 - Consider a representative range of source terms;
 - Consider a range of weather conditions to account for consequences that are less likely, but which have greater consequences.
- e. A further consideration is the geographical area around the site and the potentially significant period that these adverse weather conditions could be experienced.
- f. AWE has analysed the dose from a range of weather conditions and has decided to base its proposal on a weather category that is less likely, but which could provide significantly greater doses. Consideration of less likely weather categories, which occur around 12% of the time in the local geographical area, increases the 7.5mSv dose contour to 3160m around the site centre location.

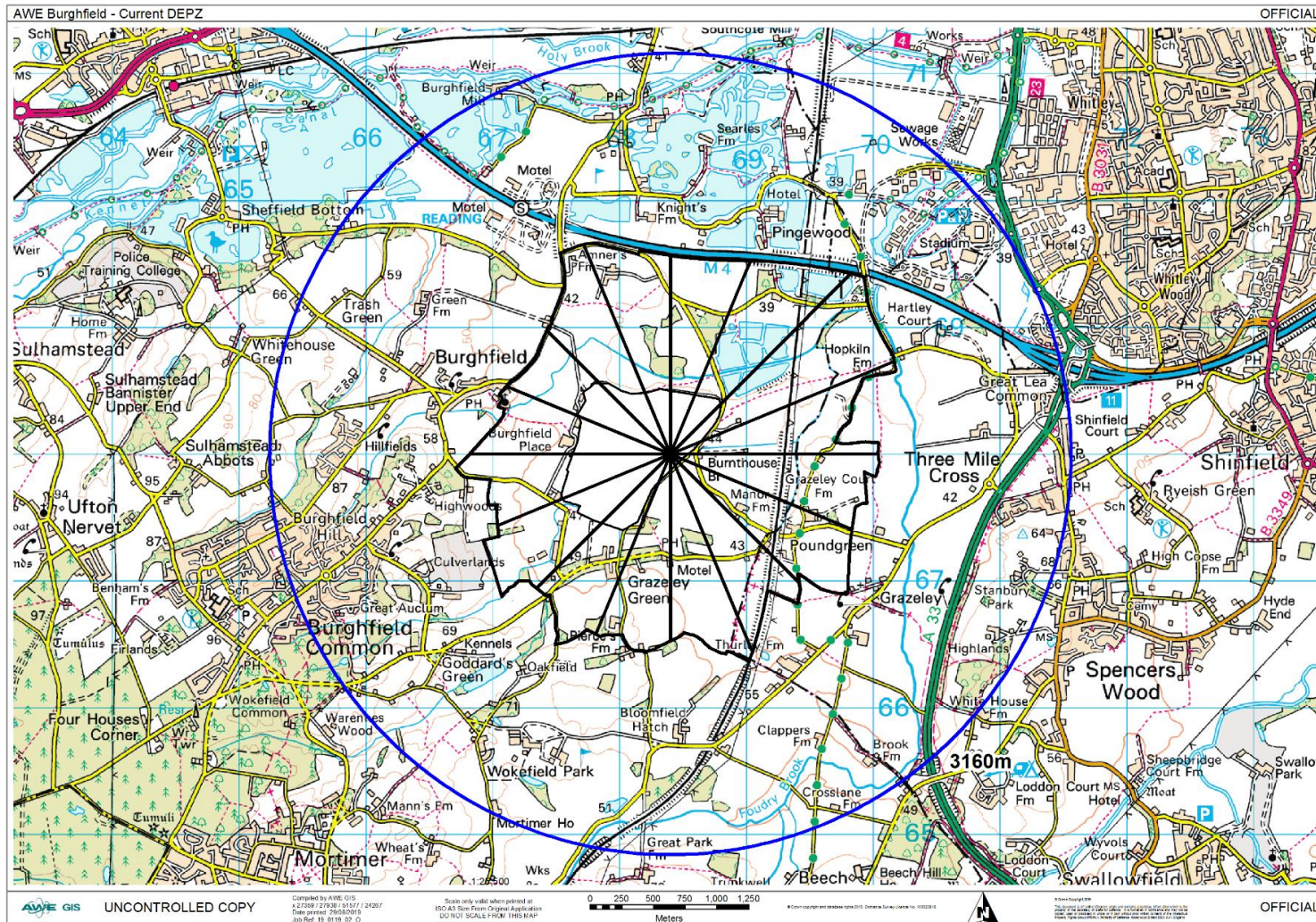
2. *Regulation 7(3) Schedule 4, paragraph 5(a) – The rationale for its recommendation on the minimum distances for which urgent protective action may need to be taken:*

- a. The minimum distance is established from the guidance provided in support of the Regulations, for the appropriate source terms, and is based on the requirement to identify a distance that has the potential to deliver a 3mSv dose saving, when adopting the recommended urgent protective action; which in this case is sheltering.

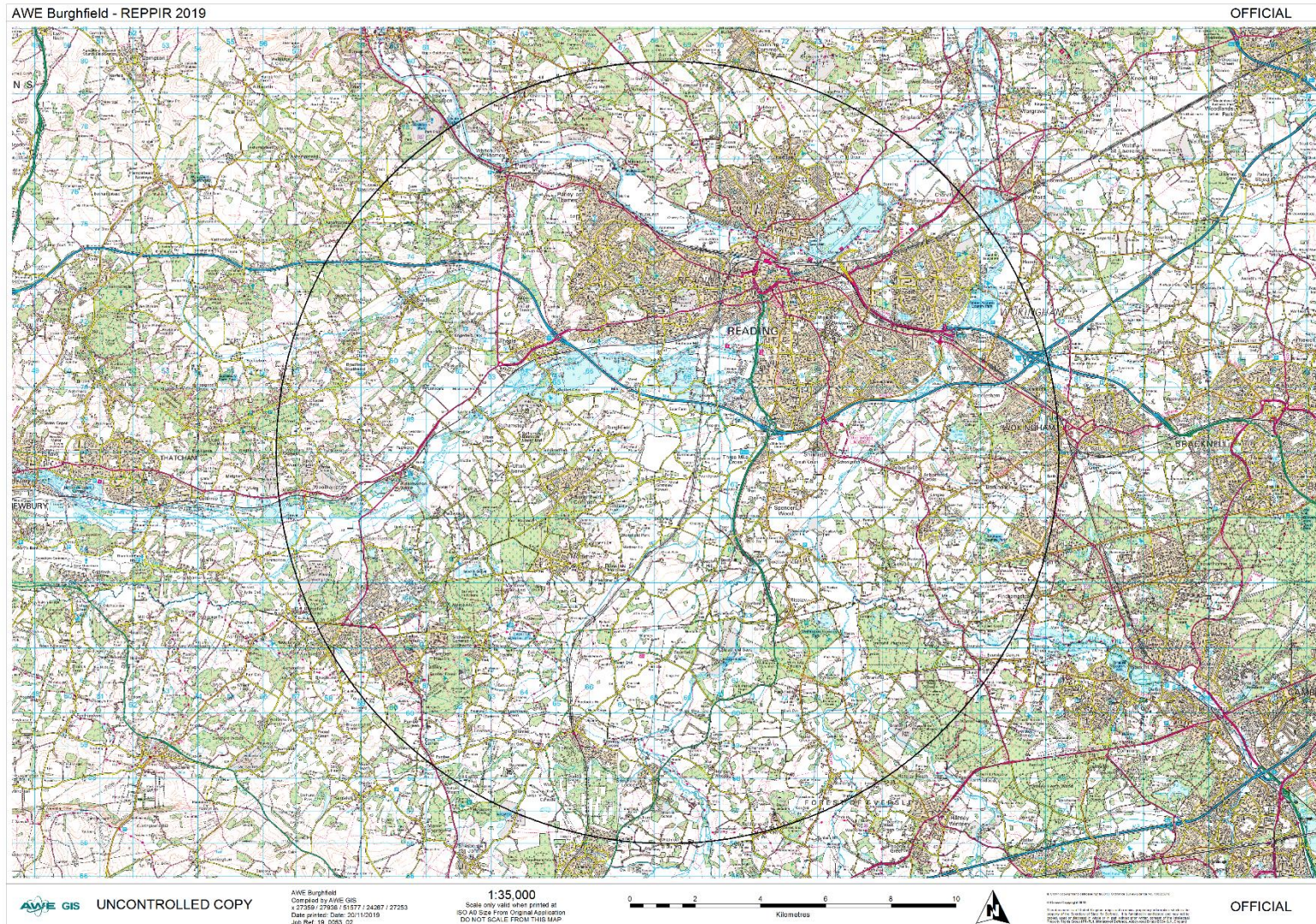
3. *Regulation 7(3) Schedule 4, paragraph 5(b) – The rationale for agreement that no off-site planning is required.*

- a. Given the content of this Consequences Report, this requirement does not apply to the Burghfield Site.

Appendix A: Map A – The ragged bold black sector is the current boundary of the Detailed Emergency Planning Zone. The Proposed Urgent Action Distance (blue circle) is set at 3160m for the Burghfield Site.



Appendix B: Map B – The Outline Planning Zone Boundary, set at 12Km for the Burghfield Site.



Appendix C: Definitions

Detailed Emergency Planning Zone (DEPZ)	A zone determined in accordance with Regulation 8 of the REPPIR 2019 Regulations. This is now covered by the Local Authority's off-site emergency plan
Outline Planning Zone (OPZ)	A zone determined in accordance with Regulation 9 of the REPPIR 2019 Regulations and covered by the Local Authority's off-site emergency plan.

AWE Off-Site Emergency Response Plan

Version 1.8 January 2019

Joint Emergency Planning Unit

LIVE

Public Version

Status of Document	Live
Version No.	1.8
Issue Date	08 January 2019
Formal Review Date	2020/2021
For further information contact:	emergencyplanning@westberks.gov.uk

If you are being alerted regarding an activation of this plan go directly to SECTION 3 [Page 16](#) for the callout notifications.

You should also check your own agency major incident plan/action cards for agency specific actions.

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Section One

1. Introduction & Plan Administration

1.1 Overview

Serious failures in plant operation or process conditions and/or physical damage to a research or production facility at either of the Atomic Weapons Establishment (AWE) sites, Aldermaston (A) and Burghfield (B), might conceivably lead to a release of radioactive material or other hazards which could present a local problem within the sites.

Other than radiation hazards the other significant hazards that may pose a risk to persons on the site and, in extreme circumstances, members of the public include:

- (a) Explosives
- (b) Chemicals
- (c) Environmental Pollutants

The hazards identified along with the potential impact of the hazards and emergency countermeasures that may be implemented to protect persons on and off the site are detailed later in this plan.

The likelihood that such a scenario could endanger the public outside a site is considered to be low. However due to the potential hazards from the AWE sites and the possibility of a release of radioactive or toxic material to the environment, sufficient in severity to necessitate action to be taken to protect employees, the public and the environment this plan has been developed.

This plan sets out the emergency arrangements for a multi-agency response to any on-site emergency with actual or potential off-site consequences at the AWE Aldermaston or Burghfield sites. Off-site emergency arrangements are also a requirement of the Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPIR).

This plan has been prepared by the AWE Off-site Planning Group.

Within this plan there are also descriptions regarding the interactions and links between these many agencies that would be involved in ensuring the safety and welfare of the public living near the establishments within the counties of Berkshire and Hampshire.

It is the individual responsibility of the participating organisations to prepare, revise and test the operational procedures described in this Plan to discharge their responsibilities under these arrangements.

The coordination of the response to an off-site emergency at either of the Aldermaston or Burghfield sites would be the responsibility of Thames Valley Police (TVP) in the first instance.

1.2 Aim & Objectives

The **aim** of this plan is to provide detailed information for all responding agencies to work to in order to facilitate the protection of the public and/or environment following an event involving an on-site accident at either of the Atomic Weapons Establishments.

The **objectives** of this plan are to:

- (a) Provide details about the sites and their hazards
- (b) Provide details of the roles and responsibilities of each responding agency
- (c) Provide details of activation, command & control and coordination
- (d) Provide details of countermeasures
- (e) Provide details of communications
- (f) Provide details of recovery
- (g) Provide details of where to find more information.

1.3 Management of the Plan

The plan will remain under continual review and will be updated as necessary as details change. It will however undergo a full formal review on a 3 yearly basis following an off-site exercise and;

- (a) Following any major incident or near incident at the site(s)
- (b) Following a major incident or near incident at other sites where lessons have been identified
- (c) Following any review and revision the relevant pages will be forwarded to all members of the off-site planning group and as appropriate an update of the public version of the plan placed on the internet.

The public version of the plan will not contain confidential or sensitive information.

West Berkshire District Council (WBDC) will circulate any amendments to those involved via ResilienceDirect (RD): <https://collaborate.resilience.gov.uk/RDSservice/home/76024/Plan>

Each organisation should inform the AWE Off-site Planning Group of changes that are relevant to the plan and therefore the response to an off-site incident.

1.4 Exercising the Plan

The AWE sites are required to exercise their emergency procedures regularly. Exercises are observed by HM Office for Nuclear Regulation (ONR). There are 3 levels, the scenario of each requiring approval of the ONR:

- Level 1: Concentrates on the operator's on-site procedures and communication. It may involve limited participation by the emergency services and other response organisations.
- Level 2: Tests the off-site emergency arrangements. It involves participation by the emergency services, emergency response organisations, government departments and agencies, and the operator.
- Level 3: A national exercise extending Level 2 by requiring involvement of Government Departments to exercise their procedures at their respective headquarters for Central Government, in order to test the interaction within and between national as well as local agencies.

In accordance with REPPiR 2001 West Berkshire District Council will agree with the regulator, the operator and emergency services the best method to test this off-site plan.

The following table lists the level and dates of exercises held:

Date of Exercise	Notes
11 November 1998	Level 2
15 November 2001	Level 2
2 March 2005	Level 2
11 November 2007	Level 2
10 November 2010	Level 2
Caldex 10 March 2010 (Office Hours)	Communications Exercise
Caldex 17 May 2011 (Office Hours)	Communications Exercise
Caldex 12/1/12 (Out of Office Hours)	Communications Exercise
Caldex 13/12/12 (Office Hours)	Communications Exercise
Caldex 10/6/13 (Office Hours)	Communications Exercise
Caldex 16/9/13 (Out of Office Hours)	Communications Exercise
Caldex 11/12/14 (Office hours)	Communications Exercise
Aldex 13 16 Nov 2013	Level 2
Ex Recuperate 13 9 Dec 13	Recovery Exercise
Caldex 14/12/14 (office hours)	Communications Exercise
Caldex 02/09/15	Communications Exercise
Caldex 26/07/16	Communications Exercise
Caldex 26/10/16	Communications Exercise
Aldex 16 7 Nov 16	Level 3

1.5 *Legislation*

Nuclear Installations Act 1965¹. The principal hazard to the public from a serious accident at the AWE sites will be the release of radioactive materials. There may be risks to health as a result of such a release. Therefore all activities on all nuclear sites in the UK are regulated under the Nuclear Installations Act 1965 and a Nuclear Site License is granted to sites with the proviso they satisfy a number of license conditions. One of these conditions requires that adequate emergency arrangements are in place.

The Radiation (Emergency Preparedness and Public Information Regulations 2001 (REPPIR))² came into effect in 2001. One of the aims of REPPIR was to protect members of the public from a release of radioactive material from premises working with such material where an accident could result in a radiation emergency. (A radiation emergency is defined as an event which is likely to result in a member of the public receiving a committed effective dose of 5mSv as a direct result of the event).

REPPIR requires nuclear operators and local authorities to make and implement arrangements to ensure that the members of the public are properly informed and prepared in advance, about what to do in the unlikely event of a radiation emergency occurring and provided with information if an emergency actually occurs. West Berkshire District Council has the duty under REPPIR in connection with off-site emergency plans and making arrangements to supply information to the public in the event of an emergency occurring. They may also be involved in the dissemination of prior information to the public from operators and carriers.

The key duties of local authorities are to prepare, revise, test and implement an off-site plan for any premises with an operator's on-site plan. The plan should bring together the emergency arrangements of all the off-site agencies with a role to play in the intervention and mitigation of an emergency occurring at the premises, and prepare arrangements to supply information to members of the public in the event of a radiation emergency actually occurring, however it may occur.

Currently the emergency arrangements are based on (a) reference accidents and (b) the principle of extendibility. The reference accident helps define the Detailed Emergency Planning Zone (DEPZ) within which arrangements to protect the public by introducing countermeasures are planned in detail. For practical reasons the DEPZ can extend

¹ [Nuclear Installations Act 1965](#)

² [Radiation - Radiation \(Emergency Preparedness and Public Inf...](#)

further to avoid, for example, splitting streets in half if one part of a street is inside the DEPZ while the other part is outside.

Other Legislation. There are various other materials and processes on the sites which may give rise to other hazards. These hazards are identified in Annex 1. A range of other regulations apply to the activities undertaken at AWE sites. Some of this legislation also requires emergency arrangements to be in place including:

- (a) Control of Major Accident Hazards (COMAH)³
- (b) Health & Safety at Work etc. Act 1974⁴
- (c) Environmental Protection Act 1990⁵
- (d) Food and Environmental Protection Act 1985⁶

1.6 Supporting Plans

As a requirement of the Civil Contingencies Act 2004 (CCA), local Category 1 responders maintain a number of plans which may also be activated in support of this plan. There are too many plans to detail all in this document, however key plans include:

- (a) West Berkshire District Council (WBDC) Major Incident Plan
- (b) West Berkshire District Council (WBDC) Reception & Rest Centre Plan
- (c) Thames Valley Local Resilience Forum (LRF) Emergency Response Arrangements
- (d) Thames Valley Local Resilience Forum (LRF) Recovery Plan
- (e) Royal Berkshire Fire & Rescue Service (RBFRS) Tactical Plan
- (f) South Central Ambulance Service (SCAS) Incident Response Plan (IRP).
- (g) Hampshire and Isle of Wight Community Recovery Plan

Although not a Category 1 Responder, AWE also maintains On-Site Emergency Plans for the Aldermaston and Burghfield sites.

1.7 Reference Accident

The reference accident is the worst reasonably foreseeable accident with radiological consequences against which it is considered reasonable to prepare detailed emergency plans. For emergency planning purposes the reference accident assumes that during a release a pathway occurs that allows radioactive material to escape uncontrolled into the environment.

See [Section 2](#) for the details in relation to the AWE sites.

³ [Control of Major Accident Hazards \(COMAH\)](#)

⁴ [Health and Safety at Work etc Act 1974](#)

⁵ [Environmental Protection Act 1990](#)

⁶ [Food and Environment Protection Act 1985](#)

1.8 Extendibility

Extendibility means Emergency Plans need to be capable of responding to accidents, which, although extremely unlikely, could necessitate urgent protective actions beyond the boundaries of the DEPZ. The measures that are required to extend the detailed arrangements cannot be precisely planned because the nature and potential of accidents can vary. The exact response would be based on an assessment made at the time. The response may make use of local and national plans prepared to deal with a wide range of emergencies. ([Section 5.5](#) provides more detail).

1.9 Local Authority Working Group

The Local Authority Working Group (LAWG) is a forum which brings together the Local Authorities across the UK and other responding agencies with interests in off-site planning for an emergency at a nuclear licensed site. The group identifies, discusses and finds solutions to common problems and agrees improvements in planning, procedure and organisation, which would form a framework of advice to emergency planners.

1.10 Plan Review & Revision Record

Ser	Date	Reason for amendment
1	Nov 2000	New Legislation
2	Jan 2004	Learning from Exercise
3	2005	Learning from Aldex 04
4	July 2009	Changes in Organisation
5	July 2011	Learning from Aldex 10
6	Mar 12	Cascade and Contacts updated
7	7 Oct 13	Plan revision following Health review and Cascade exercises.
8	Mar 15	Learning from exercises and organisational changes
9	Oct 15	Feedback on content – amendments made.
10	Dec 15	Feedback on final draft plus issue of national guidance
11	Oct 16	Changes to DEPZ
1.6	Nov 17	Changes due to DEPZ at Burghfield and Aldex learning
1.7	Sept 18	Changes due to DEPZ changes at AWE (B)
1.8	Jan 19	Changes to public dose from a reference accident

1.11 Contributors

This Off-site Plan was prepared by the AWE Off-Site Group, chaired by West Berkshire District Council, consisting of Emergency Planning Officers and professionals drawn from the following organisations who are also copy holders of the Plan:

AWE Plc
Basingstoke and Deane Borough Council
Clinical Commissioning Group (CCG) (Berkshire West)
Environment Agency (EA)
Food Standards Agency (FSA)
Ministry of Housing Communities and Local Government (MHCLG) Resilience and Emergency Division (RED)
Government Decontamination Service (GDS)
Hampshire County Council
Hampshire Constabulary
Highways England
Office for Nuclear Regulation (ONR)
Met Office
Ministry of Defence (MOD)
National Health Service (NHS) England
Network Rail
Public Health England (PHE) South East
PHE Centre for Radiation, Chemical and Environmental Hazards (CRCE)
Reading Borough Council (RBC)
Royal Berkshire Fire and Rescue Service (RBFRS)
Royal Berkshire Hospital
South Central Ambulance NHS Foundation Trust
Thames Valley Police (TVP)
Thames Water (TW)
West Berkshire District Council (WBDC)
Wokingham Borough Council (WBC)

1.12 Plan Distribution

The plan is distributed to all contributing organisations plus a public version to:

- West Berkshire District Council and relevant Hampshire County Council Libraries
- West Berkshire District Council website.

1.13 References

There are a number of references that are relevant to the site and the responders including:

[AWE](#)

www.westberks.gov.uk

[HSE](#)

[Office for Nuclear Regulation](#)

[National Nuclear Emergency Planning and Response Guidance](#)

1.14 Feedback on the Plan

If readers have constructive comments to make regarding this plan then they should be put in writing to:

Joint Emergency Planning Unit,
West Berkshire District Council,
Council Offices,
Market Street,
Newbury,
BERKSHIRE
RG14 5LD
emergencyplanning@westberks.gov.uk

Section Two

2. Premises

2.1 Site Details

AWE Aldermaston
Aldermaston
Nr Reading
Berkshire
RG7 4PR

AWE Burghfield
The Mearings
Burghfield Nr Reading
Berkshire
RG30 3RR

2.2 Site Purpose

The Ministry of Defence (MOD) owns the sites and contracts AWE plc to operate both sites. Their primary function is to carry out work in support of the UK Nuclear Deterrent Programme.

[AWE, the Atomic Weapons Establishment](#), has been central to the defence of the United Kingdom for more than 50 years. It provides and maintains the warheads for the country's nuclear deterrent, Trident.

Trident is a submarine-launched, inter-continental ballistic nuclear missile weapons system, carried by Royal Navy Vanguard-class submarines. The role of AWE is to manufacture and sustain the warheads for the Trident system, ensuring optimum safety and performance, but also to maintain a capability to produce a successor system should the Government require one in the future.

The work at AWE covers the entire life cycle of nuclear warheads; from initial concept, assessment and design, through to component manufacture and assembly, in-service support, and finally decommissioning and disposal.

The AWE Aldermaston (A) site is located in Berkshire, between Tadley and Aldermaston on the Berkshire/Hampshire Border. The AWE Burghfield (B) site is located in Berkshire between Burghfield Village and Reading.

Both sites are large; AWE Aldermaston (AWE (A)) occupies some 660 acres and AWE Burghfield (AWE (B)) occupies some 260 acres and contain a wide range of industrial facilities including facilities utilised for the design, manufacture, maintain and decommission the warheads for the Trident system, ensuring optimum safety and performance, but also to maintain a capability to produce a successor system should the Government require one in the future.

A range of potentially hazardous non-nuclear materials, common to large industrial complexes, is also present at each site. These are stored and used in an approved manner and are not a danger to the public in normal operation. The AWE (A) site has

been designated a lower tier site under the Control of Major Accidents Hazards (COMAH) Regulations. Chemical holdings at AWE (B) are currently below the COMAH threshold. Elements of these arrangements could be activated in the event of a release of non-nuclear materials if this were ever to be required.

Other potentially hazardous materials at the AWE sites are of a more specialised nature. They also are stored, transported and used in an approved manner and in normal use do not pose a hazard to the public. Details of potential Hazards at AWE with potential Off-Site consequences are detailed later in the plan.

The materials used include the radioactive materials plutonium, uranium and tritium. Of these, plutonium is potentially the most hazardous.

Both sites also contain separate explosives areas where conventional explosive components are manufactured and tested. The transportation, use and storage of the explosives at the AWE sites are in compliance with relevant regulations. Explosives are stored in approved and licensed storage magazines.

In common with other MOD establishments that store and process conventional explosives, a "safeguarding map" (used to provide guidance in planning future development) is lodged with the Local Authorities.

2.3 AWE Aldermaston – Site Specific Information

This is the company's headquarters, which covers approximately 660 acres. Formerly a wartime airfield, the site is now a centre providing advanced research, design and manufacturing facilities.

On a 'routine' working day approximately 5000 staff are on the site.

Associated mapping Ordnance Survey Maps:

- (a) OS Landranger Newbury & Wantage, Sheet 174, 1:50,000
- (b) OS Landranger Reading & Windsor, Sheet 175, 1:50,000

Unlike many other nuclear establishments AWE Aldermaston is located in a mixed urban and rural area of Berkshire. To the South of it the major community of Tadley and to the North the not insignificant community of Aldermaston. Within the Detailed Emergency Planning Zone (DEPZ) itself there are a significant number of types of premises including:

- (a) Residential
- (b) Commercial with a number of business parks in close proximity.
- (c) Schools

- (d) Care Homes
- (e) Caravan Sites
- (f) Farms
- (g) Leisure centres.

In addition the location has a number of main roads running through it including A340 in addition to the smaller rural road network and those in the housing areas. There are also a number of footpaths and community parks in the area.

2.4 AWE Burghfield – Site Specific Information

AWE Burghfield, a former munitions factory, occupies a 225 acre site and is responsible for the complex final assembly and maintenance of the warheads while in service, as well as their decommissioning.

On a 'routine' working day approximately 1500 staff are on the site.

Associated mapping Ordnance Survey Maps

- (a) OS Landranger Newbury & Wantage, Sheet 174, 1:50,000
- (b) OS Landranger Reading & Windsor, Sheet 175, 1:50,000

There are no major population centres within the AWE Burghfield Detailed Emergency Planning Zone (DEPZ). The area around the site is more rural in nature than AWE Aldermaston. It does however have a number of premises including:

- (a) Residential
- (b) Commercial with a number of business parks in close proximity.
- (c) Farms

Background information in relation to the geography and demographics can be found on the West Berkshire District Councils website.

[Mapping](#)
[Demographics](#)

2.5 Possible Incidents

As a result of the processes and materials held on the site(s) AWE is subject to inspection by the Inspectors of Office for Nuclear Regulation (ONR) who must be satisfied as to the safety of processes and plant handling radioactive and toxic materials. Nuclear Site Licensing was granted in 1997 and both sites are visited regularly by Inspectors from ONR. The processes carried out at the sites also require compliance with the Explosive

Regulations 2014, the Control of Major Accidents Hazards Regulations 2015 (COMAH), the Ionising Radiations Regulations 2017 and the Radiation Emergency Preparedness and Public Information Regulations 2001 (REPPPIR).

There are a number of systems that are in place in order to prevent, as far as possible, an incident from occurring in the first place. These systems employed by the operator are monitored by the Office for Nuclear Regulation (ONR) Inspectors who can use enforcement powers as necessary to ensure the systems employed are satisfactory. As a result failures in plant, process or research operations should be significantly reduced and therefore the risk to the public outside the sites should also be reduced.

It should be noted that the following incidents are **not possible**:

- (a) An explosion resulting in a nuclear yield is not possible by virtue of the safety features in the design of the weapon
- (b) A reactor accident with off-site consequences is also not possible as neither site has an operating nuclear reactor with a significant core inventory of fission products. (The "Herald" nuclear reactor at AWE Aldermaston was closed in the 1980s and its nuclear fuel removed from the site).

A Hazard Identification and Risk Evaluation (HIRE) for each of the AWE Aldermaston and Burghfield sites have been conducted as required by REPPPIR. Copies of these assessments are available on the AWE website. A reference accident for each of the sites has been identified as an output from the HIRE and forms the basis for this detailed emergency planning.

The reference accident for AWE Aldermaston has been defined as:

'a seismic event leading to consequential fires causing simultaneous loss of containment in multiple facilities with an unfavourable wind direction that would cause cumulative doses from two separate facilities'

The reference accident for AWE Burghfield has been defined as:

'a seismic event leading to catastrophic building collapse and consequential explosions causing simultaneous loss of containment.'

Whatever the cause, if the multiple containment barriers (defence in depth) in a radioactive materials handling facility were breached, a major fire might disperse radioactive material in particulate form into the atmosphere. Any of the materials handled at the AWE sites (plutonium, uranium and tritium) might therefore be involved.

Details regarding plutonium, uranium, and tritium are in [Section 5.1](#). An accident involving the dispersion of plutonium would present the greatest potential hazard to the public if it were to occur.

In general, there is no need and therefore no plans for the issuing for iodide tablets (stable iodine) as unlike, in a reactor incident, they are of no benefit in the event of a plutonium, uranium or tritium release.

The maximum estimated dose to a member of the public as a result of the reference accident for AWE Aldermaston is 16.9 milliSieverts (mSv) and for AWE Burghfield is 260 mSv.

2.6 Magnitude of Accident

The International Nuclear & Radiological Events Scale (INES) was introduced in 1990 by the [International Atomic Energy Agency](#) (IAEA) in order to enable prompt communication of [safety](#) significance information in case of [nuclear accidents](#). The primary purpose of INES is to facilitate communication and understanding between the technical community, the media and the public on the safety significance of events. The aim is to keep the public as well as nuclear authorities accurately informed on the occurrence and consequences of reported events

A number of criteria and indicators are defined to assure coherent reporting of [nuclear events](#) by different official authorities. There are 7 levels on the INES scale; 3 [incident](#)-levels and 4 [accident](#)-levels

Although an accident caused by a failure in plant, process, research or production operations should not endanger the public outside the site, it is possible that an accident, with consequences extending beyond an AWE site boundary might occur. It is considered that the AWE sites may result in an incident of no higher than Level 5 on the INES Scale.

The scale is detailed below:



Section Three

3 Plan Activation & Immediate Actions

3.1 IMMEDIATE ACTIONS – Primary Notification Cascade

If you are being alerted regarding an off-site incident follow the activation procedure below for the callout notifications using contacts stored on ResilienceDirect.

Notifying Agency	Agencies Notified
AWE	<ul style="list-style-type: none"> • Thames Valley Police (TVP) • MOD incl Military Coordinating Authority (MCA) Staff • ONR • Environment Agency (Radiation Incident Hotline) • Royal Berkshire Fire & Rescue Service (RBFRS) • South Central Ambulance Service (SCAS) • West Berkshire District Council • BT • Public Telephone Altering System
Thames Valley Police Control Room	<ul style="list-style-type: none"> • Hampshire Constabulary and other Police Forces if required • West Berkshire District Council • SCAS • RBFRS • Ministry of Housing Communities and Local Government (MHCLG) – Resilience and Emergency Division (RED) • TVP Strategic Coordinating Centre (SCC) Activation incl: <ul style="list-style-type: none"> • Highways England • British Transport Police (BTP) • Civil Aviation Authority (CAA) if No Fly Zone required.
Royal Berkshire Fire and Rescue Service	<ul style="list-style-type: none"> • Health and Safety Executive • Environment Agency • Hampshire Fire and Rescue Service • Met Office • West Berkshire District Council
Hampshire Constabulary	<ul style="list-style-type: none"> • As per their normal Major Incident Plan
South Central Ambulance Service	<ul style="list-style-type: none"> • Public Health England Centre South East • NHS England On call (Thames Valley and Hampshire) • Designated Receiving Hospitals: <ul style="list-style-type: none"> • Royal Berkshire Hospital • Hampshire Hospitals NHS Foundation Trust on call
Public Health England South East	<ul style="list-style-type: none"> • Public Health England – Centre for Radiation, Chemical and Environmental Hazards (CRCE)
NHS England South (South Central)	<ul style="list-style-type: none"> • CCG On-call for affected area • Berkshire West CCG • North Hampshire CCG

Notifying Agency	Agencies Notified
NHS England (Wessex) Area Team	<ul style="list-style-type: none"> NHS England (South)
Designated Receiving Hospital Royal Berkshire Hospital Hampshire Hospitals NHS Foundation Trust	<ul style="list-style-type: none"> CCG On-call for affected area Berkshire West CCG North Hampshire CCG
ONR	<ul style="list-style-type: none"> None
West Berkshire District Council	<ul style="list-style-type: none"> Berkshire Director of Public Health (DPH) & Consultant for Emergency Planning (EP) Hampshire County Council as appropriate Reading Borough Council as appropriate Wokingham Borough Council as appropriate Any schools and nurseries in WBDC area Any residential care homes in WBDC area MHCLG - Resilience and Emergency Division Food Standards Agency Thames Water Canal & River Trust Network Rail Highways England Voluntary Sector as necessary
Other neighbouring Local Authorities as necessary: Hampshire County Council (for Basingstoke & Deane Borough Council (BDBC)) for AWE (A) Reading BC for AWE (B) Wokingham BC for AWE (B)	<ul style="list-style-type: none"> Any schools and nurseries in affected area Any residential care homes in affected area Ward & Parish Council Members Normal activation
Resilience and Emergency Division	<ul style="list-style-type: none"> Cabinet Office as required by scale of event.
MCA Staff	<ul style="list-style-type: none"> MOD Headquarters (HQ)
MOD HQ	<ul style="list-style-type: none"> ONR HQ Department of Environment Food and Rural Affairs (DEFRA) – DEFRA to notify Radiological Incident Monitoring Network (RIMNET) & FSA Out of Hours (OOH) HQ FSA HQ Environment Agency HQ Department of Health and Social Care

3.2 Incident Categories

Should an incident occur at an AWE site then the following categories are used:

Descriptor	Description	Examples (<i>not exhaustive</i>)	Scale of Activation
IN FACILITY INCIDENT	Any incident which requires only local emergency arrangements to be activated and has no consequences extending beyond the facility boundary	Local spillage of hazardous material not extending beyond facility boundary. Industrial accident causing casualties but no other non-localised hazards.	On-site response Others informed: <ul style="list-style-type: none"> • MOD • Regulators • West Berkshire District Council for info & onward cascade if necessary. NO ACTIVATION OF THIS PLAN REQUIRED
ON-SITE EMERGENCY	Any incident that requires emergency management at site level and has consequences extending beyond facility boundaries but not beyond the relevant site boundary.	Criticality excursion. Minor release of radioactive material outside a facility boundary. Security incident.	On-site response Others informed for information or action as necessary: FULL NOTIFICATION (by phone and/or email) NO ACTIVATION OF THIS PLAN REQUIRED.
OFF-SITE EMERGENCY	Any incident that has actual or potential NON-RADIOLOGICAL off-site implications.	Significant incident where the hazard extends beyond the site boundary and poses a potential risk and/or causes significant disruption to the public outside the site.	FULL ACTIVATION OF THIS PLAN ACTIVATION OF THIS PLAN AS DEEMED APPROPRIATE BY THAMES VALLEY POLICE BASED ON INFORMATION RECEIVED FROM AWE

Descriptor	Description	Examples (<i>not exhaustive</i>)	Scale of Activation
OFF-SITE RADIATION EMERGENCY	Any incident that has actual or potential off-site RADIOLOGICAL implications.	Incident resulting in an actual or potential release of radioactive material or energy over the site boundary.	FULL ACTIVATION OF THIS PLAN

to a single building or a small group of buildings including public address messages c. These alerts are for the staff, contractors and visitors on-site.	b. no action is necessary by the public if such signals or messages are overheard in this way at any time c. These tests are informed to the local community via representation on the Local Liaison Committee (LLC).
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3.6 Off-site implications

Actions on-site by AWE	Off-site Implications
Assessment & Activation a. If alerting signals do sound (not a routine test), or if any event occurred that might have caused public disquiet (such as visible smoke or emergency service activity) or any other more significant off-site consequences then AWE will recommend activation of this plan to Thames Valley Police b. AWE will activate MOD response (NARO).	a. Thames Valley Police will formally activate this plan using cascade details in the contacts directory b. Following the initial notification as per cascade then each organisation would: <ul style="list-style-type: none"> ○ Activate its own call-out and notification procedures to ensure that all appropriate National Agencies or Organisations, Local Authorities and internal procedures are notified of the emergency ○ Activate own agency plan c. Ensure the relevant staff are activated to attend the relevant multi-agency locations including: <ul style="list-style-type: none"> ○ Strategic Coordinating Centre (TVP SCC) covering roles in the: ○ Strategic Coordinating Group (SCG) ○ Scientific & Technical Advisory Cell (STAC) ○ Recovery Working Group (RWG) ○ Media and support as necessary ○ and other sub groups as set up d. Ensure the relevant staff are activated to attend the multi-agency Tactical Coordinating Group (TCG) e. Ensure the relevant staff are activated to staff the Aldermaston Command Post (ACP) at the Aldermaston site as requested f. Ensure the relevant staff are activated to staff their own agencies emergency operations centres/incident rooms g. Ensure the relevant trained staff attend site.
Information AWE will provide information to those agencies it makes initial contact with confirming: <ul style="list-style-type: none"> a. The details of the incident b. A provisional categorisation c. Follow up Situation Report (SITREP) via email/ ResilienceDirect and/or fax. 	Agencies would respond accordingly under their roles and responsibilities.
Warn & Inform Public	Community to follow advice provided

Actions on-site by AWE	Off-site Implications
<p>In the event of a radiation emergency, AWE will also activate a telephone alerting system to give early warning to members of the public in the locality and to advise on the initial countermeasures to be taken. This information will include:</p> <ol style="list-style-type: none"> A notification that there is an incident at the relevant AWE site Advice to remain inside with windows and doors closed (sheltering) Advice to listen to local radio and television for Public Service Broadcasts. 	<p>Note: the AWE telephone alerting system is run as an 'opt-out' basis only; only those individuals or organisations that specifically request that their details are removed from the system are excluded from the system database.</p>
<p>Media Plan</p> <ol style="list-style-type: none"> AWE will initiate the agreed media plan with TVP AWE Emergency Managers will issue some pre agreed press releases with basic information and advice which should be based on the type of incident and the potential hazards until such time as the SCG at the TVP SCC is up and running. 	<p>Once the off-site emergency arrangements are activated Thames Valley Police will coordinate the media information including the emergency media briefing centre as required. Messages advising the public of the action to be taken may be broadcast in a number of ways including radio, television and via the internet. Note: Further information on warning & informing is in Section 5.17 in this plan.</p>

3.7 Quick Guide to Local and National Actions

Local Actions	National Actions
<ul style="list-style-type: none"> Incident occurs (Site Emergency Plan and Procedures activated). 	<ul style="list-style-type: none"> Notify Lead Government Department (LGD) - MOD and ONR (operator).
<ul style="list-style-type: none"> Radiation emergency (on-site or off-site) declared (operator). 	<ul style="list-style-type: none"> Initiate call-out of key duty personnel: LGD - MOD Emergency Control Centre (ECC) ONR Redgrave Court Incident Suite (RCIS) Government Liaison Officer (GLO).
<ul style="list-style-type: none"> Notify local responders (operator) 	<ul style="list-style-type: none"> ONR RCIS declared operational Determine central government response
<ul style="list-style-type: none"> Notification confirmed Declare major incident (Police control) Initiate call-out of local responders (Police control). 	<ul style="list-style-type: none"> MHCLG liaison team deployed to SCC.
<ul style="list-style-type: none"> Provide urgent public protection advice (initially operator until STAC has formed) Agree any immediate counter-measures (Police/SCG Chair) Confirm automated alert messaging (if appropriate) Consider immediate public information requirements and social media effect. 	<ul style="list-style-type: none"> LGD - MOD ECC declared operational Cabinet Office/LGD decision on activating Cabinet Office Briefing Room (COBR) and Scientific Advisory Group for Emergencies (SAGE).
Virtual meeting of core initial response SCG members (Police, Fire, Ambulance, Local Authorities).	<ul style="list-style-type: none"> Initial COBR meeting.
SCC and Media Support Cell declared operational (core SCC staff present).	<ul style="list-style-type: none"> Initial SITREP released.
Issue of initial public information/media release covering urgent protective actions (SCG).	<ul style="list-style-type: none"> LGD- MOD ECC declared fully operational SAGE mobilised.
Pre first SCG meeting SCG Chair to confirm: <ul style="list-style-type: none"> Information received from operator Site emergency services in place TCG being activated Potential rest centre requirements Requirement for Media Briefing Centre (MBC) Immediate evacuation actions (if appropriate) Casualty information Security related or not? 	<ul style="list-style-type: none"> Formal liaison established between national operations centres and deployed Liaison Officer (LO) teams.

Local Actions	National Actions
Receive initial radiation monitoring results at site perimeter/near site (operator).	<ul style="list-style-type: none"> • SAGE established • National Coordinating Centre (NCC) established.
Consider virtual STAC teleconference (STAC Chair).	
First SCG meeting. Confirm: <ul style="list-style-type: none"> • Prediction of off-site hazard (reasonable or beyond reasonably foreseeable scenario) • Countermeasures • Other command and control locations • Recovery Coordinating Group (RCG) Chair and recovery process • MBC • Resource issues. 	<ul style="list-style-type: none"> • SITREP update released • Full formal COBR meeting • COBR battle rhythm confirmed
SCC declared fully operational (all organisations present or have established effective communications).	<ul style="list-style-type: none"> • Detailed central government briefing issued.
Issue first public information/media release.	<ul style="list-style-type: none"> • International informing completed.
First situation report to ECC/COBR (SCG Chair).	
STAC fully operational (STAC Chair).	
National departmental and agency LOs including ONR, GLO (and team).	
Before 2 nd SCG meeting confirm: <ul style="list-style-type: none"> • Vulnerable groups at risk • Actual off-site contamination area from survey activity • Advice to schools • Advice to child care • Advice to care homes • Transport availability for evacuation. 	
Second SCG meeting (SCG Chair).	
Issue second public information/media release.	
MBC established.	
Complete radiation monitoring within DEPZ and edge of. Extendibility Zone (SCG Chair, STAC Chair, ONR, PHE CRCE, Operator)	
<ul style="list-style-type: none"> • Complete radiation monitoring within Extendibility Zone, ONR, PHE CRCE, Operator) 	

Local Actions	National Actions
<ul style="list-style-type: none">Establish public health monitoring facility (NHS England, PHE CRCE, Local Authority)	

3.8 *Notification of All Clear*

AWE personnel and other responders will continuously monitor the progress of the release/incident. They will be able to give the SCG up to date information on the affected area.

When the incident has been contained, based on the information provided from the Emergency Controller, and after consultation with the STAC chair, then the SCG will be advised as to when it is safe to start the process of recovery with the aim of returning the public to normal living conditions.

When the SCG determines that conditions are safe for the public and the emergency phase has passed, then the appropriate message will be released by the media briefing centre. If contamination problems exist then the public will be advised accordingly and a remedial/recovery phase invoked and coordinated by the relevant agencies.

Section Four

4 Command and Control

4.1 Overview

During the emergency phase of the off-site response the coordination of the incident will normally be led by a Senior Officer of Thames Valley Police.

Thames Valley Police will normally coordinate the off-site response to an emergency at AWE Aldermaston or Burghfield, using the agreed and tested multi-agency three-tier police led command structure “Operational”, “Tactical” and “Strategic”.

- (a) **Operational Coordinating Group** will be at one or more Forward Control Points (FCP) close to the incident site and the forward controls of the other emergency services. The senior officer present will deploy police resources and liaise with the other emergency services to ensure a coordinated response.
- (b) **Tactical Coordinating Group** (TCG) will be at the most suitable location depending on the site affected and community affected. The decision will be made by the Tactical Commander and will depend on the location and circumstances of the incident. Whichever location is selected the commanders must be satisfied that a robust communications system exists to support their function. The TCG will determine priorities in allocating resources, plan and coordinate when a task will be undertaken, and obtain other resources as required. Liaison Officers from AWE, Thames Valley Police, Hampshire Constabulary, MOD, Fire and Rescue Service (FRS), West Berkshire District Council, Wokingham Borough Council, Reading Borough Council, Basingstoke and Deane Council, Hampshire County Council, South Central Ambulance NHS Foundation Trust and Health organisations as appropriate will attend. In addition an Radiation Protection Advisor (RPA) to support the non-emergency services will normally be requested to attend – sources via PHE CRCE.
- (c) **Strategic Coordinating Group** (SCG) will be established by Thames Valley Police drawing together representatives from all of the organisations in this plan as appropriate. They will assemble to formulate policy and authorise press statements. Each person must be able to make executive decisions in respect of resources within their agency and have the authority to seek the aid of other agencies in support of their role.

More details by way of membership, role and agendas in relation to the SCC [Section 5.6](#).

4.1.1 Decision Making: It should be noted that whilst there is a formal command structure it may take some time for it to be put in place. Therefore the principle of subsidiarity should be followed with the decisions made at the lowest level or closest to where they can have an effect. This does not mean issues should not be raised up but where there are decisions to be made in a timely fashion then they can be without higher authority however regard should be given to this plan and expert advice.

4.1.2 Comprehensive Attendance and Sub Group arrangements. It should also be noted that at the start of the incident not all the agencies, nor all the subgroups will be in place, some will take some time to be fully functioning. Therefore the leads of the groups need to be flexible, and make best use of technology to ensure the correct people and groups are ‘available’.

4.2 Strategic Coordinating Group (SCG) - Sub Groups

In addition to the core SCG based at TVP SCC, and the staff support and liaison officers from the agencies there would also be sub groups working to support the SCG including:

- (a) a multi-agency Scientific and Technical Advisory Cell (STAC),
- (b) a Recovery Coordinating Group (RCG)
- (c) a Media Advisory Cell (MAC)
- (d) an Information Cell (ideally Multi-Agency Information Cell (MAIC))
- (e) a radiation monitoring strategy group – linked to STAC
- (f) a resources cell
- (g) an evacuation cell

There will also be individual agency incident/emergency control rooms at their own locations.

4.3 Scientific and Technical Advisory Cell (STAC)

The multi-agency Scientific and Technical Advisory Cell (STAC) will provide timely and effective technical and health advice to the SCG in order that key decisions can be made. More details by way of membership and role are detailed in [Section 5.7](#).

4.4 Recovery Coordinating Group

The recovery phase of the response will be coordinated by the Local Authorities which would normally be West Berkshire District Council. This multi-agency Recovery Coordinating Group will initially form at the TVP SCC location.

The group will normally be chaired by a Director or Head of Service from West Berkshire District Council.

The membership of the group is detailed in [Section 5.19](#).

4.5 Media Advisory Cell (MAC)

This cell will include the main communication and media advisors to the SCG and may consist of a number of key Communication Officers from a limited number of agencies (primarily TVP, WBDC, AWE & MOD) who will provide advice to their communication officers at their own response locations and develop the media briefing centre details.

4.6 Media Briefing Centre (MBC)

A media briefing centre will normally be set up in order to ensure the press is briefed accurately and in a timely fashion in a safe location. There are a number of potential sites, however, the choice will ultimately be made on the day depending on the site involved and the risks associated with the incident. [Section 5.18](#) provides further details on Communications and the Media Briefing Centre plans.

4.7 Multi-Agency Information Cell (MAIC)

The MAIC, often known as Information Cell, is made up of representatives from agencies that coordinate the situational details of the incident and coordinate the Common Operating Picture (COP). This information is provided to the SCG in order to facilitate the decision making process.

4.8 Radiation Monitoring Strategy Group

This cell could be set up to provide details to the STAC in relation to people and environmental monitoring. Their main aim would be to develop a robust monitoring strategy including sourcing equipment, and specialist officers. It is likely to be chaired by a representative from PHE CRCE.

More details in [Section 5.11](#).

4.9 Resources Cell

This cell would be set up to coordinate the sourcing of specific resources – e.g. transport etc.

4.10 Evacuation Cell

This cell would be put in place should there be a need for an evacuation subsequent to the initial countermeasure of shelter. Any urgent evacuation would be undertaken at operational level due to the risk.

4.11 Responding Agencies' Emergency Control Centres

In addition to an SCG and the groups set up at TVP SCC there will normally be a number of other command and control centres including:

- (a) Multi-agency Tactical controls,
- (b) Individual responding agencies and Government bodies own emergency control rooms. Details of locations of the control rooms are detailed in the action cards for these agencies.

An important agency command and control centre is the one set up on-site at AWE.

The Aldermaston Command Post (ACP) on-site is set up in order to stabilise the incident and to provide information to responding agencies. The ACP will have an advisory team working to the Emergency Manager. The information and activity coordinated from the ACP include:

- (a) Actions to stabilise the incident on the affected site(s).
- (b) Hazard assessments, including computer dispersion modelling, of any release.
- (c) Initial Emergency environmental monitoring both on and off (outside) the incident site would be controlled from this complex.

In addition to AWE staff being present at the SCC the following external organisations would send representatives to the ACP, normally within one hour:

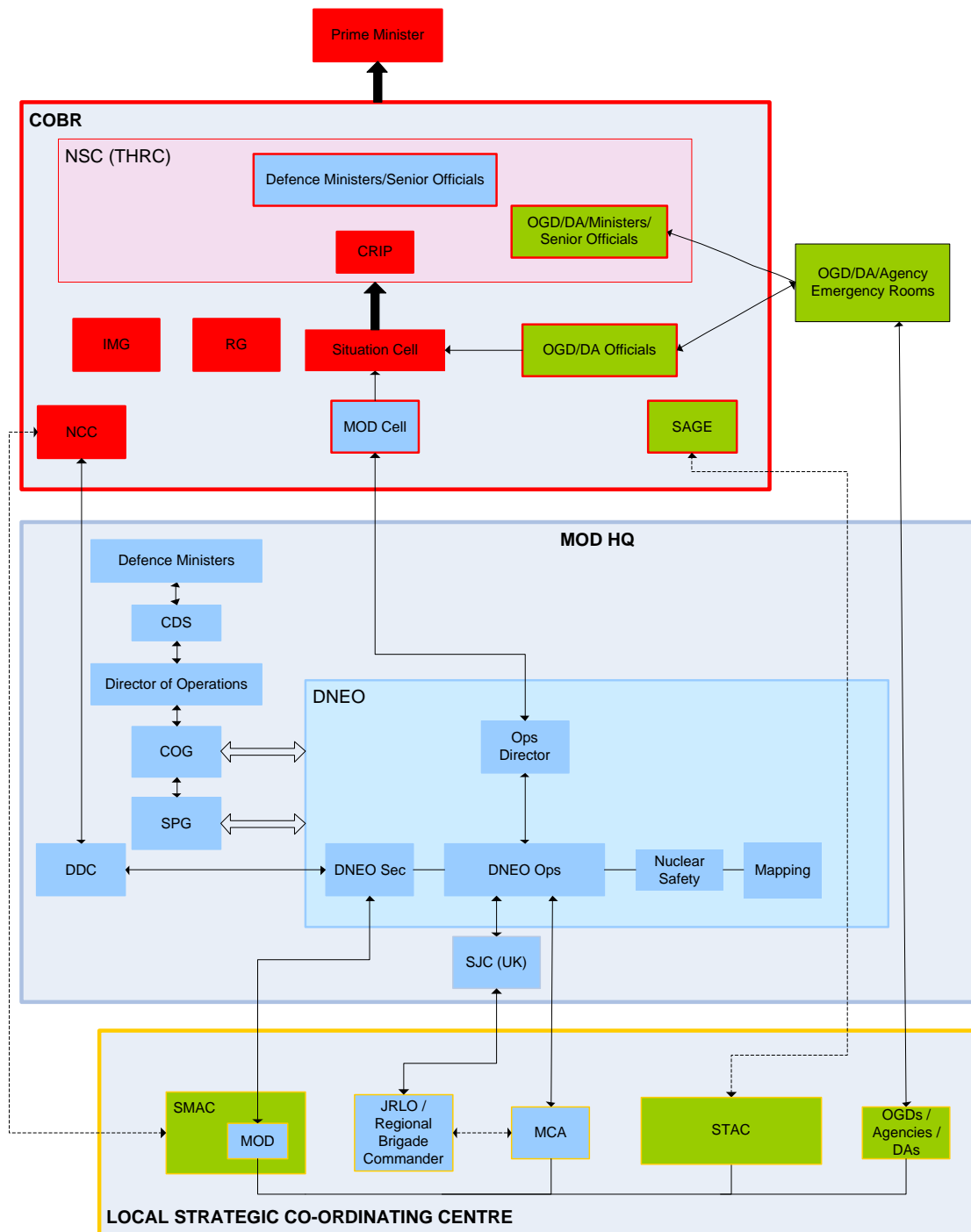
- (a) MOD
- (b) Thames Valley Police
- (c) Royal Berkshire Fire & Rescue Service
- (d) South Central Ambulance NHS Foundation Trust
- (e) West Berkshire District Council Liaison Officers representing the Local Authorities.

The number of control rooms involved will depend on the scale of the incident and its location.

4.12 Full Command and Control Arrangements

Below is a diagram of the full command and control arrangements from Local to National:

Central Government Organisation and Interaction with the Local Strategic Co-ordinating Centre



NSC THRC = National Security Council - Threats, Hazards, Resilience and Contingencies
 COG = Current Operations Group
 SAGE = Scientific Advisory Group for Emergencies
 SPG = Strategic Planning Group
 CCT = Current Commitments Team
 SMAC = Strategic Media Advisory Cell

STAC = Scientific & Technical Advice Cell
 NCC = News Co-ordination Centre
 IMG = Impact Management Group
 RG = Recovery Group
 MCA = Military/MOD Co-ordinating Authority
 JRLO = Joint Regional Liaison Officer

Section Five

5 Specific Advice and Information

This section provides details on specific advice and information to facilitate the response to an off-site incident at either AWE site.

5.1 Hazard Information on AWE's Materials – General Hazards

The materials that may potentially pose a hazard to the public are identified in the table below along with potential accident scenarios. Further specific hazard information is provided in the following paragraphs.

Identified Hazard	Scenario	Potential Off-Site Consequence
Asbestos	As many buildings at AWE were constructed in the 1950s and 1960s, asbestos may be released as a result of a conventional fire affecting one of these buildings.	Contamination of individuals and properties with asbestos. Long term risk of ill health as a result of significant exposure. No short term health effects. Potential to displace limited numbers of members of the public for the medium term whilst monitoring and decontamination is completed.
Beryllium	Release of beryllium from a facility may result in contamination of downwind areas. A release of beryllium may be combined with a release of radioactive material	Contamination of individuals and properties with beryllium. Long term risk of ill health as a result of significant exposure. No short term health effects. Potential to displace limited numbers of members of the public for the medium term whilst monitoring and decontamination is completed.
Bulk storage of Transformer Oil	Escape of transformer oil in significant quantities from a facility may result in contamination of areas outside the site boundary.	Environmental pollution of drains and watercourses outside the site boundary.
Environmental pollution by chemicals	A major accident of a chemicals from a delivery vehicle on-site but near to the site boundary may result in environmental contamination outside the site boundary.	Pollution of water courses, possible limited effect on drinking water quality
Explosives	Explosive hazard may result in a cordon being instigated that extends beyond the site boundary.	Projectile hazard may require cordoning and/or evacuation of premises/areas outside the site. Road closures and diversions. Displacement of members of the public for a considerable period.
Fissile Radioactive Material	Criticality incident in certain facility may result in an elevated radiation dose at the site boundary.	Elevated (but not life-threatening) radiation dose rates within very limited areas of the site boundary. Local cordons may be required around limited areas of the site

Identified Hazard	Scenario	Potential Off-Site Consequence
		boundary and may extend across public roads.
Inert Gases	A major accident of an inert gas from a delivery vehicle near to the site boundary may result in an asphyxiating atmosphere outside the site boundary.	Potential asphyxiation of individuals that do not remove themselves or are not removed from the hazard area promptly. Potential requirement for significant cordon around the incident scene requiring short-term evacuation of members of the public.
Natural Gas	The leakage of natural gas on the site may result in a flammable atmosphere outside the site boundary.	Conflagration of flammable atmosphere resulting in blast wave, burns and blast injuries as well as property damage in very limited areas outside the site boundary.
Pressurised cylinders/containers	Reaction of a pressurised container in a fire or other initiating event may result in a projectile hazard outside the site boundary.	Projectile hazard may require evacuation of premises/areas outside the site. Road closures and diversions. Displacement of members of the public for a period of up to 24 hours.
Radioactive Material	Release of radioactive material from a facility may result in contamination of downwind areas outside the site boundary.	Significant downwind radioactive contaminations of individuals, premises, transport routes. Sheltering and subsequent evacuation of potentially contaminated areas may be required, involving the displacement of potentially large numbers of members of the public for an extended period.
Radioactively contaminated water	A release of water potentially contaminated with radioactive material from the Aldermaston or Burghfield sites may result in the contamination of water courses.	Minor pollution of water courses, with possible effect on drinking water quality.
Release of toxic chemicals	A major accident of a toxic chemical from a facility may result in a hazard requiring a cordon extending outside the site boundary.	Respiratory problems, chemical burns in localised areas outside the site boundary. Potential for a cordon requiring evacuation of very limited areas outside the site boundary in the short-term.
Smoke	A significant 'conventional' fire on the site may result in combustion products being	In certain meteorological conditions, toxic smoke may drift downwind and cause respiratory problems in members of the public.

Identified Hazard	Scenario	Potential Off-Site Consequence
	released outside the site boundary.	Traffic restrictions and limited evacuation of downwind areas may be required.
Steam	A major failure of the AWE steam main in certain locations may result in a localised steam (heat) hazard outside the site boundary.	Localised release of steam, high temperatures, poses risk of steam burns to individuals in immediate vicinity. Possible requirement for localised road closure immediately adjacent to the site boundary.

Note the term Major Accident has been used above and relates to the definition provided by COMAH 2015 legislation:

An occurrence will be a major accident if it meets the following three conditions:

- (a) It results from uncontrolled developments at an establishment to which the Regulations apply; and
- (b) It leads to serious danger to human health or to the environment, inside or outside the establishment; and
- (c) It involves one or more dangerous substances defined in the Regulations, irrespective of the quantity involved.

5.2 *Radioactive Materials*

The following details the radioactive materials on-site.

5.2.1 *Plutonium*

General Information

Plutonium metal is chemically very reactive and oxidises in moist air (or in a fire) to form plutonium oxide that can exist as fine particles, invisible to the naked eye due to their size, that may become "airborne" and be carried downwind for considerable distances (kilometres). They can land on and "contaminate" surfaces and pose an inhalation hazard. Plutonium oxide is insoluble in water but a water wash will help remove oxide dust particles (simple decontamination) and damp them down to minimise re-suspension. The levels of dispersed material would normally decrease as the distance from the event increased, until they became undetectable.

Radiological Information

Plutonium emits alpha radiation which cannot penetrate more than a few centimetres of air, a film of moisture, intact skin or clothing. It will not cause radiation burns to the skin and external radiation from a cloud or deposits is negligible. Although alpha emitters inhaled or ingested pose a potentially significant radiological hazard.

Health Hazards

If plutonium oxide is breathed in, or enters the body through a cut, then any material that is retained (and not coughed up or washed out) will slowly be dissolved by body fluids and be distributed round the body. Plutonium is taken up by the cells of the bone surfaces and the liver, from where it is slowly excreted over many years in the urine and faeces. Living cells in any organ that is exposed to alpha radiation from plutonium may be killed,

or damaged in such a way that the statistical risk of developing a cancer at some time in the future is increased.

Potential Impact relating to an Off-Site Radiation Emergency

Consideration	Impact from Plutonium
Environmental & Building Issues.	Plutonium could be dispersed as particles of oxide dust into the atmosphere and would be carried along by the prevailing wind to form a "plume" of solid particles, rather like a cloud or plume of smoke. Dispersed radioactive material would fall to earth again; landing on surfaces to produce a fine but invisible layer of radioactive material loosely called "contamination". The area involved would extend from the origin of the event within the site to areas downwind from it. The levels of dispersed material would normally decrease as the distance from the event increased, until they became undetectable. Later, any activity that disturbed deposited plutonium oxide particles might lead to its re-suspension in the air and to the inhalation of airborne particles. The magnitude of the hazard would depend on the level of deposited material, the proportion of it re-suspended and the length of time for which an individual was exposed to it.
Human Health Issues.	Dispersed material containing plutonium could present a hazard if it were to find its way into the human body. This could occur if airborne particles of plutonium oxide were to be inhaled from the passing cloud.
Food & Water Issues.	If foodstuffs or water contaminated with deposited material were consumed, radioactive materials might be ingested and enter the body.

Tactical Information

Precautions to be taken at or near the incident site:

Plutonium poses an internal contamination hazard. It can enter the body via the following routes:

- (a) Breathing in contaminated material from the cloud or re-suspended dust.
- (b) Absorption through wounds (cuts, grazes).
- (c) Ingestion of contaminated material e.g. by eating contaminated foods.

To minimise the hazard several precautions can be taken:

- (a) Approach from upwind (where possible)
- (b) Stay upwind and out of any smoke or vapour from the incident.
- (c) Use respiratory protection to protect yourself from inhaling plutonium oxide dust, Self-Contained Breathing Apparatus provides the best protection in heavily contaminated areas. Even a simple dust mask will provide worthwhile protection elsewhere
- (d) Report any wounds or cuts at once (existing cuts should be covered)
- (e) Forbid eating, drinking or smoking whilst working in the forward area
- (f) Wear "protective clothing".

- i. Any clothing that will keep plutonium oxide off the skin and that after use can be removed and bagged so as to leave dust behind will do
- ii. Emergency Services uniforms, overalls, chemical suits etc. will provide protection against plutonium oxide dust and the feebly penetrating radiation emitted by plutonium
- iii. Clothing once worn in the affected area should be treated as "contaminated" and should be monitored before reuse. To prevent dust or "contamination" being shaken loose from clothing it should be folded or rolled in on itself during undressing. Ideally personnel should be monitored after undressing but should in any case shower and don clean clothing when it is possible to do so.

Operational Information

For use off-site at the time of the incident

- (a) Emergency services responding to the incident should approach from an upwind direction, and stay upwind of the plume
- (b) Personnel off-site and in the downwind sheltering zone should minimise the time spent operating in the open
- (c) Where possible shelter inside vehicles with cabin air intakes turned off and windows closed
- (d) Self-Contained Breathing Apparatus, respirators or dust masks will provide protection against the risk of inhaling radioactive materials. All organisations with tasks in the affected area are responsible for ensuring that their staff are trained in using appropriate respiratory protection
- (e) Emergency services responding to the incident off-site should have their uniforms monitored for contamination
- (f) Urgent evacuation of personnel would be confined to areas of the AWE site. The public would be advised to shelter downwind of the incident. This is pre-planned advice that is subject to revision once STAC are in place
- (g) District monitoring will be initiated to determine the spread of contamination.

Strategic Information

Longer term consequences of a release of Plutonium

- (a) Material deposited downwind could pose an inhalation hazard by re-suspension
- (b) Evacuation of residents from affected areas downwind might be advised for quite some time to facilitate clean up
- (c) Monitoring of crops and foodstuffs (e.g. milk) in the affected area will be carried out and FSA might ban their consumption. Contamination of the water supply is less likely - the water authorities would have to take a decision regarding the use of water
- (d) Counselling of local residents, the Emergency Services involved and wide scale monitoring of people and of the local area (and beyond) to provide reassurances is likely to be required.

5.2.2 Uranium

General Information

Enriched Uranium is similar chemically to plutonium, but significantly less hazardous. Like plutonium it forms an insoluble particulate dust. Any precautions taken against plutonium will be more than adequate for any dispersion of enriched uranium.

Depleted Uranium is very much less hazardous than enriched uranium. Again any precautions taken for plutonium will be more than adequate for depleted uranium dispersion.

It emits feebly penetrating alpha particles. In an incident it would behave similarly to plutonium and could be dispersed by fire as particles of oxide. Particles might be inhaled from the passing cloud or by disturbing (resuspending) deposited material. Radioactive material might be ingested if contaminated substances were consumed.

5.2.3 Tritium

General Information

Tritium is a radioactive form of hydrogen gas. Tritium gas, like hydrogen gas is flammable and in a fire would burn readily to form radioactive tritium oxide and might form tritiated water by replacing an ordinary hydrogen molecule in water vapour

In the absence of fire the gas (like hydrogen) will disperse upwards rapidly due to its very low density and be of little hazard. Tritium might replace some of the hydrogen in water, oils and plastics and contaminate them.

Radiological Information

Tritium emits very low energy radiation, beta particles that have very low penetrating power. The radiation is unlikely to penetrate intact skin and clothing and will not cause radiation burns to the skin. External radiation from a passing cloud or from deposited material would be negligible.

Health Hazards

Human body tissues are composed largely of water. If tritium enters the body either as a gas (inhalation) or as tritiated water or contaminated food (ingestion) it will spread quickly through the body water and tissues. It is excreted in the urine and the detection limit in urine is a small fraction of the level believed to be of any radiological significance. If tritium is taken into the body, after about ten days the natural turnover of body water will reduce the amount by half. Drinking more fluids will increase the rate of tritium excretion.

Potential Impact relating to an off-site emergency

Consideration	Impact from Tritium
Environment & Buildings	<p>Tritium that remained in the form of gas would behave similarly to hydrogen and would disperse rapidly and upwards due to its very low density.</p> <p>Both tritiated water and tritium gas might be carried along by the prevailing wind to form a “plume” or cloud. The water content of the atmosphere and the turnover of water in the environment would ensure the rapid dispersion and dilution of any tritium or tritiated water that was released, because of this it is difficult to envisage significant levels of tritium contamination occurring outside the AWE site involved</p>
Human Health	<p>Tritium emits very low energy beta particles that are unlikely to penetrate clothing or skin. External radiation from the passing cloud or from deposited material containing tritium would be negligible.</p> <p>Dispersed tritium containing material could present a hazard if it were to find its way into the human body. This could occur if airborne tritiated material was inhaled from the passing cloud, was absorbed through the skin, or if contaminated foodstuffs were consumed.</p> <p>If tritium containing material was inhaled or ingested it would be rapidly dispersed throughout the body tissues (which themselves consist largely of water) and would be excreted in the urine. Measures can be taken to promote excretion of urine (and hence of tritium) and minimise the consequences of any intake of tritium that may have occurred.</p>

Tactical Information

Precautions to be taken at or near the incident site:

Tritium presents an immediate hazard in one of two ways:

- (a) Breathing in tritium or tritiated material as the cloud passes.
- (b) Absorption through the skin

To minimise the hazard several precautions can be taken:

- (a) Approach from upwind (where possible).
- (b) Stay upwind and out of any smoke or vapour from the incident.
- (c) Use Self Contained Breathing Apparatus at the scene to protect against the risk of inhaling tritium or tritium containing material. A dust mask is no use against tritium.
- (d) Cover exposed skin surfaces to reduce the risk of skin absorption. (Chemical suits or waterproof clothing and gloves will give good protection, can be washed down with water and bagged for later checking or disposal).
- (e) A urine sample taken after the event will indicate whether any intake of tritium has occurred.

Operational Information

For use off-site at the time of the incident:

- (a) Emergency services responding to the incident should approach from an upwind direction, and stay upwind of the plume.

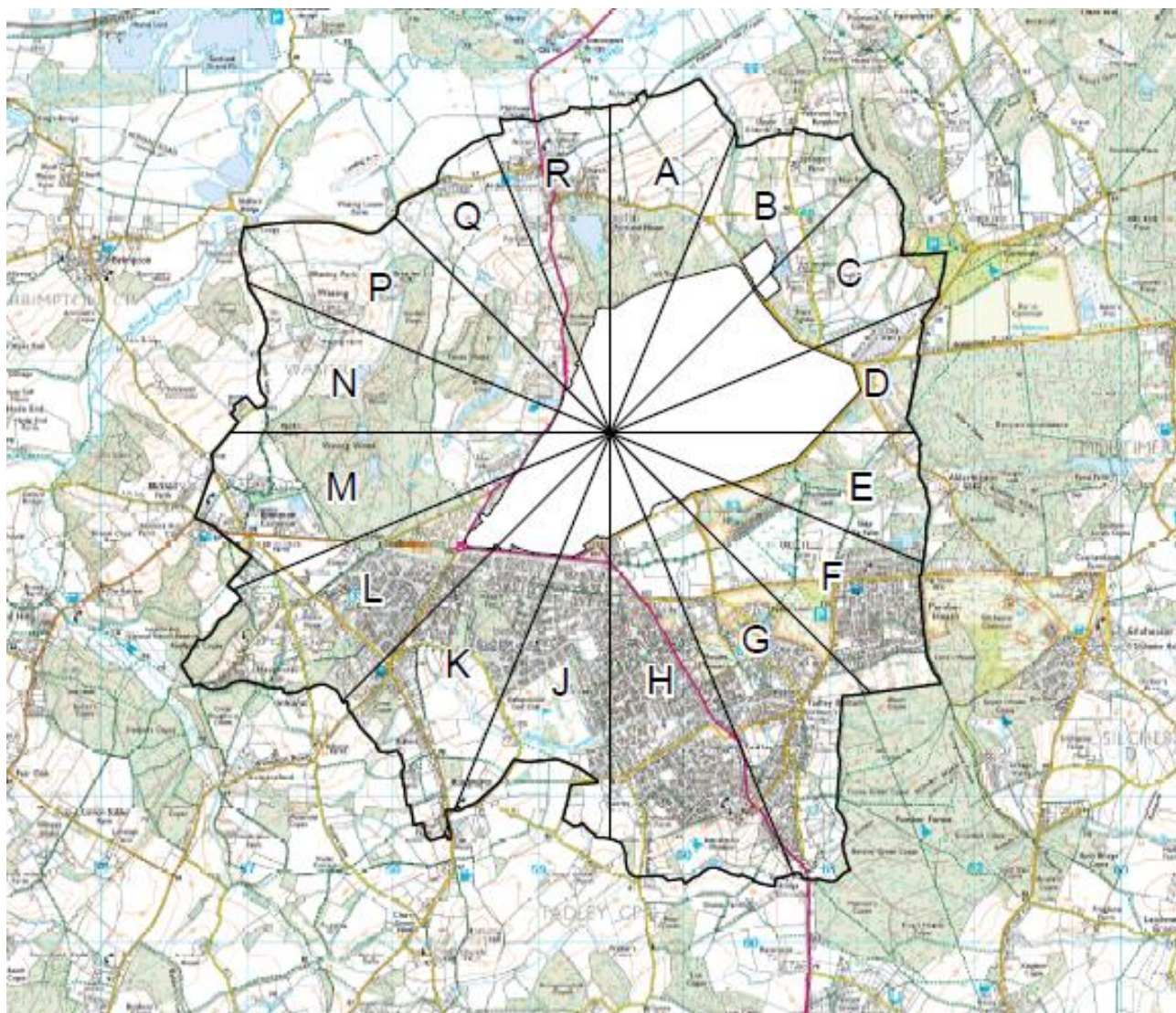
- (b) Personnel off-site and in the downwind sheltering zone should minimise the time spent operating in the open: where possible shelter inside or in vehicles with air intakes turned off.
- (c) Self-Contained Breathing Apparatus will provide protection against inhalation hazards if work in the downwind plume near to the scene is necessary for a prolonged period
- (d) The public will be advised to shelter downwind of the incident
- (e) Emergency service vehicles should be cleaned before leaving the area
- (f) Monitoring will be carried out to take water samples and vegetation for analysis.

Strategic Information

Longer term consequences of a release of Tritium

- (a) If a release of Tritium gas occurred it would be widely dispersed, combining with water vapour to form tritiated water. This and any tritiated water released would be deposited downwind of the incident. Due to the dilution effect of water already present in the environment significant off-site contamination is considered extremely unlikely
- (b) Monitoring of water supplies and vegetation would indicate whether significant contamination had occurred
- (c) Downwind of the incident it may be necessary to temporarily ban the consumption of fruit and vegetables grown in the affected area
- (d) It may also be necessary to temporarily ban the consumption of milk produced by cows grazing on affected pasture land.

5.3 AWE Aldermaston DEPZ

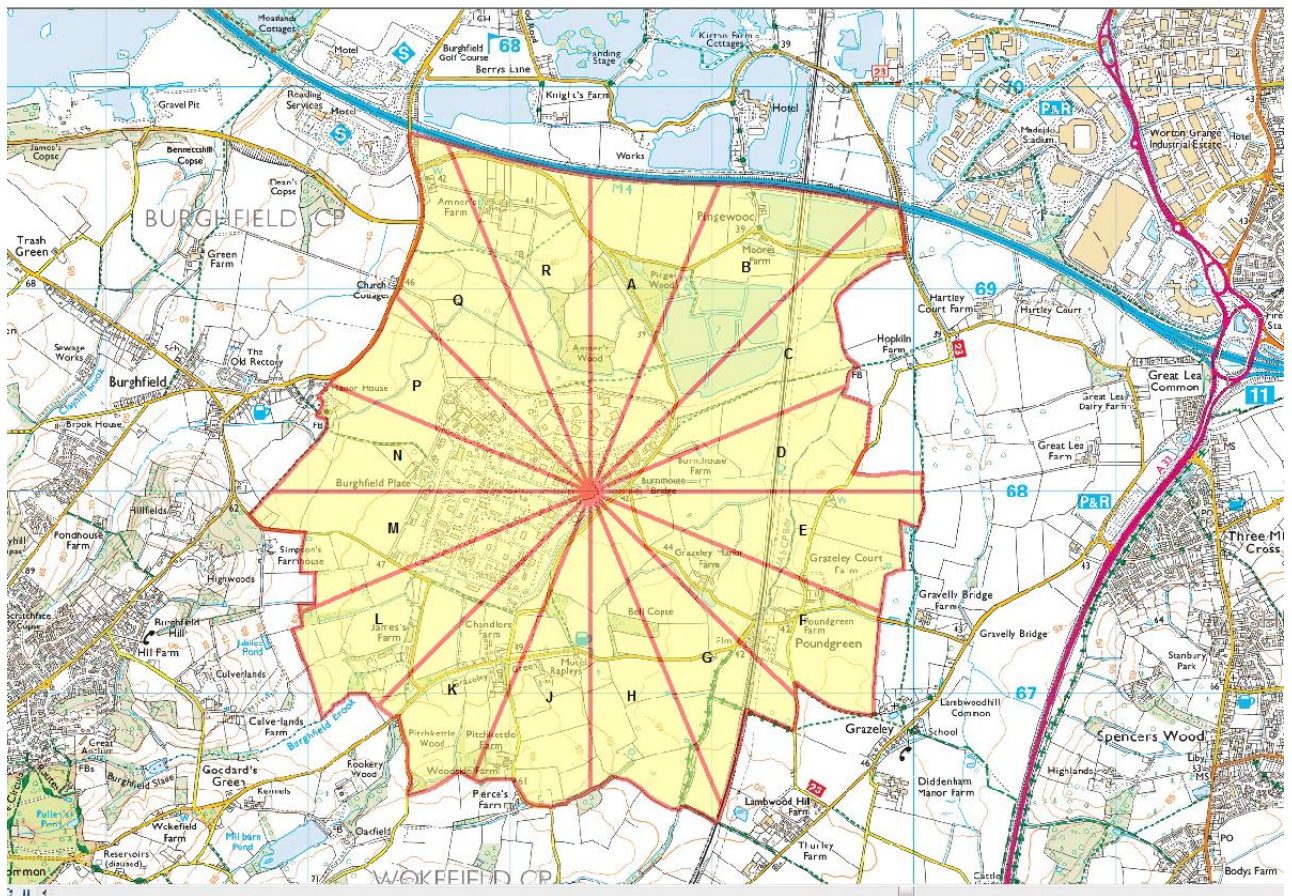


5.3.1 Aldermaston DEPZ Population Data and Area information

Source ONR as at 2018

Sector ID	Residential Properties	Residential (night time term time)	Residential (night time school holidays)	Residential (day time term time)	Residential (day time school holidays)	Work places	Workers	Care Homes	Care Home Residents	Schools	School Pupils	Childcare Population	Primary Schools	Primary School Pupils	Secondary Schools	Secondary School Pupils	Hospitals	Major Sports Venues	Farms
A	1	2	2	1	1	117	2787	0	0	0	0	0	0	0	0	0	0	0	0
B	11	25	26	8	12	113	3070	0	0	0	0	0	0	0	0	0	0	0	0
C	10	23	23	8	11	115	2677	0	0	0	0	0	0	0	0	0	0	0	0
D	62	143	144	47	68	95	4327	0	0	0	0	0	0	0	0	0	0	0	0
E	29	61	62	25	31	91	4537	0	0	0	0	0	0	0	0	0	0	0	0
F	846	1910	1944	776	992	67	3095	0	0	0	0	30	0	0	0	0	0	0	1
G	948	2255	2287	864	1166	60	1622	1	37	1	41	0	1	41	0	0	0	0	1
H	2503	5845	5900	1886	2685	55	1101	0	0	3	766	237	3	766	0	0	0	0	0
J	919	2251	2272	783	1106	48	1088	1	5	1	303	62	1	303	0	0	0	0	0
K	897	2109	2127	838	1115	57	1204	2	22	0	0	26	0	0	0	0	0	0	0
L	764	1899	1916	711	966	61	1377	2	14	1	921	74	0	0	1	921	0	0	0
M	85	206	209	72	101	68	1219	0	0	0	0	0	0	0	0	0	0	0	5
N	5	12	12	4	6	61	775	0	0	0	0	40	0	0	0	0	0	0	4
P	17	41	41	14	20	59	564	0	0	0	0	0	0	0	0	0	0	0	2
Q	8	19	19	6	9	48	859	0	0	0	0	0	0	0	0	0	0	0	0
R	147	347	350	112	160	87	2743	0	0	2	223	40	2	223	0	0	0	0	1

5.4 AWE Burghfield DEPZ



5.4.1 Burghfield DEPZ Population Data and Area information

Source ONR as at 2018

Sector	Residential Properties	Residential (night time term time)	Residential (night time school holidays)	Residential (day time term time)	Residential (day time school holidays)	Workplaces	Workers	Care Homes	Schools	Childcare Count	Childcare Population	Primary Schools	Secondary Schools	Hospitals	Major Sports Venues	Farms
A	0	0	0	0	0	15	1117	0	0	0	0	0	0	0	0	0
B	7	18	18	5	8	15	1129	0	0	0	0	0	0	0	0	0
C	2	5	5	2	3	20	958	0	0	0	0	0	0	0	0	0
D	0	0	0	0	0	32	797	0	0	0	0	0	0	0	0	0
E	6	16	16	5	7	41	1043	0	0	0	0	0	0	0	0	0
F	20	52	53	16	25	42	1061	0	0	0	0	0	0	0	0	0
G	2	5	5	2	3	32	818	0	0	0	0	0	0	0	0	0
H	0	0	0	0	0	19	469	0	0	0	0	0	0	0	0	0
J	4	10	11	4	6	16	354	0	0	0	0	0	0	0	0	1
K	25	65	68	25	38	18	232	0	0	0	0	0	0	0	0	1
L	4	10	11	4	6	19	704	0	0	0	0	0	0	0	0	0
M	3	8	8	2	3	15	1107	0	0	0	0	0	0	0	0	0
N	5	13	13	4	5	18	1108	0	0	1	60	0	0	0	0	0
P	4	8	8	2	3	15	1029	0	0	0	0	0	0	0	0	0
Q	4	10	10	3	4	15	1080	0	0	0	0	0	0	0	0	0
R	3	8	8	2	3	15	1118	0	0	1	30	0	0	0	0	1

5.5 *Extendibility*

This plan provides detailed information in relation to the requirement to plan in detail for the area defined by the DEPZ which is based on HIRE reports and on the basis of reasonably foreseeable accidents (i.e. the design basis accident or reference accident). Extendibility planning is deemed as good practice and related to the concept having arrangements in place, based on those for the DEPZ, to respond to events that are prolonged, or extend beyond the reasonably foreseeable accident.

In considering extendibility in relation to the two AWE sites preplanning has taken place. As a result areas of extendibility have been zoned on maps to allow ready consideration of the areas affected. The mapping below details the potential zones of extendibility for the AWE (A) site to be 15km and for AWE (B) site to be 12km. These areas of extendibility are reviewed on each revision of this plan to allow for changes in population density and sites of interest such as vulnerable people locations in relation to the capability of the responding agencies to respond. This will include changes due to Development Control with respect to large scale, sites of interest development and increases by 'creep' (one or two small scale developments but many of them).

Importantly the area of extendibility for both AWE sites would have a significant impact on the community affected and the responders in that, unlike many other nuclear sites, there are large urban areas which could be affected including Reading, Basingstoke and Newbury. Therefore there will be significant challenges.

It is important to note that there is not a detailed plan due to the improbability of such a radiation emergency. The information below provides guidance and considerations to responders should there be a beyond reasonably foreseeable radiation emergency. Should there be a radiation emergency which is assessed to be affecting an area greater than the DEPZ then the following actions and considerations would be put in place:

Responder Actions: The responders detailed in this plan will continue as described in relation to their normal responsibilities, unless otherwise directed via the normal command and control structure.

The Strategic Coordinating Group will continually assess the requirements for all the emergency and precautionary countermeasures. This may require consideration of an extension of the area to ensure maximum protection and reassurance.

Sd

Contingency Plans: A wide number of contingency plans are maintained in a wide range of organisations to deal with various civil emergencies from the industrial accident to natural disasters such as flooding. This plan along with these other 'supporting' plans should be used in an extendibility emergency.

Countermeasures: Key to the safety of the communities affected in the area of extendibility is the fact that the best countermeasure for the vast majority will be to take shelter. As a result a means of communicating and providing assurance is critical at an early stage.

Considerations: Consider the implications and issues relating to the area affected. These considerations may include the following:

- (a) Means of warning the public
- (b) Public information

- (c) Population sizes
- (d) Vulnerable people including 'closed communities'
- (e) Businesses/factories etc.
- (f) Transport hubs
- (g) Transport diversions – these will need to be extensive and some distance from the site
- (h) Information points, reception and rest centres
- (i) Resources – staff - a larger area will have a larger impact
- (j) Resources – equipment
- (k) Mutual aid.

These above considerations are already in place for the DEPZ but need to be considered for the wider area. Other considerations are set out in the table below;

Subject	Considerations	Actions
Time of day /day of week impacts	<p>A day time emergency would have a greater impact on response than night time.</p> <p>With the exception of between the hours of 0100-0500hrs any other time of day would have minimal impact since the area is busy at all times.</p> <p>There would be an equal impact if the emergency was at weekends since less people working generally in the community however the locations involved are high density in relation to leisure activities.</p>	<p>Activate LRF Communications Plan to ensure quick, effective, accurate, joined up communications to allow those in the wider area to take shelter quickly.</p>
Size & Type of Community	<p>The larger the area and the greater the population involved then the more challenges there will be due to sheer scale.</p> <p>Different communities will have different challenges see below.</p>	<p>Urgent Mutual Aid requests to be put in place by each agency as necessary. This could be supported by the Government Liaison Officer or relevant Government Departments to allow additional resources to be sourced to support.</p>
Variations in Local Communities by way of Culture	<p>Communities will vary in their ability to understand and work together therefore to treat them all the same would be wrong.</p> <p>Reading is an urban setting as is Newbury & Basingstoke however they are very different by way of the multi-cultural challenges.</p>	<p>Assess the potential community impacts by understanding the communities by:</p> <p>Engaging local responders.</p> <p>Assessing the community by reviewing community information for the area affected:</p> <p>West Berkshire click here</p> <p>BDBC click here</p> <p>RBC click here</p> <p>WBC click here</p>

Subject	Considerations	Actions
Vulnerable communities	<p>Within any community there will be vulnerable people. These people can be in closed communities (schools, care homes, hospitals etc.); individuals in their own homes who are known to the social care/health care environment, those in their own homes who do not have support but are still vulnerable.</p> <p>The impacts of an extendibility event setting in relation to vulnerable people include:</p> <p>Identifying where the people are (using Vulnerable People Plans and Information Sharing Protocols) RAG rating the support needed in short, medium terms;</p> <p>Deciding on the support needed and how to provide it – which could be resource intensive, have issues with staff and equipment going into contaminated areas</p>	<ul style="list-style-type: none"> • Activate relevant Vulnerable People Plan. • Activate relevant Information Sharing Protocol • Set up a Vulnerable People Coordination Group at TCG level at least if not at SCG. • Quickly identify closed communities • Gather data regarding vulnerable people in the community and assess requirements and support needed.
Communities response actions	<p>The response of the communities cannot be guaranteed. Whilst the aim would be for people to respond as requested there is a risk that: People would not listen to the advice – or don't trust it so do not act as requested.</p> <p>People are less knowledgeable about the site the further away they are and believe the worst – and try to leave the area.</p> <p>There is an assumption that people are in or near home or a suitable building to shelter in.</p> <p>People may not understand due to learning difficulties, language barriers or are visiting the area and don't realise they are affected.</p> <p>As time goes on people will become more anxious and the risk of not staying in shelter increases – creating more issues.</p>	<ul style="list-style-type: none"> • Activate LRF Communications Plan to ensure quick, effective, accurate, joined up communications. • Activate Vulnerable People plan to support those with difficulties in receiving information via media. • Activate Supporting People and Rest Centre plans to consider options in relation to self-evacuation.

Subject	Considerations	Actions
	The impacts would be additional requirement for rest centres, impact on health services away for the area.	
Impact on tourism, events and local community attractions	<p>The area has a significant number of tourism attractions including:</p> <ul style="list-style-type: none"> • Kennet & Avon Canal – transient population • The River Thames • Highclere Castle, Nr Newbury • Reading Town Centre – incl The Oracle • Basingstoke Town Centre • Newbury Town Centre • Englefield House • Basildon Park • Royal family relations • Other Heritage sites <p>Significant event locations within the area of extendibility include:</p> <ul style="list-style-type: none"> • Newbury Show Ground • Newbury Racecourse • Reading Festival • Madjeski Stadium, Reading 	<p>Review events in the area taking place or due to take place by:</p> <ul style="list-style-type: none"> • Checking with the local responders and/or checking online events information for the areas: <ul style="list-style-type: none"> ○ West Berkshire here. ○ WBC click here ○ RBC click here ○ Hampshire click here • Checking mapping of locations, historical areas etc. online: <ul style="list-style-type: none"> ○ West Berkshire here.
Impact on utility outages resulting in Public Health issues	<p>The knock on consequences of utility failures could be significant not only for lack of availability but the impacts:</p> <p>Waste / sewage issues resulting in public health issues</p> <p>Power resulting in not being able to use media so readily for messages</p> <p>BT lines out – no communications within the DEPZ.</p>	<p>Activate utility companies as part of the notification process.</p>
Responder vulnerabilities	<p>The responders may become vulnerable due to the assets they have in the areas affected</p> <p>Many responders will have assets in the areas affected which could include:</p> <p>Emergency Services Stations</p> <p>Agency Depots</p> <p>Control Rooms</p> <p>Water or Waste treatment plants</p> <p>Trunk networks for road and/or rail.</p> <p>The impact on these assets will vary but may include not being able to use all or some of the assets with the knock on consequences of no water supply; gridlock around the transport network,</p>	<p>Responders to consider in their Business Continuity Plans.</p> <p>Responders may have to be flexible in response if 'normal' assets are not available.</p> <p>Details of the locations of specific responder locations and in which sector is tabled below in this section.</p>

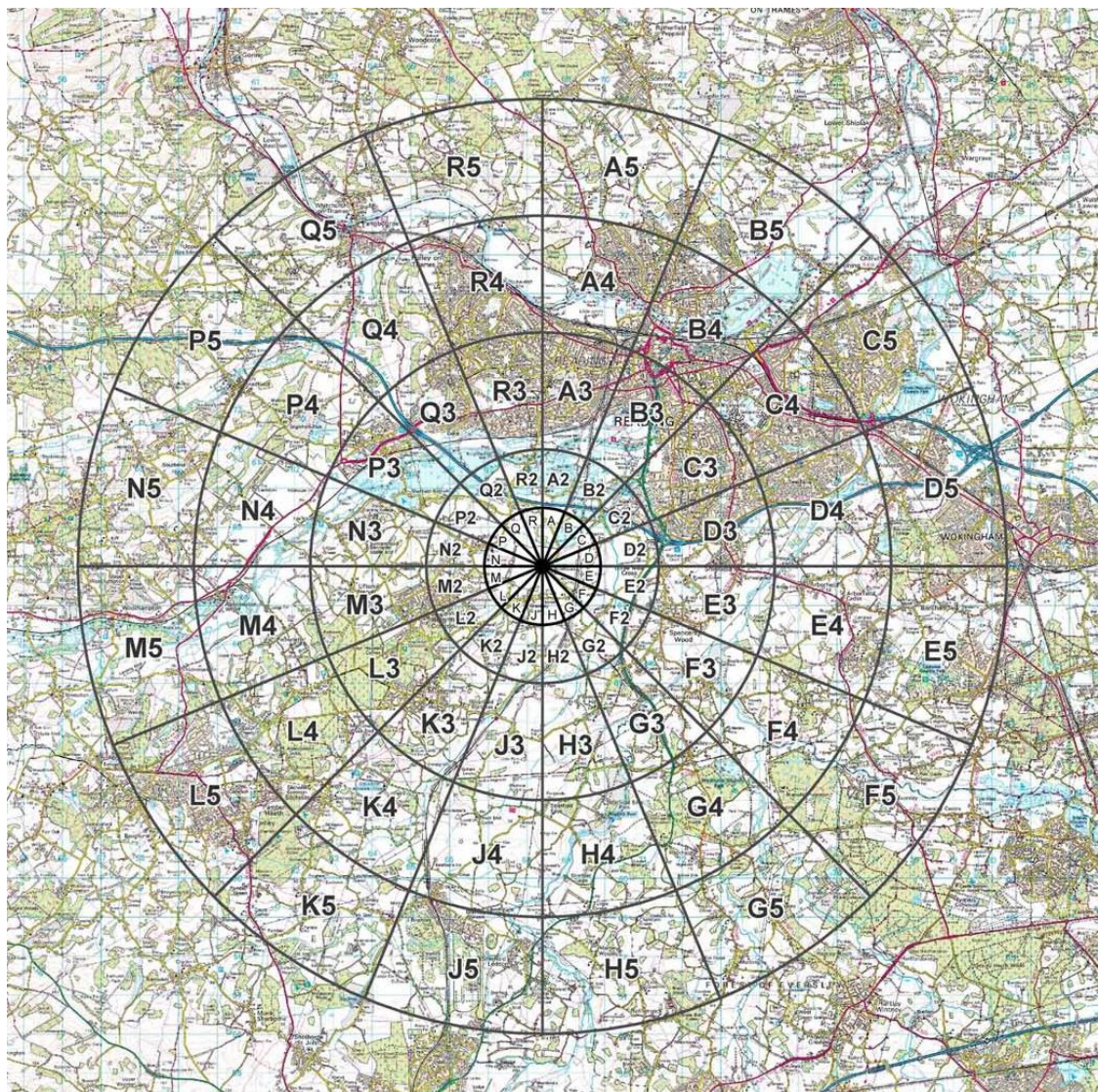
Subject	Considerations	Actions
	<p>responders being trapped in control rooms.</p> <p>Staff who live in the area affected and therefore cannot go to work since 'trapped' at home or are required to support family or indeed cannot go home.</p>	
Responding agencies resources	<p>Responding agencies will be stretched at an early stage of the response. There will therefore be impacts in relation to: Conflict in prioritising resources in a large scale event - early sharing of information in relation to key assets in the affected area and impact if they do not function will be required. Mutual aid is likely to be called up by most if not all responding agencies. There is likely to be an impact in relation to supporting the request due to lack of understanding of the risks, the requirements for PPE and training.</p>	<p>Urgent Mutual Aid requests to be put in place by each agency as necessary. This could be supported by the Government Liaison Officer or relevant Government Departments.</p>
Impact on the South East (SE) of England	<p>Due to the location there is likely to be an impact on the SE of England in a number of ways:</p> <p>Public transport implications If Reading Station is affected this would affect the network in the whole of the SE and the West Coast lines Southern and West Coast Lines are likely to be impacted – potentially all rolling stock would stop or be diverted with significant impact. Local bus networks would be stopped and diverted</p> <p>Road network implications: the M4, M3, & A34 could be directly impacted which would then have impacts on the M25, the M40 and other strategic roads and the smaller rural roads as people divert.</p> <p>If the roads and rail are 'closed' for a period of time then the impact in relation to those using the systems and financially it would be significant</p>	<p>Activate all transport leads especially network rail, local train operating companies, Highways England and the Local Highways Authorities.</p> <p>Develop a Transport coordination cell to manage the transport issues via TCG and/or SCG requests.</p>
Military Involvement	<p>Due to the scale of the event then there is likely to be request for Military Aid to Civil Authorities (MACA) support. In</p>	<p>Joint Regional Liaison Officer (JRLO) to alert via his Chain</p>

Subject	Considerations	Actions
	such a response then it would be expected that a request for support for the military should be a default action.	of Command potential request for MACA request.

5.5.1 Zone of extendibility around AWE Aldermaston– each ring is equivalent to 3km.



5.5.2 Zone of extendibility around AWE Burghfield Scale– inner 2 rings = 1.5km, all other rings = 3km.



5.5.3 Extendibility Sectors around AWE Aldermaston

3km	6km	9km,	12km	15km	18km
A1	A2 • Aldermaston Railway Station	A3	A4	A5	A6
B1	B2	B3 • TVP Police College, Sulhamstead	B4 • RBFRS HQ • WBDC Turnham Green Offices • Theale Railway Station • PUMA lower COMAH • 2 x Authorised processes	B5 • TVP Pangbourne Police Station	B6
C1	C2	C3 • PSD - COMAH	C4 • AWE Burghfield	C5 • TVP Three Mile Cross Traffic Base • RBFRS Whitley Wood • TW Water Treatment Works	C6 • TVP Reading Police Station • TVP Loddon Valley Police Station • Reading Borough Council • Thames Water HQ • Reading Railway Station
D1	D2	D3	D4 • National Grid Site	D5	D6
E1	E2	E3	E4	E5	E6
F1	F2	F3	F4	F5	F6
G1	G2	G3	G4	G5	G6
H1	H2	H3	H4 • Basingstoke Ambulance Station, RG24 9LY	H5	H6
J1	J2	J3	J4	J5	J6
K1	K2	K3	K4	K5	K6
L1	L2	L3	L4	L5	L6
M1	M2	M3	M4	M5	M6
N1	N2	N3 • Thatcham Railway Station	N4 • Racecourse Railway Station • Newbury Racecourse	N5 • TVP Newbury Police Station • West Berkshire District Council Offices x2 • RBFRS Station • SCAS Station • Vodafone HQ • Newbury Railway Station	N6
P1	P2	P3 • TVP Station	P4	P5 • Highways England Chieveley Depot	P6
Q1	Q2	Q3	Q4 • Frontier - COMAH	Q5	Q6

3km	6km	9km,	12km	15km	18km
R1	R2	R3	R4	R5	R6

5.5.4 Extendibility Sectors around AWE Burghfield

1.5km	3km	6km	9km	12km
A1	A2	A3 <ul style="list-style-type: none"> Ambulance Station 	A4	A5
B1	B2	B3	B4 <ul style="list-style-type: none"> Ambulance Station 	B5
C1	C2	C3	C4 <ul style="list-style-type: none"> Loddon Valley Police Station 	C5
D1	D2 <ul style="list-style-type: none"> Three Mile Cross Traffic 	D3	D4	D5 <ul style="list-style-type: none"> Wokingham Police Station
E1	E2	E3	E4	E5
F1	F2	F3	F4	F5
G1	G2	G3	G4	G5
H1	H2	H3	H4	H5
J1	J2	J3	J4	J5
K1	K2	K3	K4	K5
L1	L2	L3	L4	L5
M1	M2	M3 <ul style="list-style-type: none"> Sulhamstead Training Centre 	M4	M5
N1	N2	N3	N4	N5
P1	P2	P3	P4	P5
Q1	Q2	Q3 <ul style="list-style-type: none"> RBFRS HQ WBDC Turnham Green Offices 	Q4	Q5 <ul style="list-style-type: none"> Pangbourne Police Station
R1	R2	R3	R4	R5

5.6 Strategic Coordinating Centre (SCC)

As detailed in [Section 4](#) of this plan the SCC is the location where the Strategic Coordinating Group (SCG) will make the policy/strategic decisions in relation to the response to the incident.

This section provides some guidance to those attending the SCC with respect to an incident at an AWE Site.

5.6.1 Staffing of the SCC

All responding agencies with staff attending the SCC should ensure their staff are trained and understand their roles.

All agencies should consider the number of staff required to support the SCC effectively this is likely to include:

- (a) SCG rep
- (b) SCG supporting officer (to stay at the agency desk when SCG rep in meetings or deputise as necessary)
- (c) STAC rep
- (d) MAC rep
- (e) RCG rep
- (f) Multi-Agency Information Cell (MAIC) rep
- (g) Loggists
- (h) Others as necessary

All agencies must put plans in place to resource the SCC for a long period of time 24/7 since an AWE incident is unlikely to be resolved in a few hours.

All agencies should ensure the staff attending the SCC are equipped to operate independently of any other support by way of IT, telecoms, paperwork etc.

There are likely to be a large number of staff at the SCC and since space will be limited then only staff with a direct role should be in attendance.

5.6.2 Agency Attendance at SCC

The attendance, ideally in person or via teleconferencing, at the SCC includes representatives (as required) from:

- (a) Thames Valley Police
- (b) Hampshire Constabulary (depends on location of off-site incident)
- (c) West Berkshire District Council
- (d) Other Local Authorities as appropriate and depending on the location of the incident i.e.
 - i. Basingstoke and Dean Borough Council
 - ii. Hampshire County Council
 - iii. Reading Borough Council
 - iv. Wokingham Borough Council
- (e) Royal Berkshire Fire & Rescue Service
- (f) Hampshire Fire & Rescue Service (depends on-site location)
- (g) MOD
- (h) Office for Nuclear Regulation (ONR)
- (i) Environment Agency (EA)
- (j) Public Health England South East (PHE SE)
- (k) Public Health England - Centre for Radiation Chemical and Environmental Hazards (PHE CRCE)
- (l) NHS England South Central
- (m) South Central Ambulance NHS Foundation Trust

- (n) Food Standards Agency (FSA)
- (o) MHCLG Resilience and Emergency Division
- (p) AWE
- (q) Met Office
- (r) Thames Water
- (s) Highways England
- (t) Network Rail
- (u) British Transport Police
- (v) Other Utility companies as necessary

And others as deemed necessary at the time.

5.6.3 SCC Internal Communications

In order to ensure all within the TVP SCC in the different 'cells' are aware of the current status and issues being raised then the Information Management System CLIO is used. This allows an audit trail and allows all cells to see the same information including minutes, Common Operating Picture (COP) etc. A TVP rep will be able to assist the operation of the system.

It is however expected that staff within the SCC will seek out information if they cannot find it on the system by talking to others within the SCC.

It is expected that all agencies maintain their own logbooks and notes following meetings and engagement with other agencies. These should be kept for audit/investigation purposes.

5.6.4 SCC External Communications

In order to ensure agencies outside the SCC are up to date with the current situation a number of options are available to agencies attending individually or in a coordinated manner as follows:

- (a) *Situation Report (SITREP)* – this is a document created by all agencies in the SCC to allow a picture of current situation, actions and issues to be shared out to all agencies. This is coordinated by the Information Cell.
- (b) *Common Operating Picture (COP)* a more formal report which is shared with other agencies and government departments.
- (c) *Information Sharing* of Documents tends to be via email to respective agencies or via ResilienceDirect.
- (d) *Teleconferencing* – in order to speed up the initial coordination meetings many be arranged using teleconferencing facilities. The dial in details will be sent out shortly after the initial notification process.
- (e) *Other communications* will depend on agencies but will normally include mobile phones and/or airwave radios.

5.6.5 SCC Location

The location is normally at TVP South Headquarters, Kidlington, Oxfordshire. An alternative location in the Thames Valley is the Police Training College at Sulhamstead, Berkshire.

When being set up the management of the SCC is under the control of the Duty TVP Gold Officer.

If a significant population within Hampshire is affected by the incident, a similar approach may be taken by Hampshire Constabulary with representatives from both police forces in the other control and command locations to ensure consistency and clarity. Normally their SCC location would be Netley, Hampshire.

5.6.6 Strategic Coordinating Group (SCG)

The Strategic Coordinating Group is made up from nominated senior members of the statutory agencies involved in the response to the incident. Each member must be able to make executive decisions in respect of resources within their agency and have authority to seek the aid of other agencies in support of their role.

Not all agencies at the SCC will be represented at the SCG instead the chair will invite attendees.

The SCG Chair may increase or reduce representation at the meetings to ensure efficient management.

In addition some agencies may work in the STAC or the RCG, in which case only the chair of the STAC and the RCG are standing members of the SCG.

5.6.7 Role of the SCG

The SCG has a wide role, which may encompass central government assets and handling requests for advice and assistance from individual services and agencies.

The function of the SCG is to:

- (a) Review what has occurred in the period following the last meeting
- (b) Formulate plans of action for the next period at strategic level
- (c) Discuss policy and strategic issues referred to it by the Tactical Commanders, and take action accordingly.
- (d) Coordinate the efforts of all the cells and agencies
- (e) Coordinate the media output – via the MAC
- (f) Allocate strategic resources

5.6.8 Initial SCG Meeting/Teleconference Guidance

Suggested initial SCG membership for an AWE incident:

- (a) Thames Valley Police – Chair, Minute taker and rep from Ops.
- (b) RBFRS
- (c) SCAS
- (d) West Berkshire District Council
- (e) AWE
- (f) MOD
- (g) STAC Chair – prior to the establishment of the STAC expert advice may be sought via PHE CRCE
- (h) RCG Chair – if nominated
- (i) Hampshire representatives – including Police, FRS, Local Authority (BDBC)

5.6.9 Suggested initial agenda for AWE SCG meetings

Initial SCG Agenda
Introductions
Strategic priorities
Strategic assessment by SCG Commander
Urgent Items
Review of previous actions/minutes
Review of SITREP – provided in advance via Information Cell
Review of Intelligence report - provided in advance via Information Cell
Community Impact Assessment
Resourcing
Logistics
Welfare

Media & Warning & Informing/Community Messages
Any other business
Review of decisions/actions

5.6.10 Sub Groups to SCG

There are likely to be a number of supporting subgroups to the SCG at the SCC the details relating to them and an AWE incident are detailed in the other sections.

- (a) Scientific and Technical Advisory Cell (STAC)
- (b) Recovery Coordinating Group (RCG)
- (c) Media Advisory Cell (MAC)
- (d) Radiation Monitoring Unit (RMU)
- (e) Resource Cell
- (f) Multi-Agency Information Cell (MAIC)

5.7 Scientific and Technical Advisory Cell (STAC)

5.7.1 STAC Role

The provision of timely/effective technical and health advice would be given by the multi-agency Scientific and Technical Advisory Cell (STAC).

The STAC is an advisory group and depending on the nature of the incident may be led by Health or non-health organisations. Its remit is to:

- (a) Take advice on the scientific and health aspects of the incident from a range of experts;
- (b) Provide advice to the SCG on the health consequences of the incident including the consequences of any evacuation or sheltering policies;
- (c) Confirm with the SCG the advice to be given to the public on the health aspects of the incident;
- (d) Keep a written record of decisions made and the justifications for those decisions.

If necessary, the STAC will:

- (a) Liaise with Department of Health and Social Care, DEFRA and other governmental bodies
- (b) Formulate advice to health professionals involved in the incident, such as hospitals, ambulance services, general practices and NHS Direct formulate advice on strategic management of the health service response to the incident.

For an AWE incident with off-site radiological consequences, a STAC should be set up automatically. In non-radiological incidents, a STAC may be requested by the Police Incident Commander but may be recommended by a senior public health professional due to the potential impact on health and the local population from an actual or evolving incident.

The composition and function of the STAC will be incident specific and tailored to local requirements and to provide the best advice to the SCG for decisions to be made.

5.7.2 STAC Membership

The likely membership of the group for an AWE incident will include:

- (a) Public Health England
- (b) Public Health England – CRCE
- (c) West Berkshire District Council – Environmental Health
- (d) Berks LA Shared DPH Consultant
- (e) Other LA - Environmental Health - dependant on area affected.
- (f) MOD

- (g) Environment Agency
- (h) Food Standards Agency
- (i) Thames Water
- (j) AWE
- (k) ONR
- (l) Met Office
- (m) and others as deemed necessary at the time.
- (n) STAC Chair and Support

The STAC if called will be chaired by PHE as per the PHE South East STAC Plan.

In order to support the STAC chair often a non STAC member is included to support the coordination. A TVP inspector has undertaken this role.

5.7.3 STAC Considerations re: AWE Incident

Due to the nature of the site some of the initial considerations will be:

- (a) What agents are we are dealing with? Radiation? Chemical? Both?
- (b) How much is there of it?
- (c) Where is it?
- (d) What are the likely health effects?
- (e) What is the monitoring strategy?

5.7.4 STAC Quick Guide to AWE Incident Considerations

In considering items in [Section 5.4](#) the following table provides some guidance:

(a)	<p>The main types of radioactive materials used at AWE are:</p> <ul style="list-style-type: none"> • Plutonium • Uranium • Tritium. <p>There are other sources of radioactivity used for safety checks and normal industrial purposes (e.g. sources for radiography). These are well controlled, pose no threat to the public and have no potential for any off-site emergency response action</p> <p>See Section 5.1 & 5.2</p>
(b)	<p>A release of radioactive material off-site from either the Aldermaston or Burghfield licensed sites is unlikely to lead to a significant dose to a member of the public.</p> <p>A release of radioactive material would not lead to acute (deterministic) radiation effects.</p>
(c)	<p>Atmospheric releases may be accompanied by a visible plume of smoke. However, given the properties of the radioactive material, the association of any visible smoke plume with the deposition of radioactive material may not be accurate.</p>
(d)	<p>In the event of a major release of radioactive material, the dose to the general public would be minimised by the appropriate imposition of off-site countermeasures, as implemented by Local Authorities and their support services. These include the issue of instructions for the public:</p> <ul style="list-style-type: none"> • to shelter, which reduces the inhalation and irradiation doses, and • to evacuate (short term relocation may be a better term), which prevents further exposure by moving the public from the affected area. <p>The closer to the site boundary the greater the risk for the need for urgent evacuation particularly out to approx 150m with subsequent evacuation needed out to 600m.</p>

	Vulnerable sites are more likely to need evacuation.
(e)	There will be no acute effects amongst the public outside the site boundary as a result of exposure to radioactive material. Ill-effects experienced among the public are likely to be psychological.
(f)	Contaminants may be detectable outside the Detailed Emergency Planning Zone (DEPZ) for each site following an incident.
(g)	Key to the decisions is monitoring data and a monitoring strategy. See 5.11

5.7.5 Link to other Groups

During the response phase the STAC would be in place in order to support the SCG. The STAC would also share information with SAGE (Scientific Advisory Group in Emergencies), which is the national advisory group advising the Cabinet Office Briefing Room (COBR) in an emergency. More information in relation to the procedures is found on ResilienceDirect.

The STAC would also provide advice to support the Recovery Coordinating Group (RCG). Once the response phase had been completed and hand over from the Police to the Local Authority to lead on the recovery has been achieved it may be necessary for the STAC in full or elements of it to continue to exist in order to support the RCG. If this is the case the chair of the RCG should raise this with the chair of the STAC and agree a way forward. It may be that elements of the STAC become part of the RCG main group or as part of a sub group as necessary.

5.8 Countermeasures

There are a range of countermeasures that may be implemented following an incident on an AWE site. Specific countermeasures will be dependent upon the nature and scale of the incident. The decision as to what countermeasures to put in place will be taken, at any command level, following advice from the site and/or the STAC.

5.8.1 Principles of Countermeasures:

The three principles are:

- (a) **Justification** – the measure should be used if it is expected to achieve more good than harm;
- (b) **Optimisation** – the quantities criteria used for introducing and withdrawing countermeasures optimizes public protection; and
- (c) **Avoid Deterministic Effects** – use countermeasures to keep doses to levels below thresholds for deterministic effects.

5.8.2 Assessment of Appropriate Countermeasure

On activation of the off-site plan then the implementation of the automatic sheltering countermeasures will be put in place. This allows for the immediate initial countermeasure for all people in the affected area to go inside and stay inside.

Subsequent countermeasure decisions about public protection measures will need to be made based on environmental monitoring.

5.8.3 Monitoring Strategy to support Countermeasures

AWE has a capability to undertake initial monitoring of the local environment around the Aldermaston and Burghfield sites in the event of a release, or suspected release of radioactive material. The results from this monitoring would be supplied to the SCG once it is operational.

Initial results may be used to inform any immediate countermeasures implemented by the emergency services taking advice via ECOSA (Emergency Coordination of Scientific Advice).

Once Strategic Command is operational overall responsibility for environmental monitoring and therefore guidance with respect to countermeasures passes to the STAC.

5.8.4 Countermeasure Options

The default countermeasure for the community outside the site is for shelter i.e. to go inside and stay inside. There may be situations however when an urgent evacuation or subsequent evacuation may be necessary. Countermeasures will be based on monitoring and expert advice.

The countermeasures that may be implemented in an emergency at AWE are summarised below.

5.8.5 Countermeasure Options and Actions

Counter-measure	Description	Potential scenarios / areas for which this countermeasure may be implemented	Process	Limitations / Issues – including actions in place or to consider to over come
Sheltering	Going inside and staying inside buildings closing doors and windows closed and following advice given by the authorities via local and national media will substantially reduce the risk of contamination and risk to health of the population in the affected area. (Distance and shielding would be provided).	Automatic countermeasure in downwind sectors of Detailed Emergency Planning Zones once a radiation emergency has been declared. Exceptionally, sheltering may be advised across a wider area see 5.4 & 5.9. PHE CRCE Emergency Reference Dose Level for Sheltering is 3 milliSieverts.	<p>Automated public telephone altering system activated by AWE.</p> <p>The specific sectors that would be advised to shelter - the sectors alerted would be dependant primarily on the wind direction at the time of an emergency.(see monitoring)</p> <p>Advice provided would be to:</p> <ul style="list-style-type: none"> • go in or remain indoors, close all windows and doors and switch off any ventilation or air conditioning system • Remove outer clothing, blow nose and have shower or wash face and hands if out in the open at time of incident • switch on a radio or television and listen for any information about the incident <p>In particular the following local stations would be used.</p> <ul style="list-style-type: none"> • Heart Berkshire - 97, 102.9 & 103.4 MHz • Heart Oxfordshire - 102.6 MHz • FOX FM - 102.6 MHz, • BBC Radio Berkshire - 94.6, 95.4 104.1 & 104.4 MHz • Local Independent TV 	Not all premises in the DEPZ will have land lines to receive the alert – leading to additional resources needed in the area affected to ensure all inside. Reliant on businesses to inform people on-site and look after them for a period of time – leaflet issued every 3 years, businesses encouraged to have an emergency plan.

Counter-measure	Description	Potential scenarios / areas for which this countermeasure may be implemented	Process	Limitations / Issues – including actions in place or to consider to over come
			<ul style="list-style-type: none"> Local BBC TV Plus others as appropriate Prevent others entering the area – REF Road Closures Plan.	
Immediate evacuation	Evacuation of people without any delay to remove them from an immediate threat to their safety.	Immediate Evacuation (at the direction of emergency services at the scene) may be required: <ul style="list-style-type: none"> For non-radiological scenarios - e.g. areas within cordons in incidents involving explosives or other materials posing an immediate risk to life (e.g. asphyxiate gases, conventional smoke) For radiation emergencies properties and persons in close proximity to the site boundary (e.g. incidents involving the transport of radioactive materials on the site, or severe accidents) but such evacuation would normally be subject to careful consideration by STAC taking into account the potential 	<ul style="list-style-type: none"> Action will be based on information from Site or STAC which will be informed by initial monitoring results from on and off the site and associated Modelling; REF: LRF Evacuation Plan Immediate door knocking and supported evacuation by emergency services (TVP/SCAS/RBFRS) Encouraged to get a grab bag in advance if time allows Support by way of an urgent reception centre; REF: LA Rest Centre Plans Transport needed to support some/all people – emergency services Monitoring of people evacuated prior to going to more formal rest centre; REF: LRF RMU Plan Wash facilities and clothing may be needed. REF: LA Rest Centre Plans Longer term support in recovery to their property Ref: LRF Recovery Plan. 	<ul style="list-style-type: none"> Emergency services approaching respective premises in PPE which may alarm those involved; Resourcing the evacuation by way of emergency services - mutual aid by other emergency services and other responders Resourcing transport/drivers to enter into a contaminated area.

Counter-measure	Description	Potential scenarios / areas for which this countermeasure may be implemented	Process	Limitations / Issues – including actions in place or to consider to over come
		dose saving (or increase in public dose) that would result, but could perhaps be usefully classified as “Early Evacuation”.		
Priority evacuation	Evacuation of priority groups (e.g. vulnerable people) which may require extra resource	Care homes, schools, caravan sites, individual vulnerable clients may require extra support in areas affected – in order to get this support effectively the clients may need to be evacuated.	<ul style="list-style-type: none"> • Decisions made with support from STAC and cross referencing with the needs of the vulnerable involved. REF LRF Vulnerable People & Information Sharing Plans to identify and share vulnerable clients’ details. • Decisions made as to best way forward for supporting the clients depending on the incident – stay where they are with support coming in or evacuation to a safe location for support to be provided. REF: LRF Vulnerable People Plan • Contact will be made to the clients or carers and thereafter the necessary support arranged. • Support needed will be in relation to: • Suitable alternative accommodation in short and potentially long term • Transportation of the clients • Making sure they have all relevant medication, clothing and personal effects to use over the time they may be expected to be out of their homes for 	<ul style="list-style-type: none"> • Evacuating large care homes – all have been given advice in developing their emergency plans to keep residents on-site and inform next of kin etc. • Resourcing the evacuation by way of emergency services - mutual aid by other emergency services and other responders • Resourcing transport/drivers to enter into a contaminated area.

Counter-measure	Description	Potential scenarios / areas for which this countermeasure may be implemented	Process	Limitations / Issues – including actions in place or to consider to over come
			<ul style="list-style-type: none"> Management of pet evacuations REF: LRF Vulnerable People & LA Rest Centre Plans.	
Subsequent evacuation	Displacement of members of the public from their homes and businesses to facilitate longer term recovery and remediation of affected areas	May be required in the days/weeks in relation to: <ul style="list-style-type: none"> people taking cover in buildings such as factories, offices and other work places Those sheltering areas may not be suitable in terms of providing support for the people there for any length of period due to lack of facilities, food and bedding This will need to be considered at an early stage depending on the zones affected Following monitoring of the area for levels of radiation (or other) contaminants Evacuation of the public from their homes may be necessary to facilitate the recovery process.	<ul style="list-style-type: none"> Monitoring of the area for contamination Guidance received via STAC following the analysis of the monitoring requirements A map recce and cross reference to the information in this plan needs to be undertaken to establish what is in each sector- this will vary according to time of day etc. A specific joint Evacuation Cell to agree the process and the notification routes for the community to be set up the process for subsequent evacuation will be communicated via the media to those affected REF: LRF Evacuation & LA Rest Centre Plans.	

Counter-measure	Description	Potential scenarios / areas for which this countermeasure may be implemented	Process	Limitations / Issues – including actions in place or to consider to over come
Self-Evacuation	Where residents in the area decide to evacuate themselves rather than shelter or without the support of emergency services.	Where people hear/see others leaving the area this may lead to self-evacuation.	<ul style="list-style-type: none"> Control will be less manageable Ideally all self-evacuating should be encouraged to be processed at an agreed site (rest centre or RV point) If they do not go through a registration process or it would be too resource intense to manage then a helpline or website registering system should be put in place to allow people to register remotely their details. 	
Remaining Away from the area.	People out of the area when an incident takes place.	Where people are at work or out of the area when an incident happens.	<p>Media messages to:</p> <ul style="list-style-type: none"> Stay away from the area; Stay with friends and family; Register as in self-evacuation Provision of a drop in centre away from the area to get more information. <p>REF: LA Assistance Centre Plan.</p>	
Restrictions on water consumption	This is not likely to be required due to the way the water supplies are delivered.	This is unlikely to be needed as an immediate countermeasure by the nature of how water is abstracted in the area and the length of time any radiation may take to get into the supply network It may be slightly different for a chemical incident at the site however and therefore should not be discounted.	<p>The STAC should be the main source of information for decisions. Thames Water will be lead for public water supplies information. For private water supplies the EHOs within Local Authorities will have details of such supplies in the affected area and will be able to support the decision making process.</p> <p>REF: TVLRF Water Disruption Plan.</p>	

Counter-measure	Description	Potential scenarios / areas for which this countermeasure may be implemented	Process	Limitations / Issues – including actions in place or to consider to over come
Restrictions on food production	Advice or specific restrictions on food producers not to consume food sourced from a potentially contaminated area to minimise the potential ingestion of radioactive materials following a radiation emergency incident.	May be required following a radiation emergency where areas are found to have been contaminated with radioactive or other hazardous materials. Intervention levels for implementing this countermeasure are flexible and would be scenario-dependent.	<ul style="list-style-type: none"> The STAC should be the main source of information for decisions; Trading Standards & Animal , Plant and Health Agency should be involved re animals welfare, crops/gardens and food safety etc.; Food Standards Agency should be involved in relation to food safety; 	
Restrictions to transport movements Road Rail River & Canal	By restricting road, rail and other transport movements in and around the area allowing emergency vehicles access and reduce the risk of resuspension of radioactive particles.	May be required to facilitate the response and the recovery and reduce the resuspension of particles.	<p>There is a road closure plan in relation to the initial response and 'closing' down of the area to traffic to support access to site and allow emergency service access. REF: Road Closure Plan</p> <p>Agencies involved:</p> <ul style="list-style-type: none"> Highways England for M4 LA Highways & Transport Team (West Berkshire, Hampshire, Reading and Wokingham). Network Rail- If AWE (Burghfield) site is affected including zones B, C, D, E, F, G & H then the Rail line between Reading and Basingstoke should be requested to close as a 	

Counter-measure	Description	Potential scenarios / areas for which this countermeasure may be implemented	Process	Limitations / Issues – including actions in place or to consider to over come
			<p>precaution in the early stages of the incident. A plan is available for the initial closure phase.</p> <ul style="list-style-type: none"> • Canal & River Trust. <p>Reopening would be on advice from the STAC.</p>	
Public Rights of Way Restrictions	By restricting access to the public rights of way (PROW) then access to the public to the affected area is limited.	To prevent locals and others using the PROW in the area the paths would need to be formally closed.	A number of footpath and other rights of ways exist within the DEPZ of both sites. Any decision to close footpaths should be referred to the relevant Councils' Rights of Way teams in order for them to identify what paths can be closed.	

5.9 *SHELTER as a Countermeasure*

Shelter is the default countermeasure for a radiation emergency at either of the AWE sites since distance and a barrier (a building) will afford protection.

On notification the community should go to the nearest building to take shelter.

Some of the issues for responders relating to shelter include:

- (a) Vulnerable communities and individuals requiring support
- (b) Visitors to the area
- (c) People sheltering in businesses
- (d) People living in the area who were outside the area at the time
- (e) Friends and Family worried about those within the area
- (f) How long are people likely to be told to stay in shelter?

Most of these issues are addressed in other parts of this plan. The key element however will be the provision of information.

5.10 EVACUATION as a Countermeasure

Evacuation as a countermeasure may be necessary in the early stages of an emergency particularly for premises closest to the site boundary. Immediate or urgent evacuation may be necessary at the following distances from the site:

- a. 150m from site boundary – likely to require immediate evacuation.
- b. 600m from the site boundary – likely to require urgent evacuation. This will depend on levels of projected contamination and the vulnerability of the community in the area.

In order to support the assessment of need the table below shows the number of premises in each of the sectors for both sites as at Nov 2017.

AWE Aldermaston					AWE Burghfield				
Sector	COMMERCIAL		RESIDENTIAL		Sector	COMMERCIAL		RESIDENTIAL	
Distance (m)	0 - 150	150 - 600	0 - 150	150 - 600	Distance (m)	0 - 150	150 - 600	0 - 150	150 - 600
A	0	1	0	0	A	0	0	0	0
B	0	0	0	6	B	0	1	0	0
C	0	6	0	7	C	0	0	2	0
D	6	25	3	53	D	0	0	0	0
E	0	10	1	10	E	0	0	0	0
F	0	1	0	116	F	0	0	0	0
G	0	0	0	9	G	0	0	0	0
H	0	0	5	20	H	0	0	0	0
J	2	0	51	4	J	0	2	0	2
K	0	0	0	0	K	0	1	0	24
L	70	76	6	0	L	0	9	0	4
M	2	0	22	1	M	1	0	2	0
N	5	9	4	0	N	0	0	6	0
P	11	25	0	1	P	0	0	3	0
Q	1	0	0	3	Q	0	0	0	2
R	0	2	0	1	R	0	0	0	0

The process of evacuation should follow the TVLRF Evacuation and Shelter Framework and Hampshire & Isle of Wight LRF Mass Evacuation & Shelter Guidance.

A summary some of the key points in relation to evacuation are set out below.

Action	Process for AWE sites
Decision	AWE will, in conjunction with the MOD Coordinating Authority; make recommendations to Thames Valley Police (and Hampshire Constabulary) Strategic Coordinating Group(s) as to whether any evacuation of the general public is recommended. In urgent evacuation this would be made at a lower command level (operational or tactical).
Notification to community	If evacuation is recommended, the Police (and other emergency services) will be responsible for advising residents in the affected area that they shall be evacuated and will direct them to reception centres or rest centres or alternative accommodation as appropriate for onward transportation. The community would be advised as to what to take with them should they be evacuated.
	Media messages will also provide the information – this will need to be detailed with respect to the areas affected and why them and not other areas.
Transportation	Inside the contaminated area the transportation would be arranged by the Police Service/Emergency Services with support in sourcing the vehicles by the Local Authorities via their normal contractual arrangements.
	Outside the contaminated area the Local Authorities would arrange transport – arranged via an exchange rendezvous point (RVP).
Reception Centres	Arrangements are in place to shelter communities within the existing Detailed Emergency Planning Zone (DEPZ) for either site if considered necessary for public safety or for operational advantage.
	People leaving the affected area shall initially be requested to report to a designated Reception Centre/Rest Centre/RVP set up by the appropriate Local Authorities. This will help the Police and Local Authority (LA) to maintain records of movement and records of vacated premises. All persons with homes in this area who wished to enter or re-enter before it was considered safe to do so would be advised to report to a Reception Centre outside the sheltering zone to await clearance. The Reception Centre would act as the central information point for persons excluded from their homes as well as the location to which any persons had been evacuated would be sent initially. Special arrangements exist for children at school. Where necessary the Police and Local Authorities would make appropriate arrangements for their care and for the notification of parents and guardians. Children at school outside the affected area, but who live inside the affected area, would be taken to nominated Reception Centres where they will be looked after by their teachers and local authority staff until they were reunited with their families.
Radiation Monitoring Unit (RMU)	A Radiation Monitoring Unit, as appropriate, will be provided where the public can be monitored for possible radioactive contamination.

Action	Process for AWE sites
Information	Thames Valley Police (and, if appropriate, Hampshire Constabulary) will be responsible for the issue of authoritative information about evacuees and casualties. Specific telephone numbers to enable this information to be obtained will be announced by them, via the media, at the time of an emergency.

5.10.1 AWE Staff Evacuation

All personnel on the AWE site, except those directly involved in the response to the incident would be directed to take shelter inside the nearest suitable building. Later they would be evacuated from affected areas in a controlled manner as appropriate. As a matter of administrative convenience, personnel not involved in responding to the emergency would then either be sent home or to a Reception Centre /Rest Centre if they lived inside the affected area. This site exit strategy would be presented to the AWE duty team to consider and raise with the Tactical Coordinating Group (TCG) in order to ensure a coordinated site evacuation and to minimise any impact on the resources engaged in responding outside the site.

5.10.2 Uncontrolled Community Self Evacuation from Area

The possibility of self-evacuation by members of the public at any time cannot be ignored. The impact of which may cause disruption to the response and may make the situation worse should radioactive particles be resuspended. Case studies show that there is greater risk of accidents during such self-evacuation than a situation of shelter and controlled evacuation if needed.

Public Information and local control will be needed to reduce the risk of this taking place.

5.10.3 Extending the areas for Countermeasures

It is a long standing guiding principle of nuclear emergency planning that detailed plans covering the area defined in the DEPZ should be drawn up on the basis of the reasonably foreseen accident (i.e. the design basis accident or reference accident). This plan must be capable of being extended using general contingency plans to deal with a larger, even less likely accident. The improbability of a larger accident means that the absence of a detailed plan will not significantly increase the risk to the public.

[Section 5.4](#) details the potential geographic area of extendibility and the management of the situation.

5.10.4 Basis for Lifting (removing) Countermeasures

Countermeasures will not be lifted until the Strategic Coordinating Group (SCG) and at a later stage by the Recovery Coordinating Group (RCG), advised by specialist agencies in the STAC are convinced that the risk to the public is the same, if not less than if the countermeasures were to remain in force.

5.11 Monitoring Strategies – Environment

The STAC is responsible for the development of the Monitoring Strategy.

AWE plc is responsible for environmental monitoring out to approx. 15km in the first instance.

PHE CRCE is responsible for the coordination of the monitoring as detailed in their [website](#) beyond and in addition to the operator. PHE CRCE maintain a capability to deploy radiation monitoring teams capable of measuring environmental contamination and undertaking measurements of radioactivity on or in people. Teams can be deployed from Chilton, Leeds and Glasgow. Their deployment and tasking is controlled by the Monitoring Control team leader based in the Chilton Emergency Centre who reports directly to the PHE CRCE Operations Director.

In addition to deployment and management of CRCE monitoring teams, PHE also has a national monitoring coordination role during radiation emergencies, which is managed by CRCE. PHE will coordinate the monitoring resources made available to it in the event of an emergency and prepare a monitoring strategy for approval by the Strategic Coordinating Group (SCG). This responsibility covers the responsibility for monitoring people and the environment. It does not change or re-allocate any existing responsibilities that organisations might hold with regards to radiation monitoring. PHE has no power to commandeer resources and PHE would not expect to take direct tactical control of any resources made available.

Each organisation is responsible for ensuring that their staff are properly trained, and its resources are adequately maintained. Operational responsibility would be retained at each monitoring organisation's emergency centre. PHE CRCE will periodically provide organisations with what information it has as the incident develops, this should include:

- (a) A summary of the incident situation
- (b) PHE CRCE local rules for its own monitoring teams being deployed
- (c) PHE CRCE radiological risk assessment for its own monitoring teams being deployed

Organisation's monitoring teams will however need to:

- (a) Be self-sufficient in respect of their own accommodation, transport, meals, communications, etc.;
- (b) Have appropriate health physics skills to competently carry out the agreed monitoring tasks;
- (c) Work under the supervision of their own management structures; and
- (d) Be self-sufficient in terms of PPE (including RPE where appropriate).

5.11.1 Other Agencies Monitoring Responsibilities.

Some agencies have specific monitoring responsibilities and capabilities including:

- (a) The **Environment Agency** has contracts in place to deploy environmental monitoring and sampling in the event of a radiation emergency. This will form part of the monitoring plan that is based on modelling and developed in consultation with PHE in support of their role.
- (b) The **FSA** is responsible for monitoring food in order to establish areas where restrictions on food may or may not be required
- (c) The **water companies** are responsible for ensuring water is monitored.

In order to support the monitoring strategy and to understand the impact of the radiation emergency then a number of modelling procedures are normally involved including:

- (a) Knowledge of meteorological conditions is vital before monitoring data can be assessed

- (b) PACRAM (Procedures and Communications in the event of a release of Radioactive Material) available from the Meteorological Office (EMARC - the Environment Monitoring and Response Centre)
- (c) Met Office NAME (Numerical Atmospheric Modelling Environment)
- (d) RIMNET (Radioactive Incident Monitoring Network)
- (e) PHE-CRCE has various other models available.

5.11.2 Limitations to Monitoring:

- (a) Whilst PHE CRCE will activate their normal processes including all their sites, support from other nuclear licensed sites and other private contractors. All this takes time to activate and be on-site.
- (b) There is no point in monitoring deposition until the release has stopped – this prolongs the situation. Unless the objective is to obtain confirmation of a contamination hazard and where the wind direction has changed such that deposition is no longer occurring within an area being monitored
- (c) Initial monitoring resources will be few and so expect 1-2 readings per hour for the first few hours
- (d) Data will be 'raw' and so will need interpretation
- (e) Some analysis can take 1-2 hours per sample and there are likely to be a great number of samples needed to confirm level of contamination and therefore there will be a time lag in providing advice to the responders and the public
- (f) The information provided to the SCG needs interpretation to prevent inappropriate decisions to be made. The STAC chair is advised to take a suitably qualified radiation expert.

5.12 Monitoring – Strategies - People (Radiation Monitoring Unit)

5.12.1 What is a Radiation Monitoring Unit (RMU)?

In some circumstances, evacuated casualties, members of the public and emergency service personnel will require monitoring and, if necessary, decontamination. Monitoring of workers, casualties and members of the rescue services at a major nuclear site will be carried out by a mixture of the operator's staff and other health professionals. Apart from those individuals on-site and responders, there will be a need to monitor those individuals who may be contaminated (or who think they may be contaminated). This need may be fulfilled by the NHS through the setup of an RMU.

5.12.2 The need for an RMU

RMUs are needed in order to assess the need for decontamination or possible medical treatment for a large volume of people. They perform the function of reassurance for those who may be concerned about possible contamination. They serve to keep records of levels of any contamination observed. Early monitoring of uninjured people shall be carried out in suitable facilities away from A&E departments to ensure that these do not become overcrowded.

5.12.3 Activation of an RMU

NHS England is responsible for people monitoring as a result of a radiation incident. The need for an RMU will be as result of recommendations to the SCG/RCG from the STAC. Further information on RMU planning may be obtained from the NHS emergency planning guidance and the draft TVLRF and Hampshire & Isle of Wight LRF RMU Plans.

5.12.4 Location of RMUs

The RMU shall normally be located at, or adjacent to, a reception centre/ rest centres established by the Local Authority and specified in the site Emergency Plan. However, suitable NHS or other premises nearby may need to be used. Police and the Local Authority should be consulted when selecting a site.

It may be necessary that following monitoring people would need to go through the decontamination process. Therefore the site selected needs to account for enough real estate to be available for a RMU and a Decontamination unit to be available prior to onward movement to the Reception/rest centre.

5.12.5 Staffing

Staffing will be drawn from hospitals and facilities outside the areas affected by the incident. This way local staff will remain to ensure the smooth running of local hospitals and other functions.

Typical staffing might be:

- (a) Senior medical physicist to supervise the monitoring and decontamination function
- (b) Medical physicists/technicians (or similar grade staff from other organisations)
- (c) AWE staff
- (d) Nurses
- (e) Administrator
- (f) Clerks.

Arrangements exist in many areas for the nuclear site operator to provide additional staff capable of carrying out monitoring measurements. Public Health England – CRCE may also be able to provide staff to assist with monitoring.

5.12.6 Links to other sections/plans

Any rest centre set up will accommodate people who have been evacuated following urgent countermeasures. These people are a priority with regard to monitoring.

5.12.7 Concerned public across the UK

An NHS direct hotline (111) may be set up to deal with concerned persons. The algorithm to deal with calls would be provided by the Public Health England – CRCE.

5.12.8 Decommissioning an RMU

The physicist in charge will be responsible for planning and carrying out decommissioning of the unit.

5.13 Decontamination of People

After an off-site emergency from an AWE site there are likely to be concerns regarding contamination. These concerns could be related to contamination of people, animals, pets and property including gardens, homes and businesses.

The amount of any contamination will vary according to the amount released in the first place and the weather conditions as detailed in other areas of this document.

This section relates to decontamination of people only.

The decontamination process, if needed, would take place sometime after the initial response phase and normally after the risk of any further contamination from the site had stopped.

The process for decontamination would be done in a number of ways and for a number of reasons as detailed below.

5.13.1 Self-Decontamination

Initial countermeasures it is very likely that the initial guidance to the community affected would be:

- (a) GO IN - STAY IN – TUNE IN.
- (b) Take off clothes and place outside in a bag
- (c) Blow your nose
- (d) Have a shower/wash face and hands. Do not use any conditioner and do not scrub the skin such that it is abraded.

As a result if there was any contamination then it is anticipated that at least 85% would be removed by the removal of clothing alone.

5.13.2 Mass Decontamination Process

This process of people decontamination would be led by the Health services, supported by the Fire & Rescue Service (FRS).

There are two types of decontamination systems operated by Health and the Fire & Rescue Service as detailed below:

The **Fire & Rescue Services** undertake the mass decontamination using a large tent system. It includes areas for taking clothes off, shower facilities (for a period of 3 minutes in the shower) and an area to dress into robes provided. It is anticipated that for each system a maximum of 150 people per hour may be decontaminated.

The actual size of the response would depend on the number of people in the sectors affected, the time intended to process everyone and the land available to undertake the work.

It is a relatively crude system, however for large numbers it is effective.

There will always be modesty issues and people for a variety of reasons may be frightened or feel it is against their beliefs to remove all clothing, and in front of others. Explanations will be given and all efforts will be made to accommodate such issues however decontamination is the main effort in order to protect their own and other people's health.

The Fire and Rescue Service System is also used for decontamination of responders.

Ambulance Service System. This is a tented system where the contaminated people are assisted in the cleaning process if they are injured or ambulant.

There may also be the need for decontamination units at hospitals to be activated as well as lock down due to contaminated and worried people attending A&E at any hospital in the UK. This information would be activated via advice from the STAC and via the Health communication routes.

It is very likely that both systems would be set up as a matter of course.

5.13.3 Decontamination Process Location

The mass decontamination location(s) would be decided on the day following a multi-agency meeting and would take into consideration the numbers, the weather and the extent of the contamination.

There would normally be one site but it may be that more would be needed.

Regardless, of the location, the actual structures would be upwind of the incident in a controlled location for security and privacy reasons. They would also be on the edge of the warm (likely to be contaminated due to movement etc. rather than the incident itself) and cold (non contaminated area) zones.

5.13.4 *Informing and Movement of People to Decontamination Locations*

Following a period of time the community affected will be informed that they need to leave their initial place of safety in order for further remedial works to be undertaken.

The means of communicating this to the community would be via the media and/or via door to door knocking. This may be somewhat alarming for residents initially because depending on the scale of contamination and the period of time that responders may be in the contaminated area the people knocking on the door may be in protective equipment more than the residents will be requested to wear. This will have been considered by the STAC and the full health considerations taken into account.

The movement of the people may vary according to the situation but may involve streets at a time being moved in a controlled manner to the decontamination locations. This movement would be the responsibility of responders who are equipped and trained to go into the contaminated and warm zones including police, fire, ambulance and military personnel.

Prior to moving the people affected may be required to take off their own clothes and don the modesty suits, shoes and masks provided by the Fire and Rescue Service.

The control of the residents within the decontamination area before the decontamination is undertaken will be by the police in the main with assistance from the other responders involved.

Once the decontamination has been completed then the responsibility for welfare and onward movement passes to the local authority.

5.13.5 *Post Decontamination*

Once decontamination has been completed the people involved will be moved by the Local Authority transport to reception centres, rest centres and other accommodation as necessary.

The evacuees post decontamination will be in modesty suits and are likely to have no other personnel effects with them. As a result at the next stage of evacuation they will need to be provided with:

- (a) Clothing
- (b) Medical care as necessary including prescription drugs
- (c) Money
- (d) Keys to get into homes if outside the area and keys left behind etc. Access to locksmiths/carpenters may be necessary to support this
- (e) Mobile phones for use by evacuees, chargers
- (f) Access to internet.

The people and agencies that should be considered to be present at the reception centre or on standby include:

- (a) GP's for medical advice
- (b) Pharmacy on standby
- (c) Locksmiths
- (d) Carpenters
- (e) Representatives from finance re cash etc.
- (f) LA phone officers with respect to extra mobile phones for use
- (g) ICT Officers re use of Laptop terminals.

More information regarding post decontamination reception centres / rest centres and recovery are in other sections to this plan.

5.13.6 Water & Waste

Water waste from the decontamination of people needs to be contained in order to prevent discharges to the environment, the Environment Agency will advise on how to dispose of the waste and water which has been collected.

5.14 Rest Centres

It is the responsibility of the LA where the residents are affected to prepare rest centres for displaced people for overnight provision.

During any major incident there is the reality that people will become displaced. This can be due to a number of factors including:

- (a) Evacuation from their home as a result of the risks associated with staying in their home
- (b) People who as a result of the time of the incident are out of their homes and cannot return to them
- (c) There will normally be no need for the urgent evacuation of areas outside of the AWE sites in the event of a radiation emergency therefore there should be some time to plan the centres
- (d) Urgent evacuation may be necessary however since the cause of the radiation release may be as a result of explosion/fire etc. which could have an impact on the community outside the site. The risks of urgent evacuation needs will be greatest to those premises closest to the site
- (e) Subsequent evacuation of the public in some areas outside the incident site boundary might be necessary. This will depend on the results of ground monitoring and will normally be carried out to reduce contact with deposited material and to facilitate decontamination and restoration.

Staff on the AWE site, including contractors' personnel will shelter initially until the release was over. Later they will be evacuated from affected areas as appropriate by AWE these too may also need to go to a rest centre.

5.14.1 Reception Centres

A reception centre is a building that can provide:

- (a) Shelter – for people who have been evacuated from their homes or are in need of emergency accommodation following an incident
- (b) Registration – to identify who is in the Rest Centre and to enable details of casualties/evacuees to be passed to the Police Casualty Bureau
- (c) Refreshments – for people evacuated
- (d) Welfare – provision of basic support to those evacuated.

5.14.2 Information – for evacuees

In an AWE incident a number of reception centres may be necessary depending on the scale, wind direction and therefore the number of households affected. Initially a reception centre would be set up as a registration area in order to allow safe evacuation from the affected area. The main aim at that point would be allow onward movement to a more suitable rest centre location or to other accommodation.

It may be necessary to set up a number of reception centres for the general public. In addition there may be a need for one for the AWE Staff evacuees.

It is also very likely that reception centres will be needed in more than one authority therefore communication links will be key in order to ensure as far as possible that families are united etc.

5.14.3 Reception Centre Locations

There are a number of pre-assessed reception/rest centres that have been identified as detailed in 5.14 A. These may be used as registration points prior to onward movement of people to more permanent emergency accommodation.

5.14.4 Centre Choice

The decision as to which centre(s) are to be used will depend on the incident, wind direction and areas affected. This will be made at TCG level with information from the LA's essential.

5.14.5 Staffing & Equipping of Rest Centres

The respective Local Authorities have the responsibility of staffing and equipping of rest centres.

Authorities will follow their Major Incident and Rest Centre plans with respect to staffing and equipping the centres. Movement on from Reception Centre to Rest Centres and more permanent accommodation.

Once people have been evacuated, or cannot get back to their own homes due to the incident, have registered then, depending on the longer term options, the LA will make preparations for their onward movement to a rest centre or more permanent accommodation.

If the evacuation is only for a short period then people will be encouraged and assisted to stay with friends and family in the area. If this were not possible then the LA would prepare a more suitable rest centre with bedding etc.

If it is likely that they are going to be out of their homes for a prolonged period of time then more permanent accommodation will be looked for in the local area in order to maintain cohesion of the community, allow for school and work to carry on as far as possible as normal. This may be difficult if large numbers are involved.

Due to the very large numbers which may be involved, depending on the sectors affected, then it may be that support from neighbouring LAs and MHCLG REDS will be requested. Should the evacuation from the homes be for a prolonged period it may be that arrangements will need to be made for a return to the home to be arranged with removal vans in order to retrieve valuables, furniture and clothing. The items removed from properties will need to undertake reassurance monitoring

All this movement of people may result in a number of vehicles coming to the area. Therefore any centre used needs to have car parking capability and some control on vehicle movements.

5.14.6 Transport to and from Reception / Rest Centres

In order to move people to and from reception centres and rest centres a number of considerations will need to be taken into account including:

- (a) Communicating the message to the people involved as to why they are being asked to move to rest centres, when this will be happening and how it will happen. Reassuring what the reason for the move is and reassuring that everyone affected will be moved in due course so as to ensure people do not make unnecessary moves to get on the transport
- (b) Considering meeting points for people to move to or how the pick up from the houses directly is going to be arranged
- (c) How to prevent transport and people becoming contaminated as they move to the transport. This may involve the issuing of disposable shoe covers, damping down pavements and house paths etc.
- (d) Consideration of protective equipment and clothing for the responders assisting the evacuation and for the community as they move. This will very much depend on the contamination involved and the weather conditions but may involve the issuing of paper masks to residents as a precaution.

The Local Authority (LA) would be charged normally with the transportation of evacuees. However due to the nature of the incident and the fact that the LA are not equipped or

trained to operate within the affected area then the people in the affected area would be moved by other organisations onto the rest centres.

To move people from the site or the sheltering locations then support may be requested from the emergency services, AWE and the MOD via Military Aid to Civil Authorities (MACA) formal requests.

Onward movement may be via a Radiation Monitoring Unit and/or a decontamination unit. It will normally only be after this monitoring or decontamination that the LA will pick up the evacuees at an RV point for onward movement to reception and rest centres.

The PHE CRCE will give guidance as to the Personal Protective Equipment (PPE) needed for staff entering the area.

In order to prevent re- suspension of contaminants during the movement of people the vehicles will move slowly. In addition the roads may be misted with water in advance and following the vehicles movement out of the contaminated area they will be washed down in particular the wheels and tyres. This will be undertaken in a controlled manner with advice from the Environment Agency and PHE CRCE.

After the moves are completed the vehicles will then be checked for contamination inside and cleaned appropriately with guidance from PHE CRCE.

5.14.7 *Clear up of Rest Centre Post Incident*

Whilst the intention will be to ensure as far as practicable beforehand that all people entering the rest centre are not contaminated there may be a risk of this happening. As a result regardless of known contamination or not, there will be an expectation from the community and the owners of the building that the site will be effectively cleaned.

As a result due to the nature of the incident it will be essential to ensure that any Rest Centre used is cleaned satisfactorily afterwards in order that it is suitable for use thereafter.

Many of the proposed Rest Centres are schools and Community Centres and therefore the public must be reassured that the site is clean for future use.

PHE CRCE in conjunction with the site owners and the recovery group should ensure that all are satisfied the site is clean and the public are assured of this fact.

Specific areas of concern re Rest Centres following an AWE off-site incident

5.14.8 *Contaminated People*

There may be a fear that people in the rest centre are contaminated. This may be reality or perception however as a result the reception should be as near to the door as possible, shall be readily cleansed and the reception desk should have a trained health professional in place in order to give on the spot advice or guidance on monitoring. If someone presents themselves at the rest centre that may be contaminated then they shall be directed to the decontamination unit.

5.14.9 *Contaminated Pets*

As above there may be a fear of pets being contaminated. Therefore at an early stage suitable pet accommodation shall be made available outside the centre and suitably trained veterinary staff should be available in order to give on the spot advice.

5.14.10 *Media Intrusion*

Due to the nature of the incident there will no doubt be media interest in those being evacuated be they residents, business people or staff from the site. The rule will be that no media shall be allowed in reception centres and rest centres due to the sensitive nature of the situation and the potential vulnerability of the people involved. Those using the reception centres and rest centres should be reminded not to use social media to protect

themselves and others. As a result the involvement of the Police at the entrance will almost certainly be required. It may be that once the situation has settled down the media may be allowed to enter certain areas with the knowledge of the evacuees. Interviews will be strictly controlled in order not to intrude on the evacuees. Corporate Communications support will be recommended to be present from the LA.

5.14.11 *Specific Requirements*

Due to the fact that the evacuees coming to the reception centres may have had to go through a decontamination unit then they will normally be without some basics as detailed in [Section 5.12](#).

5.14.12 *Link to Radiation Monitoring Unit (RMU)*

As part of the health monitoring programme agreed at SCG then it may be that people evacuated from the affected area or people who have been in the area when the incident occurred will be screened in a RMU.

This RMU will be located at the same site or very close to a reception centre/rest centre and/or the decontamination unit. [Section 5.12](#) gives more details on these units.

5.14.13 *Extendibility Response*

Should there be an emergency which is beyond the reasonably foreseeable, then the other LAs will activate their plans to support the response.

5.14.14 Reception and Rest Centre Locations, Information and Contact Details

West Berkshire District Council:

Name	Address	Capacity
Theale Green School	Theale, Berkshire	~300
Willink Secondary School	Burghfield Common, Berkshire	~300

Others are detailed in the Council's Rest Centre Plan

Basingstoke & Deane BC area BUT activated via Hampshire CC:

Name	Address	Capacity
Hurst Community College & Leisure Centre	Brimpton Rd, Baughurst, Tadley, Basingstoke	500 + 500
Popley Fields Community Centre	Carpenters Down Road, Popley, Basingstoke	500
Fieldgate Centre	Fox's Lane. Kingsclere, Basingstoke	200
Hatch Warren Community Centre	Long Cross Lane, Hatch Warren, Basingstoke	250
Lodden Vale Bowling Club	West Ham Leisure Park , Basingstoke	200
Tadley Community Centre	New Church Road, Tadley, RG26 4HN	300
The Gill Nethercott Centre	Winchester Street, Whitchurch, RG28 7HP	100

5.15 Vulnerable People

Supporting the vulnerable throughout a major incident is always difficult due to the number of agencies involved, the different vulnerabilities of people and the ever changing vulnerability of people due to the incident type.

The TV LRF and WBDC Vulnerable People Plans will be used to support this plan.

The main issues with respect to an incident at an AWE site and the vulnerable include:

- (a) Looking after vulnerable individuals and
- (b) Looking after groups of vulnerable people including residential and nursing care homes, schools and children's nurseries.

5.15.1 Vulnerable Individuals

What constitutes a person as "vulnerable" cannot be completely determined as it will depend on the circumstance of the event. For example, someone who is agoraphobic would be vulnerable if they were expected to evacuate but not if sheltering in their own home.

The identification of an individual or group of people who are particularly vulnerable due to particular circumstances in an emergency could, in the extreme, be a matter of life and death.

No single organisation has the need, ability or responsibility to maintain the entire dataset needed for the discharge of this task. As a result there is a need for the many varied organisations, particularly the Local Authority Social Services and the Health organisations, to work together to create a list of all the known vulnerable in the area affected.

The local community leaders including Councillors and Parish Members are also an invaluable source of knowledge relating to people who may not be on any service database.

The process for alerting and dealing with vulnerable people will normally be through the LA Control Rooms, with the information being fed to SCC for consideration and recommendations for action as necessary.

5.15.2 Vulnerable Groups

Section 5.14.4 details Vulnerable Group Locations within the DEPZ's of both sites. Individual vulnerable people are not identified due to the changing nature of these vulnerable individuals.

5.15.3 Awareness Issues

All vulnerable people and group locations are issued with the REPPIR leaflet along with all other addresses in the area.

All vulnerable group locations e.g. schools and residential care homes are provided with advice from the respective Local Authority on the following:

- (a) Preparing and testing site plans
- (b) Informing and training staff
- (c) Ensuring all users of the site are aware of the emergency procedures and what the location will do in an emergency and what the guardian/family of the vulnerable people should do
- (d) Ensuring in their Business Continuity Plans, and linked to their emergency plan, have detailed alternative suitable sites for their vulnerable people that are not within any sector of the DEPZ. This plan should include potential transport plans etc.

5.15.4 Vulnerable Group Locations within DEPZ's

Within AWE Aldermaston DEPZ area.

Schools

Name & Address	Type of premises	Additional Information	Tel. No.	Responsible LA area	Zone
Alder Bridge School Bridge House, Mill Lane, Padworth, Berkshire, RG7 4JU	Primary School		Removed due to inclusion of personal contacts.	West Berkshire District Council	A2
Jubilee Day Nursery Paddock Road, Padworth, Reading, RG74JD	Nursery	Monday – Friday 7:30am – 6:00pm 160 + under 5's		West Berkshire District Council	B2
Padworth, School Road, Lower Padworth, Reading, Berkshire RG7 4JA	Nursery			West Berkshire District Council	B2
Padworth College, Padworth, Berkshire RG7 4NR	Private School	International Students		West Berkshire District Council	B2
Padworth College Padworth, Berkshire RG7 4NR	Summer School	Summer School Contacts		West Berkshire District Council	B2
Impstone Pre-School Committee of Management, Pamber Heath Memorial Hall, Pamber Heath Road, RG26 3TQ	Pre-School Play Group	26 Attendees		Hampshire County Council	F/G
Tadley Court School Common Road, Tadley, RG26 3TA	Private Boarding School	Student's aged 5 to 19, who are diagnosed as being on the autistic spectrum with associated learning difficulties. Up to 46 residents		Hampshire County Council	G

Name & Address	Type of premises	Additional Information	Tel. No.	Responsible LA area	Zone
Tadley Under Fives Pre School Community Centre, New Church Road, RG26 4HT	Pre-School Play Group	30 Attendees		Hampshire County Council	G
Greenacre Pre-School Bishopwood Co Infant School, Barlows Road, RG26 3PG	Pre-School Play Group	26 Attendees		Hampshire County Council	H
Bishopswood Infant School Barlows Road, Tadley RG26 3NA	Infant School	177 Students aged 4-7		Hampshire County Council	H
	Afterschool and Breakfast Club	Up to 30 attendees			
	Junior School	230 Students			
St Pauls Pre-School Church Hall, The Green, RG26 3PG	Pre-School Play Group	16 Attendees		Hampshire County Council	H
Tiny Town Kindergarten 1 Mount Pleasant, RG26 3AU	Day Nursery	Estimated 30 Students		Hampshire County Council	H
Bo-Peeps Day Nursery The Old Coach House, Church Road, RG26 3AU	Day Nursery	Estimated 30 Students		Hampshire County Council	I
Tadley Community Primary School The Green, Tadley, RG26 3PB	Primary School	Students aged 4-11		Hampshire County Council	I
The Saplings Pre School Burnham Copse Infants School, New Church Rd RG26 4JH	Day Nursery	Estimated 30 students		Hampshire County Council	J
Burnham Copse Primary School New Church Road, Tadley RG26 4HN	Primary School	270 Students aged 4-11		Hampshire County Council	J
The Hurst Community College (Specialist Science Status)	Secondary School	903 Students		Hampshire County Council	L

Name & Address	Type of premises	Additional Information	Tel. No.	Responsible LA area	Zone
Brimpton Road, Baughurst, Tadley RG26 5NL					
Tall Trees Out of School Club Brimpton Road, Baughurst, Tadley. RG26 5NL	Out of School Day Care Holiday Scheme	After school club		Hampshire County Council	L
Miss Polly's Kindergarten Brimpton Road, Baughurst, Tadley RG26 5NL	Day Nursery	Estimated 75 students		Hampshire County Council	L
Butterflies Pre School Heath End Village Hall, Heath End Road, RG27 5KY	Pre School	Estimated 30 Students		Hampshire County Council	L
The Children's House Grantham Farm, Baughurst, Tadley, RG26 5JS	Pre School			Hampshire County Council	L
Little Stars Pre School Heath End Village Hall, Baughurst, Tadley RG26 5LU	Pre School			Hampshire County Council	L
Boot Farm Kindergarten Back Lane, Brimpton Common, RG7 4RG	Nursery			West Berkshire District Council	M
Brimpton CE Primary School, Brimpton Lane, Brimpton, RG7 4TL	Primary School	No Kitchen		West Berkshire District Council	N2
Aldermaston Primary Wasing Lane, Aldermaston RG7 4LX	Primary School	138 Children (Primary)		West Berkshire District Council	R
Aldermaston Primary Wasing Lane, Aldermaston RG7 4LX	School Club	08.00 to 08.45 and 15.15 to 18.00		West Berkshire District Council	R
The Cedars School Church Road, Aldermaston,	Private School			West Berkshire	R

Name & Address	Type of premises	Additional Information	Tel. No.	Responsible LA area	Zone
Berkshire RG7 4LR				District Council	
Silchester Church of England Primary School School Lane, RG27 2NJ	Primary School	Estimated 210 Students		Hampshire County Council	OUTSIDE PIZ

Care Homes

Name & Address	Type of premises	Additional Information	Responsible LA area	Zone
Bethany Residential Home 17a Pamber Road, Tadley, RG26 3TH	Care Home only (Residential Care)	Care home without nursing	Hampshire County Council	F/G
Wakeford Court, Silchester Road, Pamber Heath, Tadley, Hampshire, RG26 3XD	Retirement/ sheltered housing	20 flats Non-resident management staff Leasehold	Hampshire County Council	G
21 Searing Way, Tadley, Basingstoke, RG26 4HT	Care Home only (Residential Care)	Voluntary Ownership 5 Residents Learning Disabilities	Hampshire County Council	J
Fairview 2 Pinks Lane, Baughurst, Tadley RG26 5NG	Care Home only (Residential Care)	Privately Owned 6 Residents Learning Disabilities 18+	Hampshire County Council	L
Fir Tree Lodge Heather Drive, Tadley, Basingstoke, RG26 4R	Care Home only (Residential Care)	Voluntary Ownership 6 Residents Learning Disabilities Physical Disabilities Sensory Impairments 18+	Hampshire County Council	L

Within AWE Burghfield DEPZ area.

None

Caravan/Mobile Home Locations within or directly on the border of DEPZ's

Address	No. of units	Responsible LA	Sector
Pinelands Mobile Home Park Padworth Common Padworth RG7 4BQ	~38	West Berkshire District Council	C
Padworth College Morton Hall Rectory Road Padworth RG7 4NR		West Berkshire District Council	B1
Ravenswing Mobile Home Park Aldermaston RG7 4PY	~23	West Berkshire District Council	G
32 Tadley Hill – Tadley Tadley RG26 3PW	2	Hampshire/BDBC	H
Cross Lanes Gully Paices Hill Aldermaston		West Berkshire District Council	P
Old Stocks Farm 7 Old Stocks Farm Paices Hill Aldermaston RG7 4PG	~28	West Berkshire District Council	P

Private Water Borehole Supplies Locations

Location	GRID REF
AWE (A) site	N/A
AWE (B) site	N/A
Manor House Hotel	459660 164763
Portland House	459451 164888
Old Mill Hotel	459096 166217

5.16 Personal Protective Equipment (PPE)

Each agency has responsibilities under Health and Safety legislation with respect to the appropriate PPE for staff.

Under the Ionising Radiations Regulations 2017 (IRR17) employers with staff who are working/exposed to Ionising Radiation are required to ensure they have competent advice from a [Radiation Protective Adviser](#).

A key element of the response regarding AWE involves understanding the risks to health and taking appropriate precautions.

5.16.1 Varying PPE Requirements

There are a number of situations which require the responder to enter potentially contaminated areas including:

- (a) On-site incident response
- (b) Off-site incident response
- (c) Undertaking normal business in the affected area.

5.16.2 Radiation Protection Advisors (RPA)

The emergency services and site operators in the Thames Valley and Hampshire have appointed RPA's to provide advice to their staff as to what they should and should not do, including any PPE to be worn.

The main considerations of the RPAs as they develop their advice is:

- (a) What is the contaminant?
- (b) How much is there in the affected area?
- (c) What are the responders likely to be doing?
- (d) How long will they be doing it?

Whilst the information is known in outline for the above considerations a dynamic risk assessment is necessary to confirm the arrangements in advance of emergency services responders going to site.

5.16.3 Responders with no RPA contract

Several of the responding agencies do not have a contract in place with an RPA since 'normally' they would not need to go into a contaminated area and are not required to otherwise.

These responding agencies may have to go into the affected area to undertake normal, but lifesaving or life maintenance work in order to support the vulnerable or support the response as a whole.

In order to support the response then an RPA would be sourced – via advice from PHE or AWE in the first instance to attend a TCG.

5.16.4 Personal protection advice for the community

Normally PPE would not be needed for the community- not least since they will be under shelter.

IF the community or elements of the community in the affected area are to be evacuated then it may be that PPE would need to be considered to protect people being evacuated. The advice in relation to any protection necessary would be sought from the STAC (for the community) and a RPA (for responders). The advice should take into consideration:

- (a) What is the contaminant?
- (b) How much is there in the affected area?
- (c) What are those being evacuated likely to be doing – walking/carried etc.?

- (d) How long will they be exposed to the contamination?
- (e) What will the responders be wearing?
- (f) How will it be provided?
- (g) How will it be disposed of?

5.16.5 *Other Considerations*

Other issues the STAC & Emergency Services RPA's should consider as part of the response include:

Following the authority for responders to enter the affected area:

- (a) Is there an entry RV point
- (b) Is there a different exit RV Point
- (c) what is the exit policy for these responders when they leave the area? Remove clothing? Full decontamination and if so by whom, where etc.?
- (d) Who is responsible on-site to ensure all are correctly wearing their PPE?

If vehicles enter into the affected area:

- (a) Do they go in and stay in affected area acting as shuttles to the cordon?
- (b) Do they come out and get decontaminated
- (c) If so by whom and how?
- (d) If not consider transfer of patients and what about the staff?
- (e) What are the differences in the PPE variation for responders?
- (f) What about the public perception regarding the differences for responders and what they may be asked to do?
- (g) What, if any, PPE should the public be advised to wear if evacuated?
- (h) What sources of suitable PPE are available for the tasks being asked of responders?
- (i) Is mutual aid provision of PPE between responders a possibility?
- (j) What about responding agency staff that were in the affected area at the time of an incident?
- (k) How can the PPE be safely disposed of and where?
- (l) What follow-up monitoring and dosimetry is required for responders?

5.16.6 *Types of PPE*

There are a large number of variations on PPE that could be worn ranging from full suits with breathing apparatus to ordinary face masks, goggles, disposable paper coveralls and disposable footwear.

All the above could be used in differing locations as a result of the incident and at different times. E.g. in the initial stages when minimum is known about the levels of contamination and therefore the risk then full body suits with breathing apparatus may be used by certain responders performing specific tasks, however as time progresses then face masks (FFP3) may be all that is necessary.

It may however be necessary to provide some degree of protection to the members of the public that require evacuation from potentially contaminated areas at any point during an incident.

5.16.7 *Emergency Exposure Levels (EELs)*

The table below identifies the EELs adopted by AWE and the blue light emergency services responding under this plan.

Agency	Emergency Reference Levels
AWE Fire and Rescue Service	20 mSv annual limit for all fire fighters (as classified radiation workers). Female fire fighters of reproductive capacity are additionally legally limited to 13mSv in any consecutive three month period.

Agency	Emergency Reference Levels
	<p>100 mSv dose limit of informed fire fighter volunteers to make safe plant or equipment that is likely to prevent or significantly mitigate a radiation emergency on an AWE site. Deployment only after dis-application of the dose limits prescribed in the IRRs by the AWE Emergency Manager, guidance from Health Physics and authorisation by a senior AWE FRS Officer.</p> <p>500 mSv dose limit of informed fire fighter volunteers to safe life on an AWE site during a radiation emergency. Deployment only after dis-application of the dose limits prescribed in the IRRs by the AWE Emergency Manager, guidance from Health Physics and authorisation by a senior AWE FRS Officer.</p>
AWE Ambulance Crews	20 mSv total for all AWE ambulance crew members per year (as classified radiation workers. Female ambulance crew members of reproductive capacity are additionally legally limited to 13mSv in any three month period.
Ministry of Defence Police	1mSv annual limit for operational MDP officers.
AWE Personnel (non-emergency services)	<p>1 mSv limit for all AWE non-classified radiation workers per year</p> <p>20 mSv legal limit for all AWE classified radiation workers per year.</p> <p>Female classified radiation workers of reproductive capacity are additionally legally limited to 13mSv in any three month period.</p>
South Central Ambulance NHS Foundation Trust	1 mSv total for all staff per event. After such an event, a review will be held to examine exposures and identify any improvements in working practices to reduce potential exposures in future events;
	Annual Dose Limit (Whole Body) 20 mSv – Under normal circumstances this would only be applied to the Hazardous Area Response Team (HART). Reference levels 1 and 2 would apply to other ambulance staff.
	The maximum dose for life saving operations where the casualty cannot be immediately removed from the area of high dose rate or contamination is 100 mSv; all ambulance staff can volunteer to be exposed to this level provided that they have been fully briefed and understand the implications.
Local Authority Fire and Rescue Service	<p>5 mSv per incident. Wherever possible.</p> <p>Follow the principle: try to work to the dose constraint. Where not possible work to dose limit but ALARP (as low as reasonably practicable) still applies</p>
	<p>20 mSv annual limit for all firefighters.</p> <p>If FRS policy permits deployment, women firefighters of reproductive capacity are additionally legally limited to 13mSv in any three month period. Public not likely to receive more than 5mSv in following year as a result of the incident.</p>
	<p>100 mSv dose limit of informed fire fighter volunteers.</p> <p>Deployment only after guidance from Hazardous Material Environmental Protection Advisor (HMEPA) and authorised by Brigade Manager. Emergency exposure to save life or maintain critical infrastructure.</p>

Agency	Emergency Reference Levels
	Public likely to receive more than 5mSv in following year as a result of the incident.
Home Office Police	1mSv annual limit for all police officers. Any entry into potentially contaminated environments must be clearly justified and advice from the Police Radiation Protection Adviser must be sought prior to entry.

5.17 Warning and Informing

5.17.1 Legal Requirements

The duty to provide information to the public during an off-site emergency is that of the local authority under the Radiation Emergencies Preparedness and Public Information Regulations (REPPIR). This duty can only be carried out with the support and cooperation of all the agencies responding to the emergency.

In addition under the Civil Contingencies Act 2004 there is a requirement for Category 1 responders to warn & inform the community regarding emergencies.

Warning & Informing the community involves all stages of an emergency – before, during and after and all agencies.

Coordination can be via the SCC Media Advisory Cell (MAC). However this does not stop individual agencies focusing on their areas of responsibility and getting messages out.

In the recovery phase of the incident the coordination of information to the public will be transferred to the local authority.

5.17.2 AWE Warning & Informing the Community Process

This takes place before, during and after an event in a number of formats.

Reference should also be made to West Berkshire District Councils Major Incident Plan and TV LRF Communications Plan.

The key pillars of the requirements to warn and inform the public include:

The public will need to know:	The public will want to know:	Broadcasters will require:
Basic details of the incident - what, where, when (and the who, why and how, if possible) Implications for health and welfare; Advice and guidance (e.g. stay indoors, symptoms, preparing for evacuation etc.); Reassurance.	Other practical implications such as the effect on normal routine, power supplies, telephones, schools, water supplies, food etc.; A helpline number; What is being done to resolve the situation?	Well-thought-out and joined-up media briefing arrangements between emergency services, local authority and other organisations, capable of providing agreed information at speed; An immediate telephone contact; A media rendezvous point close to the scene.

5.17.3 Before a Radiation Emergency

- (a) **REPPIR Leaflet:** On a 3 yearly basis AWE & West Berkshire District Council, in consultation with the partner agencies, produce a REPPIR leaflet.

The aim of the leaflet is to provide information to the local community as to what they should do should there be an incident at AWE sites which may affect them.

The current version of the leaflet can be found on [West Berkshire District Councils website](#).

- (b) **Local Liaison Committee (LLC):** A committee involving elected members from the Town, Parish, County, District and Borough Councils which are in the DEPZ areas. These representatives communicate to their respective communities.

There are normally four meetings a year where AWE provides updates and the Members have the opportunity to challenge the operator. More information is on the AWE website [Local Liaison Committee | AWE](#)

- (c) **Connect Leaflet.** A [leaflet](#) sent out quarterly to a large area of the community. This raises awareness of the site with messages being put in place in relation to what to do should there be an incident.
- (d) **Websites:** Information relating to the plans and the sites are held on West Berkshire District Councils website.
- (e) **Specific Vulnerable Groups:** Agencies from the AWE Off-Site Planning Group work with schools, early year settings, care homes and traveller sites in order to raise awareness and encourage on-site emergency plans so they can support the responding agencies.

5.17.4 *During the Response to an Emergency*

When this plan has been activated the following warning & informing of the affected areas would take place:

- (a) **Immediate:** For a Radiation Emergency AWE will initiate the automatic telephone alerting system to households round the affected site. The public will be advised to go inside, stay inside the nearest suitable building and to tune into the radio and television to hear public service broadcasts.
The transcript of the message is set out below:

This is an alert message from AWE.

There has been an incident at AWE.

For your safety please go indoors, stay indoors, close your doors and windows and tune in to your local radio or TV station where further information will be made available.

Press any key on your phone so we know you have received this message.

It should be noted that the automatic telephone alerting system to households around the site operates on an 'opt out' basis. Therefore, it is intended that the majority of people within the area will receive a call should they be in the area potentially affected.

- (b) **Use of Media Outlets:** Information and warnings about the emergency will be regularly reported via TV, local and national radio; social media including AWE Twitter account, and websites as appropriate. This will be managed by all agencies and coordinated by the Media Advisory Cell
- (c) **Other activities** such as loud hailers etc. may be employed to ensure messages are going out. All means necessary will be used to get the messages across
- (d) **Emergency Media Briefing Centres** may also be put in place
- (e) **Emergency Help Lines:** The SCG will decide if there is a need for an emergency help line to be activated during the response phase.

5.17.5 *During the Recovery from an Emergency*

After the initial warnings and advice has been given to the public it is essential that more information is provided quickly in order to reassure the public and to ensure they know what to do if the incident is of a prolonged nature.

There are some generic answers to these points covered in the Recovery Section ([Section 5.19](#)) to this plan. However, for any incident prior to offering the advice a review of the information against the actual situation must be undertaken.

The RCG will coordinate the information dissemination for the recovery phase. The TVLRF Recovery Plan gives guidance as to how this may be done but it may include:

- (a) Leaflets
- (b) Press releases
- (c) Information centres
- (d) Public meetings
- (e) Websites for responding agencies.
- (f) Notification of All Clear

Just as important as notification of the incident is the notification of the all clear.

As a result of the monitoring undertaken the all clear will be given as soon as possible. This would be given via the automatic telephone system in consultation with, as a minimum, AWE and the Police.

The timing of the all clear may be at a very early stage or if the incident goes on for a long period and widespread then the time for the all clear to be given may be longer.

The release of the information will be agreed and coordinated by the SCG/RCG as appropriate.

5.18 Media

It is anticipated that the media interest in an incident occurring at either of the AWE sites would be large and that the media would be on scene quickly after the incident. In the absence of a reliable source of information, the media will seek information from any source that they can find which will include responders, the local community, 'experts' and pressure groups. Given the public apprehension about radioactivity, it is important that a reliable source of information is established as soon as possible following an incident, and that it is seen to be independent and objective.

During an incident the media will be contacting all responding agencies in order to build their story. As a result a coordinated response is necessary in order to ensure consistency and accuracy of information.

It is also essential that all agencies develop an open relationship with the media in order to lessen the likelihood of the dissemination of inaccurate or misleading information that could lead to unnecessary public alarm.

Media communications are essential particularly in the early stages when the community affected are under shelter and the advice is to 'tune in'. Hence the media forms a key role in warning and informing the community.

5.18.1 Information Control

In order to support the information coordination there are a number of plans relating to the media response including:

- (a) TVLRF Communications Plan.
- (b) Joint AWE/MOD Emergency Communications Plan

Thames Valley Police Press Office is responsible for the coordination of the messages to the media during the response phase of the incident and will appoint a Public Information Officer to manage this task. This responsibility will be transferred to the Local Authority for the recovery phase.

Each agency has its own press officer(s) or communication teams who have responsibility for their agencies information. This does not mean that agencies cannot confirm what their own response measures and business continuity plans are, however, they should not speculate on others and the overall picture without the exact details being available. Coordination is managed by setting up a multi-agency Media Advisory Cell (MAC) at the TVP SCC or via teleconference.

Press Officers from the agencies are likely to be at a number of locations as detailed below:

- (a) Their own organisation location
- (b) The Emergency Media Briefing Centre (MBC) – in support of their media spokesperson or to act as their agency spokesperson
- (c) At MAC at TVP SCC
- (d) At other response locations e.g. Reception Centre / Rest Centres.
- (e) SCC Media Advisory Cell for AWE Incident
- (f) Thames Valley Police will set up a Media Advisory Cell at TVP SCC.
- (g) Representatives of the Police, Local Authority, PHE, EA, AWE, MOD and other responding agencies will staff the cell.

This combined media cell will support the responses to press inquiries addressed to TVP and will maintain contact with other Media Briefing Centres and Press Cells set up elsewhere e.g. nearer the scene in order to maintain consistency of information.

The MAC will coordinate the information given to the media via the Media Briefing Centre. It is not envisaged that the media will be attending TVP SCC; instead Press Conferences will be scheduled at the Media Briefing Centre.

5.18.2 *Emergency Media Briefing Centre (MBC)*

TVP are responsible for the facilities provided at the Emergency MBC.

Within the MBC a press cell will be established, consisting of press officers from the Police, MOD, Local Authority Press officers, health related agencies such as DEFRA, PHE, etc. and others as required.

This press cell will manage the queries received from the media coordinating the response in line with the MAC including requesting information from the MAC if not known.

The location chosen should have the following as a minimum:

- (a) Reasonable proximity to the AWE sites, whilst being out of the Detailed Emergency Planning Zones (DEPZ)
- (b) Easy Access and car parking, capable of dealing with media vehicles
- (c) A large room for the agencies press cell – to include: tables, telephones, photocopiers, fax machines, ICT capability and media monitoring equipment – for the press cell
- (d) A room for the media representatives
- (e) A room for a press conference – tables, chairs will be necessary
- (f) Toilets
- (g) Basic refreshment capabilities.
- (h) Media Briefing Sites.

A number of sites will potentially suit most of the above requirements including:

- (a) Newbury Racecourse, Newbury
- (b) Wokefield Park Hotel, Mortimer
- (c) The Comfort Inn, Padworth
- (d) Regus Office complex, Theale
- (e) Pincent's Manor Hotel, Pincent's Lane, Tilehurst.

The site chosen on the day will very much depend upon the site affected, the wind direction, availability of the site and where the press are naturally attracted to, although safety and ensuring the response to the incident must be the priority.

The Emergency MBC does not need to be equipped with technology for the media attending to use – most come self-sufficient.

5.18.3 *Press Statements*

In the AWE/TVP joint media plan there are a number of joint statements that can be released with basic information without the approval of the SCG media cell. These statements allow for accurate information to be sent out quickly and allow the SCG media cell to meet and confirm in more detail at a later stage the information to be released.

Once the MAC has convened, statements will be sent from there.

It is important that all press releases sent out are copied to all agencies involved in order that everyone is aware of the reports going out should they be questioned on the release.

5.18.4 *Specific Public Information relating to AWE Incident Concerns*

The table below covers some of the common questions asked following an AWE incident. There is also some agreed draft statements and advice plus the lead agency or coordinating group to go to get final confirmation of the data prior to release.

Issue	Specifics	Draft Information/advice to be used	Sources of further guidance for Press Officers: Plan section, Lead Organisation or coordinating groups.
Shelter & Evacuation Countermeasures	Concerns in relation to whether to shelter or evacuate and specific actions to be taken.	Everyone is advised to go into the nearest building to where they are. Close all the windows and doors. Tune into the local radio, TV or internet. If outside at the time of the incident then if possible: Blow their nose, take off outer clothing – bagging it somewhere safe and wash their face and hands.	REPPIR leaflet STAC/SCG
Personal Health	People will be concerned about their health or of friends/relatives who are in the affected area.	There is no risk of an immediate impact of any radiation contamination. In order to reduce any risk then people who were outside at the time should: Blow their nose, take off outer clothing – bagging it somewhere safe and wash their face and hands. If they are still concerned then they should contact their GP.	REPPIR leaflet STAC when in place or AWE/PHE CRCE in the initial phase.
Vulnerable People	What about the vulnerable in the	There are plans in place to support the vulnerable in the community.	STAC/SCG TV LRF Vulnerable People Plan.

Issue	Specifics	Draft Information/advice to be used	Sources of further guidance for Press Officers: Plan section, Lead Organisation or coordinating groups.
	community e.g. school children, elderly etc.?	<p>Initially they should take shelter like everyone else in the affected area.</p> <p>Schools and care homes in the affected area will be getting contacted to check on the support they need and plans put in place to support them.</p> <p>Individuals in their own home who get support should contact their carer to see what can be done to help them, if they have not contacted them. Support will be confirmed on an individual basis depending on their needs.</p>	There are also site specific plans for schools etc. to help schools plan to support the children, staff and parents.
Pet Health	People will be concerned about their pets – either if they were or are outside at the time of the incident and if they are evacuated from their home.	<p>Pets which were inside at the time of the incident should have no issues.</p> <p>Pets that were outside may be brought under cover – into kennels, chicken coup or if necessary into the house but not petted. This should be done ideally without going outside so as not to put the owner at risk.</p> <p>If you need to be evacuated then you will be given advice as to what to do with your pets.</p> <p>Based on the characteristics of the incident guidance will be issued at the time following consultation with experts</p>	<p>STAC/SCG/RCG</p> <p>Veterinary assistance and guidance will be sought via the RSPCA, Defra and Animal Health in order to determine the best advice and actions in relation to pet health</p>

Issue	Specifics	Draft Information/advice to be used	Sources of further guidance for Press Officers: Plan section, Lead Organisation or coordinating groups.
Public Water Supplies	Concerns about water safety from contamination	<p>It is very unlikely that the public water supplies will be affected by radiation since there are no treatment plants in the area and the public supply is contained in pipes.</p> <p>If there is chemical contamination then water may be contaminated – however due to the water treatment processes it should not get into the water supply.</p> <p>Monitoring will be undertaken to check this remains the case.</p> <p>Portable supplies would be put in place if this were not the case.</p>	<p>STAC/SCG</p> <p>Water suppliers, PHE and Environment Agency will be able to provide more information.</p> <p>TV LRF Water Distribution Plan</p>
Private Water Supplies	Concerns about water safety from contamination	<p>There are some private water supplies in and around the respective DEPZ of both sites.</p> <p>These are supplies that come from private wells, natural springs or other ground water sources.</p> <p>The risk of this water being contaminated is very low since the radiation needs to enter the groundwater which would take time.</p> <p>Chemical contamination may be more of a risk which may result in restrictions on the use of water being considered.</p>	<p>STAC/SCG</p> <p>West Berkshire District Councils' Environmental Health service will be responsible for advising those with private water supplies on their potability in conjunction from the advice from the STAC.</p> <p>The PHE CRCE will support the Council with respect to sampling, analysis of results and advise as to whether the water is safe to drink.</p>

Issue	Specifics	Draft Information/advice to be used	Sources of further guidance for Press Officers: Plan section, Lead Organisation or coordinating groups.
			<p>Sampling may be necessary for some time after the event. This should be considered by the Recovery Coordinating Group.</p> <p>If water restrictions are necessary they the Council along with the premises owner will review temporary alternative water supplies.</p>
Waste	There are a number of types of waste that may arise as a result of the incident including:		
Domestic Waste.	What do people do with household waste.	<p>It is likely that domestic waste collection for the area affected will be suspended mainly to allow responders to access the area and to protect the refuse collectors.</p> <p>All waste should be left in situ with further guidance provided when the collections will start again – this may be a few days since the priority is to make sure people are safe. If adding rubbish to the bins it is advised to wear gloves and wash hands afterwards.</p> <p>Most of the bins used by the Councils are wheeled bins however there are approx 23</p>	<p>STAC/RCG</p> <p>The resumption of waste collection will depend upon a risk assessment based upon the specifics of the incident and dialogue with the contractor – with info from the STAC/TCG.</p> <p>Will provide the advice to the Councils.</p>

Issue	Specifics	Draft Information/advice to be used	Sources of further guidance for Press Officers: Plan section, Lead Organisation or coordinating groups.
		dwellings in BDBC area who chose to continue to use bags.	
Clothing Waste	What to do with clothes that people have worn if outside at the time of the incident and may therefore be contaminated (as per guidance in REPPIR leaflet).	<p>If you have taken off clothes you have had on outside when the incident happened then you should:</p> <ul style="list-style-type: none"> • Put the clothes inside a bag. Then put that bag inside another bag (double bagging) • The bagged clothing should be left outside the door • More information will be provided as to what to do with the bagged clothes following more detailed monitoring around the site perimeter have been completed • They may include guidance as to how to dispose of the bag or how to clean the clothes. 	STAC/RCG Will provide guidance to the Councils.
Drainage Waste	Are the sewerage works likely to be contaminated?	<p>The waste water companies are working with all the other agencies and checking for the risk of radiation contamination.</p> <p>They will also be monitoring the effluent and the sludge material prior to discharge to check there is no contamination going into the environment.</p>	STAC/RCG Involving the Environment Agency and DEFRA along with the water companies who will advise on drainage and sewerage coming from the affected area. It is likely that the majority of any radioactive waste entering the

Issue	Specifics	Draft Information/advice to be used	Sources of further guidance for Press Officers: Plan section, Lead Organisation or coordinating groups.
			sewage system will settle out in the sludge in the local sewage treatment works (depending on capacity); so disposal of the sludge will be managed by the water company. The Environment Agency can advise on appropriate disposal methods and routes.
Contaminated Land Waste	Is the land contaminated and if so what is happening with it.	A comprehensive monitoring regime is being put in place to check for any radiation contamination. Once the full scale of the situation is known then a more detailed clean-up programme, if needed will be put into place.	STAC/RCG It is the Local Authorities responsibility to investigate and determine if land is to be designated as contaminated land under the Environmental Protection Act 1990. If the LA designate the land as a 'Special Site' under the legislation then the Environment Agency will be responsible for remediation. Public Health England will provide environmental assessments in conjunction with the Environment Agency and will give advice on remediation options and the associated cost of implementing these.

Issue	Specifics	Draft Information/advice to be used	Sources of further guidance for Press Officers: Plan section, Lead Organisation or coordinating groups.
Gardens	What can I do in the garden? What do I do with the vegetables etc.?	<p>It is recommended that directly after the incident then gardens do not work in their garden.</p> <p>In particular no one should do things that may mean any contamination being resuspended and therefore potentially breathed in.</p> <p>Monitoring of the area will be taking place and as soon as the results from that are known then more detailed advice will be given.</p>	<p>RCG.</p> <p>Public Health England CRCE will provide environmental assessments in conjunction with the Environment Agency and will give advice on remediation options. Part of the remediation plan will include gardens. This process will vary depending on the contamination and the concentration. Issues that will need to be considered include:</p> <ul style="list-style-type: none"> • Grass and hedge cutting • Flower removal • Vegetable removal • Paths/Drives/Decking cleansing/disposal. • Furniture and ancillary cleansing/disposal. • Long Term use of land.
Food – General	Is my food safe to use?	Any food that was inside the home or offices when the incident happened will not be affected, in particular tins and packaged goods, so can be used.	<p>STAC/RCG</p> <p>Food Safety is the responsibility of Food Standards Agency (FSA), who will give advice to the public about the safety of food and milk</p>

Issue	Specifics	Draft Information/advice to be used	Sources of further guidance for Press Officers: Plan section, Lead Organisation or coordinating groups.
		Any food that was outdoors at the time of the incident should not be used until further sampling and information is available.	<p>in the event of an off-site emergency. FSA advice to the public is likely to cover both what foods are unaffected and safe to eat, together with advice on potentially contaminated foodstuffs.</p> <p>The area over which food is affected is likely to be much larger than the areas where people have been asked to shelter in their homes or evacuate. Sheltering and evacuation are necessary to avoid people breathing in radioactivity or receiving direct radiation from the plume for the short time that it passes overhead. However, it is possible that some people may eat large quantities of contaminated foods from the affected areas (e.g. vegetables from allotments) over prolonged periods. It is therefore, necessary to limit radioactivity in food at a cautious level which, in turn, leads to a relatively large area being affected. The following</p>

Issue	Specifics	Draft Information/advice to be used	Sources of further guidance for Press Officers: Plan section, Lead Organisation or coordinating groups.
			are some of the issues the FSA will consider with a basic outline as to the likely advice subject to the actual event.
Livestock	What do I do with livestock?	All livestock should be left where they are in the short-term until the environmental monitoring results are known. If there are specific welfare issues such as feeding, milking, lambing/calving then they should contact the Councils Animal Health team.	STAC/SCG Animal Welfare: The responsibility for animal welfare issues lies with DEFRA, Animal Health and Trading Standards Services. Food Safety: The Food Standards Agency will assess the potential for meat from livestock to be contaminated and, if necessary, the FSA can control of the movement and slaughter of livestock using the powers invested by Food & Environmental Protection Act 1985 (FEPA 85).
Crops	Are the farm crops safe to use?	No crops or foodstuffs should be harvested in the affected area until more detailed environmental monitoring results are known. Crops and foodstuffs exposed to a chemical or radiation release may become	The Food Standards Agency (FSA) will undertake the sampling and testing of foodstuffs produced and/or stored in areas affected by the incident.

Issue	Specifics	Draft Information/advice to be used	Sources of further guidance for Press Officers: Plan section, Lead Organisation or coordinating groups.
		<p>contaminated in the downwind sector from the site of the incident. This can be either immediate contamination through direct deposition, or may occur over a longer time period due to uptake of contamination into growing plants.</p> <p>In the early stages of the response farmers (and gardeners) will not be encouraged to harvest crops or eating other foods that may be contaminated.</p> <p>Advice on the temporary closure of any outdoor markets etc. in the area may also be provided.</p>	<p>Emergency measures necessary to control the consumption and distribution of agricultural products will be implemented as appropriate by the FSA, who would liaise with the STAC.</p> <p>If necessary a statutory ban on the harvesting, movement and sale of foodstuffs coming from the affected area will be imposed by the FSA under the Food & Environmental Protection Act 1985.</p>
Fish	Is locally caught fish safe to use?	<p>The Kennet & Avon Canal is within the DEPZ of AWE (A) and there are a number of fishing lakes near both sites.</p> <p>Initial advice is that no fishing should take place and certainly no consumption of any fish caught when the release was ongoing until such time as sampling had been undertaken.</p>	<p>STAC/RCG</p> <p>The FSA leads on the assessment of the likelihood of contamination of fish or shellfish in watercourses or the marine environment and may apply restrictions on fishing in the areas affected in order to protect human health</p>
Milk	Is locally produced milk safe to use?	Any milk purchased through shops will be safe to use.	STAC/RCG.

Issue	Specifics	Draft Information/advice to be used	Sources of further guidance for Press Officers: Plan section, Lead Organisation or coordinating groups.
		<p>Any milk sold directly by the farmer from his farm should not be used until further monitoring results are known.</p> <p>Contamination of milk may occur in the downwind sector as a result of the animals ingesting contaminated pasture. Although contamination levels on pasture may be low, cows and goats are efficient grazers and can cover a considerable area of land each day. Contaminant taken in by the animals can concentrate in the milk, which may then exceed acceptable levels of the contaminant in milk.</p> <p>It takes at least 24hrs for the contaminant to appear in the milk and may take a few days for peak concentrations to be reached.</p>	<p>The FSA will take action, including introducing restrictions under FEPA 85 to prevent contaminated milk getting into the human food chain.</p> <p>The FSA will liaise other members of the RCG to ensure arrangements are put in place for milk unable to enter the food chain.</p> <p>Sampling of milk will be undertaken by the FSA and West Berkshire District Council Environmental Health Officers. This is likely to occur on a scale larger than the DEPZ.</p> <p>Consideration will also be given to ensure appropriate arrangements are made for collection and disposal of contaminated milk. The Environment Agency will provide advice and guidance in conjunction with other appropriate.</p>

Issue	Specifics	Draft Information/advice to be used	Sources of further guidance for Press Officers: Plan section, Lead Organisation or coordinating groups.
			Trading Standards and Animal Health will consider the welfare of the animals in relation to continued milking.
Housing	If I have to move out of my home where can I go?	<p>If residents are evacuated or cannot get home due to the incident or cordons in place then people are advised to try to stay with friends or relatives in the first instance</p> <p>If this is not possible then residents will be supported at a reception centre where they can get registered and be provided with basic provisions (sleeping bags, basic wash kit, some refreshments etc.</p> <p>In the longer term then options would to stay with friends or family, check with insurance companies for alternative accommodation or be put into emergency housing. The latter may be some distance from the area.</p>	<p>SCG/RCG</p> <p>There are short term and longer term solutions to find. The lead for this will normally be the local authority.</p>
Financial Implications	I have a business and lost money? I am a home owner and have had to move out who pays for this?	Anyone who believes they are being financially penalised as a result of the incident should check with their insurance company in the first instance making notes of all the expenses caused by the incident.	RCG

Issue	Specifics	Draft Information/advice to be used	Sources of further guidance for Press Officers: Plan section, Lead Organisation or coordinating groups.
	Who pays for the clean-up?		

5.19 Recovery

Whilst the timely response to an incident is essential in order to prevent additional consequences from the initial incident, the recovery phase has as much if not more importance in order to bring the community back to normality as soon as possible after the event.

More information on recovery can be obtained in the TVLRF Recovery Plan and Hampshire & Isle of Wight LRF Recovery Plan.

5.19.1 Role of Recovery

The overall aim of any recovery process is to consider what is required in order to bring the area and the community back to 'normality' as quickly as possible. In so doing there is support provided to assist the affected community towards management of its own recovery. It is recognised that where a community experiences a significant emergency, there is a need to supplement the personal, family and community structures which have been disrupted.

The Recovery Coordinating Group (RCG) should support strategic planning at the TVP SCC.

5.19.2 Thames Valley LRF Recovery Plan

The TVLRF Recovery Plan (and where appropriate Hampshire & Isle of Wight LRF Recovery Plan) shall be used at an early stage in providing guidance to the Recovery Coordinating Group (RCG). This group will automatically be set up should an off-site incident occur at an AWE site.

The plan provides details of who would be part of the group, the role of the group, suggested terms of reference and strategies, potential subgroups plus a draft agenda.

5.19.3 Other Radiation Recovery Guidance

- (a) [Guidance on decontamination of buildings, infrastructure and open environment](#)
- (b) [PHE Radiation Recovery Guidance](#)

5.19.4 Recovery Coordinating Group Activation & Location

A Recovery Coordinating Group (RCG) shall normally be put in place as soon as possible after an Off-Site Emergency has been declared in order to start looking at the recovery requirements at an early stage.

All agencies as per the agreed membership will be invited to confirm representation and attend meetings or teleconferences in the early stages to start scoping the requirements. The RCG will initially normally convene at the SCC or via teleconferencing. After the emergency response phase is over the group would move to a suitable agreed location nearer to the affected area to manage longer term recovery.

It may be possible to establish a RCG outside of the SCC, if the main area of concern lies outside of the TVP area. However, this will only be acceptable, if close communication links are being kept between the RCG and the SCG and STAC.

5.19.5 Membership & Chairing of RCG

The group will normally be chaired by a Director, or senior manager from West Berkshire District Council. However depending on the area affected this may transfer, with agreement, to Basingstoke and Deane Borough Council.

The Recovery Coordinating Group membership will vary however as a minimum the membership will include:

- (a) West Berkshire District Council (lead) (Chair, Vice chair and minute taker) plus a number of service representation including:

Highways & Transportation Service

- (a) Environmental Health

- (b) Rights of Ways

- (c) Waste Service

- (d) Community Care

- (e) Public Health & Wellbeing

- (f) Education

- (b) Neighbouring LA's as necessary plus service representatives as necessary

- (c) Thames Valley Police

- (d) Hampshire Constabulary

- (e) Berkshire West and Hampshire CCGs

- (f) PHE CRCE

- (g) Berkshire FRS & Hampshire FRS

- (h) South Central Ambulance NHS Foundation Trust

- (i) Environment Agency

- (j) Food Standards Agency

- (k) Highways England

- (l) Network Rail

- (m) MHCLG RED

- (n) ONR

- (o) AWE staff

- (p) MOD staff

- (q) Government Decontamination Service

- (r) Met Office

- (s) Thames Water

- (t) Canal & River Trust

- (u) British Transport Police

- (v) Relevant Utilities companies

5.19.6 *Specific AWE Recovery Considerations*

Whilst the Thames Valley Recovery Plan gives a good generic guide for members of recovery groups in general, an incident at an AWE site will provide additional challenges due to the nature of the sites and the potential contamination issues. Some considerations for the first meeting are detailed below:

	Issues	Considerations
(a)	A common aim of the RCG would be to recover all affected areas to an agreed standard so that they are 'suitable for use' for their defined future purposes. The difficulty in this case would be initially determining how clean is clean? This can be difficult due to expectations of the population and the fact that there are always some background natural levels of radioactive substances in the environment.	There has been a great deal of environmental sampling in this area over many years therefore there is known data which will be of assistance in guiding the recovery group to the background levels. Independence of information may be necessary for public reassurance.
(b)	Agreement of environmental management systems to make the best use of technical and manpower resources and sharing information to avoid unnecessary duplication of effort.	There are a number of agencies that can get involved including AWE, PHE, EA, Local Authority, Utilities etc. therefore determining who is doing what and ensuring consistency of approach is essential to determine at the first meeting of the RCG.
(c)	Determining the priority areas for tie-down and decontamination; identification of environmental contamination containment and remediation options and propose/initiate action.	Essential here is to get accurate sample results to assess the spread of any contaminants and to what levels. Thereafter due to the location of the contaminants the priority for decontamination etc. can be prepared
(d)	Implementing a systematic and balanced remediation plan, using best practical environmental options, that is rapid and economical and produces minimal amounts of controllable wastes and disruption.	Contributors to this plan would include the Government Decontamination Service (GDS) for appropriate contractors and the Environment Agency with respect to disposal.
(e)	Liaising with higher authorities, through each agency's management chain, to ensure that early containment and remediation is not impeded or delayed by conflicts of interest between departments.	Clarity on who is doing what and when is to be set out at the first meeting and then communicated up the chains of command. This is important to ensure a swift response. Minutes are therefore essential to assist in this process.
(f)	Identifying the statutory responsibilities and regulatory powers of participating organisations and agreement of management responsibilities and inter-	As with (e) above this needs to be clearly set out to prevent issues further down the recovery process.

	Issues	Considerations
	relationships during the initial phases of remediation	
(g)	Limiting the spread and re-suspension of contamination and protection of public health. This will be important not only in terms of preventing the spread of any contamination and therefore making the recovery process longer but having regard to public reassurance and prevention of public health concerns over a wider area than would be necessary.	Methods of operations need to be considered Speed of controlling the spread/re-suspension is important.
(h)	Determining, as necessary, a health monitoring programme of the local community and advice for other health services should there be concern from people who were in the area at the time of the incident.	A Radiation Monitoring Unit (RMU) may already be set up as part of the response by the Health agencies. If not it may be considered as part of the recovery. Guidance should be prepared for health agencies across the UK and abroad in order that self-presenters get consistent accurate support and advice.
(i)	The practicalities of the recovery also need to be considered including:	Who does the work? What equipment would be used? Where does any contaminated waste go to? What equipment is needed to prevent contamination of clean areas? Is health monitoring of personnel required?

5.19.7 Remediation Phases & Considerations

The early phase (days) involves prompt tie-down or containment of contamination and the recovery of items. The intermediate phase (weeks) involves the treatment of the heaviest or most significant contamination. The late phase (months) involves reduction of environmental contamination to acceptable levels.

Immediate actions include:

- Identification of the significant environmental effects of the incident and preparation of a register of environmental effects.
- Identification of human health effects.
- Determination of 'interim' responsibilities for operational control in respect of tie-down, containment and initial remediation.
- Consideration of shelter/evacuation issues when remediation produces short-term re-suspension.
- Advice on containment and tie-down measures undertaken and assessment of their implications for long term radioactive and conventional remediation.

Medium term actions include:

- (a) Identification of remediation options for all the affected areas and proposal of a remediation plan (with priorities, objectives, end-points and timescales) to higher authorities.
- (b) Identification of waste management, assay, transport and storage issues.
- (c) Identification of relocation issues.
- (d) Coordination of environmental reviews, audits and reports undertaken at the request of higher authorities.
- (e) Consideration of wider issues of public confidence and regeneration and the measures necessary to convince the public that it is safe to return to the area.

Longer term actions include:

- (a) Preparation of a long-term plan to outline the resources and support needed by the local authority for the management of the longer-term remediation issues and public consultation.
- (b) Modification of plan to suit changes in requirements.
- (c) Confirmations that appropriate radiological end-points have been chosen.
- (d) Obtaining certification for reuse of remediated areas.

5.19.8 Remediation Options

There are a number of remediation options available. However, each option needs to be considered in connection with the release, location and potential other impacts by using that form of remediation. It will be the responsibility of the group to move through this decision making process with the evidence available to them at the time.

A common strategy is to divide up the contaminated area into zones according to land use and contamination level. Then a range of alternative options is detailed for each zone. The performance of each option is assessed using indicators such as: the percentage of contamination removed and dose reduction, the volume of waste produced, the resources required, the rate of working and cost. In addition, the advantages and limitations of each option are also considered. Hence, a recommended option is selected for each zone.

5.19.9 Some of the options are detailed below:

Various tie-down reagents (e.g. water, bitumen emulsion, strippable paints etc.) may be applied to reduce the spread of contamination and reduce re-suspension risks. Selection of the appropriate material and application technique is dependent on many factors (e.g. surface type, weather conditions, coverage required etc.).

Non-aggressive decontamination techniques (e.g. vacuum, brushing, hosing etc.) are relatively quick and cheap and generally produce small amounts of controllable waste. These are more applicable in areas where contamination is low level and loosely bound to the surface.

Aggressive decontamination techniques (e.g. road planning, high-pressure water, grit blasting etc.) may be required in areas where contamination is higher level and fixed to the surface. These are much slower and expensive and can generate large volumes of waste.

5.19.10 Recovery Communications

An essential part of recovery will be engagement and information to the local community quickly after the event. This process must continue thereafter on a regular basis in order to ensure everyone is aware of what is happening, why, how and when.

If during the response people have been evacuated the communications must also be made to those displaced residents and businesses in order to ensure they are kept engaged and understand the process.

Due to the nature of the site there will no doubt be a great deal of media interest and therefore it will be important to ensure the correct information is distributed in order to maintain reality on the recovery process and to prevent unnecessary panic.

Regular communications to the staff of responding organisations, town and parish councils and members is also essential to maintain during the recovery process in order to ensure everyone is accurately informed

5.19.11 *Link to Scientific and Technical Advisory Cell (STAC)*

During the response phase the STAC would be in place in order to support the SCG. It would also support the RCG. The RCG will work closely with the STAC in order to share scientific and technical information and expertise. Agencies with a remit in both cells need to consider their number of attendants at the SCG

Once the response phase has been completed and hand over from the police to the local authority to lead on the recovery has been achieved, it may be necessary for the STAC in full or elements of it to continue to exist in order to support the RCG. If this is the case the chair of the RCG should raise this with the chair of the STAC and agree a way forward. It may be that elements of the STAC become part of the RCG main group.

5.19.12 *Recovery Coordinating Group (RCG) Closure*

At an early stage the group should ensure that the aims and objectives clearly define a point at which the group would no longer be necessary and the work is business as usual, or near usual, for the majority of agencies involved. This may have a proviso that the group may be reconvened should a group action or decision be necessary.

5.20 *Financial Arrangements*

Financial issues arise before, during and after a Major Incident. The following gives guidance and links to other more appropriate plans.

5.20.1 *Before a Major Incident:*

In the planning, reviewing and exercising of the plan the costs of such activity by the LA is recovered from the Operator on an annual basis.

5.20.2 *During a Major Incident:*

The cost of response and recovery whilst important is not the highest consideration as to how to respond. The main issue is having regard to the best way to respond, saving and protecting human life and further environmental damage.

5.20.3 *After a Major Incident:*

There are various issues which need to be considered via the recovery process. There is more guidance on this in the TVLRF Recovery Plan. Some of the issues include:

- (a) The Department of Social Security (Supplementary Benefits commission) is empowered to make various loans to persons who find themselves in urgent financial need as a result of a major accident or natural disaster.
- (b) Authorities or Services placing demands on outside agencies for assistance, services or materials would be responsible for the settlement of any charges which may arise

- (c) Local Authorities may be able to invoke Bellwin Scheme arrangements for the recovery of a proportion of essential costs.
- (d) Recovery of costs will, normally, be directed at the site owners.

5.21 Rendezvous Points (RVPs)

There are a number of RVPs associated with this plan in relation to where responders could collocate in advance of going forward. RVPs close to the site will be identified based on a risk assessment at the time having regard to the direction of any radiation contamination.

Other RVPs have been identified in relation to bringing in additional resources from outside the area and taking into account road closures. Set out below are some predetermined locations:

- (a) West Berkshire District Council, Padworth IWMF, Padworth Lane, Lower Padworth, West Berkshire, RG7 4JF
- (b) Chieveley Services, J13 of M4.
- (c) Reading Services, Between J11 & J12 of M4
- (d) Tothill Services, Nr Newbury on A34
- (e) Membury Services, between J14 and J15 on M4

Section Six

6 Specific Joint Plans To Support this Plan

6.1 AWE Roads Tactical Plan – THIS IS STORED ON RD UNDER AWE PLANS

Not available in public document for purpose of safety and security.

Section Seven

7 Roles and Responsibilities

It is essential in any response to a major incident that the roles and the responsibilities of responding agencies are clear and understood by the other agencies.

It is also essential that the different services within an agency know what their roles are in order to keep focused on the response and thereafter the recovery.

The following section give details as to the responding agencies and their roles, alerting procedures and responsibilities.

7A	AWE
7B	Police
7C	AWE Fire & Royal Berkshire Fire & Rescue Service
7D	South Central Ambulance NHS Foundation Trust
7E	Health Services Other than SCAS & PHE CRCE
7F	PHE Centre for Radiation Chemical and Environmental Hazards (CRCE)
7G	West Berkshire District Council
7H	Wokingham & Reading Borough Councils
7I	Blank
7J	Basingstoke and Deane Borough Council
7K	Hampshire County Council
7L	Resilience & Emergency Division
7M	Office for Nuclear Regulation (ONR)
7N	MOD Coordinating Authority (MCA)
7O	Other Government Departments and Agencies
7P	Environment Agency
7Q	Food Standards Agency
7R	Radioactive Incident Monitoring Network (RIMNET)
7S	Met Office
7T	Government Decontamination Service (GDS)
7U	Action by Utilities
7V	Network Rail
7W	Other Organisations
7X	Highways England

7A AWE

Role

As the site(s) operator, AWE has three primary roles in an Off-Site Emergency:

- (a) To take such action as is necessary to stabilise the emergency on the affected site. This might include saving and protecting life, preventing or mitigating the release of hazardous materials, and monitoring to establish the extent of any contamination resulting from an emergency.
- (b) Initiate the cascade call out to responders and the alerting system to those in the community.
- (c) To provide information and advice to other responders on AWE's hazards and the status of the on-site emergency to enable other responders to discharge their own responsibilities under this plan.

Alerting Procedures

On-site there are a number of alerting procedures to warn of an on-site incident, these include:

- (a) Local alarms and alerts that apply to a single building or a small group of buildings,
- (b) A site Public Address system that enables a site alarm to be sounded on each site, directing persons on-site to shelter, and directive and/or advisory messages to be broadcast to person on the site as appropriate. The systems are tested and exercised routinely, and may be heard outside the site (depending on the wind direction).
- (c) No action should be taken by the public if such signals or messages are overheard in this way at any time.
- (d) If the Emergency Manager (A) or Emergency Manager (B) believes that there may be a risk to the public outside the site, they will contact Thames Valley Police with the recommendation that this Off-Site Plan is activated for certain sectors of the Detailed Emergency Planning Zone around the site based on wind direction (see Annexes 2 and 3). Real-time local weather information is available on both sites.
- (e) Outside normal working hours when the Emergency Manager (A) (or Emergency Manager (B)) is not present on-site, other staff have the authority to declare an off-site emergency.
- (f) For an off-site emergency occurring at either AWE site, the Emergency Manager (A) would notify the Office for Nuclear Regulation and the Environment Agency, as well as the Ministry of Defence Coordinating Authority on-call officer that activation of these arrangements had been recommended to Thames Valley Police.
- (g) AWE will also activate the telephone alerting system, which will result in landline numbers within the relevant sectors of the affected site's DEPZ being dialled and, if answered, given an initial advisory message.

Actions

Action to stabilise the incident will be taken on the affected site under the direction of the Emergency Manager (A) or Emergency Manager (B) as appropriate. Some or all of AWE's on-site emergency services will be deployed as appropriate in response to the incident. Off-site emergency services may also be requested to attend the site via pre-planned arrangements. These arrangements, including those for briefing, access and liaison with external emergency services are detailed in the relevant tactical plans. AWE on-site emergency services include:

- (a) *Ministry of Defence Police*. The MOD Police (MDP) have officers based on both sites 24 hours a day. In an emergency, MOD Police officers provide security and access controls to the incident scene and facilitate proper access to responding services and are the primary point of contact for disseminating information between AWE's various emergency response organisations

- (b) *Fire and Rescue Service.* The AWE Fire and Rescue Service has its own appliances and crews at each site, is trained in dealing with the hazards presented by AWE special materials, and has close links with neighbouring Fire and Rescue Services, training/exercising regularly with them.
- (c) *Medical/Ambulance Service.* Emergency medical support is available at both AWE sites during working hours. At other times, a nursing officer and a doctor are both on-call to provide specialist advice on the medical aspects of an emergency at AWE. AWE Fire and Rescue Service also operate an ambulance service on each site.
- (d) *Safety Shift.* Engineering staff are on duty twenty four hours a day and conduct safety patrols of facilities routinely outside normal working hours. Automatic alerting systems monitor for the presence of abnormal conditions including fire and the release of radioactive materials.
- (e) *Radiological Protection (Health Physics).* A capability to measure radioactive materials and radiation, including advice to AWE and external emergency services is always available with AWE (B) calling on additional support from AWE (A) when required

Activation of the cascade callout.

Initial monitoring both on and off the affected site will be undertaken by AWE's own personnel. The results of this monitoring will be passed via the Emergency Manager to other agencies as appropriate.

The Emergency Manager will assemble a team of personnel to respond to the Aldermaston Command Post, led by a Senior Scientific Adviser (SSA). The team will also include a Radiation Protection Advisor and a Radiological Assessment Team with material dispersion Modelling capabilities, as well as a media representative.

An AWE media team, accompanied by AWE senior management representatives will deploy to the Media Briefing Centre that will be set up by Thames Valley Police.

AWE will, if requested, also send representatives to other locations such as TCG centres. As the response progresses, external agencies will be represented at the Aldermaston site as appropriate to facilitate inter-agency liaison at the site level. Specific agencies expected at the Aldermaston Command Post (ACP) would include:

- (a) Emergency Services
- (b) Local Authorities
- (c) ONR
- (d) Environment Agency
- (e) Public Health England

Until the Strategic Coordinating Group (SCG) is operational, the Emergency Manager will be the source of authoritative advice on the status of the incident on the affected site and the potential risk to the public. Once SCG is operational, the AWE SSA will become the source of advice to the SCG Commander, and will remain in regular contact with the Emergency Manager (A).

The actions detailed above (with the exception of radiological advice and monitoring) could also be taken if a non-radioactive material posed a hazard to the public as a result of an incident at an AWE site. AWE specialist advice on the hazardous substance or substances involved in the incident would be made available to other responders as appropriate.

7B POLICE

Role

The Thames Valley Police (TVP), with the support of the Hampshire Constabulary as necessary, will control and co-ordinate the off-site response for dealing with an incident at AWE Aldermaston (AWE(A)) or AWE Burghfield (AWE(B)) with actual or potential off-site consequences with other agencies having legislative responsibilities. Other services and agencies will provide resources and technical advice so as to offer a combined and structured response to the incident.

Other roles for the police include:

- (a) In conjunction with other agencies protect and preserve the scene as necessary and thereafter lead or assist in any post incident investigation.
- (b) Support, with other agencies, the collation and dissemination of casualty information.
- (c) Support, with other agencies, the identification of casualties and coordination of the management of casualties including the remains of any deceased.
- (d) Coordination of the media response
- (e) Coordination of the public information during the response phase
- (f) Coordination and implementation of public safety measures
- (g) To assist, with other agencies, the return to normality.

Alerting Procedure

The Thames Valley Police Control Room will be notified by the AWE (A) MOD Police, acting on behalf of the Aldermaston Emergency Manager, when an actual or potential off-site emergency has occurred. The AWE (A) Emergency Manager will subsequently confirm the alert and establish contact with TVP.

Thames Valley Police will notify:

- (a) RBFRS
- (b) South Central Ambulance Service
- (c) West Berkshire District Council
- (d) Hampshire Constabulary and other police forces as necessary
- (e) MHCLG – RED
- (f) Civil Aviation Authority (CAA) if No Fly Zone required.
- (g) SCG Activation Procedure including activation of:
 - i. Highways England
 - ii. British Transport Police and Network Rail (if the rail network is affected)
- (h) Public Information Services such as relevant radio and television stations, also relevant cable company service providers

On receipt of information from TVP, Hampshire Constabulary will notify:

- (a) Hampshire Fire & Rescue Service
- (b) Hampshire County Council

Actions

On declaration by the AWE (A) Emergency Manager that an off-site emergency at either AWE Aldermaston or AWE Burghfield has occurred, or on declaration by the AWE (B) Emergency Controller at Burghfield that an off-site emergency at Burghfield has occurred and subsequent notification to TVP, TVP will:

- i. Designate safe approach routes for the emergency response personnel, based upon available meteorological information.

Send Liaison Officers as necessary to:

- (a) the Aldermaston Command Post (ACP) at AWE (A).

(b) The respective Tactical and Strategic Command Centres.

Establish:

- (a) A Tactical Coordination Centre at the most appropriate location
- (b) A Strategic Coordination Centre at TVP Headquarters (Kidlington) or suitable alternative
- (c) A Casualty Bureau if appropriate
- (d) An Emergency Media Briefing Centre if required
- (e) Coordinate a plan to divert non-essential traffic and keep routes open for the emergency services and vehicles used for evacuation from the area if necessary.
- (f) Support local Authorities with road closures
- (g) Provide advice to the public in the early stages of an emergency. This is likely to recommend sheltering as the safest option
- (h) Will implement if necessary an evacuation plan. This will be jointly coordinated with the Police and Local Authority

Hampshire Constabulary will mirror TVP actions as necessary and will support TVP with Mutual Aid if required.

When affected areas have been declared safe, the Police will inform those people and organisations notified during the emergency phase. The same notification routes apply as for the initial notification.

7C AWE FIRE & ROYAL BERKSHIRE FIRE & RESCUE SERVICE (& HAMPSHIRE FRS)

Role

The Fire & Rescue Service core remit includes:

- (a) Saving of life in conjunction with other emergency services
- (b) Assuming control of the incident when a major fire is involved
- (c) Rescue trapped casualties
- (d) Prevention of further escalation of the incident by tackling the fires, dealing with released chemicals, other hazardous situations and public decontamination, where required
- (e) Gathering of information and hazard assessment to give to the police on the need to evacuate members of the public
- (f) Liaison with the police regarding the establishment of an inner cordon and subsequent control of the inner cordon
- (g) Sectoring of the incident and to effectively define and relay this information to the Police, Ambulance Service and other agencies attending
- (h) The safety of all the personnel involved in rescue work. This includes ensuring that all non-fire service personnel entering the inner cordon are aware of and conform to the Fire and Rescue Service safety procedures and, in particular the use of the evacuation system and nominal roll procedures
- (i) Consider the effect and actions to minimise any dangers to the environment
- (j) Body recovery, in conjunction with the police as required. Participation in investigations and preparation of reports with supporting evidence for subsequent inquiries
- (k) Standing by during the non-emergency/recovery phase as appropriate

AWE has its own full-time Fire & Rescue Service and appliances at Aldermaston and Burghfield, with staff trained to deal with AWE special materials, including radioactive materials and explosives, as well as conventional fire hazards. If required, additional assistance would be sought from the Royal Berkshire Fire & Rescue Service and/or Hampshire Fire & Rescue Service as appropriate to deal with an incident on an AWE site. AWE Fire & Rescue Service trains regularly with external Fire & Rescue Services.

The Royal Berkshire Fire and Rescue Service would coordinate assistance from other County Fire and Rescue Services, should they be called upon to assist with a fire on-site, and operate within the site as agreed with the AWE Fire and Rescue Service. The senior RBFRS Officer would assume control with advice from the AWE Senior Fire Officer.

The Fire & Rescue Service also has the role of decontamination of people. In such circumstances then the deployment of specialist equipment to enable people affected or potentially affected to be decontaminated immediately on-site, reducing any adverse effects on their health. They can then be transported safely to hospitals or shelter for further treatment or support without the risk of contaminating others. There are such resources available to local services but additional equipment and trained fire fighters would be called upon as necessary to support.

Alerting Procedure

The Royal Berks Fire & Rescue Service will be notified by Thames Valley Police in the formal channels. However through their own standing operating procedures they should also be notified by the AWE Fire and Rescue Service and/or MOD Police of an incident on or off the site.

If it is an off-site incident then the RBFRS will notify:

- (a) West Berkshire District Council
- (b) Environment Agency

- (c) Health and Safety Executive
- (d) Hampshire Fire & Rescue Service
- (e) Met Office.

Actions

The RBFRS will attend any incident to which it is requested to respond in accordance with agreed attendance protocols. Detailed arrangements exist for the Service to attend and to effectively deal with incidents in collaboration with the AWE Fire and Rescue Service and personnel. These arrangements provide for a tailored response to incidents and make provision for reinforcement and attendance at the site by appliances and personnel from other Services.

It is anticipated that any incident with off-site consequences requiring the activation of this plan will have resulted from an on-site incident to which the Fire Service will have been alerted.

In the event of the activation the following additional resources of the Royal Berkshire Fire and Rescue Service will be deployed:

- (a) 1 x Principal Officer + Staff Officer to the Strategic Coordinating Centre
- (b) 1 x Senior Officer to TVP Tactical Coordinating Group

FRS activity at the incident will be directed by the Senior Fire Service Officer present. The effective control of an incident will best be achieved by the effective utilisation of personnel, equipment and information. Detailed information, equipment, including monitoring equipment and knowledge of the site is available from on-site personnel. Suitably trained personnel should be incorporated into the Incident Command Support structure adopted for the incident.

The FRS may also request for a PACRAM or information relating to the weather via the Met Office.

The FRS has the role of decontamination of people. This will take some consideration including:

- (a) There may be a role for decontamination from conventional chemical contamination or radiation contamination. Therefore at an early stage of activation the New Dimensions decontamination process will be considered by the service and by STAC and SCG.
- (b) Any decontamination process will normally be set up at the edge of the contaminated area in order that once people are decontaminated they can quickly move to a clean area and onwards to a suitable rest centre or a radiation monitoring unit (as set up by the Health Agencies).

The exact location of the decontamination unit will be decided by the SCG on consultation with the STAC and the LA.

A large area will be required in order to allow for the equipment, potentially large numbers of people from the affected area and potentially people who were in the area at the time of the incident who may be worried that they are contaminated returning.

A strict access route and flow of people will have to be administered in order to ensure 'dirty' and 'clean' are kept separate.

7D SOUTH CENTRAL AMBULANCE NHS FOUNDATION TRUST

Role

NHS England have the responsibility for the NHS Services to the population around the AWE sites but this responsibility has been delegated to West Berkshire Clinical Commissioning Group and Ambulance Trust. These bodies are responsible for ensuring the satisfactory Health Service arrangements are in place for dealing with major incidents. In the event of such an incident at AWE they would work in conjunction with the AWE Medical Adviser or their representative and would fulfil the following functions:

On-site treatment and evacuation of casualties, including those who might be contaminated by radioactive material.

Responsibilities

The Ambulance Service responsibilities are:

- (a) the saving of life, in conjunction with other emergency services,
- (b) the treatment and care of those injured at the scene, either directly or in conjunction with medical personnel,
- (c) to provide a focal point at the incident, through a Mobile Ambulance Control Unit, for all NHS resource,
- (d) to provide an Ambulance Incident Officer to the incident and a Medical Incident Officer if necessary,
- (e) the determination of the priority evacuation needs of those injured, either directly or in conjunction with medical personnel
- (f) to determine the main designated "Receiving" and "Supporting" hospitals for the receipt of those injured,
- (g) to arrange the most appropriate means of transporting those injured to the main "Receiving" and "Supporting" hospitals,
- (h) to ensure that adequate medical personnel and support equipment resources are available at the scene,
- (i) the provision of communications facilities for NHS resources at the scene and the ability to communicate with the other emergency services present.
- (j) initial alerting of appropriate NHS Agencies and Trusts following notification by Thames Valley Police.

ALERTING PROCEDURES

In the event of an off-site emergency being declared at AWE Aldermaston or AWE Burghfield, The South Central Ambulance Service (SCAS) will be notified by the Thames Valley Police, and will in turn notify:

- (a) Public Health England Centre South East
- (b) NHS England South (South Central)
- (c) NHS England (Wessex)
- (d) CCG's
- (e) Designated Receiving Hospitals
- (f) Royal Berkshire Hospital
- (g) Hampshire Hospitals NHS Foundation Trust on call

Actions

Detailed arrangements exist for the SCAS to attend and assist the onsite services to deal with incidents involving casualties as required. These arrangements provide for a tailored response to incidents and make provision for reinforcements and attendance at the site by Ambulances and personnel from other NHS Ambulance Trusts.

It is anticipated that any incident with off-site consequences requiring the activation of this plan will result from an onsite incident. Where casualties have been sustained on-site, SCAS resources will already have been deployed.

In the event of a decision by the SCG to evacuate any residents in the affected area, to assist with those who are ill or disabled at home, calling on the support of the Voluntary Agencies as required.

Where on-site casualties have been sustained, dispatch if required:

- (a) an Ambulance Incident Officer to the TCG
- (b) a Senior Ambulance Officer to SCG. SCAS resources may already have been deployed as the result of an on-site incident

7E HEALTH SERVICES OTHER THAN AMBULANCE SERVICE

NHS ENGLAND

Role

The aim of NHS England in an incident involving AWE would be to lead and coordinate the response of all health organisations in the south.

Responsibilities

In the event of an incident at AWE NHS England teams across the south would:

- (a) Establish, maintain and disseminate the best possible understanding of the incident and its impact on the health sector;
- (b) Ensure that all necessary and available support is provided to local health responders;
- (c) Establish command, control, coordination and communications arrangements in accordance with its Incident Response Plan (IRP) and those IRP's of local regional offices;
- (d) Establish and maintain a reporting mechanism and daily cycle of command across all health organisations;
- (e) Liaise with local regional offices initially leading the incident and agree whether and how to conduct a handover with NHS England South for a regional response;
- (f) Analyse reports received to identify strategic priorities and support required;
- (g) Implement mutual aid arrangements to identify strategic priorities and support required;
- (h) Link NHS organisations in the NHS South area with the appropriate resources and capacity out of the area;
- (i) Liaise with NHS England national team on identification of and access to national resources if required;
- (j) Set up and maintain an Incident Coordination Centre and an Incident Management Team;
- (k) Local Regional Teams will attend SCG meetings in coordination with assistance from local commissioning groups attending and TCG's that may be set up;
- (l) Provide a regional media / comms response;

Alerting Procedure

NHS England would be alerted by South Central Ambulance Service Foundation Trust.

HOSPITAL ARRANGEMENTS

Role

The Chief Executive of a "Receiving Hospital" is responsible for ensuring that the resources of the hospital are fully mobilised to manage casualties. This shall include:

- (a) alerting/ calling in all necessary and additional staff and managing volunteer helpers;
- (b) establishing a Major Incident Control Team and an effective Control Centre;
- (c) organising essential facilities for the reception, treatment and admission of casualties, including (as necessary) the relocation of patients to provide sufficient accommodation including contaminated casualties;
- (d) making comprehensive arrangements for the reception and care of relatives and friends, religious and voluntary services support;
- (e) providing the media with controlled access, authoritative information and necessary administrative support in close liaison with the Police;
- (f) ensuring that tight security arrangements are in place, particularly to protect victims and relatives from unauthorised media intrusion;
- (g) activating the hospital's casualty documentation system and ensuring an effective link with the Police documentation team at the hospital;

- (h) providing the Police with appropriate office, communication and welfare support arrangements;
- (i) briefing other patients (as necessary) regarding changes in procedure due to the major incident response;
- (j) activating arrangements to preserve property and evidence;

Alerting System

The Major Incident Plans of Receiving Hospitals will be triggered by an appropriate call from Ambulance Control;

Actions

The Royal Berkshire Hospital NHS Foundation Trust is the immediate hospital designated to accept casualties and to advise on, and to assist, with the decontamination of personnel as part of the National Arrangements for Incidents involving Radiation (NAIR) scheme;

Should circumstances and/ or the number of casualties make it necessary other hospitals may also be utilized;

A number of hospitals have been designated to minimise the distance which a person injured in an accident has to travel in order to receive appropriate treatment. They include Royal Berkshire Hospital NHS Foundation Trust, Reading and Basingstoke and North Hampshire Hospitals.

Each hospital will:

- (a) Maintain site security ensuring that sites can be locked down to ensure the security of the site
- (b) Establish local command control and coordination arrangements
- (c) Provide NHS England local regional office with situation reports
- (d) Monitor capacity and manage local resources appropriately
- (e) Provide a clinical response to all casualties
- (f) Ensure recovery is addressed in organizational strategic incident management meetings.

CLINICAL COMMISSIONING GROUP

Role

Support NHS England to manage the local impacts of the incident;

Actions

- (a) Lead on escalation aspects of the incident
- (b) Ensuring that critical functions are maintained
- (c) Establishing internal command and control structures in conjunction with NHS England
- (d) Attending local multi-agency meetings as required by NHS England
- (e) Identifying and releasing clinical and administrative staff to support the response subject to availability and service impact

7F PUBLIC HEALTH ENGLAND (PHE) CENTRE FOR RADIATION CHEMICAL AND ENVIRONMENTAL HAZARDS (CRCE)

Role

PHE-CRCE is responsible for the provision of expert advice and information relating to the radiological protection aspects of an emergency to government and any strategic group set up to manage the response. PHE publishes guidance on Emergency Reference Level (ERLs) to protect the public. This guidance is accepted as a basis for the current nuclear emergency arrangements.

Actions

On receipt of an alert, PHE-CRCE will determine the appropriate level of its response to the emergency. This level of response might include all or some of the following:

- (a) Deployment of senior staff to a number of key locations. These would include:
- (b) The SCC (to provide advice on the Strategic Coordinating Group (SCG), the Scientific and Technical Advice Cell (STAC)) and the Recovery Coordinating Group (RCG) on radiological protection aspects of the emergency
- (c) The Media Briefing Centre (MBC)
- (d) Scientific Advisory Group for Emergencies (SAGE)
- (e) Set up an emergency operations centre at CRCE HQ, Chilton. The key functions of this centre will be to gather relevant information (particular radiation monitoring information), to assess this information and to provide expert advice on the basis of this information.
- (f) Recommend and support sourcing an RPA for the TCG to support the non-emergency services with safety advice
- (g) Deploy radiation-monitoring teams capable of measuring environmental contamination and measurements of radioactivity on or in people. Support will be provided to Radiation Monitoring Units (RMUs) as appropriate and where resources allow
- (h) Undertake the role of national radiation monitoring coordination
- (i) Provide expert advice on radiological issues for the recovery phase
- (j) Liaise effectively with, but not confined to, the key stakeholders in the response at a local, regional and national level including the Food Standards Agency (FSA), the Environment Agency (EA), Local Authority, Environmental Health Departments and water companies.
- (k) Collate, interpret and submit to RIMNET, personal monitoring results from NHS medical physics departments.

7G WEST BERKSHIRE DISTRICT COUNCIL

Role

The main role of West Berkshire District Council includes:

- (a) Support to the emergency services
- (b) Alerting other agencies as detailed in the activation section ([Section 3.1](#)) and set out below
- (c) Coordination and management of reception and rest centres
- (d) Coordinating the recovery process

Alerting Procedure

AWE and TVP control will, on receipt of an appropriate alert, notify West Berkshire District Councils Civil Contingencies or if Out of Hours they will inform the Duty West Berks Council Emergency Manager via the Emergency Contact Operators

Actions

WBDC will:

- (a) Record full details of the incident, immediately open a log and call back to AWE and TVP Control to verify the message.
- (b) Initiate the alerting process as detailed in the Councils' Major Incident Plan.

Activate the external alerting processes as follows:

Agency	Notes
Internal Services	who start the internal actions for the services
Hampshire County Council as appropriate	For AWE (A) Incident (or B if wind direction appropriate) request rep to go to SCC/TCG as appropriate.
Basingstoke & Deane Borough Council as appropriate	For AWE (A) Incident (or B if wind direction appropriate) request rep to go to SCC/TCG as appropriate.
Reading Borough Council as appropriate	For AWE (B) Incident (or A if wind direction appropriate) request rep to go to SCC/TCG as appropriate.
Wokingham Borough Council as appropriate	For AWE (B) Incident (or A if wind direction appropriate) request rep to go to SCC/TCG as appropriate.
All Schools and nurseries in WBDC area	Normally by Education Services
Any Residential Care Homes in WBDC affected area	Normally by Adult Social Care Service
Resilience & Emergency Division	As per contact list
Food Standards Agency	
Highways England	As per contact list
Network Rail	As per contact list
Thames Water	As per contact list
Canal & Rivers Trust	As per contact list
Town & Parish Councils in area including local ward members	As per contact list
Other LA's in Berkshire	To be prepared to support with mutual aid
Voluntary Sector	as necessary

Arrange for the following command and control arrangements to be supported:

Location	Whom	Roles
ECC	As per MIP	As per MIP

Location	Whom	Roles
TVP SCC - SCG	Local Authority Liaison Officer (LALO) to SCC to be the SCG representative. This person is normally a Director or other senior officer as nominated by the Chief Executive	To inform the WBDC ECC Controller of requests made to the local authorities for support or action To provide local authority support and information to the Emergency Services. To authorise expenditure on behalf of the LA as necessary
TVP SCC	Senior Officer	To support the Local Authority Liaison Officer (LALO). This is a competent officer who understands emergencies, in particular AWE and the role of the LA. They shall be able to stand in for the LALO as necessary. Their main role is to support and to link in with the LALO at TCG Location and the Councils ECC.
TVP SCC – Media Team	Public Relations (PR) Officer	To work with the SCG media team
TVP SCC – STAC	Principal Environmental Health Officer	To attend the STAC
TVP SCC – RCG	Head of Service(HoS)/Senior Officer	Chair Recovery Coordinating Group
TVP SCC – RCG	Snr Officer	Deputises for chair of RCG
TVP SCC-RCG	Loggist	To record RCG key decisions
ACP at AWE (A)	Duty Emergency Manager	LALO at the AWE SCC To inform the WBDC ECC Controller of requests made to the local authorities for support or action To update the LALOs and WBDC ECC of up to date info regarding the incident.
TCG	Duty Emergency Manager (DEM)/HoS/Third Tier Manager	LALO at the TCG To inform the WBDC ECC Controller of requests made to the local authorities for support or action To provide local authority support and information to the Emergency Services.
Emergency Media Briefing Centre (MBC)	PR Officer	LALO at MBC
Other LALO Locations		

Location	Whom	Roles
Hampshire TCG	WBDC LALO	To inform the WBDC ECC Controller of requests made to the local authorities for support or action To ensure cross border consistency.

Initial West Berkshire District Council considerations include:

Staff Deployment:	Deploy staff to the relevant command locations as necessary
Open Emergency Operations Centre (ECC): In accordance with the WBDC Major Incident Plan	Establish the ECC at the council offices and open all necessary communication links, including links to Basingstoke and Deane Borough Council, Reading and Wokingham Councils as appropriate.
Road Closures:	Initiate relevant Road Closures, as indicated in Section 6 and on RD in conjunction with the police in Thames Valley and Hampshire. These road closures may move closer or further out from the incident as necessary.
Assist Establishment of Media Briefing Centre:	
Place Services on Stand-by: including:	EHOs with respect to water pollution to drinking supplies, contaminated land, food supply chain etc.
	Trading Standards with respect to animal health and welfare matters
	Countryside Rangers and Rights of ways staff with respect to closure of footpaths etc.
	LA Highways officers with respect to road closures and diversions
	Rest Centre Staff
	Voluntary agencies to assist with rest centres.
	Adult Social Care for vulnerable adults
Consider the need for one or more Rest Centres	Education Services in relation to vulnerable children and schools
	On basis of need and guidance from SCG rep open suitable rest centres
Consider the support required for a Radiation Monitoring Unit	The provision of a Radiation Monitoring Unit (RMU) may be requested at the SCG level, perhaps as a result of a number of worried well presenting themselves at hospitals or

	<p>as a result of genuine concern regarding contaminants</p> <p>The provision of the RMU is the responsibility of health agencies however it is likely that there will be a request for a suitable location/building to be used. As a result a number of locations have been identified and considered suitable.</p> <p>Section 5.12 details the locations and the key information relating to this plan and the radiation monitoring unit plan.</p>
Consider the need for Mutual Aid.	<p>Due to the nature of the incident, the potential scale and as a result press and Government interest plus the potential for a long term response and recovery consideration at an early stage should be given to mutual aid support from other LA's and Voluntary Agencies.</p>
Consider the Initial, Medium and Long Term Recovery Process	<p>Recovery is led by the Local Authorities but it is still a Multi-agency process.</p> <p>More details on recovery are in Section 5.19.</p>

7H WOKINGHAM & READING BOROUGH COUNCILS

Role

Wokingham & Reading Borough Councils (with assistance from neighbouring Councils if necessary) would be responsible, in conjunction with West Berkshire District Council, for providing assistance to the Emergency Services in the event of an incident at AWE Burghfield with actual or potential off-site consequences.

Alerting Procedure

In the event of an offsite incident at AWE Burghfield, Wokingham & Reading Borough Council would be informed by West Berkshire District Council.

Actions

The Council Resilience Team or Duty Emergency Manager will:

- (a) Record full details of the incident, immediately open a log and call back to West Berkshire District Council in order to verify the message
- (b) Activate as necessary the Council emergency response in accordance with the MIP.

Wokingham & Reading Borough Council will provide for an incident at AWE Burghfield:

Location	Whom	Roles
ECC	As per MIP	As per MIP
TVP SCC - SCG	Local Authority Liaison Officer (LALO) to SCC to be the SCG representative. The SCG rep will normally be the SCG rep for West Berkshire District Council	To inform the ECC Controller of requests made to the local authorities for support or action To provide local authority support and information to the Emergency Services. To authorise expenditure on behalf of the LA as necessary
TVP SCC	Senior Officer	To support the LALO This is a competent officer who understands emergencies, in particular AWE and the role of the LA. They shall be able to stand in for the LALO as necessary. Their main role is to support and to link in with the LALO at TCG Location and the Councils ECC.
TVP SCC – Media Team	PR Officer	To work with the SCG media team
TVP SCC – RCG	Snr Officer	Rep on RCG
TCG	DEM/HoS/Third Tier Manager	LALO at the TCG To inform the Councils ECC of requests made to the local authorities for support or action To provide local authority support and information to the Emergency Services.
Emergency Media Briefing Centre (MBC)	PR Officer	LALO at MBC.

Initial Wokingham & Reading Borough Council considerations include:

Staff Deployment:	Deploy staff to the relevant command locations as necessary.
Open ECC: In accordance with the WBC Major Incident Plan	Establish the Emergency Operations Centre at the council offices and open all necessary communication links, including links to Basingstoke and Deane Borough Council, Reading/Wokingham and West Berkshire District Councils as appropriate.
Assist Establishment of Media Briefing Centre:	
Place Services on Stand-by: including:	EHOs with respect to water pollution to drinking supplies, contaminated land, food supply chain etc.
	Trading Standards with respect to animal health and welfare matters
	Countryside Rangers and Rights of ways staff with respect to closure of footpaths etc.
	LA Highways officers with respect to road closures and diversions
	Rest Centre Staff
	Voluntary agencies to assist with rest centres.
	Adult Social Care for vulnerable adults
Consider the support required for a Radiation Monitoring Unit	Education Services in relation to vulnerable children and schools
	Consider the need for one or more Rest Centres
	On basis of need and guidance from SCG rep open suitable rest centres
Consider the need for Mutual Aid.	The provision of a Radiation Monitoring Unit (RMU) may be requested at the SCG level, perhaps as a result of a number of worried well presenting themselves at hospitals or as a result of genuine concern regarding contaminants
	The provision of the RMU is the responsibility of health agencies however it is likely that there will be a request for a suitable location/building to be used. As a result a number of locations have been identified and considered suitable.
	Monitoring – Strategies - People (RMU) Section 5.12 details the locations and the key information relating to this plan and the radiation monitoring unit plan.
Consider the Initial, Medium and Long Term Recovery Process	Due to the nature of the incident, the potential scale and as a result press and Government interest plus the potential for a long term response and recovery consideration at an early stage should be given to mutual aid support from other LA's and Voluntary Agencies.
	Recovery is led by the Local Authorities but it is still a Multi-agency process.
	More details on recovery are in Section 5.19 .

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7J BASINGSTOKE AND DEANE BOROUGH COUNCIL

Role

Basingstoke & Deane Borough Council (with assistance from neighbouring Councils if necessary) would be responsible, in conjunction with West Berkshire District Council, for providing assistance to the Emergency Services in the event of an incident at AWE Aldermaston with actual or potential off-site consequences.

Alerting Procedure

In the event of an offsite incident at AWE Aldermaston, BDBC would be informed by West Berkshire District Council, the Emergency Services or the HCC Duty Officer in accordance with the procedure in the Emergency Plan.

Actions

The Councils Duty Emergency Manager will:

- (a) Record full details of the incident, immediately open a log and call back to West Berkshire District Council in order to verify the message.
- (b) Activate as necessary the Council emergency response in accordance with the Borough Emergency Plan.

In the event of an incident at AWE Aldermaston Basingstoke & Deane BC will consider deploying officers to the following locations:

Location	Whom	Roles
ECC	As per MIP	AS per MIP
TVP SCC - SCG	Local Authority Liaison Officer (LALO) to SCC to be the SCG representative. The SCG rep will normally be the SCG rep for West Berkshire District Council but when an incident at AWE is affecting communities in BDBC are then a rep will be sent to the SCG. Liaison between HCC and BDBC will take place to establish which authority will deploy personnel to the locations below to avoid over-representation	To inform the ECC Controller of requests made to the local authorities for support or action To provide local authority support and information to the Emergency Services. To authorise expenditure on behalf of the LA as necessary
TVP SCC	Senior Officer	To support the LALO This is a competent officer who understands emergencies, in particular AWE and the role of the LA. They shall be able to stand in for the LALO as necessary. Their main role is to support and to link in with the LALO at TCG Location and the Councils ECC.
TVPSCC – Media Team	PR Officer	To work with the SCG media team
TVP SCC – RCG	Snr Officer	Rep on RCG
TCG	DEM/HoS/Third Tier Manager	LALO at the TCG To inform the Councils ECC of requests made to the local authorities for support or action

Location	Whom	Roles
		To provide local authority support and information to the Emergency Services.
Emergency Media Briefing Centre (MBC)	PR Officer	LALO at MBC

Initial Basingstoke & Deane BC considerations include:

Staff Deployment:	Deploy staff to the relevant command locations as necessary
Open ECC: In accordance with the WBC Major Incident Plan	Establish the Emergency Operations Centre at the council offices and open all necessary communication links, including links to Basingstoke and Deane Borough Council, Reading/Wokingham and West Berkshire District Councils as appropriate.
Assist Establishment of Media Briefing Centre:	
Place Services on Stand-by: including:	EHOs with respect to water pollution to drinking supplies, contaminated land, food supply chain etc. Countryside Rangers and Rights of ways staff with respect to closure of footpaths etc.
Consider the support required for a Radiation Monitoring Unit	The provision of the RMU is the responsibility of health agencies however it is likely that there will be a request for a suitable location/building to be used. As a result a number of locations have been identified and considered suitable. Section 5.12 details the locations and the key information relating to this plan and the radiation monitoring unit plan.
Consider the need for Mutual Aid.	Due to the nature of the incident, the potential scale and as a result press and Government interest plus the potential for a long term response and recovery consideration at an early stage should be given to mutual aid support from other LA's and Voluntary Agencies.
Consider the Initial, Medium and Long Term Recovery Process	Recovery is led by the Local Authorities but it is still a Multi-agency process. More details on recovery are in Section 5.19 .

7K HAMPSHIRE COUNTY COUNCIL

Role

Hampshire County Council (with assistance from neighbouring Councils if necessary) would be responsible, in conjunction with West Berkshire District Council, for providing assistance to the Emergency Services in the event of an incident at AWE Aldermaston with actual or potential off-site consequences.

Alerting Procedure

In the event of an offsite incident at AWE Aldermaston Hampshire County Council may be informed by West Berkshire District Council, the Emergency Services or BDBC, in accordance with the procedure in the County Emergency Plan.

Hampshire County Council will notify Basingstoke and Deane Borough Council.

Actions

The HCC Emergency Planning & Resilience Team or Duty Emergency Planning Officer will:

- (a) Record full details of the incident, immediately open a log
- (b) Activate as necessary the Council emergency response
- (c) Provide support and assistance to Basingstoke and Deane BC as required

Provide for an incident at AWE Aldermaston including:

Location	Whom	Roles
ECC activated	As per MIP	AS per MIP
TVP SCC - SCG	Local Authority Liaison Officer (LALO) to SCC to be the SCG representative. This person is normally a Director or other senior officer as nominated by the Chief Executive	To inform the HCC & BDBC ECC of requests made to the local authorities for support or action To provide local authority support and information to the Emergency Services. To authorise expenditure on behalf of the LA as necessary
TVP SCC	Senior Officer	To support the LALO. This is a competent officer who understands emergencies, in particular AWE and the role of the LA. They shall be able to stand in for the LALO as necessary. Their main role is to support and to link in with the LALO at TCG Location and the Councils ECC.
TVPSCC – Media Team	Corporate Communications Officer to liaise with Basingstoke and Deane BC on all public information issues.	To work with the SCG media team.
TVPSCC – STAC	Public Health Consultant	To attend the STAC
TVP SCC – RCG	Snr Officer	
TCG	DEM/HoS/Third Tier Manager	LALO at the TCG To inform the HCC ECC Controller of requests made to the local authorities for support or action

Location	Whom	Roles
		To provide local authority support and information to the Emergency Services.
Emergency Media Briefing Centre (MBC)	Corporate Communications Officer	LALO at MBC.
Other LALO Locations		
West Berkshire ECC	LALO	To inform the HCC ECC of requests made to the local authorities for support or action To ensure cross border consistency.

Initial HCC considerations include:

Staff Deployment:	Deploy staff to the relevant command locations as necessary
Open ECC: In accordance with the WBC Major Incident Plan	Establish the Emergency Operations Centre at the council offices and open all necessary communication links, including links to Basingstoke and Deane Borough Council, Reading and Wokingham Councils as appropriate.
Road Closures:	Initiate relevant Road Closures, as indicated in Section 6 in conjunction with the police in Thames Valley and Hampshire. These road closures may move closer or further out from the incident as necessary.
Assist Establishment of Media Briefing Centre:	
Place Services on Stand-by: including:	Trading Standards with respect to animal health and welfare matters.
	LA Highways officers with respect to road closures and diversions.
	Rest Centre Staff
	Voluntary agencies to assist with rest centres.
	Adult Social Care for vulnerable adults
Consider the need for one or more Rest Centres	Education Services in relation to vulnerable children and schools.
Consider the support required for a Radiation Monitoring Unit	On basis of need and guidance from SCG rep open suitable rest centres.
	The provision of a Radiation Monitoring Unit (RMU) may be requested at the SCG level, perhaps as a result of a number of worried well presenting themselves at hospitals or as a result of genuine concern regarding contaminants.
	The provision of the RMU is the responsibility of health agencies however it is likely that there will be a request for a

	suitable location/building to be used. As a result a number of locations have been identified and considered suitable.
	Section 5.12 details the locations and the key information relating to this plan and the radiation monitoring unit plan.
Consider the need for Mutual Aid.	Due to the nature of the incident, the potential scale and as a result press and Government interest plus the potential for a long term response and recovery consideration at an early stage should be given to mutual aid support from other LA's and Voluntary Agencies.
Consider the Initial, Medium and Long Term Recovery Process	Recovery is led by the Local Authorities but it is still a Multi-agency process.
	More details on recovery are in Section 5.19 .

7L MHCLG RESILIENCE & EMERGENCY DIVISION (RED)

Role

The role of MHCLG RED is to:

- (a) Provide accurate and timely information on the incident and response to central government departments and COBR if activated
- (b) Provide a single point of contact to central government for local responders
- (c) Represent the interests of central government departments to local responders
- (d) Provide appropriate information, advice and support as required by local responders or central government departments
- (e) Provide a point of contact for neighbouring areas
- (f) Arrange visits to affected areas by Ministers and other government officials.

Alerting Procedure

RED will be formally alerted by TVP and West Berkshire District Council that an Off-Site Emergency has been declared at an AWE site and that the “Off-Site Plan” is being implemented.

Actions

Once an off-site incident has been confirmed, RED will activate its own Emergency Response Plan. The Regional Resilience Team (RRT) will always lead the RED response, but it may be necessary to call upon staff from other teams to support the response. RED will:

- (a) Send Government Liaison Officer to SCG
- (b) Set up their Operations Room
- (c) Inform Civil Contingencies Secretariat (CCS) and other Whitehall Colleagues
- (d) Start collecting correct information for a report to Whitehall
- (e) Confirm the “timetable” of reporting and meetings for/in Whitehall
- (f) Coordinate any Ministerial visits.

7M Office for Nuclear Regulation (ONR)

Role

To provide advice to Central Government, the PHE CRCE, and the Government Technical Advisor at the SCG.

Alerting Procedure

ONR will be alerted via AWE Plc.

Actions

In order to fulfil its role and function following confirmation that the site has been involved in an off-site emergency then the ONRs approved emergency plan will be activated this will include the ONR initiating the following actions:

- (a) Activate the Redgrave Court Incident Suite (RCIS)
- (b) Attending the ACP at AWE (A)
- (c) Attend Strategic Coordinating Centre
- (d) Monitoring events on-site and the actions taken to restore the site to a safe condition

7N MOD incl MOD Coordinating Authority (MCA)

Role

The Ministry of Defence as the owner of the Atomic Weapon Establishment sites of Aldermaston & Burghfield would be the nominated Lead Government Department for an Off-Site Nuclear Emergency at either of the sites. The Defence Equipment and Support Organisation (DE&SO) is the arm of the MOD which contracts the operations of the sites. The MOD maintains a Nuclear Accident Response Organisation (NARO) to respond to an accident or incident, including one arising through terrorist acts, involving defence nuclear assets. Defence nuclear assets include: nuclear weapons, special nuclear materials, nuclear facilities and naval nuclear reactors. The role of NARO is detailed on the [Gov.uk website](https://www.gov.uk).

In the event of an emergency with potential off-site consequences, the Submarine Delivery Agency will arrange for a senior 1* officer known as the MOD Coordinating Authority (MCA) to go to the Strategic location and attend the Strategic Coordinating Group.

The role of the MCA is to direct all MOD response activities, provide technical information and advice and provide the MOD Lead Government Department input to the multi-agency Strategic Coordinating Group.

The MCA is responsible for:

- (a) Providing authoritative and timely advice concerning the progress or development of the emergency and the potential implications, including mitigation, of operations to make safe and recover the asset during an emergency
- (b) Keep MOD HQ Defence Nuclear Emergency Organisation (DNEO) informed on the status of the emergency and the operational response
- (c) Act on strategic guidance from MOD HQ DNEO and seek any additional military support required through the Joint Regional Liaison Officer (JRLO) or Regional Force Brigade Commander (RF BDE CDR).

Alerting Procedure

The MCA will be alerted by the Emergency Manager at the AWE Situations Coordination Centre who will contact the Strategic Weapons Project Team First Point of Contact (SW PT FPOC) who in conjunction with the Officer in Charge (OiC) Rear Echelon Link (REL) will alert the SW Nuclear Emergency Organisation

Action

The MCA will activate their own emergency plan which will include the following actions:

- (a) Deploying to the Strategic Coordinating Group at Thames Valley Police Headquarters with a supporting team;
- (b) Dispatching a Spokesperson to the Media Briefing Centre with a supporting team.
- (c) Via the Ministry of Defence there would be activation of its Headquarters for Defence Nuclear Emergency Organisation (DNEO) in London.

70 OTHER GOVERNMENT DEPARTMENTS AND AGENCIES

Overview

This Annex should be read in conjunction with Annex L referring to MHCLG RED. There are a number of Government Departments other than the MOD that would be involved in an incident at AWE. The Departments most likely to be involved include:

[Cabinet Office](#)

[Ministry of Defence](#)

[Home Office](#)

[Department of Health and Social Care](#)

[Department for Transport](#)

[Department for Education](#)

[Department for Business, Innovation & Skills](#)

[Department for Work and Pensions](#)

[Ministry of Housing, Communities and Local Government](#)

[Department for Environment, Food & Rural Affairs](#)

Role

The role of the Departments would be to ensure a coordinated response from Government including support to the agencies and services involved on the ground. In addition leadership from the Government would be provided via the Cabinet Office Briefing Rooms (COBR). Links to COBR would be provided by the Government Liaison Team (GLT).

Alerting System

Alerting of the relevant Departments would be via the MOD HQ and MHCLG RED.

Responsibilities

It would not be normal for members of all government departments to attend SCG or other locations in the initial response phase of the incident instead each Department would coordinate their resources via COBR through the GLT. The GLT would link in with agencies such as the Food Standards Agency, the Environment Agency, and Animal Health etc. at the SCG in order to communicate the key issues to the SCG and to government departments.

7P ENVIRONMENT AGENCY

Role

The Environment Agency (EA) has a broad role to protect and enhance the environment in England. In the case of an emergency at a nuclear site, these responsibilities comprise some that are statutory, where there may be a breach of a law which the EA is responsible for enforcing, and others that are operational, where the EA effectively acts on behalf of or in support of DEFRA in providing a response and advice to multi-agency partners.

Alerting Procedure

EA will be alerted by RBFRS and AWE via the Radiation Incident Hotline number.

The EA Radioactive Substances Regulation Duty Manager (RSR-DM) will then be informed for immediate assessment and response.

Actions

The EA's roles and responsibilities, in the event of an emergency at a nuclear site, include the following:

- (a) Provide advice on radiological aspects of environmental contamination to all relevant participating organisations during the course of the incident
- (b) Provide EA representatives with specialist knowledge of radioactive substances at relevant multi-agency centres, including the Strategic Coordination Centre (SCC), DEFRA Emergency Operations Centre and MOD HQ Defence Nuclear Emergency Organisation (HQ DNEO)
- (c) Advise on appropriate disposal of radioactive waste
- (d) Arrange for contractors to carry out environmental monitoring and sampling as part of the multi-agency monitoring strategy
- (e) Advise DEFRA Divisions on technical and regulatory aspects of the response;
- (f) Provide information to the public and the media, in consultation with the Lead Department and the strategic command at the SCC
- (g) Manage flows of regulated waters if appropriate, to minimise impact. This operational response might include releasing water from reservoirs or altering river levels
- (h) Ensure safety of any Agency staff who may be involved
- (i) Check for breach of site operator's authorisation, where relevant
- (j) Pursue relevant regulatory investigations in accordance with the Agency's statutory duties.

The Agency's broader responsibilities, including fisheries, conservation, water resources, waste regulation and water quality, could come into play at some stage during the early response or during the short to long-term remediation. More extensive statutory powers could be involved if an incident also involved significant chemical contamination.

The EA does not have a specific statutory duty to monitor controlled waters for radioactive contamination. But in the event of an environmental incident involving a release of radioactive substances to controlled waters, the EA would arrange sampling and radiochemical analysis with a view to protecting the environment and advising downstream users and abstractors.

During the Recovery Phase, the Environment Agency will specifically:

- (a) Support the work of the Recovery Coordinating Group to assist the community in returning to normality
- (b) Advise on the impact of radioactive contamination in the environment, including overseeing remediation as part of the Environment Agencies role in Part 2A of the Environmental Protection Act 1990 (Radioactive Contaminated Land regime)
- (c) Work with partner organisations to identify feasible remediation options and support the development of a Recovery Strategy

- (d) Advise on the management and disposal of wastes contaminated with radioactivity
- (e) Advise DEFRA on any need for a Radioactive Substances Exemption Order to facilitate the efficient management and disposal of radioactive wastes.

7Q FOOD STANDARDS AGENCY

Roles

The Food Standards Agency's role is to ensure that the public is protected from contaminated food following a pollution emergency.

Specific responsibilities are:

- (a) Food Standards Agency HQ, London to provide point of contact with the SCG
- (b) To determine the level of any contamination of the food chain. Thereafter, as necessary, take legal measures to prevent unacceptably contaminated food entering the food chain by the implementation of emergency restriction orders under the Food and Environment Protection Act 1985. Such orders are commonly referred to as FEPA Orders and restrict the supply, movement or sale of produce from an affected area
- (c) To take action to ensure that food contaminated to unacceptable levels does not enter the food chain
- (d) To provide advice and information to the public
- (e) To ensure, in conjunction with the Environment Agency, the safe disposal of contaminated food
- (f) To ensure that subsequent remediation takes account of food safety issues.
- (g) To assist with the enforcement of emergency restriction orders
- (h) To disseminate food safety advice, as requested
- (i) The FSA Incident Branch coordinates the Agency's response to all incidents with potential to affect the food chain. This includes environmental contamination incidents (such as fires, toxic discharges, waterways contamination and accidents at industrial sites) and food contamination incidents (physical, chemical, microbiological or malicious tampering) where the food is in the distribution chain or available for sale.

Alerting System

FSA incident branch will be alerted by West Berkshire District Council.

The FSA Incident Branch will then activate its staff via internal arrangements.

Actions of Food Standards Agency.

During such an emergency then staff would be deployed to the following locations. The information also covers DEFRA officers:

Location	Food Standards Agency
Food Standards Agency HQ, London	Emergency team to make assessments, issue food safety advice and statutory food orders as appropriate
Thames Valley Police SCG	Radiological expert to inform Strategic Commander on food safety issues and Agency actions via STAC.
Media Briefing Centre	Spokesperson to issue advice and information on FSA's response
Government Coordination Centre, London	Representative to liaise with other Government Departments

7R RADIOACTIVE INCIDENT MONITORING NETWORK

Role

A key component of the Government's response arrangements to the occurrence of an overseas nuclear accident with consequences for the UK is a national Radioactive Incident Monitoring Network and information management system (RIMNET). The RIMNET Team within the Met Office is responsible for maintaining, on behalf of Business, Energy and Industrial Strategy (BEIS), the operational readiness of the RIMNET facilities including:

- (a) Maintaining the operational capability of the RIMNET system
- (b) Ensuring the RIMNET facilities in emergency centres are properly maintained;
- (c) Providing briefing and training on the use of the system
- (d) Planning exercises to test the UK response systems, facilities and procedures
- (e) RIMNET is a UK-wide emergency management system, which was first established in 1988 following a review of the UK response to the Chernobyl accident. It consists of:
 - a. A network of 96 fixed gamma dose rate monitoring stations across the UK;
 - b. A central database accessible by all Government Departments, Agencies and Devolved Administrations
 - c. A Geographic Information System
 - d. Statistical and analysis tools
 - e. A robust network of links to other emergency response systems operated by Government Departments, the UK nuclear industry and international organisations
 - f. Document management and desktop publishing facilities; and
 - g. Diverse communications systems.

The locations of all the RIMNET gamma dose rate monitoring stations are detailed in the BEIS web pages [RIMNET: map of sites in the UK](#).

7S MET OFFICE

Role

The Met Office is responsible for providing weather and plume dispersion information as part of (PACRAM) Procedures and Communications in the event of a Release of Radioactive Material.

The 24 hour EMARC (Environment Monitoring and Response Centre) at Exeter will provide weather forecasts following the release of radioactive materials into the environment. On notification of an accident the EMARC staff will run the NAME (Numerical Atmospheric Modelling Environment) simulation having input all given information about the release. Output from the Model is in a graphical map based form, as an animation to show plume behaviour

There is a 24 hour emergency contact point for the EMARC desk at Exeter. In addition the Met Office Advisor (Civil Contingencies) (MOACC) for SE England can provide additional help with interpretation of the data provided by Exeter. The MOACC can also attend Strategic Coordinating Centre meetings either in person or remotely.

Contact details for the MOACC: via Met Office Advisor – see AWE MA Activation Plan

Alerting Procedure

The Met Office will normally be activated by TVP and AWE as required.

Actions

Provide advice, if required, through the MOACC or Met Office Exeter on the plume direction during any release and post a release in order to support response requirements.

7T GOVERNMENT DECONTAMINATION SERVICE (GDS)

Role

The Government Decontamination Service (GDS), is part of the Department for Environment, Food and Rural Affairs (DEFRA), and can provide advice and guidance on decontamination processes and providers to support those responsible for decontamination and/or remediation following an incident which can involve Chemical, Biological, Radioactive or Nuclear materials (CBRN).

The GDS services are available on request (can be requested by Central Government, Emergency Services or Responsible Authorities who may be specified by statute or, in the case of a private body or company, may be the owner/agent of a building, location or asset).

Specifically the GDS can provide advice on:

- (a) Remediation options (including whether or not to decontaminate and what alternative options are available)
- (b) Capability, capacity and availability of specialist CBRN decontamination contractors in terms of decontamination of the built and open environment, infrastructure and transport. They may, if invited to do so, be able to offer other resources to assist in the site clearance process e.g. monitoring and sampling
- (c) Support (and facilitate where necessary) the contractual relationship between the Responsible Authority (or Agent) and specialist CBRN decontamination contractor(s) through a Framework where agreed terms, conditions and pricing schedules are already in place.

Alerting Procedure

Via DEFRA as detailed in figure below.

Actions

The actions of the GDS include:

- (a) Attend SCG with at least one representative in the STAC and the RCG
- (b) Advise the STAC and RCG of decontamination options, issues and costs
- (c) Liaise with private companies to prepare for a possible deployment for decontamination
- (d) Provide options to the RCG for clear up/decontamination
- (e) Support the decontamination process
- (f) Work with the specialist companies on specific aspects of decontamination as they might impact on their operations
- (g) Work with the RCG to develop strategies

In order for the GDS to provide the advice etc. then the following information would be requested:

- (a) The specifics and extent of contamination (What, where, how much, fixed or mobile?)
- (b) Site plans (both street and buildings – with services where possible) and rendezvous/strategic holding areas for Framework Suppliers to bring kit/staff forward to
- (c) Details of who is responsible for managing the remediation process will they accept responsibility for the cost of a specialist CBRN decontamination contractor – if not, who will?
- (d) Details as to whether the contamination been contained to prevent further spread?
- (e) Have forensic investigations been completed by the police and specialist teams (GDS specialist suppliers can assist in this process if requested) and the site handed over for remediation?

Details of the Recovery Coordination Group (RCG) and whether a decision to decontaminate has been taken? – prioritisation of work and resources may be required.

(GDS Science Team may assist with technical remediation options and can feed information into the remediation / decontamination strategy / Science and Technical Advice Cell (STAC) / Strategic Coordination Group)

In order that the decontamination process can continue then the following would be considered in the Decontamination Process:

- (a) Specific sampling and monitoring would be carried out to inform the decontamination strategy
- (b) RCG and STAC agree decontamination and waste strategy (includes agreed end point, planning to prioritise workloads, cost estimation, decisions on decontamination technology, disposal routes and monitoring processes)
- (c) Once engaged, the specialist GDS contractor(s) will, in accordance with decontamination strategy, provide a plan which will include method statements and risk assessments
- (d) Decontamination carried out (various methods may apply)
- (e) Post decontamination (clearance) sampling carried out
- (f) Final clearance given by RCG / Clearance Committee
- (g) Completion report provided.

7U ACTION BY UTILITIES

During any major incident the utilities have a role to play in order to support the emergency response make sure the situation does not get worse for the community in the long term. The following details the main responsibilities of the utilities.

WATER COMPANIES

Role

Thames Water and South East Water are the main water utility companies covering both areas around the sites. Their main responsibilities are to ensure that the public water supply meets the legal requirements and as a result is fit for human consumption.

Alerting Procedure

The Environment Agency will alert the Water Company (ies) in the affected area.

The Water Companies will then alert through their own internal systems.

Actions

The main responsibilities of the water company would be to:

Assess the risk of contamination of the public water supply

- (a) Sample surface and, in certain cases, underground water sources used for public supply in an area extending up to or beyond 40km from the site. The samples would be sent for analysis for radioactive materials. This would be in conjunction with the EA and PHE CRCE
- (b) Consider the results obtained and any advice received from the Environment Agency in determining appropriate action
- (c) Provide advice to customers on public water supplies in accordance with the Public Health guidelines
- (d) Supply alternative drinking water to the affected areas as necessary
- (e) Attend the SCG, STAC and/or the RCG at SCC as necessary.

COMMUNICATION COMPANIES**Role**

The main communications provider, British Telecom, operates a monitoring system for 999 calls and may be alerted to an AWE Off-site Radiation Emergency in its early stages. Other communication providers will also monitor their networks to ensure communications are maintained.

Alerting Procedure

Any alert to the communications company would normally be via the SCG or via the responding agencies directly.

Actions

- (a) The main actions of all the communications companies are to monitor their networks to ensure communications is maintained
- (a) They may be invited to attend the SCG if there is a particular issue to be resolved.
- (b) Mobile Communications network operators may be requested to activate the Mobile Telephone Preferential Access Service (MTPAS)
- (c) BT on notification of an incident will specifically:
 - a. Maintain a log of all incoming and outgoing messages and a diary of events, times, dates etc.
 - b. Establish their Emergency Control Group and nominate a BT incident control manager.
 - c. Establish their Emergency Communications Centre and appropriate local emergency Control Point.

ELECTRICITY COMPANIES**Role**

The role and actions of the electricity companies are to:

- (a) To maintain /restore the supply of electricity
- (b) To isolate and make safe electrical apparatus as necessary.
- (c) Liaison with local authorities and other organisations as appropriate
- (d) To manage and operate electricity distribution to the conditions prevailing throughout the emergency
- (e) To respond to requests to connect and disconnect
- (f) To attend SCG as requested.

Alerting Procedure

Any alert to the electricity companies would normally be via the SCG or via the responding agencies directly.

GAS COMPANIES**Role**

The role and actions of the electricity companies are to:

- (a) To maintain as necessary the gas supply
- (b) To connect or disconnect gas supplies as requested
- (c) To attend SCG as requested.
- (d) Alerting Procedure
- (e) Any alert to the gas companies would normally be via the SCG or via the responding agencies directly.

Alerting Procedure

Any alert to the electricity companies would normally be via the SCG or via the responding agencies directly.

7V NETWORK RAIL**Role**

Network Rail's role is to control the rail network in an emergency. As a result within the DEPZs of the AWE sites there may be a requirement for Network Rail to be involved should the wind direction etc. result in the plume affecting or likely to affect the main London-Newbury or Reading-Basingstoke rail lines.

Alerting Procedure

Depending on the sectors affected and the distances involved of potential contamination then Network Rail will be notified by the British Transport Police or West Berkshire District Council.

Actions

Network Rail will:

- (a) Ensure that the users of the lines affected are informed of the incident, including Train Operating Companies (GWR, South West Trains etc.) and Freight Operating Companies.
- (b) Inform their National Operations Centre, other affected Routes, and controlling signal boxes for the area.
- (c) Work with other agencies at the most appropriate command level to ensure the most appropriate action is taken to secure the safety of all staff, passengers, freight and trains on the affected lines.
- (d) Ensure that any affected trains are properly identified and cleaned in conjunction with advice and guidance provided by STAC and the SCG/RCG.
- (e) Follow advice from STAC and the SCG/RCG in terms of closing and re-opening lines.

7W OTHER ORGANISATIONS

Other individual organisations may be involved as and when required. It may be none or only one or two are involved. However it may be that in a significantly large incident then more organisations will be called upon to assist.

Other organisations that may be asked to assist include:

The Military

To provide personnel, specialist plan and transport etc. on an as and when basis.

Voluntary Agencies

Would assist with Rest Centres etc. and would be coordinated by the relevant Local Authority

Road Transport organisations

To provide transport required of essential plan and machinery.

Passenger Transport Organisations

To provide transport for people in the event of any necessary temporary re-location of affected people

Other Local Authorities

To provide manpower and specialist equipment etc. under MOU agreements.

7X HIGHWAYS ENGLAND

Role

Highways England is responsible for managing, and maintaining the Strategic Road Network (SRN) throughout England. This is performed by the TOS (Traffic Officer Service) and Service Provider contracted to maintain

Highways England Traffic Officers and their Service Provider would be responsible, for providing assistance to the Emergency Services in the event of an incident at AWE Aldermaston with actual or potential off-site consequences where the need for closures on the SRN would be required.

Alerting Procedure

In the event of an offsite incident at AWE, Highways England East Regional Control Room would be informed by West Berkshire District Council, the Emergency Services (Police for AWE Burghfield only) in accordance with the procedure in the Emergency Plan.

Actions

The East Duty Regional Control Centre (RCC) Manager will:

- (a) Record full details of the incident, immediately open a log and call back to West Berkshire District Council in order to verify the message.
- (b) Inform the Duty Operations Manager
- (c) Inform the South Emergency Planning Team
- (d) Inform Service Provider and place on standby in case any closures are to be implemented on the SRN.

8 Communications Directory

This is stored on RD as a separate **AWE Multi-Agency Activation Plan**

Not available in public document for purpose of safety and security.

9 Glossary of Terms

Acronyms	Meaning
ACP	Aldermaston Command Post
ALARP	As Low As Reasonably Practicable
AWE	Atomic Weapons Establishment
AWE(A)	AWE Aldermaston
AWE(B)	AWE Burghfield
BC	Borough Council
BDBC	Basingstoke & Deane Borough Council
BEIS	Business, Energy and Industrial Strategy
CAA	Civil Aviation Authority
CBRN	Chemical Biological Radiation and Nuclear
CCG	Clinical Commissioning Group
CCS	Civil Contingencies Secretariat
CMC	Crisis Management Centre
COBR	Cabinet Office Briefing Room
COI	Central Office of Information
COMAH	Control of Major Accident Hazards Regulations 2015
COP	Common Operating Picture
CRIP	Commonly Recognised Information Picture
DE&SO	Defence Equipment and Support Organisation
DEFRA	Department of Environment, Food and Rural Affairs
DEM	Duty Emergency Manager
DEPZ	Detailed Emergency Planning Zone
DERP	Defence Environmental Restoration Program
DNEO	Defence Nuclear Emergency Organisation
DPH	Director of Public Health
EA	Environment Agency
ECC	Emergency Control Centre
ECOSA	Emergency Coordination of Scientific Advice
EELs	Emergency Exposure Levels
EHO	Environmental Health Officer
ELL	Emergency Exposure Levels

Acronyms	Meaning
EM (A)	Emergency Manager (Aldermaston)
EM (B)	Emergency Manager (Burghfield)
EMARC	Environmental Monitoring and Response Centre
ECC	Emergency Control Centre
EP	Emergency Planning
EPO	Emergency Planning Officer
FCP	Forward Control Point
FEPA	Food & Environmental Protection Act 1985
FRS	Fire and Rescue Service
FSA	Food Standards Agency
GDS	Government Decontamination Service
GLO	Government Liaison Officer
GLT	Government Liaison Team
HART	Hazardous Area Response Team
HCC	Hampshire County Council
HMEPA	Hazardous Material Environmental Protection Advisor
HoS	Head of Service
HQ	Headquarters
IAEA	International Atomic Energy Agency
INES	International Nuclear Events Scale
IRR	Ionising Radiation Regulations 2017
JRLO	Joint Regional Liaison Officer
LA	Local Authority
LALO	Local Authority Liaison Officer
LGD	Lead Government Department
LLC	Local Liaison Committee
LO	Liaison Officer
LRF	Local Resilience Forum
MAC	Media Advisory Centre
MACA	Military Aid to the Civil Authorities
MAIC	Multi-Agency Information Cell
MBC	Media Briefing Centre
MCA	Military Coordinating Authority

Acronyms	Meaning
MDP	Ministry of Defence Police
MHCLG	Ministry of Housing, Communities and Local Government
MHCLG RED	MHCLG Resilience & Emergency Division
MICR	Major Incident Control Room
MIP	Major Incident Plan
MOACC	Met Office Advisor Civil Contingencies
MOD	Ministry of Defence
mSv	millisieverts
NAIAG	Nuclear Accident Information Advisory Group
NAME	Numerical Atmospheric Modelling Environment
NARO	Nuclear Accident Response Organisation
NCC	National Coordinating Centre
NEPLG	National Emergency Planning Liaison Group
NHS	National Health Service
OOH	Out of Hours
OiC	Officer in Charge
ONR	Office for Nuclear Regulation
ONR RCIS	Office for Nuclear Regulation Redgrave Court Incident Suite
PACRAM	Procedures and Communications in the event of a Release of Radioactive Material
PHE	Public Health England
PHE CRCE	Public Health England Centre for Radiation, Chemical and Environmental Hazards
PIC	Public Information Centre
PIO	Press and Information Officer
PPE	Personal Protective Equipment
PR	Public Relations
PROW	Public Rights of Way
RBC	Reading Borough Council
RBFRS	Royal Berkshire Fire & Rescue Service
RCC	Regional Control Centre
RCG	Recovery Coordinating Group
RCIS	Redgrave Court Incident Suite

Acronyms	Meaning
RD	ResilienceDirect
RED	Resilience & Emergency Division
REL	Rear Echelon Link
REPPIR	Radiation Emergency Preparedness and Public Information Regulations 2001
RF BDE CDR	Regional Force Brigade Commander
RIMNET	Radiological Incident Monitoring Network
RMU	Radiation Monitoring Unit
RPA	Radiation Protection Advisor
RRT	Regional Resilience Team
RVP	Rendezvous Point
SAGE	Scientific Advisory Group for Emergencies
SBC	Slough Borough Council
SCAS	South Central Ambulance Service
SCC	Strategic Coordinating Centre
SCG	Strategic Coordinating Group
SITREP	Situation Report
SSA	Senior Scientific Adviser
STAC	Scientific and Technical Advisory Cell
SW PT FPOC	Strategic Weapons Project Team First Point of Contact
TVP	Thames Valley Police
WBC	Wokingham Borough Council
WBDC	West Berkshire District Council

AWE Off-Site Emergency Plan

Joint Emergency Planning Unit

**If you are being alerted regarding activation
of this plan go to **SECTION 3** [Page 25](#)
for the callout notifications**

**You should also check your own agency major incident
plan/action cards for agency specific actions.**

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Section One

1 Introduction & Plan Administration

1.1 Introduction

The Atomic Weapons Establishment (AWE) sites, Aldermaston (A) and Burghfield (B), are required to comply with several pieces of legislation including Radiation Emergency Preparedness and Public Information Regulations 2019 (REPPIR) as a result of the hazardous materials and processes they undertake on site in particular radioactive sources.

Serious failures in plant operation or process conditions and/or physical damage to a research or production facility at either of the AWE sites, might conceivably lead to a release of radioactive material or other hazards which could present a local problem within the sites boundaries and potentially outside the sites boundaries and therefore affect the wider community.

The likelihood that such a scenario could endanger the public outside a site boundary is considered to be low. However, due to the potential hazards from the AWE sites and the possibility of a release of radioactive or toxic material to the environment, sufficient in severity to necessitate action to be taken to protect employees, the public and the environment, this AWE Off-Site Emergency Plan (this plan) has been developed.

Off-site emergency arrangements are also a requirement of the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPIR) as a result this plan sets out the emergency arrangements for a multi-agency response to any on-site emergency with actual or potential off-site consequences at the AWE Aldermaston or Burghfield sites.

This plan has been prepared by West Berkshire District Council (WBDC) in conjunction with the AWE Off-Site Planning Group.

This plan sets out the multi-agency response. It is the responsibility of each responding organisation to prepare, revise and test their own plans in relation to the operational procedures described in this Plan in order to discharge their responsibilities under these arrangements.

1.2 Aim & Objectives

The **aim** of this plan is to enable an effective response to incident at either of the Atomic Weapons Establishments which has or could have an impact on the community surrounding the sites.

The **objectives** of this plan are to provide:

- (a) Information about the sites and their hazards
- (b) The roles and responsibilities of each responding agency
- (c) The activation, command & control and coordination procedures
- (d) Protective actions to implement
- (e) Warning and Informing, including communication procedures
- (f) Information about recovery
- (g) Where to find more information.

1.3 Legislation

Nuclear Installations Act 1965. The principal hazard to the public from a serious accident at the AWE sites will be the release of radioactive materials. There may be risks to health as a result of such a release. Therefore all activities on all nuclear sites in the UK are regulated under the Nuclear Installations Act 1965 and a Nuclear Site License is granted to sites with the proviso they satisfy a number of license conditions. One of these conditions requires that adequate emergency arrangements are in place.

The Radiation (Emergency Preparedness and Public Information Regulations 2019 (REPPIR)) came into effect in 2019 (replacing REPPIR 2001). One of the aims of REPPIR is to protect members of the public from a release of radioactive material from premises working with radioactive materials where an accident could result in a radiation emergency. A radiation emergency is defined as a non-routine situation or event arising from work with ionising radiation that necessitates prompt action to mitigate the serious consequences:

- (a) of a hazard resulting from that situation or event;
- (b) of a perceived risk arising from such a hazard; or
- (c) to any one or more of-
 - i. human life;
 - ii. health and safety;
 - iii. quality of life;
 - iv. property;
 - v. the environment

For the purposes of REPPIR 19, in addition to consideration of perceived risks, all non-routine events that may result in an annual effective radiation dose of 1 mSv or more, to one or more person(s) off-site over a period of one year following the event, are considered to be a radiation emergencies.

REPPIR 19 also requires that the lead local authority must:

- i. Determine the Detailed Emergency Planning Zone (DEPZ) (Reg 8).
- ii. Prepare, revise, test and implement the AWE Off-Site Emergency Plan (Reg 11).
The plan should bring together the emergency arrangements of all the off-site

agencies with a role to play in the intervention and mitigation of an emergency occurring at the premises, and prepare arrangements to supply information to members of the public in the event of a radiation emergency actually occurring, however it may occur.

- iii. Provide information to the population within the DEPZs so they are informed and prepared in the unlikely event of a radiation emergency occurring (Reg 21, Part 2, Schedule 8).
- iv. Have information available to those within the Outline Planning Zone (OPZ) (Reg 21 Part 2, Schedule 8)

Other Legislation

There are various other materials and processes on the AWE sites which may give rise to other risks which may affect the community should there be an accident. These risks are reduced by way of other legislative requirements including:

- (a) Control of Major Accident Hazards (COMAH)
- (b) Health & Safety at Work etc. Act 1974
- (c) Environmental Protection Act 1990
- (d) Food and Environmental Protection Act 1985

More information about the materials and hazards on site is detailed in [Section 2](#).

1.4 Supporting Plans

As a requirement of the Civil Contingencies Act 2004 (CCA), Category 1 responders maintain a number of plans which may also be activated in support of this plan. There are too many plans to detail them all in this plan, however some of key supporting multi-agency plans include:

- (a) Hampshire & Isle of Wight (HIOW) and Thames Valley Local Resilience Forum (TVLRF) Emergency Response Arrangements (ERA)
- (b) Thames Valley Local Resilience Forum Communications Plan
- (c) PHE South East Scientific and Technical Advisory Cell Plan
- (d) Thames Valley Local Resilience Forum Recovery Plan
- (e) Hampshire and Isle of Wight Local Resilience Forum (HIOW LRF) Community Recovery Plan
- (f) HIOW & TVLRF Radiation Monitoring Unit Interim Operational Plan

In addition there are individual agency plans and although not a Category 1 Responder, AWE also maintains On-Site Emergency Plans for the Aldermaston and Burghfield sites.

1.5 Plan Review & Revision Record

Ser	Date	Reason for amendment
1	Nov 2000	New Legislation
2	Jan 2004	Learning from Exercise
3	2005	Learning from Aldex 04
4	July 2009	Changes in Organisation
5	July 2011	Learning from Aldex 10
6	Mar 2012	Cascade and Contacts updated
7	Oct 2013	Plan revision following Health review and Cascade exercises
8	Mar 2015	Learning from exercises and organisational changes
9	Oct 2015	Feedback on content – amendments made
10	Dec 2015	Feedback on final draft plus issue of national guidance
11	Oct 2016	Changes to DEPZ for AWE Aldermaston (AWE (A))
12	Nov 2017	Changes due and learning from Aldex 16
13	Sept 2018	Changes due to DEPZ changes at AWE Burghfield (AWE (B))
14	Jan 2019	Changes to public dose from a reference accident
15	May 2020	REPPIR 2019 introduced with new duty holder positions
15.1	Oct 2020	Further updates from May 2020 consultation
15.2	Nov 2020	Updates received from October 2020 consultation
15.3	2020/2021	Updates prior to Workshops

1.6 Management of the Plan

The plan owner is West Berkshire District Council (WBDC). WBDC will ensure the plan is updated in accordance with:

- (a) Following any major incident or near incident at the site(s)
- (b) Following a major incident or near incident at other sites where lessons have been identified
- (c) Following any organisational or process changes
- (d) On at least a 3 yearly basis a full formal review will be undertaken

Following any review and revision the plan will be forwarded to all members of the AWE Off-Site Planning Group as appropriate for consultation and agreement.

WBDC will circulate any amendments to those involved via ResilienceDirect (RD):

Each organisation should inform the AWE Off-Site Planning Group of changes that are relevant to the plan and, therefore, the response to an off-site incident.

1.7 Contributors

This plan was prepared by West Berkshire District Council in conjunction with the AWE Off-Site Planning Group, consisting of Emergency Planning Officers and professionals drawn from the following organisations:

AWE Plc
Basingstoke and Deane Borough Council (BDBC)
Clinical Commissioning Group (CCG) (Berkshire West)
Environment Agency (EA)
Food Standards Agency (FSA)
Ministry of Housing Communities and Local Government (MHCLG) Resilience and Emergency Division (RED)
Defra CBRN Emergencies Team
Hampshire County Council (HCC)
Hampshire Constabulary
Highways England
Office for Nuclear Regulation (ONR)
Met Office
Ministry of Defence (MOD)
National Health Service (NHS) England/NHS Improvement and Health systems across West Berkshire and Hampshire
Network Rail
Public Health England (PHE) South East (SE)
PHE Centre for Radiation, Chemical and Environmental Hazards (CRCE)
Reading Borough Council (RBC)
Royal Berkshire Fire and Rescue Service (RBFRS)
Royal Berkshire Hospital (RBH)
South Central Ambulance Service NHS Foundation Trust (SCAS)
Thames Valley Police (TVP)
Thames Water (TW)
West Berkshire District Council (WBDC)
Wokingham Borough Council (WBC)

1.8 Plan Distribution

The plan is available to distribute to all contributing organisations on Resilience Direct.

1.9 *Feedback on the Plan*

If readers have constructive comments to make regarding this plan then they should be put in writing to:

Joint Emergency Planning Unit,
West Berkshire District Council,
Council Offices,
Market Street,
Newbury,
BERKSHIRE
RG14 5LD
emergencyplanning@westberks.gov.uk

Section Two

2 About the Premises

2.1 Site Addresses

AWE Aldermaston
Aldermaston
Nr Reading
Berkshire
RG7 4PR

AWE Burghfield
The Mearings
Burghfield, Nr Reading
Berkshire
RG30 3RR

2.2 Site Purpose

The Ministry of Defence (MOD) owns both the sites and contracts AWE plc to operate both sites. Their primary function is to carry out work in support of the UK Nuclear Deterrent Programme.

[AWE, the Atomic Weapons Establishment](#), has been central to the defence of the United Kingdom for more than 50 years. It provides and maintains the warheads for the country's nuclear deterrent, Trident.

Trident is a submarine-launched, inter-continental ballistic nuclear missile weapons system, carried by Royal Navy Vanguard-class submarines. The role of AWE is to design, manufacture, maintain and decommission the warheads for the Trident system, ensuring optimum safety and performance, but also to maintain a capability to produce a successor system should the Government require one in the future.

The work at AWE covers the entire life cycle of nuclear warheads; from initial concept, assessment and design, through to component manufacture and assembly, in-service support, and finally decommissioning and disposal.

The AWE Aldermaston (AWE (A)) site is located in Berkshire, between Tadley and Aldermaston on the Berkshire/Hampshire border. The AWE Burghfield (AWE (B)) site is located in Berkshire between Burghfield Village and Reading.

Both sites are large multi acre sites and contain a wide range of industrial and office facilities.

Both sites were granted Nuclear Site Licensing in 1997 when crown immunity was removed from MOD sites.

2.3 AWE Aldermaston – Site Specific Information

This site is the company's headquarters and is a former WWII airfield, the site is now a centre providing advanced research, design and manufacturing facilities.



REDACTED ON BASIS OF SECTION 23 & 24

Associated mapping Ordnance Survey Maps:

- (a) OS Landranger Newbury & Wantage, Sheet 174, 1:50,000
- (b) OS Landranger Reading & Windsor, Sheet 175, 1:50,000

Unlike many other nuclear establishments, AWE Aldermaston is located inland and not on the coast. To the south of the site is the urban community of Tadley and to the North is a slightly more rural area and the village of Aldermaston.

2.4 AWE Burghfield – Site Specific Information

AWE Burghfield, a former WWII munitions factory, is the site responsible for the complex final assembly and maintenance of warheads while in service, as well as their decommissioning.



REDACTED ON BASIS OF SECTION 23 & 24

Associated mapping Ordnance Survey Maps

- (a) OS Landranger Newbury & Wantage, Sheet 174, 1:50,000
- (b) OS Landranger Reading & Windsor, Sheet 175, 1:50,000

Similar to the AWE Aldermaston the AWE Burghfield site is inland but is in a more rural setting with the nearest communities being several kilometres from the site boundary.

Background information relating to the location and demographics around both AWE sites can be found on West Berkshire District Council's website

[Mapping](#)
[Demographics](#)

2.5 On Site AWE Material Hazards

Both AWE sites have a range of potentially hazardous materials on site, both non-nuclear and nuclear materials. All materials are stored and used in an approved manner as required by legislation.

The summary of the materials used on the sites are:

- (a) radioactive materials plutonium, uranium and tritium, plutonium being potentially the most hazardous
- (b) conventional explosive components which are also manufactured and tested. Explosives are stored in approved and licensed storage magazines. In common with other MOD establishments that store and process conventional explosives, a "safeguarding map" (used to provide guidance in planning future development) is lodged with the local authority.
- (c) Chemical substances with the AWE (A) site has been designated a lower tier site under the Control of Major Accidents Hazards (COMAH) Regulations 2015 due the volumes and type of chemicals involved.

Further more detailed information about the specific hazard information is provided in the table and subsequent paragraphs set out below. Further information can be found in the [chemical hazards compendium](#).

The table below provides information on identified hazards, what may go wrong and the potential off-site consequences.

Identified Hazard	Scenario	Potential Off-Site Consequence
Asbestos	Since many buildings at AWE were constructed in the 1950s and 1960s, asbestos may be released as a result of a conventional fire affecting one of these buildings.	Contamination of individuals and properties with asbestos. Long term risk of ill health as a result of significant exposure. No short term health effects. Potential to displace limited numbers of members of the public for the medium term whilst monitoring and decontamination is completed.
Beryllium	Release of beryllium from a facility may result in contamination of downwind areas. A release of beryllium may be combined with a release of radioactive material	Contamination of individuals and properties with beryllium. Long term risk of ill health as a result of significant exposure. No short term health effects. Potential to displace limited numbers of members of the public for the medium term whilst monitoring and decontamination is completed.
Bulk storage of Transformer Oil	Escape of transformer oil in significant quantities from a facility may result in contamination of areas outside the site boundary.	Environmental pollution of drains and watercourses outside the site boundary.

Identified Hazard	Scenario	Potential Off-Site Consequence
Environmental pollution by chemicals	A major accident of a chemicals from a delivery vehicle on-site but near to the site boundary may result in environmental contamination outside the site boundary.	Pollution of water courses, possible limited effect on drinking water quality
Explosives	Explosive hazard may result in hazards being projected off site beyond the site boundary.	Projectile hazard may require cordoning and/or evacuation of premises/areas outside the site. Road closures and diversions. Displacement of members of the public for a considerable period.
Fissile Radioactive Material	Criticality incident in certain facilities may result in an elevated radiation dose at the site boundary.	Elevated (but not life-threatening) radiation dose rates within very limited areas of the site boundary. Local cordons may be required around limited areas of the site boundary and may extend across public roads.
Inert Gases	A major accident of an inert gas from a delivery vehicle near to the site boundary may result in an asphyxiating atmosphere outside the site boundary.	Potential asphyxiation of individuals that do not remove themselves or are not removed from the hazard area promptly. Potential requirement for significant cordon around the incident scene requiring short-term evacuation of members of the public.
Natural Gas	The leakage of natural gas on the site may result in a flammable atmosphere outside the site boundary.	Conflagration of flammable atmosphere resulting in blast wave, burns and blast injuries as well as property damage in very limited areas outside the site boundary.
Pressurised cylinders/containers	Reaction of a pressurised container in a fire or other initiating event may result in a projectile hazard outside the site boundary.	Projectile hazard may require evacuation of premises/areas outside the site. Road closures and diversions. Displacement of members of the public for a period of up to 24 hours.
Radioactive Material	Release of radioactive material from a facility may result in contamination of downwind areas outside the site boundary.	Significant downwind radioactive contaminations of individuals, premises, transport routes. Sheltering and evacuation (as well as temporary or permanent relocation) of potentially contaminated areas may be

Identified Hazard	Scenario	Potential Off-Site Consequence
		required, involving the displacement of potentially large numbers of members of the public for an extended period.
Radioactively contaminated water	A release of water potentially contaminated with radioactive material from the Aldermaston or Burghfield sites may result in the contamination of water courses.	Pollution of water courses, with possible effect on drinking water quality.
Release of toxic chemicals	A major accident of a toxic chemical from a facility may result in a hazard requiring a cordon extending outside the site boundary.	Respiratory problems, chemical burns in localised areas outside the site boundary. Potential for a cordon requiring evacuation of very limited areas outside the site boundary in the short-term.
Smoke	A significant 'conventional' fire on the site may result in combustion products being released outside the site boundary.	In certain meteorological conditions, toxic smoke may drift downwind and cause respiratory problems in members of the public. Traffic restrictions and limited evacuation of downwind areas may be required.
Steam	A major failure of the AWE steam main in certain locations may result in a localised steam (heat) hazard outside the site boundary.	Localised release of steam, high temperatures, poses risk of steam burns to individuals in immediate vicinity. Possible requirement for localised road closure immediately adjacent to the site boundary.

Note the term Major Accident has been used above and relates to the definition provided by COMAH 2015 legislation:

An occurrence will be a major accident if it meets one the following three conditions:

- (a) It results from uncontrolled developments at an establishment to which the Regulations apply; and
- (b) It leads to serious danger to human health or to the environment, inside or outside the establishment; and
- (c) It involves one or more dangerous substances defined in the Regulations, irrespective of the quantity involved.

2.6 Radioactive Materials Information – Including response considerations

Plutonium

General Information

Plutonium metal is chemically very reactive and oxidises in moist air (or in a fire) to form plutonium oxide that can exist as fine particles, invisible to the naked eye due to their size, that may become "airborne" and be carried downwind for considerable distances (kilometres). They can land on and "contaminate" surfaces and pose an inhalation hazard. Plutonium oxide is insoluble in water but a water wash will help remove oxide dust particles (simple decontamination) and damp them down to minimise re-suspension. The levels of dispersed material would normally decrease as the distance from the event location increases, until they became undetectable.

Radiological Information

Plutonium emits alpha radiation which cannot penetrate more than a few centimetres of air, a film of moisture, intact skin or clothing. It will not cause radiation burns to the skin and external radiation from a cloud or deposits is negligible. However alpha emitters inhaled or ingested pose a potentially significant radiological hazard.

Health Hazards

If plutonium oxide is breathed in, or enters the body through a cut, then any material that is retained (and not coughed up or washed out) will slowly be dissolved by body fluids and be distributed round the body. Plutonium is taken up by the cells of the bone surfaces and the liver, from where it is slowly excreted over many years in the urine and faeces. Living cells in any organ that is exposed to alpha radiation from plutonium may be killed, or damaged in such a way that the statistical risk of developing a cancer at some time in the future is increased.

Potential Impact relating to an Off-Site Radiation Emergency

Consideration	Impact from Plutonium
Environmental & Building Issues.	<p>Plutonium could be dispersed as particles of oxide dust into the atmosphere and would be carried along by the prevailing wind to form a "plume" of solid particles, rather like a cloud or plume of smoke.</p> <p>Dispersed radioactive material would fall to earth again; landing on surfaces to produce a fine but invisible layer of radioactive material loosely called "contamination". The area involved would extend from the origin of the event within the site to areas downwind from it. The levels of dispersed material would normally decrease as the distance from the event increased, until they became undetectable.</p> <p>Later, any activity that disturbed deposited plutonium oxide particles might lead to its re-suspension in the air and to the inhalation of airborne particles. The magnitude of the hazard would depend on the level of deposited material, the proportion of it re-suspended and the length of time for which an individual was exposed to it.</p>

Consideration	Impact from Plutonium
Human Health Issues.	Dispersed material containing plutonium could present a hazard if it were to find its way into the human body. This could occur if airborne particles of plutonium oxide were to be inhaled from the passing cloud. The magnitude of the hazard would depend on the level of deposited material, the proportion of it re-suspended and the length of time for which an individual was exposed to it, increasing the statistical risk of developing cancer in the future.
Food & Water Issues.	If foodstuffs or water contaminated with deposited material were consumed, radioactive materials might be ingested and enter the body, increasing the statistical risk of developing cancer in the future

Uranium**General Information**

Enriched Uranium is similar chemically to plutonium, but significantly less hazardous. Like plutonium it forms an insoluble particulate dust.

Depleted Uranium is very much less hazardous than enriched uranium.

Radiological Information

Uranium emits feebly penetrating alpha particles. In an incident it would behave similarly to plutonium and could be dispersed by fire as particles of oxide.

Health Hazards

Particles might be inhaled from the passing cloud or by disturbing (resuspending) deposited material. Radioactive material might be ingested if contaminated substances were consumed.

Potential Impact relating to an Off-Site Radiation Emergency

Consideration	Impact from Uranium
Environmental & Building Issues.	<p>Uranium could be dispersed as particles of oxide dust into the atmosphere and would be carried along by the prevailing wind to form a "plume" of solid particles, rather like a cloud or plume of smoke.</p> <p>Dispersed radioactive material would fall to earth again; landing on surfaces to produce a fine but invisible layer of radioactive material loosely called "contamination". The area involved would extend from the origin of the event within the site to areas downwind from it. The levels of dispersed material would normally decrease as the distance from the event increased, until they became undetectable.</p> <p>Later, any activity that disturbed deposited uranium oxide particles might lead to its re-suspension in the air and to the inhalation of airborne particles. The magnitude of the hazard would depend on the level of deposited material, the proportion of it re-suspended and the length of time for which an individual was exposed to it, increasing the statistical risk of developing cancer in the future.</p>
Human Health Issues.	<p>Dispersed material containing uranium could present a hazard if it were to find its way into the human body. This could occur if airborne particles of uranium were to be inhaled from the passing cloud.</p>
Food & Water Issues.	<p>If foodstuffs or water contaminated with deposited material were consumed, radioactive materials might be ingested and enter the body, increasing the statistical risk of developing cancer in the future.</p>

Tritium

General Information

Tritium is a radioactive form of hydrogen gas. Tritium gas, like hydrogen gas is flammable and in a fire would burn readily to form radioactive tritium oxide and might form tritiated water by replacing an ordinary hydrogen molecule in water vapour. In the absence of fire the gas (like hydrogen) will disperse upwards rapidly due to its very low density and be of little hazard. Tritium might replace some of the hydrogen in water, oils and plastics and contaminate them.

Radiological Information

Tritium emits very low energy radiation, beta particles that have very low penetrating power. The radiation is unlikely to penetrate intact skin and clothing and will not cause radiation burns to the skin. External radiation from a passing cloud or from deposited material would be negligible.

Health Hazards

Human body tissues are composed largely of water. If tritium enters the body either as a gas (inhalation) or as tritiated water or contaminated food (ingestion) it will spread quickly through the body water and tissues. It is excreted in the urine and the detection limit in urine is a small fraction of the level believed to be of any radiological significance. If tritium is taken into the body, after about ten days the natural turnover of body water will reduce the amount by half. Drinking more fluids will increase the rate of tritium excretion.

The most vulnerable groups likely to be affected by an off-site release involving tritium would be breast fed infants and an unborn child. This is because the mother may ingest or inhale the tritium (in the form of tritiated water) and pass this on to the unborn child or pass to the breast fed infant through the contaminated mother's milk.

Potential Impact relating to an off-site emergency

Consideration	Impact from Tritium
Environment & Buildings	<p>Tritium that remained in the form of gas would behave similarly to hydrogen and would disperse rapidly and upwards due to its very low density.</p> <p>Both tritiated water and tritium gas might be carried along by the prevailing wind to form a "plume" or cloud. The water content of the atmosphere and the turnover of water in the environment would ensure the rapid dispersion and dilution of any tritium or tritiated water that was released, as a result significant levels of tritium contamination occurring outside the AWE site involved is unlikely</p>
Human Health	<p>Tritium emits very low energy beta particles that are unlikely to penetrate clothing or skin. External radiation from the passing cloud or from deposited material containing tritium would be negligible.</p> <p>Dispersed tritium containing material could present a hazard if it were to find its way into the human body. This could occur if airborne tritiated material was inhaled from the passing cloud,</p>

Consideration	Impact from Tritium
	<p>was absorbed through the skin, or if contaminated foodstuffs were consumed.</p> <p>In the case of breast feeding or pregnant mothers, a proportion of the inhaled/ingested dose will be transferred to the unborn child or passed on to the breast feeding infant through contaminated mothers' milk</p> <p>If tritium containing material was inhaled or ingested it would be rapidly dispersed throughout the body tissues (which themselves consist largely of water) and would be excreted in the urine. Measures can be taken to promote excretion of urine (and hence of tritium) and minimise the consequences of any intake of tritium that may have occurred.</p>

2.7 Regulators

The processes carried out both the sites require compliance with Nuclear Installation Act 1965, the Explosive Regulations 2014, the Control of Major Accidents Hazards Regulations 2015 (COMAH), the Ionising Radiations Regulations 2017 and the Radiation Emergency Preparedness and Public Information Regulations 2019 (REPPPIR).

As a result of the above legislation the processes and materials held on both AWE site(s) are both subject to inspection by the Regulators. A number of regulators are involved depending on the legislation, these include (but not limited to):

- a) The Office for Nuclear Regulation (ONR)
- b) Environment Agency
- c) Health & Safety Executive
- d) Defence Nuclear Safety Regulator (DNSR)

The regulators must be satisfied as to the safety of the processes and handling of radioactive and toxic materials.

2.8 Possible Incidents

There are a number of systems that are in place in order to prevent, as far as possible, an incident from occurring in the first place. These systems, employed by the operator, are monitored by the Regulators who can use enforcement powers as necessary to ensure the systems are satisfactory. As a result, failures in plant, process or research operations should be significantly reduced and therefore the risk to the public outside the sites should also be reduced.

It should be noted that the following incidents are **not possible**:

- (a) An explosion resulting in a nuclear yield is not possible by virtue of the safety features in the design of the weapon
- (b) A reactor accident with off-site consequences is also not possible as neither site has an operating nuclear reactor with a significant core inventory of fission products.

(The "Herald" nuclear reactor at AWE Aldermaston was closed in the 1980s and its nuclear fuel removed from the site).

A radiation emergency may be caused as a result of a significant breach in the multiple containment barriers at a radioactive materials handling facility such as a major fire which might cause the dispersal of radioactive material in particulate form into the atmosphere. Any of the materials handled at the AWE sites (plutonium, uranium and tritium) might therefore be involved.

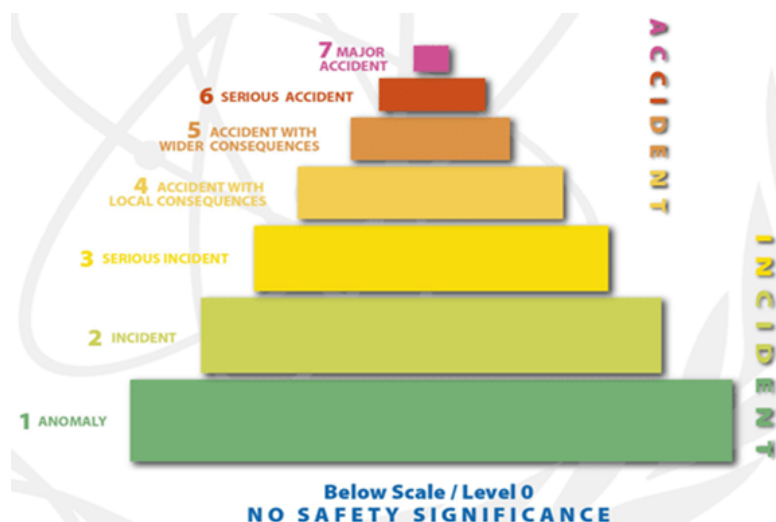
An accident involving the dispersion of plutonium would present the greatest potential hazard to the public if it were to occur.

2.9 Magnitude of Accident

The International Nuclear & Radiological Event Scale (INES) was introduced in 1990 by the [International Atomic Energy Agency](#) (IAEA) in order to enable prompt communication of [safety](#) significant information in case of [nuclear accidents](#). The primary purpose of INES is to facilitate communication and understanding between the technical community, the media and the public on the safety significance of events. The aim is to keep the public as well as nuclear authorities accurately informed on the occurrence and consequences of reported events.

A number of criteria and indicators are defined to assure coherent reporting of [nuclear events](#) by different official authorities. There are 7 levels on the INES scale; 3 [incident](#)-levels and 4 [accident](#)-levels, as illustrated in the diagram over.

The INES Scale (International Atomic Energy Agency (IAEA))



Although an accident caused by a failure in plant, process, research or production operations should not endanger the public outside the site, it is possible that an accident, with consequences extending beyond an AWE site boundary might occur.

Section Three

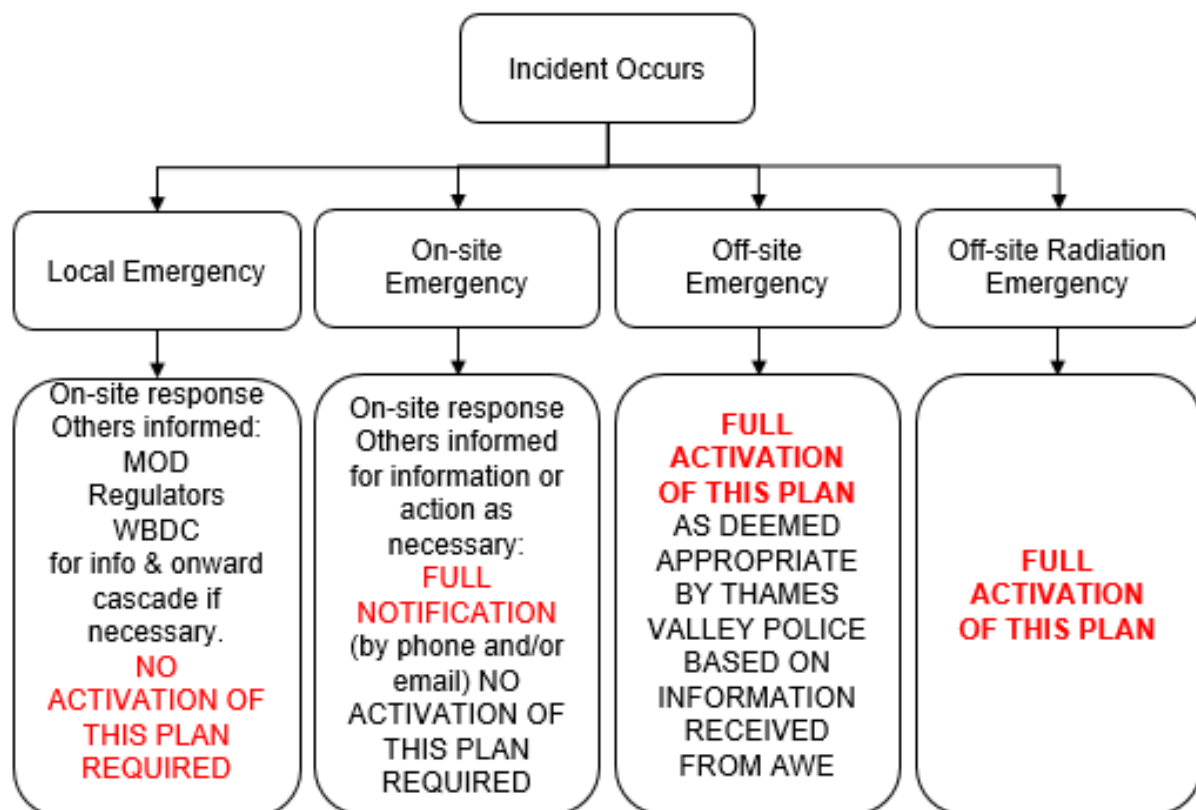
3 Plan Activation & Immediate Actions

3.1 Plan Triggers

This plan is triggered when it is believed a site emergency might or will cause an impact off site to the public and/or the environment regardless of the incident category ([Section 3.2](#) & [Section 3.3](#))

3.2 Activation Process

This plan is activated by AWE notifying Thames Valley Police of an incident and recommending activation of the plan.



3.3 IMMEDIATE ACTIONS – Primary Notification Cascade

If you are being alerted about an off-site incident follow the activation procedure below for the callout notifications contact details are stored on Resilience Direct.

Notifying Agency	Agencies Notified
AWE	<ul style="list-style-type: none"> • Thames Valley Police (TVP) • MOD First Point of Contact (FPOC) incl Military Coordinating Authority (MCA) Staff • ONR • Environment Agency (Radiation Incident Hotline) • Royal Berkshire Fire & Rescue Service (RBFRS) • South Central Ambulance Service NHS Foundation Trust • West Berkshire District Council • BT - Public Telephone Altering System
Thames Valley Police	<ul style="list-style-type: none"> • Hampshire Constabulary and other Police Forces if required • West Berkshire District Council • SCAS • RBFRS • Ministry of Housing Communities and Local Government (MHCLG) – Resilience and Emergency Division (RED) • Strategic Coordinating Centre (SCC) Activation including: <ul style="list-style-type: none"> – Highways England – British Transport Police (BTP) – Met Office – Civil Aviation Authority (CAA) if No Fly Zone required.
Royal Berkshire Fire and Rescue Service	<ul style="list-style-type: none"> • Health and Safety Executive • Environment Agency • Hampshire Fire and Rescue Service • West Berkshire District Council • Met Office
Hampshire Constabulary	<ul style="list-style-type: none"> • As per their normal Major Incident Plan

Notifying Agency	Agencies Notified
South Central Ambulance Service NHS Foundation Trust	<ul style="list-style-type: none"> Public Health England South East NHS England/NHS Improvement - South East On call (Hampshire and Thames Valley (HTV)) Designated Receiving Hospitals: <ul style="list-style-type: none"> Royal Berkshire Hospital Trust Hampshire Hospitals NHS Foundation Trust
Public Health England South East	<ul style="list-style-type: none"> Public Health England – Centre for Radiation, Chemical and Environmental Hazards (CRCE)
NHS England/NHS Improvement South East (HTV)	<ul style="list-style-type: none"> CCG On-call for affected area: <ul style="list-style-type: none"> Berkshire West CCG North Hampshire CCG NHS England/NHS Improvement - South East (Hampshire and Thames Valley)
Designated Receiving Hospitals: <ul style="list-style-type: none"> Royal Berkshire Hospital Hampshire Hospitals NHS Foundation Trust 	<ul style="list-style-type: none"> CCG On-call for affected area: <ul style="list-style-type: none"> Berkshire West CCG North Hampshire CCG
ONR	<ul style="list-style-type: none"> None
West Berkshire District Council	<ul style="list-style-type: none"> Berkshire Director of Public Health (DPH) & PH Consultant for Emergency Planning (EP) Hampshire County Council Reading Borough Council Wokingham Borough Council Any schools and nurseries in WBDC area Any residential care homes in WBDC area MHCLG - Resilience and Emergency Division Food Standards Agency Thames Water Canal & River Trust Network Rail Highways England Voluntary Sector as necessary Ward & Parish Council Members and MPs

Notifying Agency	Agencies Notified
<p>Other neighbouring Local Authorities as necessary:</p> <ul style="list-style-type: none"> • Hampshire County Council (for Basingstoke & Deane Borough Council (BDBC)) for AWE (A) • Reading BC for AWE (B) • Wokingham BC for AWE (B) 	<ul style="list-style-type: none"> • Normal activation • Any schools and nurseries in affected area • Any residential care homes in affected area • Ward & Parish Council Members and MPs
Resilience and Emergency Division	<ul style="list-style-type: none"> • Cabinet Office as required by scale of event.
MCA Staff	<ul style="list-style-type: none"> • MOD Headquarters (HQ)
MOD HQ	<ul style="list-style-type: none"> • Activation of the Headquarters Defence Nuclear Emergency Organisation (HQ DNEO) in MOD Main Building. • Activation of the Chief of Defence Staff Duty Officer (CDSDO) alert of other government departments and agencies required to respond to an activation of the Cabinet Officer Briefing Room (COBR).

3.4 Incident Categories

Should an incident occur at an AWE site then the following categories are used:

Descriptor	Description	Examples (not exhaustive)	Scale of Activation
LOCAL EMERGENCY	Any incident which requires only local emergency arrangements to be activated and has no consequences extending beyond the building/facility boundary/localised area	Local spillage of hazardous material not extending beyond facility boundary. Industrial accident causing casualties but no other non-localised hazards.	On-site response Others informed: <ul style="list-style-type: none"> • MOD • Regulators • WBDC for info & onward cascade if necessary. NO ACTIVATION OF THIS PLAN REQUIRED
ON-SITE EMERGENCY	Any incident that requires emergency management at site level and has consequences extending beyond building/facility/localised area but not beyond the relevant site boundary.	Criticality excursion. Minor release of radioactive material outside a facility boundary. Security incident.	On-site response Others informed for information or action as necessary: FULL NOTIFICATION (by phone and/or email) NO ACTIVATION OF THIS PLAN REQUIRED.
OFF-SITE EMERGENCY	Any incident that has actual or potential NON-RADIOLOGICAL off-site implications.	Significant incident where the hazard extends beyond the site boundary and poses a potential risk and/or causes significant disruption to the public outside the site.	FULL ACTIVATION OF THIS PLAN AS DEEMED APPROPRIATE BY THAMES VALLEY POLICE BASED ON INFORMATION RECEIVED FROM AWE
OFF-SITE RADIATION EMERGENCY	Any incident that has actual or potential off-site RADIOLOGICAL implications.	Incident resulting in an actual or potential release of radioactive material or energy over the site boundary.	FULL ACTIVATION OF THIS PLAN

3.5 Site Situation Report (SITREP)

Below is the AWE Incident Reporting Form which would be sent to professional partners at the start and as necessary during an incident

SITE SITUATION REPORT (SITREP)	
AWE EXERCISE/ INCIDENT/ EMERGENCY*	
Time of incident:	At approximately:
Major Emergency Declared	Local/ On-Site/ Off-Site / Radiation Emergency *
Exact Location	AWE(A) or AWE(B) Facility
Type of Emergency	Concise description.
Hazards	Concise description.
Access	E.g. Direction/ Gate.
Number & Type of Casualties	Estimated number.
Emergency Services Present & Required	Attending/ requested.
Protective actions	Sheltering in sectors? Notification to community in DEPZ. External Roads closed.
Weather	Wind from degrees +/- degrees, Average speed? Metres/second.
Site Actions	Ministry of Defence Police (MDP) have secured the site Site undercover (sheltering). Cordon Size Gate closures Site Evacuation
Command & Control:	AWE Emergency Operations and Control Centre (EOCC) Aldermaston (A) is activated.* AWE Emergency Operations and Control Centre (EOCC) Burghfield (B) is activated.* Ad hoc/Fall-back EOCC is activated at*
ACTIONS for Agencies:	You are requested to activate the procedures in line with the AWE Off-Site Emergency Plan and be prepared to send officers to the SCC and/or the AWE Emergency Operations and Control Centre (EOCC) Aldermaston (A) as set out in the AWE Off-Site Emergency Plan.
Shelter Completed by: Date & Time:	

3.6 Actions by on-site Emergency Managers

The following tables show the on-site actions on activation which would be initiated by the Emergency Manager (AWE (A)) or Emergency Manager (AWE (B)) and the off-site plan implications/actions.

3.6.1 On-site plan actions – no off-site risk

Actions on-site	Off-site Implications
<ul style="list-style-type: none"> a. Alarms are raised across the site b. There are a number of local onsite alerting signals that apply to a single building or a small group of buildings including public address messages c. These alerts are for the staff, contractors and visitors on-site. d. The full on-site plans will be put in place should alarms which are not tests are sounding. 	<ul style="list-style-type: none"> a. If no offsite implications then there is no action to be taken. It should also be noted that: b. These systems are periodically tested and, on occasions, can be heard outside the site depending on the wind direction. No action is necessary by the public if these systems or messages are overheard Notification of any tests is provided to the local community via representation on the AWE Local Liaison Committee (AWE LLC).

3.6.2 On site Plan actions – Off-site implications

Actions on-site by AWE	Off-site Implications
<p>Assessment & Activation</p> <ul style="list-style-type: none"> a. If alerting signals do sound (not a routine test), or if any event occurred that might have caused public disquiet (such as visible smoke or emergency service activity) or any other more significant off-site consequences, then AWE will recommend activation of this plan to Thames Valley Police b. AWE will activate MOD response 	<p>Thames Valley Police will formally activate this plan using cascade details in the contacts directory</p> <ul style="list-style-type: none"> a. Following the initial notification as per cascade each organisation would activate its own call-out and notification procedures to ensure that all appropriate national agencies or organisations, are notified of the emergency b. Ensure the appropriate staff attend the relevant multi-agency locations including the Strategic Coordinating Centre (SCC), covering roles in the: <ul style="list-style-type: none"> i. Strategic Coordinating Group (SCG) ii. Scientific & Technical Advice Cell (STAC) iii. Recovery Coordinating Group (RCG) iv. Media Advisory Cell (MAC) and support as necessary v. and other sub groups as set up c. Tactical Coordinating Group (TCG)

Actions on-site by AWE	Off-site Implications
	<ul style="list-style-type: none"> d. Emergency Operations and Control Centre (Aldermaston) at the Aldermaston site as requested e. attend their own agencies emergency operations centres/incident rooms f. Ensure the relevant trained staff attend the site.
<p>Information</p> <p>AWE will provide information to those agencies it makes initial contact with, confirming:</p> <ul style="list-style-type: none"> a. The details of the incident b. A provisional categorisation c. Follow up Situation Report (SITREP) via email/ ResilienceDirect. 	<p>Agencies would respond according to their roles and responsibilities (as per Section 11).</p>
<p>Warn & Inform Public</p> <p>In the event of a radiation emergency, AWE will also activate a telephone alerting system to give early warning to members of the public in the locality and to advise on the initial protective actions to be taken. This information will include:</p> <ul style="list-style-type: none"> a. A notification that there is an incident at the relevant AWE site b. Advice to remain inside with windows and doors closed (sheltering) c. Advice to listen to local radio and television for Public Service Broadcasts. 	<p>Community to follow advice provided</p> <p>Note: the AWE telephone alerting system is run as an 'opt-out' basis only; only those individuals or organisations that specifically request that their details are removed from the system are excluded from the system database.</p>
<p>Media Plan</p> <ul style="list-style-type: none"> a. AWE will initiate the AWE emergency comms/media plan b. AWE Emergency Managers will issue pre-agreed press releases with basic information and advice based on the type of incident and the potential hazards until such time as the SCG at the TVP SCC is up and running. 	<p>Once the off-site emergency arrangements are activated, Thames Valley Police will initially coordinate Media Advisory Cell and the emergency media briefing centre, as required.</p> <p>Messages advising the public of the action to be taken may be broadcast in a number of ways, including radio, television and via the internet.</p> <p>Note: Further information on warning & informing is in Section 5.</p>

3.7 Quick Guide to Local and National Actions

Local Actions	National Actions
<ul style="list-style-type: none"> Incident occurs (On-Site Emergency Plan and Procedures activated). 	<ul style="list-style-type: none"> AWE notify MOD, the nominated Lead Government Department (LGD). AWE notify ONR
<ul style="list-style-type: none"> Radiation emergency (on-site or off-site) declared (AWE). 	<ul style="list-style-type: none"> Initiate call-out of key duty personnel: <ul style="list-style-type: none"> LGD - Headquarters Defence Nuclear Emergency Organisation (HQ DNEO) ONR [REDACTED] <p>INFORMATION REDACTED ON BASIS OF SECTION 38</p> <ul style="list-style-type: none"> Government Liaison Officer (GLO).
<ul style="list-style-type: none"> Activate cascade call out of responders (AWE) 	<ul style="list-style-type: none"> ONR RCIS declared operational Determine central government response
<ul style="list-style-type: none"> Activate automated alert messaging – (AWE) - if appropriate Initial social media notifications issued 	
<ul style="list-style-type: none"> Notification confirmed Major incident formally declared (Police control) Initiate call-out of local responders (Police Control) 	<ul style="list-style-type: none"> MHCLG liaison team deployed to SCC.
<ul style="list-style-type: none"> Provide urgent public protection advice to Police (initially AWE until STAC has formed) Agree any immediate counter-measures (AWE/Police Gold) Confirm agreed immediate public information requirements 	<ul style="list-style-type: none"> LGD - HQ DNEO declared operational Cabinet Office/LGD decision on activating Cabinet Office Briefing Room (COBR) and Scientific Advisory Group for Emergencies (SAGE).
<ul style="list-style-type: none"> Receive initial radiation monitoring results at site perimeter/near site (AWE). 	<ul style="list-style-type: none"> No national action
<ul style="list-style-type: none"> Road Closures initiated 	<ul style="list-style-type: none"> No national action
<ul style="list-style-type: none"> Virtual meeting of core initial response SCG members (Emergency Services, Local Authorities & AWE). 	<ul style="list-style-type: none"> Initial COBR meeting.

Local Actions	National Actions
<ul style="list-style-type: none"> Media Advisory Cell (MAC) initial coordination meeting (Emergency Services, Local Authorities & AWE). 	<ul style="list-style-type: none"> Initial SITREP & COP released.
<ul style="list-style-type: none"> Issue of additional core messages covering urgent protective actions (SCG). 	<ul style="list-style-type: none"> LGD- HQ DNEO declared fully operational SAGE mobilised.
<p>Pre first SCG meeting, SCG Chair to confirm:</p> <ul style="list-style-type: none"> Information received from operator Site emergency services in place TCG being activated Potential rest centre requirements Requirement for Media Briefing Centre (MBC) Urgent evacuation actions (if appropriate) Consider STAC if not already stood up Casualty information Security related or not? 	<ul style="list-style-type: none"> Formal liaison established between national operations centres and deployed Liaison Officer (LO) teams.
<p>Request virtual STAC teleconference (STAC Chair).</p>	<p>SAGE established and operational</p>
<p>First full SCG meeting. Confirm:</p> <ul style="list-style-type: none"> Prediction of off-site hazard (reasonable or beyond reasonably foreseeable scenario) Protective actions Other command and control locations Recovery Coordinating Group (RCG) Chair and recovery process MBC Resource issues. 	<ul style="list-style-type: none"> SITREP update released Full formal COBR meeting COBR battle rhythm confirmed
<ul style="list-style-type: none"> SCC declared fully operational - all organisations present or have established effective communications. 	<ul style="list-style-type: none"> Detailed central government briefing issued.

Local Actions	National Actions
<ul style="list-style-type: none"> • Issue first public information/media release post SCG. 	<ul style="list-style-type: none"> • International informing completed.
<ul style="list-style-type: none"> • First COP report to ECC/COBR (SCG Chair). 	
<ul style="list-style-type: none"> • STAC fully operational (STAC Chair). 	
<ul style="list-style-type: none"> • National departmental and agency LOs including ONR, GLO (and team). 	
<p>Before second SCG meeting, confirm:</p> <ul style="list-style-type: none"> • Vulnerable groups at risk • Actual off-site contamination area from survey activity • Advice to schools • Advice to child care • Advice to care homes • Transport availability for evacuation. 	
<p>Second SCG meeting (SCG Chair).</p>	
<p>Issue second public information/media release.</p>	
<p>Media Briefing Centre established.</p>	
<p>Complete radiation monitoring within DEPZ and edge of OPZ (SCG Chair, STAC Chair, ONR, PHE CRCE, Operator)</p>	
<ul style="list-style-type: none"> • Complete radiation monitoring within OPZ, ONR, PHE CRCE, Operator) 	
<ul style="list-style-type: none"> • Establish public health monitoring facility (NHS England/NHS Improvement South East (HTV), PHE CRCE, Local Authority) 	

3.8 Responders Safety Procedures for Radiation Hazards

Precautions to be taken at or near the incident site:

Plutonium & Uranium pose an internal contamination hazard. They can enter the body via the following routes:

- (a) Breathing in contaminated material from the cloud or re-suspended dust.
- (b) Absorption through wounds (cuts, grazes).
- (c) Ingestion of contaminated material e.g. by eating contaminated foods.

Tritium presents an immediate hazard in one of two ways:

- (a) Breathing in tritium or tritiated material as the cloud passes.
- (b) Absorption through the skin

To minimise the hazard the following precautions should be taken for all radiation emergencies:

- (a) Approach from upwind (where possible),
 - (b) Stay upwind and out of any smoke or vapour from the incident:
 - i. Personnel off-site and in the downwind sheltering zone should minimise the time spent operating in the open
 - ii. Where possible shelter inside vehicles with cabin air intakes turned off and windows closed
- a. PPE - Plutonium and Uranium Incidents:
- (a) Protecting Inhalation:
 - i. On site - Use respiratory protection to protect yourself from inhaling plutonium oxide dust, Self-Contained Breathing Apparatus provides the best protection in heavily contaminated areas.
 - ii. Off-site - a simple dust mask will provide worthwhile protection for plutonium and uranium but NOT for tritium.
 - (b) Clothing - Any clothing that will keep plutonium oxide off the skin and that after use can be removed and bagged so as to leave dust behind will do. Emergency Services uniforms, overalls, chemical suits etc. will provide protection against plutonium oxide dust and the feebly penetrating radiation emitted by plutonium
- b. PPE Tritium Incidents
- (a) Protecting Inhalation:
 - i. On site Use Self Contained Breathing Apparatus at the scene to protect against the risk of inhaling tritium or tritium containing material.
 - ii. Off-site a simple dust mask will NOT provide worthwhile protection for tritium.

- (b) Clothing - Cover exposed skin surfaces to reduce the risk of skin absorption. (Chemical suits or waterproof clothing and gloves will give good protection, can be washed down with water and bagged for later checking or disposal).
- c. Used "protective clothing".
 - i. Clothing once worn in the affected area should be treated as "contaminated" and should be monitored before reuse. To prevent dust or "contamination" being shaken loose from clothing it should be folded or rolled in on itself during undressing. Ideally personnel should be monitored after undressing but should in any case shower and don clean clothing when it is possible to do so.
 - ii. Report any wounds or cuts at once (existing cuts should be covered)
 - iii. Forbid eating, drinking or smoking whilst working in the forward area
- d. Post Entry to the area
 - i. Responders to the incident should have their uniforms monitored for contamination
 - ii. Emergency service vehicles should be cleaned before leaving the area
 - iii. A urine sample taken after the event will indicate whether any intake of tritium has occurred.

3.9 Immediate Actions for AWE Staff & Public

3.9.1 Immediate Action for AWE Staff

- (a) AWE Staff will be notified to shelter. Any staff evacuated from an area will be confined to other areas on the AWE site.

3.9.2 Immediate Actions for Public

- (a) The public within the DEPZ to be advised to shelter – both sites
- (b) Not to eat anything that has been out in the open such as fruit and vegetables. Only food contained in removable and sealed wrappers will be safe to consume – both sites
- (c) Breast feeding mothers should switch to uncontaminated milk substitutes as soon as possible (Aldermaston Site only).

3.9.3 Strategic Initial Guidance

- (a) **Access:** All access to the site should be limited as far as possible to reduce the risk to responders with any access routes being clearly identified.
- (b) **PPE:** All organisations with tasks in the affected area are responsible for ensuring that their staff are trained in using appropriate PPE including respiratory protection

- (c) **Movement:** Limited movement within the affected area is essential in plutonium/uranium events in order to reduce resuspension of radioactive contaminated material.
- (d) **Public Shelter:** The public who are sheltering or who have been evacuated are likely to be in that situation for at least 24-48 hours.
- (e) **Food Restrictions:** Downwind of the incident a temporarily ban on the consumption of fruit and vegetables grown in the affected area and out to 30km is likely to be put in place by the Food Standards Agency
- (f) **Monitoring:** Establishing and implementing a robust monitoring plan is critical. Noting that with the exception of the initial environmental monitoring the rest will take place when there is no further release. In addition if the release is of Tritium gas then it would be widely dispersed, combining with water vapour to form tritiated water. This and any tritiated water released would be deposited downwind of the incident. Due to the dilution effect of water already present in the environment significant off-site contamination is considered extremely unlikely.

The monitoring plan should include the monitoring of:

- i. The environment around the sites to establish the spread and level of radiation contamination
 - ii. Food – any crops and foodstuffs grown in the area – for direct consumption or to be put into manufactured human or animal food products (fruit, vegetables, grain, grass, milk etc.)
 - iii. Water- Contamination of the water supply is less likely - the water authorities would have to take a decision regarding the use of water based on STAC advise
 - iv. People – setting up a radiation monitoring unit in order to reassure people who think they may have been contaminated and allow decontamination of those who have.
- (g) **Communications:** Ensure a robust communications plan is in place.

3.9.4 Consider and /or receive information for the SCGs

The table below sets out the information and issues to consider at SCGs:

Information or considerations	Source of information	Timescale
Information received from operator	AWE	1 st and subsequent SCGs
Site emergency services in place and where	AWE	1 st and subsequent SCG
Security related or not?	AWE /TVP with MDP	1 st & 2 nd SCG
Casualty information	AWE/SCAS	1 st and subsequent SCG
Prediction of off-site hazard (reasonable or beyond reasonably foreseeable scenario)	AWE	1 st and subsequent SCGs
What protective actions are in place or needed	AWE /PHE CRCE – then STAC	1 st and subsequent SCGs
Urgent evacuation undertaken or required (if appropriate)	AWE/PHE CRCE	1 st and subsequent SCG
Plan activation status <ul style="list-style-type: none"> Has activation been completed Is any other agency required 	TVP	1 st and subsequent SCG
Data in relation to the area affected: <ul style="list-style-type: none"> No. of properties (split residential, commercial and farms) No. of vulnerable sites – schools, nurseries, GPs, care homes etc. No. of individual vulnerable people Events going on in the area or due to take place in next 7 days 	Local authorities inc GIS specialists to map	1 st /2 nd /3 rd SCG
Communications <ul style="list-style-type: none"> Initial public alert activation status Communications issued Media enquiries MAC status 	AWE, TVP/MAC lead	1 st and subsequent SCG

Information or considerations	Source of information	Timescale
<ul style="list-style-type: none"> MBC requirement and status 		
Road and rail information: <ul style="list-style-type: none"> Roads closed (the plan) Rail network activity 	Local authorities, Highways England and Network Rail	2 nd and subsequent
Vulnerable People – issues and actions required including ongoing advise to schools, care homes, nurseries etc.	Local authorities	2 nd and subsequent
Monitoring Plan – process to agree and results to be received. (inc RMU)	PHE CRCE/STAC	2 nd and subsequent
Command Structures in place and where: <ul style="list-style-type: none"> TCGs STAC MAC EMBC Logistics Recovery 	MAIC	2 nd and subsequent
Locations of: <ul style="list-style-type: none"> RVPs in place Reception/Rest Centres Friend and Family Centres RMUs 	MAIC	2 nd and subsequent
Decontamination	PHE CRCE/STAC	2 nd and subsequent
Resource Issues		

3.10 Issues to Consider

The table below sets out issues to be considered at all levels of Coordination including communications, along with outline answers and the sources for more information:

Issue	Specifics	Draft Information/advice to be used	Sources of further guidance for Press Officers: Plan section, Lead Organisation or coordinating groups
Shelter & Evacuation Protective Actions	Concerns in relation to whether to shelter or evacuate and specific actions to be taken.	Everyone is advised to go into the nearest building to where they are to shelter. Close all the windows and doors. Tune into the local radio, TV or internet. If outside at the time of the incident then if possible: Blow their nose, take off outer clothing – bagging it somewhere safe and wash their face and hands.	REPPIR booklet STAC/SCG
Personal Health	People will be concerned about their health or of friends/relatives who are in the affected area.	There is no risk of an immediate impact of any radiation contamination. In order to reduce any risk then people who were outside at the time should: Blow their nose, take off outer clothing – bagging it somewhere safe and wash their face and hands. If they are still concerned then they should contact NHS 111 or their GP.	REPPIR booklet STAC when in place or AWE/PHE CRCE in the initial phase.
Vulnerable People	What about the vulnerable in the community e.g. school children, elderly etc.?	There are plans in place to support the vulnerable in the community. Initially they should take shelter like everyone else in the affected area.	STAC/SCG TVLRF Identification of Vulnerable Persons Plan . There are also Site specific plans for schools etc. to help schools plan to

Issue	Specifics	Draft Information/advice to be used	Sources of further guidance for Press Officers: Plan section, Lead Organisation or coordinating groups
		<p>Schools and care homes in the affected area will be getting contacted to check on the support they need and plans put in place to support them.</p> <p>Individuals in their own home who get support should contact their carer to see what can be done to help them, if they have not contacted them. Support will be confirmed on an individual basis depending on their needs.</p>	support the children, staff and parents.
Pet Health	People will be concerned about their pets – either if they were inside or outside at the time of the incident and if they are evacuated from their home.	<p>Pets which were inside at the time of the incident should have no issues.</p> <p>Pets that were outside may be brought under cover – into kennels, chicken coop or if necessary into the house but not petted, and put in an area away from the household. This should be done ideally without going outside so as not to put the owner at risk.</p> <p>If you need to be evacuated then you will be given advice as to what to do with your pets.</p> <p>Based on the characteristics of the incident guidance will be issued at the time following consultation with experts.</p>	<p>STAC/SCG/RCG</p> <p>Veterinary assistance and guidance will be sought via the RSPCA, DEFRA and Animal Health in order to determine the best advice and actions in relation to pet health</p>

Issue	Specifics	Draft Information/advice to be used	Sources of further guidance for Press Officers: Plan section, Lead Organisation or coordinating groups
Public Water Supplies	Concerns about water safety from contamination	<p>The public water supply is contained in pipes, however radiation monitoring will be undertaken as part of response and the wider radiation monitoring strategy.</p> <p>If there is chemical contamination then water may be contaminated – however due to the water treatment processes it should not get into the water supply.</p> <p>Monitoring will be undertaken to check this remains the case.</p> <p>Portable supplies would be put in place if this were not the case.</p>	<p>STAC/SCG</p> <p>Water suppliers, PHE and Environment Agency will be able to provide more information.</p> <p>TVLRF Water Distribution Plan</p> <p>UK recovery handbooks for radiation incidents: https://www.gov.uk/government/publications/uk-recovery-handbooks-for-radiation-incidents-2015</p>
Private Water Supplies	Concerns about water safety from contamination	<p>There are some private water supplies in and around the respective DEPZ of both sites.</p> <p>These are supplies that come from private wells, natural springs or other ground water sources.</p> <p>The risk of this water being contaminated is very low since the radiation needs to enter the groundwater which would take time.</p> <p>Chemical contamination may be more of a risk which may result in restrictions on the use of water being considered.</p>	<p>STAC/SCG</p> <p>The local authorities Environmental Health services will be responsible for advising those with private water supplies on their pot ability in conjunction from the advice from the STAC.</p> <p>The PHE CRCE will support the local authorities with respect to sampling, analysis of results and advise as to whether the water is safe to drink.</p>

Issue	Specifics	Draft Information/advice to be used	Sources of further guidance for Press Officers: Plan section, Lead Organisation or coordinating groups
			<p>Sampling may be necessary for some time after the event. This should be considered by the RCG.</p> <p>If water restrictions are necessary the local authorities along with the premises owner will review temporary alternative water supplies.</p>
Waste	There are a number of types of waste that may arise as a result of the incident including:		
Domestic Waste.	What do people do with household waste	<p>It is likely that domestic waste collection for the area affected will be suspended mainly to allow responders to access the area and to protect the refuse collectors.</p> <p>All waste should be left in situ with further guidance provided when the collections will start again – this may be a few days since the priority is to make sure people are safe. If adding rubbish to the bins it would be recommended that gloves are worn and hands are washed afterwards.</p> <p>Most of the bins used by the local authorities are wheeled bins however there are approx. 23 dwellings in BDBC area who chose to continue to use bags.</p>	<p>STAC/RCG</p> <p>The resumption of waste collection will depend upon a risk assessment based upon the specifics of the incident and dialogue with the contractor – with info from the STAC/TCG being provided to the local authorities.</p>
Clothing Waste	What to do with clothes that people have worn if outside at the time of the	<p>Take off outer layer of clothing if outside at the time of the incident.</p> <p>Clothes should then be:</p>	<p>STAC/RCG</p> <p>Will provide guidance to the local authorities.</p>

Issue	Specifics	Draft Information/advice to be used	Sources of further guidance for Press Officers: Plan section, Lead Organisation or coordinating groups
	incident and may therefore be contaminated (as per guidance in REPPIR booklet).	<ul style="list-style-type: none"> • Put inside a bag, and place the bag inside another bag (double bagging) • The bagged clothing should be left outside the door • More information will be provided on to do with the bagged clothes following more detailed assessment of the risks. • The information may include guidance as to how to dispose of the bag or how to clean the clothes. 	
Drainage Waste	Are the sewerage works likely to be contaminated?	<p>The waste water companies are working with all the other agencies and checking for the risk of radiation contamination.</p> <p>They will also be monitoring the effluent and the sludge material prior to discharge to check there is no contamination going into the environment.</p>	<p>STAC/RCG</p> <p>Involving the Environment Agency and DEFRA along with the waste water companies who will advise on drainage and sewerage coming from the affected area. It is likely that the majority of any radioactive waste entering the sewage system will settle out in the sludge in the local sewage treatment works (depending on capacity); so disposal of the sludge will be managed by the water company. The Environment Agency can advise on appropriate disposal methods and routes.</p>

Issue	Specifics	Draft Information/advice to be used	Sources of further guidance for Press Officers: Plan section, Lead Organisation or coordinating groups
Contaminated Land Waste	Is the land contaminated and if so what is happening with it.	<p>A comprehensive monitoring regime would be put in place to check for any radiation contamination.</p> <p>Once the full scale of the situation is known a more detailed clean-up programme, if needed will be put into place.</p>	<p>STAC/RCG</p> <p>It is the Local Authorities responsibility to investigate and determine if land is to be designated as contaminated land under the Environmental Protection Act 1990. If the LA designate the land as a 'Special Site' under the legislation then the Environment Agency will be responsible for remediation. Public Health England will provide environmental assessments in conjunction with the Environment Agency and will give advice on remediation options and the associated cost of implementing these.</p>
Gardens	What can I do in the garden? What can I do with the vegetables etc.?	<p>It is recommended that directly after the incident then gardeners do not work in their garden.</p> <p>In particular no one should do things that may mean any contamination being resuspended and therefore potentially breathed in.</p> <p>Monitoring of the area will be taking place and as soon as the results are known more detailed advice will be given.</p>	<p>RCG.</p> <p>Public Health England CRCE will provide environmental assessments in conjunction with the Environment Agency and will give advice on remediation options. Part of the remediation plan will include gardens. This process will vary depending on the contamination and the</p>

Issue	Specifics	Draft Information/advice to be used	Sources of further guidance for Press Officers: Plan section, Lead Organisation or coordinating groups
			<p>concentration. Issues that will need to be considered include:</p> <ul style="list-style-type: none"> • Grass and hedge cutting • Flower removal • Vegetable removal • Paths/Drives/Decking cleansing/disposal. • Furniture and ancillary cleansing/disposal. • Long Term use of land.
Food – General	Is my food safe to use?	<p>Any food that was inside the home or offices when the incident happened will not be affected, in particular tins and packaged goods, so can be used.</p> <p>Any food that was outdoors at the time of the incident should not be used until further sampling and information is available.</p>	<p>STAC/RCG</p> <p>Food Safety is the responsibility of Food Standards Agency (FSA), who will give advice to the public about the safety of food and milk in the event of an off-site emergency. FSA advice to the public is likely to cover both what foods are unaffected and safe to eat, together with advice on potentially contaminated foodstuffs.</p> <p>The area over which food is affected is likely to be much larger than the areas where people have been asked to shelter in or evacuate. Sheltering and evacuation are necessary to</p>

Issue	Specifics	Draft Information/advice to be used	Sources of further guidance for Press Officers: Plan section, Lead Organisation or coordinating groups
			<p>reduce the risk of people breathing in radioactivity or receiving direct radiation from the plume for the short time that it passes overhead. However, it is possible that some people may eat large quantities of contaminated foods from the affected areas (e.g. vegetables from allotments) over prolonged periods. It is therefore, necessary to limit radioactivity in food at a cautious level which, in turn, leads to a relatively large area being affected. The following are some of the issues the FSA will consider with a basic outline as to the likely advice subject to the actual event.</p>
Livestock	What do I do with livestock?	<p>All livestock should be left where they are in the short-term until the environmental monitoring results are known.</p> <p>If there are specific welfare issues such as feeding, milking, lambing/calving then contact should be made with the local authorities Animal Health team.</p>	<p>STAC/SCG</p> <p>Animal Welfare: The responsibility for animal welfare issues lies with DEFRA, Animal Health and Trading Standards Services.</p> <p>Food Safety: The Food Standards Agency will assess the potential for meat from livestock to be contaminated and, if necessary, the FSA can control the movement and slaughter of livestock using the</p>

Issue	Specifics	Draft Information/advice to be used	Sources of further guidance for Press Officers: Plan section, Lead Organisation or coordinating groups
			powers invested by Food & Environmental Protection Act 1985 (FEPA 85).
Crops	Are the farm crops safe to use?	<p>No crops or foodstuffs should be harvested in the affected area until more detailed environmental monitoring results are known.</p> <p>Crops and foodstuffs exposed to a chemical or radiation release may become contaminated in the downwind sector from the incident. This can be either immediate contamination through direct deposition, or may occur over a longer time period due to uptake of contamination into growing plants.</p> <p>In the early stages of the response farmers (and gardeners) will be encouraged not to harvest crops or eat food that may be contaminated.</p> <p>Advice on the temporary closure of any outdoor markets etc. in the area may also be provided.</p>	<p>The Food Standards Agency (FSA) will undertake the sampling and testing of foodstuffs produced and/or stored in areas affected by the incident.</p> <p>Emergency measures necessary to control the consumption and distribution of agricultural products will be implemented as appropriate by the FSA, who would liaise with the STAC.</p> <p>If necessary, a statutory restriction on the harvesting, movement and sale of foodstuffs coming from the affected area will be imposed by the FSA under the Food & Environmental Protection Act 1985.</p>
Fish	Is locally caught fish safe to use?	<p>The Kennet & Avon Canal is within the DEPZ of both sites, along with a number of fishing lakes.</p> <p>Initial advice is that no fishing should take place and certainly no consumption of any fish caught when the release is ongoing until such time as sampling has been undertaken.</p>	<p>STAC/RCG</p> <p>The FSA leads on the assessment of the likelihood of contamination of fish, shellfish in watercourses or the marine environment, and may apply restrictions on fishing in the</p>

Issue	Specifics	Draft Information/advice to be used	Sources of further guidance for Press Officers: Plan section, Lead Organisation or coordinating groups
			areas affected in order to protect human health.
Milk	Is locally produced milk safe to use?	<p>Any milk purchased through shops will be safe to use.</p> <p>Any milk sold directly by the farmer from their farm should not be used until further monitoring results are known.</p> <p>Contamination of milk may occur in the downwind sector as a result of the animals ingesting contaminated pasture. Although contamination levels on pasture may be low, cows and goats are efficient grazers and can cover a considerable area of land each day. Contaminant taken in by animals can concentrate in the milk, which may exceed acceptable levels of the contaminant in milk.</p> <p>It takes at least 24hrs for the contaminant to appear in the milk and may take a few days for peak concentrations to be reached.</p>	<p>STAC/RCG.</p> <p>The FSA will take action, including introducing restrictions under FEPA 85 to prevent contaminated milk getting into the human food chain.</p> <p>The FSA will liaise with members of the RCG to ensure arrangements are put in place for milk unable to enter the food chain.</p> <p>Sampling of milk will be undertaken by the FSA and the local authorities Environmental Health Officers. This is likely to occur on a scale larger than the DEPZ.</p> <p>Consideration will also be given to ensure appropriate arrangements are made for collection and disposal of contaminated milk. The Environment Agency will provide advice and guidance in conjunction with other appropriate organisations.</p> <p>Trading Standards and Animal Health will consider the welfare of</p>

Issue	Specifics	Draft Information/advice to be used	Sources of further guidance for Press Officers: Plan section, Lead Organisation or coordinating groups
			the animals in relation to continued milking.
Housing	If I have to move out of my home where can I go?	<p>If residents are evacuated or cannot get home due to the incident or cordons in place then people are advised to try to stay with friends or relatives in the first instance</p> <p>If this is not possible then residents will be supported at a reception centre where they can get registered and be provided with basic provisions (sleeping bags, basic wash kit, some refreshments etc.)</p> <p>In the longer term options would be to stay with friends or family, check with insurance companies for alternative accommodation or be put into emergency housing. The latter may be some distance from the area.</p>	<p>SCG/RCG</p> <p>There are short term and longer term solutions to find. The lead for this will normally be the local authority.</p>
Financial Implications	<p>I have a business and lost money. I am a home owner and have had to move out. Who pays for this?</p> <p>Who pays for the clean-up?</p>	Anyone who believes they are being financially penalised as a result of the incident should check with their insurance company in the first instance making notes of all the expenses caused by the incident.	RCG

3.11 Specific Immediate Response Information

3.11.1 Identified Command and Control Locations

See [Section 4.3.5](#)

3.11.2 Rendezvous Points (RVPs)

There are a number of RVPs associated with this plan in relation to where responders could co-locate in advance of going forward. RVPs close to the site will be identified based on a risk assessment at the time having regard to the direction of any radiation contamination.

Other RVPs have been identified in relation to bringing in additional resources from outside the area and taking into account road closures. Set out below are some predetermined locations:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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3.11.3 Road Closures

See AWE Transport Plan

3.11.4 Reception Centres and Rest Centres

See [Section 7.4](#)

3.11.5 Responders attending site

Emergency services/responders requested to attend an AWE Site will be directed to the appropriate gate where AWE will facilitate their requirement to gain access onto the premises.

Arrangements are in place to brief emergency services/responders arriving on site in line with Joint Emergency Services Interoperability Principles (JESIP). These briefings will be carried out by pre-identified AWE responders depending where on-site emergency services/responders are deployed to. For those responding to the incident scene, this will be carried out by AWE's Lead Emergency Service (AWE FRS/MDP). Those that are responding to the Emergency Operations Control Centre/Command Post will be briefed by AWE's Emergency Managers.

Tabards are worn by AWE emergency responders from the premises and the emergency services to ensure clear identification of individuals and roles. AWE emergency services/responders wear tabards with roles titled on them to assist responding agencies.

Emergency services/responders pre-identified as requiring to attend site during an incident should have undertaken training provided by their organisation and identified any specialist equipment to respond to an incident on-site. Each responding agency is responsible for their own equipment required to respond to carry out the duties of their service.

AWE's Emergency Services and emergency responders have equipment for their required capabilities. AWE has conventional and specialised fire fighting media and equipment which is monitored daily for availability. [REDACTED]

[REDACTED]

[REDACTED]

Information REDACTED ON BASIS OF SECTION 38

AWE monitors daily and captures the availability and function/capabilities of the on-site response teams via the AWE Site Status. For external response support, this would be reported by exception.

3.12 Notification of 'Steady State'

AWE personnel and other responders will continuously monitor the progress of the incident, and will be able to give the SCG up to date information on the affected area. A 'Steady State' declaration is the point at which it is decided that no further escalation of the emergency is foreseeable. This denotes the end of the on-site emergency phase of the response by AWE.

When the incident has been contained, based on the information provided from the AWE Emergency Manager, and after consultation with the STAC chair, then the SCG will be advised as to when it is safe to start the process of recovery with the aim of returning the public to normal living conditions.

When the SCG determines that conditions are safe for the public and the emergency phase has passed, the appropriate message will be released by the media briefing centre. If contamination problems exist, the public will be advised accordingly and a remedial/recovery phase invoked and coordinated by the relevant agencies.

Section Four

4 Multi-Agency Command and Coordination Arrangements

This section provides details on the command and coordination structures which would be put in place to facilitate the response to an off-site incident at either AWE site. Some of these could be virtually and/or physically located.

4.1 Overview

The structures put in place to coordinate the off-site response to an emergency at AWE Aldermaston or Burghfield, is the same agreed and tested multi-agency three-tier command structure which is used for any major incident i.e. “Operational”, “Tactical” and “Strategic”. The Joint Emergency Services Interoperability Principles (JESIP) will be used to support the response to ensure a common understanding and coordinated response to the incident.

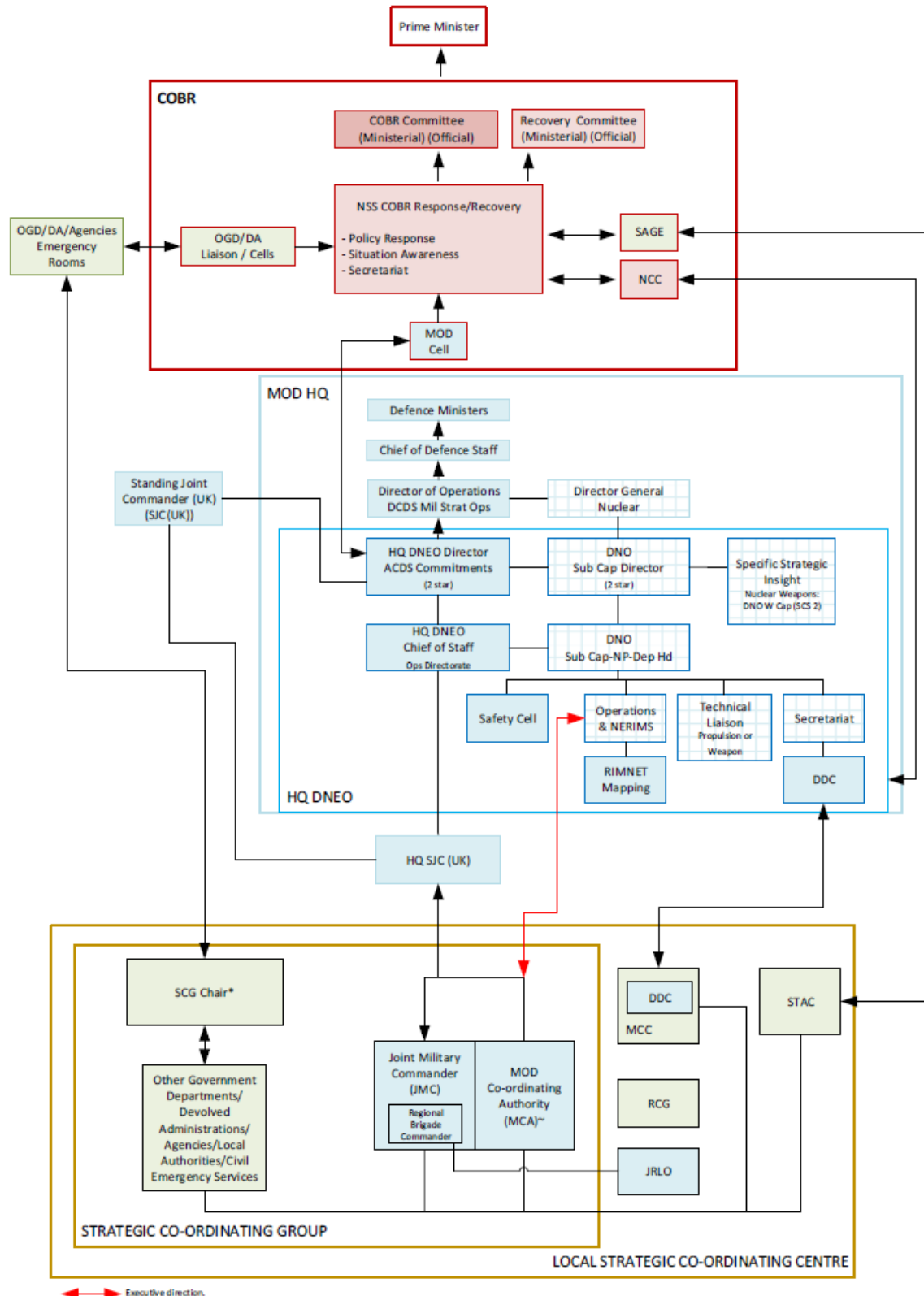
- (a) **Operational Coordinating Group (s)** will be at one or more Forward Control Point(s) (FCP) close to the incident site and the forward controls of other emergency responders. The senior officer for each responding agency present will deploy their agencies resources and liaise with the other senior officer present in order to ensure a coordinated response at or near the scene.
- (b) **Tactical Coordinating Group (TCG)** will be at the most suitable location depending on the site affected and community affected. The decision will be made by the Tactical Commander and will depend on the location and circumstances of the incident. Whichever location is selected the commanders must be satisfied that a robust communications system exists to support their function. The TCG will determine priorities in allocating resources; plan and coordinate when a task will be undertaken; and obtain other resources as required referring any issues which require strategic attention up to the SCG. Liaison Officers from AWE, Thames Valley Police, Hampshire Constabulary, MOD, Fire and Rescue Service (FRS), West Berkshire District Council, Wokingham Borough Council, Reading Borough Council, Basingstoke and Deane Council, Hampshire County Council, South Central Ambulance NHS Foundation Trust and Health organisations as appropriate will attend. In addition a Radiation Protection Advisor (RPA) to support the non-emergency services will normally be requested to attend – sourced via PHE CRCE. More information can be found HIOW & TVLRF Emergency Response Arrangements [Handbook C: Tactical Coordinating Group](#)
- (c) **Strategic Coordinating Group (SCG)** will be established drawing together representatives from all of the organisations in this plan as appropriate. They will assemble to formulate policy, make strategic decisions and authorise press statements. Each person must be able to make executive decisions in respect of resources within their agency and have the authority to seek the aid of other agencies in support of their role.

The SCG will be based at the Strategic Coordinating Centre, if not a remote SCG. The SCG is likely to have a number of subgroups working to it including the TCGs, MAC and RCG.

More information can be found HIOW & TVLRF Emergency Response Arrangements [Handbook D: Strategic Coordinating Group](#) or for strategic arrangements for an AWE incident in section 4.3.

4.2 Central Government Organisation and Interaction with the Local Strategic Coordination Centre

Below is a diagram of the Central Government and MOD Defence Crisis Management Organisation (DCMO)/Headquarters Defence Nuclear Emergency Organisation (HQ DNEO) interaction with the MOD Coordination Authority (MCA) and the Strategic Co-ordinating Group (SCG).



4.3 Strategic Coordinating Centre (SCC)

This section provides some guidance to those attending the SCC with respect to an incident at an AWE Site.

4.3.1 Staffing of the SCC

All responding agencies with staff attending the SCC should ensure their staff are trained and understand their roles.

All agencies should consider the number of staff required to support the SCC effectively which is likely to include:

- (a) Strategic Coordinating Group (SCG) Agency 'gold' rep
- (b) SCG supporting officer (support the agency 'gold' officer or deputise as necessary)
- (c) Appropriate subgroup reps to include STAC, MAC, RCG reps
- (d) Multi-Agency Information Cell (MAIC) rep
- (e) Loggists
- (f) Others as necessary

All agencies must put plans in place to resource the SCC for a number of days covering 24hrs since an AWE incident is unlikely to be resolved in a few hours.

All agencies should ensure the staff attending the SCC are equipped to operate independently of any other support by way of IT, telecoms, paperwork etc.

There are likely to be a large number of staff at the SCC, therefore with limited space only staff with a direct role should be in attendance.

4.3.2 Agency Attendance at SCC for AWE Incident

The attendance, ideally in person or via teleconferencing, at the SCC includes representatives from:

- (a) Thames Valley Police (& Hampshire Constabulary (depends on location of off-site incident))
- (b) West Berkshire District Council
- (c) Other Local Authorities as appropriate and depending on the location of the incident i.e.
 - i. Basingstoke and Deane Borough Council
 - ii. Hampshire County Council
 - iii. Reading Borough Council
 - iv. Wokingham Borough Council
- (d) Royal Berkshire Fire & Rescue Service (& Hampshire Fire & Rescue Service (depends on-site location))
- (e) MOD

- (f) Office for Nuclear Regulation (ONR)
- (g) Environment Agency (EA)
- (h) Public Health England South East (PHE SE)
- (i) Public Health England - Centre for Radiation Chemical and Environmental Hazards (PHE CRCE)
- (j) NHS England South and NHS Improvement South East
- (k) South Central Ambulance NHS Foundation Trust
- (l) Food Standards Agency (FSA)
- (m) MHCLG Resilience and Emergency Division
- (n) AWE
- (o) Met Office
- (p) Thames Water
- (q) Highways England
- (r) Network Rail
- (s) British Transport Police
- (t) Other Utility companies as necessary

Along with other agencies as deemed necessary at the time.

4.3.3 SCC Internal Communications



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It is however expected that staff within the SCC will seek out information if they cannot find it on the system by talking to others within the SCC.

It is expected that all agencies maintain their own logbooks and notes following meetings and engagement with other agencies. These should be kept for audit/investigation purposes.

4.3.4 SCC External Communications

In order to ensure agencies outside the SCC are up to date with the current situation a number of options are available to agencies attending individually or in a coordinated manner as follows:

- (a) *Situation Report (SITREP)* – this is a document created by all agencies in the SCC to allow a picture of current situation, actions and issues to be shared out to all agencies. This is coordinated by the Multi-Agency Information Cell (MAIC).
- (b) *Common Operating Picture (COP)* a more formal report which is shared with all agencies and government departments.
- (c) *Information Sharing* of Documents will normally be via email to respective agencies or via ResilienceDirect.
- (d) *Teleconferencing* – in order to speed up the initial coordination meetings will be arranged using teleconferencing facilities. The dial in details will be sent out shortly after the initial notification process.
- (e) *Other communications* will depend on agencies but will normally include mobile phones and/or airwave radios.

4.3.5 SCC Locations

When being set up the management of the SCC is under the control of the Duty TVP Gold Officer who will decide on the virtual or physical location.

[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

Information REDACTED ON BASIS OF SECTION 38

If a significant population within Hampshire is affected by the incident, a similar approach may be taken by Hampshire Constabulary with representatives from both police forces in the other control and command locations to ensure consistency and clarity.

4.4 Strategic Coordinating Group (SCG) Sub Groups

In addition to the SCG there will normally be a number of sub groups working to support the SCG.

There will also be individual agency incident/emergency control rooms at their own locations.

Sub Groups	Role	More information
Scientific & Technical Advice Cell (STAC)	<p>The multi-agency Scientific & Technical Advice Cell (STAC) will provide timely and effective technical and health advice to the SCG in order that key decisions can be made.</p> <p>This may include a Monitoring Cell as a sub cell.</p>	<p>Public Health England South East Scientific & Technical Advice Cell (STAC) Plan</p> <p>STAC Action Card in Section 11</p>
Media Advisory Cell (MAC) / Strategic Media Advisory Cell (SMAC)	<p>The MAC include the main communication and media advisors to the SCG and may consist of a number of key Communication Officers from a limited number of agencies (primarily TVP, WBDC, AWE & MOD) who will provide advice to their communication officers at their own response locations and develop the media briefing centre details.</p>	<p>Thames Valley Local Resilience Forum Communications Plan</p> <p>Section 5.6 provides further details on Communications and the Media Briefing Centre plans.</p>
Emergency Media Centre (EMC) / Media Briefing Centre (MBC)	<p>A EMC / MBC will normally be set up in order to ensure the press is briefed accurately and in a timely fashion in a safe location. There are a number of potential sites, however, the choice will ultimately be made on the day depending on the site involved and the risks associated with the incident.</p>	<p>Section 5.6.2 provides further details on Communications and the Media Briefing Centre plans.</p>
Multi-Agency Information Cell (MAIC)	<p>The MAIC, often known as Information Cell, is made up of representatives from agencies that coordinate the situational details of the incident and coordinate the Common Operating Picture (COP). This information is provided to the SCG in order to facilitate the decision making process.</p>	<p>HIOW & TVLRF Emergency Response Arrangements Handbook B: Multi-Agency Information Cell (MAIC) provides information to support MAIC chair and participants</p>
Radiation Monitoring Strategy Group / Radiation Monitoring Unit (RMU)	<p>This cell could be set up to provide details to the STAC in relation to people and environmental monitoring. Their main aim would be to develop a robust monitoring strategy including sourcing equipment, and specialist officers. It is likely to be chaired by a representative from PHE CRCE.</p>	<p>HIOW & TVLRF RMU Plan</p> <p>More details in Section 7.2</p>

Sub Groups	Role	More information
Logistics Cell	This cell would be set up to coordinate the sourcing of specific resources – e.g. transport etc.	
Evacuation/ Shelter Cell	This would be put in place should there be a need for an evacuation/relocation subsequent to the initial protective actions of shelter. Any urgent evacuation would be undertaken at operational level due to the risk.	TVLRF Evac and Shelter Framework HIOW Mass Evac and Shelter Guidance
Recovery Coordination Group (RCG)	This group would be put in place in order to coordinate the recovery from the radiation emergency.	TVLRF & HIOW Recovery Plans More information Section 9.3

4.5 Responding Agencies' Emergency Control Centres

In addition to the multi-agency coordination groups put in place normally each agency will put in place its own incident /emergency control centres in order to coordinate their own assets. The number of control rooms involved will depend on the scale of the incident and its location.

An important agency command and control centre is the one set up on-site at AWE. The Emergency Operations and Control Centre (EOCC) Aldermaston (A) on-site is set up in order to coordinate the stabilisation of the incident and to provide information to responding agencies. The EOCC (A) will have an advisory team working to the Emergency Manager. The information and activity coordinated from the EOCC (A) include:

- (a) Actions to stabilise the incident on the affected site(s).
- (b) Hazard assessments, including computer dispersion modelling, of any release.
- (c) Initial Emergency environmental monitoring both on and off (outside) the incident site would be controlled from this complex.

The following external organisations would normally send representatives to the EOCC (A), ideally within an hour of notification:

- (a) MOD
- (b) Thames Valley Police
- (c) Royal Berkshire Fire & Rescue Service
- (d) South Central Ambulance NHS Foundation Trust
- (e) West Berkshire District Council Liaison Officers representing the Local Authorities.

4.6 Decision Making

Whilst there is a formal command structure it may take some time for it to be put in place. Therefore the principle of subsidiary should be followed with the decisions made at the lowest level or closest to where they can have an effect. This does not mean

issues should not be raised up but where there are decisions to be made in a timely fashion then they can be without higher authority however regard should be given to this plan and expert advice

4.7 *Comprehensive Attendance.*

At the start of the incident not all the agencies, nor all the subgroups will be in place, some will take some time to be fully functioning. Therefore the leads of the groups need to be flexible, and make best use of technology to ensure the correct people and groups are 'available'.

Section Five

5 Warning and Informing

The duty to provide information to the public prior to and during an off-site emergency is that of the local authority under REPPIR 19 (Reg 21 & Reg 22). This duty can only be carried out with the support and cooperation of all the agencies responding to the emergency.

In addition under the Civil Contingencies Act 2004 there is a requirement for Category 1 responders to warn & inform the community regarding emergencies.

Warning & Informing the community involves all stages of an emergency, before, during and after and involves all agencies.

Coordination can be via the Media Advisory Cell (MAC). However this does not stop individual agencies focusing on their areas of responsibility and getting messages out. In the recovery phase of the incident the coordination of information to the public will be transferred to the local authority.

5.1 AWE Warning & Informing the Community Process

This takes place before, during and after an event in a number of formats. Reference should also be made to TVLRF Communications Plan.

The key pillars of the requirements to warn and inform the public include:

What the public will need to know:	What the public will want to know:	What the Broadcasters will require:
<p>Basic details of the incident - what, where, when (and who, why and how, if possible).</p> <p>Implications for health and welfare</p> <p>Advice and guidance (e.g. stay indoors, symptoms, preparing for evacuation etc.)</p> <p>Reassurance.</p>	<p>Other practical implications such as the effect on normal routine, power supplies, telephones, schools, water supplies, food etc.</p> <p>A helpline number</p> <p>What is being done to resolve the situation?</p>	<p>Well-thought-out and joined-up media briefing arrangements between emergency services, local authority and other organisations, capable of providing agreed information at speed</p> <p>An immediate telephone contact</p> <p>A media rendezvous point close to the scene.</p>

5.2 Before a Radiation Emergency (Regulation 21)

- (a) **REPPIR Booklet:** On a 3 yearly basis West Berkshire District Council supported by AWE and the partner agencies, produce a REPPIR booklet. The aim of the booklet is to provide information to the local community so they know what they should do should there be an incident at either of the AWE sites which may affect them. It also provides information on the size and extent of the DEPZ and OPZ for both sites.

The current version of the booklet can be found on [West Berkshire District Councils website](#).

- (b) **AWE Local Liaison Committee (AWE LLC):** A committee involving elected members from the Town, Parish, County, District and Borough Councils which are in

the DEPZ areas. These representatives then communicate to their respective communities.

There are normally three meetings a year where AWE provides updates and the Members have the opportunity to challenge AWE. More information is on the AWE website [Local Liaison Committee | AWE](#)

- (c) **Connect Magazine.** A [magazine](#) sent out quarterly to a large area of the community and covering all those communities in the DEPZ. This raises awareness of the site with messages being put in place in relation to what to do should there be an incident.

Websites: Information relating to the plan and the sites are held on [West Berkshire District Councils website](#).

Specific Vulnerable Groups: Agencies from the AWE Off-Site Planning Group work with schools, early year settings, care homes and traveller sites in order to raise awareness and encourage on-site emergency plans so they can support those they are looking after.

5.3 During the Response to an Emergency

When this plan has been activated the following warning & informing of the affected areas would take place:

- (a) **Immediate:** For a Radiation Emergency AWE will initiate the automatic telephone alerting system to the public round the affected site. The public will be advised to go inside, stay inside the nearest suitable building and to tune into the radio and television to hear public service broadcasts.



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It should be noted that the automatic telephone alerting system to households around the site operates on an 'opt out' basis. Therefore, it is intended that the majority of people within the area will receive a call through their landline should they be in the area potentially affected. Limitations however are the reduction in landlines in properties.

- (b) **Use of Media Outlets:** Information and warnings about the emergency will be regularly reported via TV, local and national radio; social media including AWE Twitter account, and websites as appropriate. This will be managed by all agencies and coordinated by the Media Advisory Cell
- (c) **Other activities** such as loud hailers etc. may be employed to ensure messages are going out. All means necessary will be used to get the messages across.
- (d) **Emergency Media Briefing Centres** may also be put in place to coordinate and support the media get accurate information in relation to the incident. Each agency would therefore need to identify a media spokesperson to support this activity.

- (e) **Emergency Help Lines:** The SCG will decide if there is a need for an emergency help line to be activated during the response phase.

5.4 During the Recovery from an Emergency

After the initial warnings and advice has been given to the public it is essential that more information is provided quickly in order to reassure the public and to ensure they know what to do if the incident is of a prolonged nature.

There are some generic answers to these points covered in the Recovery Section ([Section 9](#)) to this plan. However, for any incident prior to offering the advice a review of the information against the actual situation must be undertaken.

The RCG will coordinate the information dissemination for the recovery phase. The TVLRF Recovery Plan & HLOW Community Recovery Plan gives guidance as to how this may be done which may include:

- (a) Leaflets
- (b) Press releases
- (c) Information centres
- (d) Public meetings
- (e) Websites for responding agencies.

5.5 Notification of Steady State /All Clear

Just as important as notification of the incident is the notification of the 'Steady State' / all clear. As a result of the monitoring undertaken the 'Steady State' / all clear will be given as soon as possible. This will be given via the automatic telephone system in consultation with, as a minimum, AWE and the Police. The release of the information will be agreed and coordinated by the SCG/RCG as appropriate.

5.6 Working with the Media

It is anticipated that the media interest in an incident occurring at either of the AWE sites would be large and that the media would be on scene quickly after the incident. In the absence of a reliable source of information, the media will seek information from any source that they can find which will include responders, the local community, 'experts' and pressure groups. Given the public apprehension about radioactivity, it is important that a reliable source of information is established as soon as possible following an incident, and that it is seen to be independent and objective.

During an incident the media will be contacting all responding agencies in order to build their story. As a result a coordinated response is necessary in order to ensure consistency and accuracy of information.

It is also essential that all agencies develop an open relationship with the media in order to lessen the likelihood of the dissemination of inaccurate or misleading information that could lead to unnecessary public alarm.

Media communications are essential particularly in the early stages when the community affected are under shelter and the advice is to 'tune in'. Hence the media forms a key role in warning and informing the community.

5.6.1 Information Control

In order to support the information coordination there are a number of plans relating to the media response including:

- (a) TVLRF Communications Plan.
- (b) Joint AWE/MOD Emergency Communications Plan

Thames Valley Police Press Office is normally responsible for the coordination of the messages to the media during the response phase of the incident. This responsibility will be transferred to the Local Authority for the recovery phase.

Each agency has its own press officer(s) or communication teams who have responsibility for their agency's information. This does not mean that agencies cannot confirm what their own response measures and business continuity plans are, however, they should not speculate on others and the overall picture without the exact details being available.

Coordination is managed by setting up a multi-agency Media Advisory Cell (MAC) at the SCC or via teleconference.

Early actions for the MAC to put in place include:

- (a) Identifying a lead for the MAC and a Deputy
- (b) Set up a rolling comms officer email chain
- (c) Identifying the need for a Media Briefing Centre – and therefore the location and resourcing
- (d) Identifying spokespersons for each agency

- (e) Identifying spokespersons for coordinating groups put in place
- (f) Identifying Media Officers to support the following:
 - i. The Emergency Media Briefing Centre (MBC) – in support of their media spokesperson or to act as their agency spokesperson
 - ii. other response locations e.g. Reception Centre / Rest Centres.
 - iii. Coordinating groups, including sub groups set up.

This combined media cell will support the responses to press inquiries addressed to TVP and will maintain contact with other Media Briefing Centres and Press Cells set up elsewhere e.g. nearer the scene in order to maintain consistency of information.

The MAC will coordinate the information given to the media via the Media Briefing Centre.

It is not envisaged that the media will be attending TVP SCC; instead Press Conferences will be scheduled at the Media Briefing Centre.

5.6.2 Emergency Media Centre (EMC)/ Media Briefing Centre (MBC)

See TVLRF Communications Plan for information relating to the EMC / MBC. In addition to the normal media support to the MBC for an AWE incident then press officers from the following agencies should also be included: MOD, DEFRA, FSA, PHE, PHE CRCE, etc. and others as required.

This press cell will manage the queries received from the media, coordinate the response in line with the MAC Strategy and key lines to take including requesting information from the MAC if a response is not known.

In addition to the normal considerations for the location of a MBC (easy access, car parking, tables, chairs, toilets etc) for an AWE incident the location also needs to consider how close it is to the AWE sites and the areas of contamination. A number of sites will potentially suit most of the above requirements including:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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The site chosen on the day will very much depend upon the AWE site affected, the wind direction, availability of the site and where the press are naturally attracted to, although safety and ensuring the response to the incident must be the priority.

The Emergency MBC does not need to be equipped with technology initially for the media attending to use – most come self-sufficient.

5.6.3 Press Statements

Press Statements will be sent from the MAC once it has convened.

It is important that all press releases sent out are copied to all agencies involved in order that everyone is aware of the reports going out should they be questioned on the release.

5.6.4. Information relating to AWE Incident Concerns

The table in [Section 3.9](#) covers some of the concerns likely to be asked by responders and the public following an AWE incident including outline points to be used in a response and where to find more information – in the plan, in other documents, coordinating groups or organisations.

Section Six

6 Protective Actions

There are a range of protective actions that may be implemented following an incident on an AWE site the purpose of which is to afford the greatest protection to the community affected as possible. Specific protective actions will be dependent upon the nature and scale of the incident. The decision as to what protective actions to put in place will be taken, at any command level, following advice from the site and/or the STAC.

6.1 Principles of Protective actions:

The three principles are:

- (a) **Avoid Deterministic Effects** – use protective actions to keep doses to levels below thresholds for deterministic effects. It should also avoid serious health effects caused from non-radiological incidents
- (b) **Justification** – the action should be used if it is expected to achieve more good than harm;
- (c) **Optimisation** – the quantities criteria used for introducing and withdrawing protective actions optimizes public protection; and

6.2 Immediate Protective Actions

On activation of the off-site plan then the implementation of the automatic sheltering protective action will be put in place. This allows for the immediate initial protective action for all people in the affected area to go inside and stay inside.

6.3 Assessment of Appropriate Protective Actions

Subsequent protective action decisions about public protection measures will need to be made based on environmental monitoring and will normally be made by the SCG on the advice of the STAC and will be based on monitoring results which can take time to be provided.

6.4 Monitoring Strategy to support Protective actions

AWE has a capability to undertake initial monitoring of the local environment around the Aldermaston and Burghfield sites in the event of a release, or suspected release of radioactive material. The results from this will be shared with organisations represented at the SCC.

Once the SCG is operational, PHE CRCE will be responsible for co-ordination of environmental monitoring and guidance with respect to protective actions passes to the STAC.

6.5 Protective Action Options

The default protective action for the community outside the site is for shelter i.e. to go inside and stay inside. There may be situations however when an urgent evacuation followed by subsequent evacuation may be necessary. Protective actions will be based on monitoring and expert advice.

The protective actions that may be implemented in an emergency at AWE are summarised below.

6.5.1 Protective Action Options and Actions

Protective action	Description	Potential scenarios / areas for which this protective action may be implemented	Process	Limitations / Issues – including actions in place or to consider to overcome
Sheltering	Going inside and staying inside buildings closing doors and windows and following advice given by the authorities via local and national media will substantially reduce the risk of contamination and risk to health of the population in the affected area. (Distance and shielding would be provided).	Automatic protective action in downwind sectors of Detailed Emergency Planning Zones once a radiation emergency has been declared. Exceptionally, sheltering may be advised across a wider area see Section 6.6 & Section 6.7 .	Automated public telephone altering system activated by AWE. The specific sectors that would be advised to shelter - the sectors alerted would be dependant primarily on the wind direction at the time of an emergency.(see monitoring) Advice provided would be to: <ul style="list-style-type: none"> go in or remain indoors, close all windows and doors and switch off all non-critical ventilation or air-conditioning systems Remove outer clothing, blow nose and have shower or wash face and hands if out in the open at time of incident (Further information on self-decontamination in Section 7.3.1) switch on a radio or television and listen for any information about the incident In particular the following local stations would be used. <ul style="list-style-type: none"> Heart Berkshire - 97, 102.9 & 103.4 MHz Heart Oxfordshire - 102.6 MHz BBC Radio Berkshire - 94.6, 95.4 104.1 & 104.4 MHz 	Not all premises in the DEPZ will have land lines to receive the alert – leading to additional resources needed in the area affected to ensure all inside. Reliant on businesses to inform people on-site and look after them for a period of time – booklet issued every 3 years, businesses encouraged to have an emergency plan. If outside at the time of the incident then if possible: Blow their nose, take off outer clothing – bagging it somewhere safe and wash their face and hands. A plan needs to be in place within 48hrs due to the decreasing effect of sheltering, as a result of natural air changes in buildings.

Protective action	Description	Potential scenarios / areas for which this protective action may be implemented	Process	Limitations / Issues – including actions in place or to consider to overcome
			<ul style="list-style-type: none"> • The Breeze Basingstoke and North Hampshire 107.6 MHz • The Breeze Newbury 105.6 MHz and 107.4 MHz • The Breeze Reading 107 MHz • Local Independent TV • Local BBC TV • Plus others as appropriate <p>Prevent others entering the area – AWE Transport Plan.</p>	
Urgent evacuation – leading to temporary or permanent relocation	<p>Evacuation of people without any delay to remove them from an immediate threat to their safety.</p> <p>This may be necessary, particularly for those closer to the site depending on the levels of radiation contamination, types of premises and</p>	<p>Urgent evacuation (at the direction of emergency services at the scene) may be required:</p> <ul style="list-style-type: none"> • For non-radiological scenarios - e.g. areas within cordons in incidents involving explosives or other materials posing an immediate risk to life (e.g. asphyxiate gases, conventional smoke) • For radiation emergencies where due to the properties and persons close proximity 	<p>Action will be based on information from Site or STAC which will be informed by initial monitoring results from on and off the site and associated Modelling; REF: TVLRF Evacuation and Shelter Framework & HIOW Mass Evacuation and Shelter Guidance</p> <ul style="list-style-type: none"> • Immediate door knocking and supported evacuation by emergency services (TVP/SCAS/FRS) • Encouraged to get a grab bag in advance if time allows – Preferably making sure they have all relevant medication, clothing and personal effects to use over the time they may be out of their homes for • Wash facilities and clothing may be needed. REF: LA Rest Centre Plans 	<ul style="list-style-type: none"> • Emergency services approaching respective premises in PPE which may alarm those involved; • Resourcing the evacuation by way of emergency services - mutual aid by other emergency services and other responders. This will depend on the numbers involved; • Resourcing transport/drivers to enter into a contaminated area;

Protective action	Description	Potential scenarios / areas for which this protective action may be implemented	Process	Limitations / Issues – including actions in place or to consider to overcome
	vulnerability of the occupants (those requiring extra support).	<p>to the site boundary (e.g. incidents involving the transport of radioactive materials on the site, or severe accidents). Such evacuation would normally be subject to careful consideration by STAC taking into account the potential dose saving (or increase in public dose) that would result, but could perhaps be usefully classified as “Early Evacuation”.</p> <ul style="list-style-type: none"> Care homes, schools, caravan sites, boats (liveaboard & pleasure), individual vulnerable clients may require extra support in areas affected – in order to get this support effectively the individuals may need to be evacuated. 	<ul style="list-style-type: none"> Support by way of an urgent reception centre; REF: LA Rest Centre Plans Transport needed to support some/all people – emergency services Management of pets <p>TVLRF Identification of Vulnerable Persons Plan & TVLRF Information Sharing Protocol to identify and share vulnerable clients’ details.</p> <p>Decisions made as to best way forward for supporting vulnerable people depends on the incident – stay where they are with support coming in or evacuation to a safe location for support to be provided. REF: TVLRF Identification of Vulnerable Persons Plan</p> <p>Monitoring of people evacuated prior to going to more formal rest centre; REF: HIOW & TVLRF Radiation Monitoring Unit Interim Operational Plan</p> <p>Longer term support in recovery to their property Ref: TVLRF Recovery Plan & HIOW Community Recovery Plan.</p>	<ul style="list-style-type: none"> Evacuating large care homes – all have been given advice in developing their emergency plans to keep residents on-site and inform next of kin etc; A balance of continuing in shelter versus needs of vulnerable people in community settings (Schools/care homes) and managing their families.
Subsequent evacuation – leading to temporary or	Displacement of members of the public from their homes and businesses due	<p>May be required in the days/weeks in relation to:</p> <ul style="list-style-type: none"> people taking cover in buildings such as 	<ul style="list-style-type: none"> Monitoring of the area for contamination Guidance received via STAC following the analysis of the monitoring requirements 	A plan to be in place within 24hrs for subsequent evacuation to start taking place and be completed

Protective action	Description	Potential scenarios / areas for which this protective action may be implemented	Process	Limitations / Issues – including actions in place or to consider to overcome
permanent relocation	<p>to the sheltering protective action no longer being valid and/ or to facilitate longer term recovery and remediation of affected areas.</p> <p>This may be necessary, some 12 to 48 hours later, depending on the levels of contamination determined.</p> <p>Beyond 48hrs it is considered that sheltering indoors is normally not adequate within the affected areas.</p>	<p>factories, offices and other work places</p> <ul style="list-style-type: none"> Those sheltering areas may not be suitable in terms of providing support for the people there for any length of period due to lack of facilities, food and bedding This will need to be considered at an early stage depending on the zones affected <p>Following monitoring of the area for levels of radiation (or other) contaminants</p> <p>Evacuation of the public from their homes may be necessary to facilitate the recovery process.</p>	<ul style="list-style-type: none"> A map recce and cross reference to the information in this plan needs to be undertaken to establish what is in each sector- this will vary according to time of day etc. A specific joint Evacuation Cell to agree the process and the notification routes for the community to be set up the process for temporary or permanent relocation will be communicated via the media to those affected <p>REF: TVLRF Evacuation and Shelter Framework & HIOW Mass Evacuation and Shelter Guidance & LA Rest Centre Plans.</p>	<p>within 48hrs of the incident starting.</p> <p>Once Individuals have been removed from the area, temporary or permanent relocation needs to be identified for those unable to return to their properties.</p>
Self-Evacuation	When members of the public in the area remove themselves from the area rather than shelter or	Where people hear/see others leaving the area this may lead to self-evacuation.	<ul style="list-style-type: none"> Ideally all self-evacuating should be encouraged to be processed at an agreed site (rest centre or RV point) If they do not go through a registration process or it would be too resource intense to manage then a helpline or website 	<ul style="list-style-type: none"> Control will be less manageable Spread and resuspension of contaminants

Protective action	Description	Potential scenarios / areas for which this protective action may be implemented	Process	Limitations / Issues – including actions in place or to consider to overcome
	evacuate under the support of emergency services		registering system should be put in place to allow people to register remotely their details.	<ul style="list-style-type: none"> Incident becomes a wider issue than limited to the local Berkshire/Hampshire areas.
Remaining away from the area.	People out of the area when an incident takes place.	Where people are at work or out of the area when an incident happens.	Media messages to: <ul style="list-style-type: none"> Stay away from the area; Stay with friends and family; Register as in self-evacuation Provision of a drop in centre away from the area to get more information. Road closures put in place REF: LA Assistance Centre Plan.	<ul style="list-style-type: none"> People may wish to get back home to pick up or visit vulnerable people. People may have concerns for animals welfare of pets or livestock left unattended Reception / rest centres may be necessary to support those who are 'homeless'
Restrictions on water consumption	This is not likely to be required due to the way the water supplies are delivered.	This is unlikely to be needed as an immediate protective action by the nature of how water is abstracted in the area and the length of time any radiation may take to get into the supply network If may be slightly different for a chemical incident at the site however and therefore should not be discounted.	The STAC should be the main source of information for decisions. Thames Water will be lead for public water supplies information. For private water supplies the EHOs within Local Authorities will have details of such supplies in the affected area and will be able to support the decision making process via the STAC. REF: TVLRF Water Disruption Plan.	

Protective action	Description	Potential scenarios / areas for which this protective action may be implemented	Process	Limitations / Issues – including actions in place or to consider to overcome
Restrictions on food production	Advice or specific restrictions on food producers not to consume food sourced from a potentially contaminated area to minimise the potential ingestion of radioactive materials following a radiation emergency incident.	May be required following a radiation emergency where areas are found to have been contaminated with radioactive or other hazardous materials. Intervention levels for implementing this protective actions are flexible and would be scenario-dependent.	<ul style="list-style-type: none"> The STAC should be the main source of information for decisions Trading Standards & Animal, Plant and Health Agency and the Food Standards Agency should be involved re animals welfare, crops/gardens and food safety etc. 	
Restrictions to transport movements Road Rail River & Canal	By restricting road, rail and other transport movements in and around the area allowing emergency vehicles access and reduce the risk of resuspension of radioactive particles.	May be required to facilitate the response and the recovery and reduce the resuspension of particles.	<p>There is an AWE Transport Plan in relation to the initial response and 'closing' down of the area to traffic to support access to site and allow emergency service access.</p> <p>Agencies involved:</p> <ul style="list-style-type: none"> Highways England for M4, A34 and M3 LA Highways & Transport Team (West Berkshire, Hampshire, Reading and Wokingham). Network Rail- If AWE (Burghfield) site is affected including zones B, C, D, E, F, G & H then the Rail line between Reading and 	<p>Traffic and trains are likely to have travelled through the area before being formally alerted and therefore concern to the companies, passengers and road users along with the incident being wider than Berkshire/Hampshire borders.</p> <p>Notification regarding PH advise to be shared with all LRFs.</p>

Protective action	Description	Potential scenarios / areas for which this protective action may be implemented	Process	Limitations / Issues – including actions in place or to consider to overcome
			<p>Basingstoke should be requested to close as a precaution in the early stages of the incident. A plan is available for the initial closure phase.</p> <ul style="list-style-type: none"> • Canal & River Trust. <p>Reopening would be on advice from the STAC.</p>	
Public Rights of Way Restrictions	By restricting access to the public rights of way (PROW) then access to the public to the affected area is limited.	To prevent locals and others using the PROW in the area inadvertently, then the paths would need to be formally closed.	<p>A number of footpath and other rights of ways exist within the DEPZ of both sites.</p> <p>Any decision to close footpaths should be referred to the relevant local authority's Rights of Way teams in order for them to identify what paths can be closed.</p>	

6.6 *SHELTER as a Protective Action Summary*

Shelter is the default protective action for a radiation emergency at either of the AWE sites since distance and a barrier (a building) will afford protection.

On notification the community should go to the nearest building to take shelter.

Some of the issues for responders relating to shelter include:

- (a) Vulnerable communities and individuals requiring support
- (b) Visitors to the area
- (c) People sheltering in businesses
- (d) People living in the area who were outside the area at the time
- (e) Friends and Family worried about those within the area
- (f) How long are people likely to be told to stay in shelter?

Most of these issues are addressed in other parts of this plan. The key element however will be the provision of information.

Sheltering effectiveness: any structure where doors and windows can be closed (so not tents or barns) offers some degree of protection from the inhalation of airborne radioactive material. The degree of protection offered by a structure will vary depending on how air permeable it is and how it manages air exchanges.

Sheltering in temporary structures such as caravans, boats (live aboard & pleasure) and mobile homes can therefore be appropriate for a short period of time but if there is the option of sheltering in a more substantial structure then this should be used.

When considering lifting sheltering and introducing relocation or introducing evacuation, consideration should be given to prioritising to those in less protective dwellings. The nature and extent of protective actions will be continuously reviewed by STAC. Advice on amending protective actions will be provided by STAC to SCG, based on the scientific and technical information available at the time

6.7 *EVACUATION as a Protective Action*

An evacuation is defined as the movement of people and, where appropriate, pets away from an actual or potential danger to a safer place for a length of time.

Type of evacuations considered:

Type of evacuation	Description
Urgent evacuation	Evacuation of people without any delay to remove them from an immediate threat to their safety
Subsequent evacuation	Displacement of members of the public from their homes and businesses due to the sheltering protective action no longer being valid and/ or to facilitate longer term recovery and remediation of

[illegible]

[illegible][illegible]

Action	Process for AWE sites
Notification to community	If evacuation is recommended, normally, the Police and other emergency services, will be responsible for advising residents in the affected area that they should evacuate the building they are in, how this will be done and where they can go to. The community would be advised as to what to take with them should they be evacuated.
	Media messages will also provide the information – this will need to be detailed with respect to the areas affected and why them and not other areas, as necessary
Transportation	Inside the contaminated area the transportation would normally be arranged by the Logistic Cell with support in sourcing the vehicles by the Local Authorities via their normal contractual arrangements.
	Outside the contaminated area the Local Authorities would arrange transport – arranged via an exchange rendezvous point (RVP).
Reception Centres/ Rest Centres	Arrangements are in place to shelter communities within the existing Detailed Emergency Planning Zone (DEPZ) for either site if considered necessary for public safety or for operational advantage.
	<p>People leaving the affected area may initially be requested to report to a designated Reception Centre/ Rest Centre/ RVP set up by the appropriate Local Authorities. This will help the Police and Local Authority (LA) to maintain records of movement and records of vacated premises.</p> <p>All persons with homes in the area who wished to enter or re-enter before it was considered safe to do so would be advised to report to a Reception Centre outside the sheltering zone to await clearance.</p> <p>The Reception Centre would act as the central information point for persons excluded from their homes as well as the location to which any persons had been evacuated would be sent initially.</p> <p>Special arrangements exist for children at school. Where necessary the Police and Local Authorities would make appropriate arrangements for their care and for the notification of parents and guardians. Children at school outside the affected area, but who live inside the affected area, would be taken to nominated Reception Centres where they will be looked after by their teachers and local authority staff until they were reunited with their families.</p>
Radiation Monitoring Unit (RMU)	A Radiation Monitoring Unit, as appropriate, will be provided where the public can be monitored for possible radioactive contamination. Further information can be found: HLOW & TVLRF Radiation Monitoring Unit Interim Operational Plan

Action	Process for AWE sites
Information	<p>Thames Valley Police (and, if appropriate, Hampshire Constabulary) will be responsible for the issue of authoritative information about evacuees and casualties.</p> <p>Specific telephone numbers to enable this information to be obtained will be announced by them, via the media, at the time of an emergency.</p>

6.7.1 AWE Staff Evacuation

All personnel on the AWE site, except those directly involved in the response to the incident would be directed to take shelter inside the nearest suitable building. Later they would be evacuated from affected areas in a controlled manner as appropriate. This site exit strategy would be presented by the AWE duty team to consider and raise with the Tactical Coordinating Group (TCG) to be authorised and to ensure the coordinated site evacuation managed by AWE does not have an adverse impact on the resources engaged in responding outside the site.

6.7.2 Uncontrolled Community Self Evacuation from Area

The possibility of self-evacuation by members of the public at any time cannot be ignored. The impact of which may cause disruption to the response and may make the situation worse should radioactive particles be resuspended. Case studies show that there is greater risk of accidents during such self-evacuation than a situation of shelter and controlled evacuation if needed.

Public Information and local control will be needed to reduce the risk of this taking place.

6.8 *Basis for Lifting (removing) Protective Actions*

Protective actions will not be lifted until the Strategic Coordinating Group (SCG) and at a later stage by the Recovery Coordinating Group (RCG), advised by specialist agencies in the STAC are convinced that the risk to the public is the same, if not less than if the protective actions were to remain in force. The decision to lift the protective actions is made by the SCG, but the initial message must be delivered by the police.

Section Seven

7 Supporting Information

This section covers Monitoring Strategies, Rest Centres, Vulnerable People and PPE.

7.1 Monitoring Strategies

PHE CRCE is responsible for the development of the Monitoring Strategy. This strategy should include environmental monitoring to include food and water and people monitoring. The strategy will be agreed at STAC and subsequently approved at the SCG.

Information about PHE CRCE's national radiation monitoring co-ordination role can be found in the [National Nuclear Emergency Planning and Response Guidance](#) (section 5.6 on radiation monitoring and specifically section 5.6.10)

7.1.1 Responsibilities

- a) AWE plc is responsible for environmental monitoring out to approx. 15km in the first instance.
- b) PHE CRCE is responsible for the coordination of the monitoring as detailed in their [website](#) beyond and in addition to the operator. PHE CRCE maintain a capability to deploy radiation monitoring teams capable of measuring environmental contamination and undertaking measurements of radioactivity on or in people. Teams can be deployed from Chilton, Leeds and Glasgow. Their deployment and tasking is controlled by the Monitoring Coordination team leader based in the Chilton Emergency Centre who reports directly to the PHE CRCE Operations Director.

In addition to deployment and management of PHE CRCE monitoring teams, PHE also has a national monitoring coordination role during radiation emergencies, which is managed by PHE CRCE. PHE CRCE will coordinate the monitoring resources made available to it in the event of an emergency and prepare a monitoring strategy for approval by the Strategic Coordinating Group (SCG). This responsibility covers the responsibility for monitoring people and the environment. It does not change or re-allocate any existing responsibilities that organisations might hold with regards to radiation monitoring. PHE CRCE has no power to commandeer resources and PHE CRCE would not expect to take direct tactical control of any resources made available.

- c) PHE CRCE will periodically provide organisations with information as the incident develops, this should include:
 - i. A summary of the incident situation
 - ii. PHE CRCE local rules for its own monitoring teams being deployed
 - iii. PHE CRCE radiological risk assessment for its own monitoring teams being deployed

Organisations' monitoring teams will however need to:

- a) Be self-sufficient in respect of their own accommodation, transport, meals, communications, etc.;
- b) Have appropriate health physics skills to competently carry out the agreed monitoring tasks;

- c) Work under the supervision of their own management structures; and
- d) Be self-sufficient in terms of PPE (including RPE where appropriate).

7.1.2 Other Agencies Monitoring Responsibilities.

Some agencies have specific monitoring responsibilities and capabilities including:

- (a) The **Environment Agency** organises targeted environmental sampling and analysis through its call off monitoring framework and adapts its routine monitoring programmes to an incident:
 - 1. Monitoring of radioactivity in the environment near nuclear sites, including dose rate monitoring and sampling and radio-chemical analysis of environmental materials
 - 2. Radio-chemical analysis of raw water sources which are used for drinking water supplies
 - 3. Monitoring radioactivity in air and rainwater.
- (b) The **FSA** is responsible for monitoring food in order to establish areas where restrictions on food may or may not be required
- (c) The **water companies** are responsible for ensuring main supply water is monitored.

Radiation monitoring of public water supplies undertaken on behalf of the water companies will form part of the wider radiation monitoring strategy developed by PHE CRCE as part of its national radiation monitoring co-ordination role. The monitoring strategy will be agreed at STAC before being submitted to SCG for approval, prior to implementation. The monitoring strategy will develop during the response as more information becomes available regarding the nature and extent of the incident and more monitoring resources are made available.

Each organisation is responsible for ensuring that their staff are properly trained, and its resources are adequately maintained. Operational responsibility would be retained at each monitoring organisation's emergency centre.

7.1.3 Modelling Procedures

In order to support the monitoring strategy and to understand the impact of the radiation emergency then a number of modelling procedures are normally involved including:

- (a) Knowledge of meteorological conditions before monitoring data can be assessed is vital
- (b) PACRAM (Procedures and Communications in the event of a release of Radioactive Material) available from the Met Office (EMARC - the Environment Monitoring and Response Centre)
- (c) Met Office NAME (Numerical Atmospheric Modelling Environment)
- (d) RIMNET (Radioactive Incident Monitoring Network)
- (e) PHE-CRCE has various other models available.

7.1.4 Limitations to Monitoring:

- (a) PHE CRCE will active monitoring resources from all its sites, additional resources may also be available from other nuclear licensed sites and other organisations with monitoring resources. Additional monitoring resources from PHE CRCE and other organisations are provided on a best endeavours basis and depending on the resources available at the time.
- (b) There is no point in monitoring deposition until the release has stopped – this prolongs the situation. Unless the objective is to obtain confirmation of a contamination hazard and where the wind direction has changed such that deposition is no longer occurring within an area being monitored
- (c) Initial monitoring resources will be few and so expect 1-2 readings per hour for the first few hours
- (d) Data will be 'raw' and so will need interpretation by experts
- (e) Some analysis can take 1-2 hours per sample and there are likely to be a great number of samples needed to confirm level of contamination and therefore there will be a time lag in providing advice to the responders and the public
- (f) The information provided to the SCG needs interpretation to prevent inappropriate decisions to be made. The STAC chair is advised to take a suitably qualified radiation expert.

7.2 Monitoring Strategies - People (Radiation Monitoring Unit)

7.2.1 What is a Radiation Monitoring Unit (RMU)?

In some circumstances, evacuated casualties, members of the public and emergency service personnel will require monitoring and, if necessary, decontamination. Monitoring of workers, casualties and members of the rescue services at a major nuclear site will be carried out by a mixture of the operator's staff and other health professionals. Apart from those individuals on-site and responders, there will be a need to monitor those individuals who may be contaminated (or who think they may be contaminated). This need may be fulfilled by the NHS through the setup of an RMU.

7.2.2 The need for an RMU

RMUs are needed in order to assess the need for decontamination or possible medical treatment for a large volume of people. They perform the function of reassurance for those who may be concerned about possible contamination. They serve to keep records of levels of any contamination observed. Early monitoring of uninjured people shall be carried out in suitable facilities away from A&E departments to ensure that these do not become overcrowded.

7.2.3 Activation of an RMU

NHS England is responsible for people monitoring as a result of a radiation incident. The activation process would follow routine major incident command and control arrangements. Activation of the RMU response will be initiated by the SCG following recommendation from the Scientific & Technical Advisory Cell (STAC).

Communication of activation would be via organisational representatives at the SCG. Further information on RMU planning may be obtained from the NHS emergency planning guidance and the draft HIOW & TVLRF Radiation Monitoring Unit Interim Operational Plan.

7.2.4 Location of RMUs

The RMU shall normally be located at, or adjacent to, a reception centre/ rest centre established by the Local Authority. However, suitable NHS or other premises nearby may need to be used. Police and the Local Authority should be consulted when selecting a site.

It may be necessary that following monitoring, people would need to go through the decontamination process. Therefore the site selected needs to account for enough real estate to be available for a RMU and a Decontamination Unit to be available prior to onward movement to the reception/rest centre.

7.2.5 Staffing

Staffing will be drawn from hospitals and facilities outside the areas affected by the incident. This way local staff will remain to ensure the smooth running of local hospitals and other functions.

Typical staffing might be:

- (a) Senior medical physicist to supervise the monitoring and decontamination function
- (b) Medical physicists/technicians (or similar grade staff from other organisations)
- (c) AWE staff (where possible)
- (d) Nurses
- (e) Administrator
- (f) Clerks.

Arrangements exist in many areas for the nuclear site operator to provide additional staff capable of carrying out monitoring measurements. Public Health England – CRCE may also be able to provide staff to assist with monitoring.

7.2.6 Links to other sections/plans

Any rest centre set up will accommodate people who have been evacuated following urgent countermeasures. These people are a priority with regard to monitoring.

7.2.7 Concerned public across the UK

An NHS direct hotline (Via 111) may be set up to deal with concerned persons. The algorithm to deal with calls would be provided by the Public Health England – CRCE.

7.2.8 Decommissioning an RMU

The physicist in charge will be responsible for planning and carrying out decommissioning of the unit.

7.3 Decontamination of People

After an off-site emergency from an AWE site there are likely to be concerns regarding contamination. These concerns could be related to contamination of people, animals, pets and property including gardens, homes and businesses. The amount of any contamination will vary according to the amount released in the first place and the weather conditions as detailed in other areas of this document. This section relates to decontamination of people only.

The decontamination process, if needed, would take place sometime after the initial response phase and normally after the risk of any further contamination from the site had stopped.

The process for decontamination would be done in a number of ways and for a number of reasons as detailed below.

7.3.1 Self-Decontamination

Initial countermeasures it is very likely that the initial guidance to the community affected would be GO IN – STAY IN – TUNE IN.

PHE guidance for self-decontamination in a radiation emergency

STEP 1: Take off outer layer of clothing	
<ul style="list-style-type: none"> • Taking off your outer layer of clothing can remove up to 90% of radioactive material. • Once inside, limit your movement to prevent the spread of radioactive contamination. • If a dust mask is available, place this over your nose and mouth before disrobing. • Take care when removing clothing to prevent radioactive material from shaking loose. • Where possible, avoid removing clothing over your head. • Avoid touching your skin with the outside of your clothing. • Put clothing in a plastic bag or other sealable container. Place the container outside or away from living areas. 	
STEP 2: Wash yourself off	
In all situations, blow your nose and wipe your eyelids, eyelashes and ears.	
If you can shower: <ul style="list-style-type: none"> • Use mild soap and shampoo. Water should be tepid (i.e. not too hot or cold). • Do not use conditioner as it may fix radioactive contamination to your hair. • Keep your mouth and eyes closed when washing your hair and face. • Do not scald, scrub, or scratch your skin. Only soft brushes or sponges should be used. • Keep cuts and scrapes covered when washing to keep radioactive material away from open wounds. 	
If you cannot shower: <ul style="list-style-type: none"> • Wash your hands, face, and other exposed body parts at a sink or tap. • Use soap and plenty of water. • Keep your mouth and eyes closed when washing your hair and face 	
If you cannot use a sink or tap: <ul style="list-style-type: none"> • Use a moist wipe, clean wet cloth, or damp paper towel to wipe the parts of your body that were uncovered. • Pay special attention to your hands and face. • Place any waste materials in a plastic bag or other sealable container. Place this outside or away from living areas. 	
STEP 3: Put on clean clothes	

- Put on clean clothes that have been stored indoors.
- Do not put contaminated clothes back on.

STEP 4: Helping others and pets

- Wear waterproof gloves and a dust mask if possible.
- Keep cuts and scrapes covered to keep radioactive material away from open wounds.
- Waste generated from cleaning other people or pets should be placed in a plastic bag or other sealable container. This should be placed outside or away from living areas.
- Rewash your hands, face, and parts of your body that were uncovered.

STEP 5: Stay tuned

- Stay tuned for updated information from public health officials.
- Communications may come from television, radio, or official social media channels.

7.3.2 Mass Decontamination Process

This process of people decontamination would be led by the Health services, supported by the Fire & Rescue Service (FRS).

There are two types of decontamination systems operated by Health and the Fire & Rescue Service as detailed below:

The **Fire & Rescue Services** undertake the mass decontamination using Mass Decontamination Units (MDU) which includes a large inflatable tent disrobe, showering and re-robe system. It includes areas for taking clothes off, shower facilities (for a period of 3 minutes in the shower) and an area to dress into robes provided.

Information REDACTED ON BASIS OF SECTION 38

The actual size of the response would depend on the number of people in the sectors affected, the time intended to process everyone and the land available to undertake the work.

It is a basic system, however for large numbers it is quick and effective.

There will always be modesty issues and people for a variety of reasons may be frightened or feel it is against their beliefs to remove all clothing, and in front of others. Explanations will be given and all efforts will be made to accommodate such issues however decontamination is the main effort in order to protect their own and other people's health.

The Fire and Rescue Service System is also used for decontamination of responders.

Ambulance Service System. This is a tented system where the contaminated people are assisted in the cleaning process if they are injured or ambulant.

There may also be the need for decontamination units at hospitals to be activated as well as lock down due to contaminated and worried people attending A&E at any hospital in the UK. This information would be activated via advice from the STAC and via the Health communication routes.

It is very likely that both systems would be set up as a matter of course.

7.3.3 Decontamination Process Location

The mass decontamination location(s) would be decided on the day following a multi-agency meeting and would take into consideration the numbers, the weather and the extent of the contamination.

There would normally be one site but it may be that more would be needed.

Regardless, of the location, the actual structures would be upwind of the incident in a controlled location for security and privacy reasons. They would also be on the edge of the warm (likely to be contaminated due to movement etc. rather than the incident itself) and cold (non-contaminated area) zones.

7.3.4 Informing and Movement of People to Decontamination Locations

Following a period of time the community affected will be informed that they need to leave their initial place of safety in order for further remedial works to be undertaken.

REDACTED ON BASIS OF SECTION 38

The means of communicating this to the community would be via the media and/or via door to door knocking. This may be somewhat alarming for residents initially because depending on the scale of contamination and the period of time that responders may be in the contaminated area the people knocking on the door may be in protective equipment more than the residents will be requested to wear. This will have been considered by the STAC and the full health considerations taken into account.

The movement of the people may vary according to the situation, and will be coordinate by the Evacuation/ Shelter Cell, but may involve streets at a time being moved in a controlled manner to the decontamination locations. This movement would be the responsibility of responders who are equipped and trained to go into the contaminated and warm zones including police, fire, ambulance and military personnel.

The control of the residents within the decontamination area before the decontamination is undertaken will be by the police in the main with assistance from the other responders involved.

Once the decontamination has been completed then the responsibility for welfare and onward movement passes to the local authority.

7.3.5 Post Decontamination

Once the decontamination has been completed the Logistics Cell will arrange the onward movement and local authorities will be responsible for the welfare of individuals.

The evacuees post decontamination will be in modesty suits and are likely to have no other personnel effects with them. As a result they may need to be provided with:

- (a) Clothing
- (b) Medical care as necessary including prescription drugs

- (c) Money
- (d) Keys to get into homes if outside the area and keys left behind etc. Access to locksmiths/carpenters may be necessary to support this
- (e) Mobile phones for use by evacuees, chargers
- (f) Access to internet.

The people and agencies that should be considered to be present at the reception centre or on standby include:

- (a) GP's for medical advice
- (b) Pharmacy on standby
- (c) Locksmiths
- (d) Carpenters
- (e) Representatives from finance re cash etc.
- (f) LA phone officers with respect to extra mobile phones for use
- (g) ICT Officers re use of Laptop terminals.

More information regarding post decontamination reception centres / rest centres and recovery are in other sections to this plan.

7.3.6 Water and Waste

Water waste from the decontamination of people needs to be contained in order to prevent discharges to the environment, the Environment Agency will advise on how to dispose of the waste and water which has been collected.

7.4 Reception Centres and Rest Centres

During any major incident there is the possibility people will become displaced. It is the responsibility of the LA where the residents are affected to prepare reception centre and or rest centres for those displaced.

Type of centre	Description
Reception Centres	<p>A reception centre is a building that can provide:</p> <ul style="list-style-type: none"> • Safety – a place of safety/refuge. • Registration – to identify who is in the rest centre and to enable details of casualties/evacuees to be passed to the Police Casualty Bureau • Refreshments – for people evacuated • Welfare – provision of basic support to those evacuated • Assistance - practical and emotional support and assistance <p>A reception centre will not provide emergency overnight accommodation.</p>
Rest Centre	A rest centre is a building which offers:

	<ul style="list-style-type: none"> • Shelter – for people who have been evacuated from their homes or are in need of emergency overnight accommodation following an incident • Welfare – provision of basic support to those evacuated • Assistance - practical and emotional support and assistance <p>Ideally Hotels will be used for overnight accommodation, to reduce safeguarding concerns associated with bedding evacuees down in shared halls, provides those affected with greater privacy and some ownership of their space.</p>
Family and Friends Reception Centres (FFRC)	FFRC may be required to help reunite family and friends with those thought to be within the DEPZ/cordoned area as well as provide practical and emotional support and assistance.

For an incident at AWE the following factors may result in people being displaced:

(a) Evacuation from their home as a result of the risks associated with staying in their home

- i. There will normally be no need for the urgent evacuation of areas outside of the AWE sites in the event of a radiation emergency therefore there should be some time to plan the centres
- ii. Urgent evacuation may be necessary however since the cause of the radiation release may be as a result of explosion/fire etc. which could have an impact on the community outside the site. The risks of urgent evacuation needs will be greatest to those premises closest to the site
- iii. Subsequent evacuation of the public in some areas outside the incident site boundary might be necessary. This will depend on the results of ground monitoring and will normally be carried out to reduce contact with deposited material and to facilitate decontamination and restoration.

(b) People who at the time of the incident are out of their homes and cannot return to them

(c) Staff on the AWE site, including contractors' personnel will shelter initially until the release is over. Later they will be evacuated from affected areas as appropriate, this will be suggested by AWE and authorised by TCG. The coordinated site evacuation will be managed by AWE to ensure it does not have an adverse impact on the resources engaged in the response outside the site.

7.4.1 Information – for evacuees

In an AWE incident a number of reception centres and rest centres may be required depending on the scale, wind direction and therefore the number of households affected. Initially a reception centre would be set up as a registration area in order to allow safe evacuation from the affected area. The main aim at that point would be to allow onward movement to a more suitable rest centre or to other accommodation (at friends, family or possible hotels).

It may be necessary to set up a number of reception centres for the general public. It is also very likely that reception centres will be needed in more than one authority therefore communication links will be key in order to ensure as far as possible that families are united.

7.4.2 Reception Centre and Rest Centre Locations, Information and Contact Details

Each Council holds a Rest Centre Plan along with contact details for the responsible person/key holders.

The decision as to which centre(s) are to be used will depend on the incident, wind direction and areas affected. This will be made at TCG level, information and engagement from the LA's is essential in the decision.

7.4.3 Staffing & Equipping of Rest Centres

The respective LA's have the responsibility of staffing and equipping of rest centres. Authorities will follow their Rest Centre Plans with respect to staffing and equipping the centres.

7.4.4 Movement on from Reception Centre to Rest Centres and/or more permanent accommodation.

Once people have been registered (following evacuation or being restricted access to their own homes due to the incident) the LA will make preparations for their onward movement to a rest centre or more permanent accommodation, depending on the longer term options.

If the evacuation is only for a short period people will be encouraged and assisted to stay with friends and family in the area. Where this is not possible the LA would prepare a more suitable rest centre.

If it is likely that they are going to be out of their homes for a prolonged period of time then more permanent accommodation will be looked for in the local area in order to maintain cohesion of the community, allow for school and work to carry on as far as possible as normal. This may be difficult if large numbers are involved. Depending on the sectors affected, it may be that support from neighbouring LAs and MHCLG RED will be requested.

Should the evacuation from homes be for a prolonged period it may be that arrangements will need to be made for a return to the home with removal vans in order to retrieve valuables, furniture and clothing. The items removed from properties may need to be monitored.

All this movement of people may result in a number of vehicles coming to the area, therefore any rest centre used needs to have large parking capability and some control on vehicle movements.

7.4.5 Transport to and from Reception Centres / Rest Centres

In order to move people to and from reception centres/rest centres a number of considerations will need to be taken into account including:

- (a) Communicating the message to the people involved as to why they are being asked to move to rest centres, when this will be happening and how it will happen. Reassuring what the reason for the move is and reassuring that everyone affected will be moved in due course so as to ensure people do not make unnecessary moves to get on the transport
- (b) Considering meeting points for people to move to or how the pick up from the houses directly is going to be arranged
- (c) How to prevent transport and people becoming contaminated as they move to the transport. This may involve the issuing of disposable shoe covers, damping down pavements and house paths etc.
- (d) Consideration of PPE and clothing for the responders assisting the evacuation and for the community as they move. This will very much depend on the contamination involved and the weather conditions but may involve the issuing of paper masks to residents as a precaution.

The Local Authority (LA) would be charged normally with the transportation of evacuees. However due to the nature of the incident and the fact that the LA are not equipped or trained to operate within the affected area the people in the affected area would be moved by other organisations onto the rest centres.

To move people from the site or the sheltering locations support may be requested from the Logistic Cell or responding agency via Military Aid to Civil Authorities (MACA) formal requests.

Onward movement may be via a Radiation Monitoring Unit and/or a decontamination unit. It will normally only be after this monitoring or decontamination that the LA will pick up the evacuees at an RV point for onward movement to reception and rest centres.

The PHE CRCE will give guidance as to the Personal Protective Equipment (PPE) needed for staff entering the area.

In order to prevent re-suspension of contaminants during the movement of people the vehicles will move slowly. In addition the roads may be misted with water in advance and following the vehicles movement out of the contaminated area they will be washed down in particular the wheels and tyres. This will be undertaken in a controlled manner with advice from the Environment Agency and PHE CRCE.

After the moves are completed the vehicles will then be checked for contamination inside and cleaned appropriately with guidance from PHE CRCE.

7.4.6 Clear up of Rest Centre Post Incident

Whilst the intention will be to ensure as far as practicable beforehand that all people entering the rest centre are not contaminated there may be a risk of this happening. As a result regardless of known contamination or not, there will be an expectation from the community and the owners of the building that the site will be effectively cleaned.

As a result due to the nature of the incident it will be essential to ensure that any rest centre used is cleaned satisfactorily afterwards in order that it is suitable for use thereafter.

Many of the proposed rest centres are schools and Community Centres and therefore the public must be reassured that the site is clean for future use. PHE CRCE in conjunction with the site owners and the recovery group should ensure that all are satisfied the site is clean and the public are assured of this fact.

7.5 Specific areas of concern regarding Rest Centres following an AWE Off-Site incident

7.5.1 Contaminated People

There may be a fear that people in the rest centre are contaminated. This may be reality or perception however as a result the reception should be as near to the door as possible, shall be readily cleansed and the reception desk should have a trained health professional in place in order to give on the spot advice or guidance on monitoring. If someone presents themselves at the rest centre that may be contaminated then they shall be directed to the decontamination unit.

7.5.2 Contaminated Pets

As above there may be a fear of pets being contaminated. Therefore at an early stage suitable pet accommodation shall be made available outside the centre and suitably trained veterinary staff should be available in order to give on the spot advice.

7.5.3 Media Intrusion

Due to the nature of the incident there will no doubt be media interest in those being evacuated be they residents, business people or staff from the site. The rule will be that no media shall be allowed in reception centres and rest centres due to the sensitive nature of the situation and the potential vulnerability of the people involved. Those using the reception centres and rest centres should be reminded not to use social media to protect themselves and others. As a result the involvement of the Police at the entrance will almost certainly be required. It may be that once the situation has settled down the media may be allowed to enter certain areas with the knowledge of the evacuees. Interviews will be strictly controlled in order not to intrude on the evacuees. Corporate Communications support will be recommended to be present from the LA.

7.5.4 Link to Radiation Monitoring Unit (RMU)

As part of the health monitoring programme agreed at SCG it may be that people evacuated from the affected area or people who have been in the area when the incident occurred will be screened at a RMU.

The RMU may be located at the same site or very close to a reception centre/rest centre and/or the decontamination unit. [Section 7.2](#) gives more details on these units.

7.6 Vulnerable People

Supporting the vulnerable throughout a major incident is always difficult due to the number of agencies involved, the different vulnerabilities of people and the ever

changing vulnerability of people due to the incident type. What constitutes a person as “vulnerable” cannot be completely determined as it will depend on the circumstance of the event. For example, someone who is agoraphobic would be vulnerable if they were expected to evacuate but not if sheltering in their own home or somewhere familiar.

For the purposes of this plan, vulnerable people are those ‘that are less able to help themselves in the circumstances of an emergency’ (para 5.99 Emergency Preparedness – Guidance in part 1 of the CCA 2004). This suggests that focus should be on those who are assessed as not being self-reliant and may need extra assistance to be safe.

The TVLRF Identification of Vulnerable Persons Plan and WBDC Vulnerable People Plan will be used to support this plan.

The main issues with respect to an incident at an AWE site and the vulnerable include:

- (a) Looking after vulnerable individuals and
- (b) Looking after groups of vulnerable people.

No single organisation has the need, ability or responsibility to maintain the entire dataset needed for the discharge of this task. As a result there is a need for the many varied organisations, particularly the local authorities Social Services and the Health organisations, to work together to create a list of all the known vulnerable in the area affected.

The local community leaders including Councillors and Parish Members are also an invaluable source of knowledge relating to people who may not be on any service database.

7.6.1 Vulnerable Groups Locations within DEPZ’s







As well the vulnerable groups identified below, consideration should be given to the transient population within the DEPZ’s at the time of an incident.




Vulnerable group locations within AWE Aldermaston DEPZ area.

Schools

There are a number of schools that are early years and nursery schools with after school and holiday care provisions as well. There are also primary and secondary schools.

Name & Address	Type of premises	Additional Information	Telephone number	Responsible LA area	Sector
Impstone Pre-School Committee of Management Pamber Heath Memorial Hall, Pamber Heath Road G26 3TQ	Pre-School Play Group	██████████ REDACTED ON BASIS OF SECTION 38	07733 898914	Hampshire County Council	F11
Tadley Court School Common Road, Tadley, RG26 3TB	Private Boarding School	Student's aged 5 to 19, ██████████ ██ ██ REDACTED ON BASIS OF SECTION 38	0808 2739573	Hampshire County Council	G8
Greenacre Pre-School Bishopwood Co Infant School, Barlows Road, RG26 3NA	Pre-School Play Group	██████████ REDACTED ON BASIS OF SECTION 38	0118 981 1010	Hampshire County Council	H11
Bishopswood Infant School Barlows Road, Tadley RG26 3NA	Infant School	████████████████████ REDACTED ON BASIS OF SECTION 38	0118 981 2836	Hampshire County Council	H11
	Afterschool and Breakfast Club	████████████████████ REDACTED ON BASIS OF SECTION 38	0118 981 2836		

Name & Address	Type of premises	Additional Information	Telephone number	Responsible LA area	Sector
	Junior School	 REDACTED ON BASIS OF SECTION 38	0118 981 2836		
Tiny Town Kindergarten 1 Mount Pleasant, RG26 4JH	Day Nursery	 REDACTED ON BASIS OF SECTION 38	0118 981 4325	Hampshire County Council	H7
Bo-Peeps Day Nursery The Old Coach House, Church Road, RG26 3AU	Day Nursery	 REDACTED ON BASIS OF SECTION 38	0118 981 0805	Hampshire County Council	H11
Tadley Community Primary School The Green, Tadley, RG26 3PB	Primary School	Students aged 4-11	0118 981 3805	Hampshire County Council	H12
St Pauls Pre-School Church Hall, The Green, RG26 3PB	Pre-School Play Group	 REDACTED ON BASIS OF SECTION 38	07879 645600	Hampshire County Council	H12
The Saplings Pre School Burnham Copse Infants School, New Church Rd RG26 4JH	Day Nursery	 REDACTED ON BASIS OF SECTION 38	0118 981 2927	Hampshire County Council	J7
Burnham Copse Primary School New Church Road,	Primary School		0118 981 4498	Hampshire County Council	J7



Name & Address	Type of premises	Additional Information	Telephone number	Responsible LA area	Sector
Tadley RG26 4HN		REDACTED ON BASIS OF SECTION 38			
Tadley Under Fives Pre School Community Centre, New Church Road, RG26 4HN	Pre-School Play Group	 REDACTED ON BASIS OF SECTION 38	07768 026189	Hampshire County Council	J7
The Hurst Community College (Specialist Science Status) Brimpton Road, Baughurst, Tadley RG26 5NL	Secondary School	 REDACTED ON BASIS OF SECTION 38	0118 981 7474	Hampshire County Council	L11
Tall Trees Out of School Club Brimpton Road, Baughurst, Tadley. RG26 5NL	Out of School Day Care Holiday Scheme	After school club	0118 981 2918	Hampshire County Council	L11
Miss Polly's Kindergarten Brimpton Road, Baughurst, Tadley RG26 5NL	Day Nursery	 REDACTED ON BASIS OF SECTION 38	0118 981 4325	Hampshire County Council	L11
Little Stars Pre School Heath End Village Hall, Baughurst, Tadley RG26 5LU	Pre School		0118 981 7732	Hampshire County Council	K11


Name & Address	Type of premises	Additional Information	Telephone number	Responsible LA area	Sector
Boot Farm Kindergarten Back Lane, Brimpton Common, RG7 4RG	Nursery	██████████ (ages 0-4) REDACTED ON BASIS OF SECTION 38	0118 981 6619	West Berkshire District Council	N12
Aldermaston Primary Wasing Lane, Aldermaston RG7 4LX	Primary School	██████████ (Primary) REDACTED ON BASIS OF SECTION 38		West Berkshire District Council	R10
The Cedars School Church Road, Aldermaston, Berkshire RG7 4LR	Private School			West Berkshire District Council	R8

Schools in close proximity to DEPZ in OPZ







In previous editions of the off-site plan a number of schools had been identified as part of the DEPZ, under this plan a greater granularity has been applied to sort them based on their location to allow for priority to be given to those within the DEPZ firstly, but their information is presented below to assist in commensurate planning that may require actions in the OPZ that are close proximity to the site.




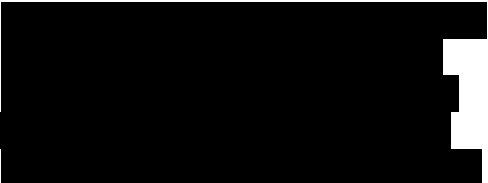
Name & Address	Type of premises	Additional Information	Telephone number	Responsible LA area	Sector
Brimpton CE Primary School, Brimpton Lane, Brimpton, RG7 4TL	Primary School	No Kitchen	0118 971 2311	West Berkshire District Council	N14


Name & Address	Type of premises	Additional Information	Telephone number	Responsible LA area	Sector
Silchester Church of England Primary School School Lane, RG27 2NJ	Primary School	 REDACTED ON BASIS OF SECTION 38	0118 970 0256	Hampshire County Council	E13
Grantham Farm Montessori School & The Children's House Grantham Farm, Baughurst, Tadley, RG26 5JS	Pre School		0118 981 5821	Hampshire County Council	K13
Alder Bridge School Bridge House, Mill Lane, Padworth, Berkshire, RG7 4JU	Primary School			West Berkshire District Council	A14
Jubilee Day Nursery Paddock Road, Padworth, Reading, RG7 4JD	Nursery	Monday – Friday 7:30am – 6:00pm  REDACTED ON BASIS OF SECTION 38		West Berkshire District Council	C13
Jubilee Gems School Road, Lower Padworth, Reading, Berkshire RG7 4JA	Nursery			West Berkshire District Council	B14

Name & Address	Type of premises	Additional Information	Telephone number	Responsible LA area	Sector
Padworth College, Padworth, Berkshire RG7 4NR	Private School	 REDACTED ON BASIS OF SECTION 38		West Berkshire District Council	B13




Care Homes


Name & Address	Type of premises	Additional Information	Responsible LA area	Sector
Bethany Residential Home 17a Pamber Road, Tadley, RG26 3TH	Care Home only (Residential Care)	Care home without nursing	Hampshire County Council	G11
Wakeford Court, Silchester Road, Pamber Health, Tadley, Hampshire, RG26 3XD	Retirement/sheltered housing	 REDACTED ON BASIS OF SECTION 38   REDACTED ON BASIS OF SECTION 38	Hampshire County Council	F11
Dimensions 21 21 Searing Way Tadley, Basingstoke, RG26 4HT	Care Home only (Residential Care)	   REDACTED ON BASIS OF SECTION 38	Hampshire County Council	J7

Name & Address	Type of premises	Additional Information	Responsible LA area	Sector
Fairview 2 Pinks Lane, Baughurst, Tadley RG26 5NG	Care Home only (Residential Care)	 REDACTED ON BASIS OF SECTION 38	Hampshire County Council	L7
Seeability Heather House Nursing Home Heather House Heather Drive Tadley RG26 4QR	Care home only (Residential Care)	 REDACTED ON BASIS OF SECTION 38	Hampshire County Council	K7
Seeability – Fir Tree Lodge Residential Home Heather Drive, Tadley, Basingstoke, RG26 4QR	Care Home only (Residential Care)	 REDACTED ON BASIS OF SECTION 38	Hampshire County Council	K6
Red Roof Pinks Lane Baughurst Tadley RG26 5NG	Care home only (Residential Care)		Hampshire County Council	L7













Name & Address	Type of premises	Additional Information	Responsible LA area	Sector
Karibu Place 37-39 Mulfords Hill Tadley Hampshire RG26 3HY	Care home only (Residential Care)	 REDACTED ON BASIS OF SECTION 38	Hampshire County Council	H7

Caravan/Mobile Home Locations within or directly on the border of DEPZ's

Address	No. of units	Responsible LA	Sector
Pinelands Mobile Home Park Padworth Common Padworth RG7 4QB	 REDACTED ON BASIS OF SECTION 38	West Berkshire District Council	D11
Ravenswing Mobile Home Park Aldermaston RG7 4PY	 REDACTED ON BASIS OF SECTION 38	West Berkshire District Council	E6/F6/F 5/G5
Cross Lanes Gully Paices Hill Aldermaston		West Berkshire District Council	M2/M3
Old Stocks Farm 7 Old Stocks Farm Paices Hill Aldermaston RG7 4PG	 REDACTED ON BASIS OF SECTION 38	West Berkshire District Council	M2/M3

Sleepy Hollow, Forest Lane, Tadley, RG26 3NU	 REDACTED ON BASIS OF SECTION 38	Hampshire County Council	G12
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Private Water Borehole Supplies Locations REDACTED ON BASIS OF SECTION 38

**Vulnerable group locations within AWE Burghfield DEPZ area
Schools**

Name & Address	Type of premises	Additional Information	Tel. No.	Responsible LA area	Sector
Green Park Day Nursery and Preschool 200 S Oak Way Reading RG2 6UQ	Early Years Establishment		0118 9313115	Reading Borough Council	C10
Busy Bees Childcare Basingstoke Road Behind the Verizone Building Reading RG2 6DA	Early Years Establishment		0118 9145560	Reading Borough Council	D10
Farm View Day Nursery Beech Hill Road Spencers Wood, Reading Wokingham RG7 1HR	Early Years Establishment		0118 988 2131	Wokingham Borough Council	F12
Lambs Lane Primary School 4333 Back Lane Spencers Wood Reading RG7 1PW	Primary School		0118 988 3820	Wokingham Borough Council	F13
Farm View Day Nursery Loddon Court Farm Park Homes Beech Hill Road Spencers Wood Wokingham	Early Years Establishment		0118 988 7889	Wokingham Borough Council	G13

Name & Address	Type of premises	Additional Information	Tel. No.	Responsible LA area	Sector
RG7 1HT					
Mrs Williams Pre School Burghfield Common Reading West Berkshire RG7 3HP	Early Years Establishment			West Berkshire Council	M11
Mrs Blands Infant School 6 Jordan's Ln Burghfield Common Reading RG7 3LP	Early Years Establishment		0118 983 2332	West Berkshire Council	M13
Garland Junior School 46 Clayhill Road Burghfield Common Reading RG7 3HG	Primary School		0118 983 2776	West Berkshire Council	M12
Burghfield St Mary's Church of England Primary School Theale Road Burghfield Reading RG30 3TX	Primary School		0118 983 2957	West Berkshire Council	N9
Oakbank School Hyde End Ln Reading RG7 1ER	Secondary School		0118 988 3616	Wokingham Borough Council	E13

Name & Address	Type of premises	Additional Information	Tel. No.	Responsible LA area	Sector
The Willink School School Ln Burghfield Common Reading RG7 3XJ	Secondary School		0118 983 2030	West Berkshire Council	M13
Grazeley Parochial Primary School MereOak Lane Grazeley Berkshire RG7 1JY	Other Education/Primary School		0118 988 3340		F8

Care Homes

Name & Address	Type of premises	Additional Information	Responsible LA area	Sector
Nadam Care LTD Belamie Gables 210 Hyde End road Spencers Wood RG7 1DG	Care Home Only (Residential Care)	<div style="background-color: black; width: 100%; height: 1.2em; margin-bottom: 2px;"></div> <div style="background-color: black; width: 100%; height: 1.2em; margin-bottom: 2px;"></div> <div style="background-color: black; width: 100%; height: 1.2em; margin-bottom: 2px;"></div> <p style="color: red; margin-top: 5px;">REDACTED ON BASIS OF SECTION 38</p>	Wokingham Borough Council	E14
Dimensions - Loddon House Beech Hill Road Spencers Wood Wokingham RG7 1HT	Care Home Only (Residential Care)		Wokingham Borough Council	G13

Name & Address	Type of premises	Additional Information	Responsible LA area	Sector
Hollies Care Home Reading Road Burghfield Common West Berks RG7 3BH	Care Home Only (Residential Care)	[REDACTED] [REDACTED] [REDACTED] [REDACTED] REDACTED ON BASIS OF SECTION 38	West Berkshire Council	M9
Residential Community Care Ltd Glebe Garden Reading Road Burghfield Common West Berks RG7 3BH	Care Home Only (Residential Care)	[REDACTED] [REDACTED] [REDACTED] REDACTED ON BASIS OF SECTION 38	West Berkshire Council	M9
Dimensions – 43 Clayhill Road Burghfield Common West Berks RG7 3HF	Care Home Only (Residential Care)	[REDACTED] [REDACTED] REDACTED ON BASIS OF SECTION 38	West Berkshire Council	M12
Rowan Cottage Sulhamstead Road Burghfield West Berks RG30 3SB	Care Home and Education	[REDACTED] [REDACTED] REDACTED ON BASIS OF SECTION 38	West Berkshire Council	N9

Caravan/Mobile Home Locations within or directly on the border of DEPZs

Address	Number of units	Responsible LA	Sector
Mere Oak Park Three Mile Cross Reading RG7 1NR	<div></div> REDACTED ON BASIS OF SECTION 38	Wokingham Borough Council	D10/D11
Loddon Court Farm Park Beech Hill Road Spencers Wood Reading RG7 1 HL	<div></div> REDACTED ON BASIS OF SECTION 38	Wokingham Borough Council	G12/G13
Four Houses Corner Reading Road Ufton Nervet Reading RG7 4QJ	<div></div> REDACTED ON BASIS OF SECTION 38	West Berkshire District Council	L15
Roselawn Hotel Burghfield Hill Reading RG30 3RU	<div></div> REDACTED ON BASIS OF SECTION 38	West Berkshire District Council	N8

Boats (liveaboard & pleasure)

Address	Number of units	Responsible LA	Sector
River Kennet/ Kennet & Avon Cana	Unknown due to transient community.	West Berkshire Council	P14/ P13/ Q13/ Q12/ R12/ R11/ R10/ A10/ A11
River Kennet/ Kennet & Avon Cana	Unknown due to transient community	Reading Borough Council	A11/ A12/ A13/ B13

Large/ significant facilities

Name & Address	Type of premises	Additional Information	Responsible LA area	Sector
Madejski Stadium, Junction 11, M4 Reading RG2 0FL	Sports stadium	Home to Reading Football Club [REDACTED] [REDACTED] REDACTED ON BASIS OF SECTION 38	Reading Borough Council	C10/ C11
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] REDACTED ON BASIS OF SECTION 38	[REDACTED]	[REDACTED]
Thames Water, Fobney Water Treatment Works RG2 0SF	Water Treatment Works	Serving Reading of fresh water	Reading Borough Council	B13/ B14
Thames Water, Reading Sewage Treatment Works, 18 Island Rd, Reading RG2 0RP	Sewage Treatment Works		Reading Borough Council	B12/ B13
Mereoak Park and Ride, Three Mile Cross, Reading, RG7 1WJ	Park and Ride	Capacity of 570	Wokingham Borough Council	D9/E9

Private Water Borehole Supplies Locations REDACTED ON BASIS OF SECTION 38

Location	GRID REF
[REDACTED]	[REDACTED]

7.7 Personal Protective Equipment (PPE)

Each agency has responsibilities under Health and Safety legislation with respect to supplying appropriate PPE for its own staff.

Under the Ionising Radiations Regulations 2017 (IRR17) employers with staff who are working/exposed to Ionising Radiation are required to ensure they have competent advice from a [Radiation Protective Adviser](#).

A key element of the response regarding AWE involves understanding the risks to health and taking appropriate precautions.

The decision regarding the level of PPE required for each agency is based on the responding services own dynamic risk assessment and their radiation protection advisor. It is not the responsibility of the STAC to advise agencies on appropriate PPE.

7.7.1 Varying PPE Requirements

There are a number of situations which require the responder to enter potentially contaminated areas including:

- (a) On-site incident response
- (b) Off-site incident response
- (c) Undertaking normal business in the affected area.

7.7.2 Radiation Protection Advisors (RPA)

The emergency services and site operators in the Thames Valley and Hampshire have appointed RPAs to provide advice to their staff as to what they should and should not do, including any PPE to be worn.

The main considerations of the RPAs as they develop their advice is:

- (a) What is the contaminant?
- (b) How much is there in the affected area?
- (c) What are the responders likely to be doing?
- (d) How long will they be doing it?

Whilst the information is known in outline for the above considerations a dynamic risk assessment is necessary to confirm the arrangements in advance of emergency services responders going to site.

7.7.3 Responders with no RPA contract

Several of the responding agencies do not have a contract in place with an RPA since 'normally' they would not need to go into a contaminated area and are not required to otherwise.

These responding agencies may have to go into the affected area to undertake normal, but lifesaving or life maintenance work, in order to support the vulnerable or support the response as a whole.

In order to support the response an RPA would be sourced – via advice from PHE CRCE or AWE in the first instance to attend a TCG.

7.7.4 Personal protection advice for the community

Normally PPE would not be needed for the community- not least since they will be under shelter.

If the community or elements of the community in the affected area are to be evacuated then it may be that PPE would need to be considered to protect people being evacuated.

The advice in relation to any protection necessary would be sought from the STAC (for the community) and a RPA (for responders). The advice should take into consideration:

- (a) What is the contaminant?
- (b) How much is there in the affected area?
- (c) What are those being evacuated likely to be doing – walking/carried etc.?
- (d) How long will they be exposed to the contamination?
- (e) What will the responders be wearing?
- (f) How will it be provided?
- (g) How will it be disposed of?

7.7.5 Other Considerations

Other issues the STAC & Emergency Services RPAs should consider as part of the response include:

Following the authority for responders to enter the affected area:

- (a) Is there an entry RV point
- (b) Is there a different exit RV Point
- (c) What is the exit policy for these responders when they leave the area?
Remove clothing? Full decontamination and if so by whom, where etc.?
- (d) Who is responsible on-site to ensure all are correctly wearing their PPE?

If vehicles enter into the affected area:

- (a) Do they go in and stay in affected area acting as shuttles to the cordon?
- (b) Do they come out and get decontaminated
- (c) If so by whom and how?

- (d) If not consider transfer of patients and what about the staff?
- (e) What are the differences in the PPE variation for responders?
- (f) What about the public perception regarding the differences for responders and what they may be asked to do?
- (g) What, if any, PPE should the public be advised to wear if evacuated?
- (h) What sources of suitable PPE are available for the tasks being asked of responders?
- (i) Is mutual aid provision of PPE between responders a possibility?
- (j) What about responding agency staff that were in the affected area at the time of an incident?
- (k) How can the PPE be safely disposed of and where?
- (l) What follow-up monitoring and dosimetry is required for responders?

7.7.6 Types of PPE

There are a large number of variations on PPE that could be worn ranging from full suits with breathing apparatus to ordinary face masks, goggles, disposable paper coveralls/scrubs and disposable footwear.

All the above could be used in differing locations as a result of the incident and at different times. e.g. in the initial stages when minimum is known about the levels of contamination and therefore the risk then full body suits with breathing apparatus may be used by certain responders performing specific tasks, however as time progresses then face masks (FFP3) may be all that is necessary.

It may however be necessary to provide some degree of protection to the members of the public that require evacuation from potentially contaminated areas at any point during an incident.

7.7.7 Emergency Workers

An 'emergency worker' is *any person who has a defined responding role in an operator's emergency plan or a local authority's off-site emergency plan, and who might be exposed to radiation as a result of a potential or actual radiation emergency.*

Therefore an emergency worker is someone who has a defined role within an emergency plan and could be exposed to radiation whilst undertaking their role in response to an emergency.

7.7.8 Emergency Exposure Levels (EELs)

The table below identifies the EELs adopted by AWE and the blue light emergency services responding under this plan.

Agency	Emergency Exposure Levels
AWE Fire and Rescue Service	20 mSv annual limit for all fire fighters (as classified radiation workers).
	100 mSv dose limit of informed fire fighter volunteers to make safe plant or equipment that is likely to prevent or significantly mitigate a radiation emergency on an AWE site.
	Deployment only after dis-application of the dose limits prescribed in the IRRs by the AWE Emergency Manager, guidance from Health Physics and authorisation by a senior AWE FRS Officer.
	500 mSv dose limit of informed fire fighter volunteers to safe life on an AWE site during a radiation emergency. Deployment only after dis-application of the dose limits prescribed in the IRRs by the AWE Emergency Manager, guidance from Health Physics and authorisation by a senior AWE FRS Officer.
AWE Medical First Responders	20 mSv total for all AWE Medical First Responders per year (as classified radiation workers).
Ministry of Defence Police	1mSv annual limit for operational MDP officers.
AWE Personnel (non-emergency services)	1 mSv limit for all AWE non-classified radiation workers per year 20 mSv legal limit for all AWE classified radiation workers per year.
South Central Ambulance NHS Foundation Trust	1 mSv total for all staff per event. After such an event, a review will be held to examine exposures and identify any improvements in working practices to reduce potential exposures in future events;
	Annual Dose Limit (Whole Body) 20 mSv – Under normal circumstances this would only be applied to the Hazardous Area Response Team (HART). Reference levels 1 and 2 would apply to other ambulance staff.
	The maximum dose for life saving operations where the casualty cannot be immediately removed from the area of high dose rate or contamination is 100 mSv; all ambulance staff can volunteer to be exposed to this level provided that they have been fully briefed and understand the implications.
Fire and Rescue Service (Royal Berkshire FRS & Hampshire FRS)	5 mSv per incident. Wherever possible.
	Follow the principle: try to work to the dose constraint. Where not possible work to dose limit but ALARP (as low as reasonably practicable) still applies
	20 mSv annual limit for all firefighters. FRS policy permits deployment any female firefighters of reproductive capacity are additionally limited to 13mSv in any three month period. Public not likely to receive more than 5mSv in following year as a result of the incident.

Agency	Emergency Exposure Levels
	<p>100 mSv dose limit of informed fire fighter volunteers.</p> <p>Deployment only after guidance from Hazardous Material Environmental Protection Advisor (HMEPA) and authorised by Brigade Manager. Emergency exposure to save life or maintain critical infrastructure.</p> <p>Public likely to receive more than 5mSv in following year as a result of the incident.</p>
Home Office Police	<p>1mSv annual limit for all police officers. Any entry into potentially contaminated environments must be clearly justified and advice from the Police Radiation Protection Adviser must be sought prior to entry.</p>

7.7.9 Reference Level (RL)

The concept of a Reference Level (RL) is the level of dose above which it is judged inappropriate to plan to allow exposures to occur. The RL can be taken as an indicator of the level of exposure considered as tolerable, given the prevailing circumstances. RLs are tools for supporting the optimisation of protection strategies by maintaining doses as low as reasonably achievable (ALARA – also referred to in the UK as low as reasonably practicable (ALARP)) and are applicable to all areas/zones affected by contamination following the radiation emergency.

The objective of defining RLs is to ensure that when implementing protective actions the dose distribution moves towards lower levels of dose, reducing (preferably eliminating) the number of individuals who would be receiving an exposure greater than the selected RL. Optimisation is an iterative process that will, over time, reduce inequalities in the overall dose distribution. The involvement of relevant stakeholders will help to drive the optimisation process.

For planning purposes, residual doses in the first year are assessed for a range of emergency scenarios considering any urgent protective actions that have been planned and any restrictions placed on marketed foodstuffs or drinking water. It is these residual doses that are compared to the RL.

During response, once urgent protective actions have been initiated, and as more information becomes available, STAC will reappraise the response defined in the emergency plan and consider whether it should be modified. In addition to comparing averted doses with Emergency Reference Levels (ERLs), projected doses in the first year can be compared with RLs to give an additional perspective on the level of protection achieved. This information can be used to indicate whether urgent protective actions need to be extended beyond the DEPZ, whether evacuation of sheltered populations may be required and subsequently whether any further protective actions are necessary (including decontamination, further food restrictions, and temporary relocation).

Early in an emergency, where the prevailing circumstances are unknown and may be changing rapidly, it is appropriate to use the RL selected during planning. However, as more information becomes available, it will be necessary to reassess the situation to determine whether a new RL should be selected.

During the recovery phase, it is appropriate to select a RL in the range of 20 mSv y⁻¹ or below, with a long-term objective of 1 mSv y⁻¹.

Further details on the use of Reference Levels in the UK can be found in: Nisbet AF (2019). Public Health Protection in Radiation Emergencies. Chilton, UK, PHE-CRCE-049.

7.7.10 Mutual Aid

Mutual aid may be required to support large scale, complex or extended-duration incident responses. The provision of equipment and staff to support any emergency can become stretched for individual agencies. This plan uses existing arrangements for requesting additional support as outlined in the HIOW-TVLRf Emergency Response Arrangements.

In addition to these the Local Authority Nuclear Working Group (LANWG) should be considered as a resources of knowledge. LANWG is a forum which brings together the Local Authorities across the UK and other responding agencies with interests in off-site planning for an emergency at nuclear licensed sites. The group identifies, discusses and finds solutions to common problems and agrees improvements in planning, procedure and organisation, which would form a framework of advice to emergency planners.

Section Eight

8 Detailed Emergency Planning Zone (DEPZ) and Outline Planning Zones (OPZ)

8.1 Local Authorities in the DEPZ and OPZ

The table below illustrates which Local Authorities fall within the DEPZ and OPZ

Site	AWE A		AWE B	
Zone	DEPZ	OPZ	DEPZ	OPZ
West Berkshire District Council (WBDC)	✓	✓	✓	✓
Basingstoke and Deane Borough Council (BDBC)	✓	✓	✗	✓
Hampshire County Council (HCC)	✓	✓	✓	✓
Reading Borough Council (RBC)	✗	✓	✓	✓
Wokingham Borough Council (WBC)	✗	✓	✓	✓
Hart District Council (HDC)	✗	✓	✗	✓
Oxfordshire County Council (OCC)	✗	✓	✗	✓
South Oxfordshire District Council (SODC)	✗	✓	✗	✓

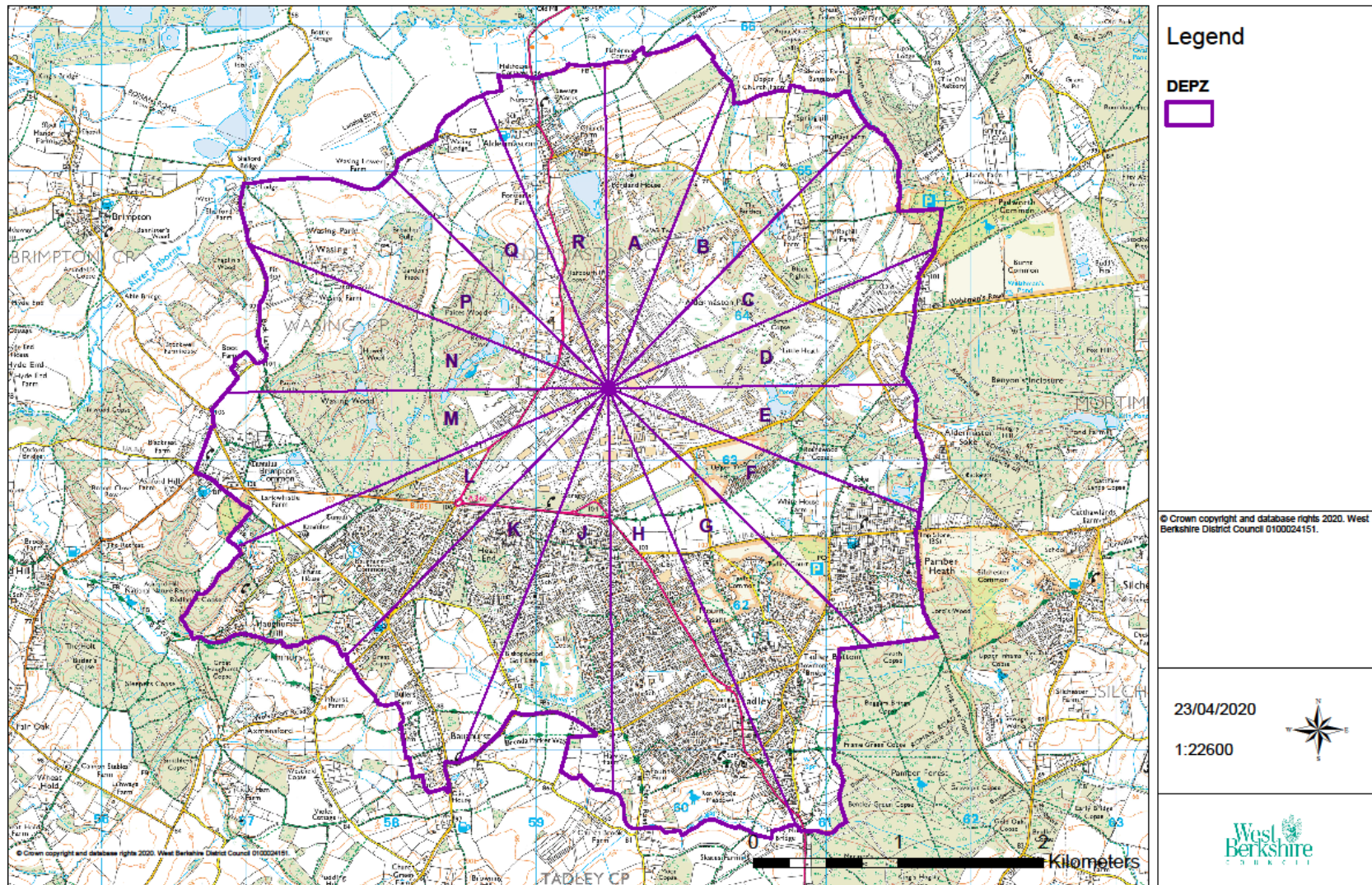
8.2 Detailed Emergency Planning Zone (DEPZ)

The emergency arrangements in this plan focus on the areas around each AWE site known as Detailed Emergency Planning Zone (DEPZ). These zones are based on the Hazard Evaluation & Consequence Assessment (HECA) process completed by AWE with the outcome being a minimum Urgent Protective Action (UPA) distance around each site. This information is provided to the lead local authority in a Consequences Report. The lead local authority then determines the DEPZ based on the minimum UPA distance, information provided in REPIR 19, the Approved Code of Practice and related guidance. The Consequences Reports also provides the lead local authority with the area known as the OPZ which was dictated to AWE by the Secretary of State for Defence.

The minimum UPA distance for the AWE sites as provided in the Consequences Reports are:

- a) AWE Aldermaston: 1.54 km
- b) AWE Burghfield: 3.16 km

AWE Aldermaston DEPZ sectors



AWE Aldermaston DEPZ sectors with subdivisions



[illegible]

[illegible]

[illegible]

[illegible]

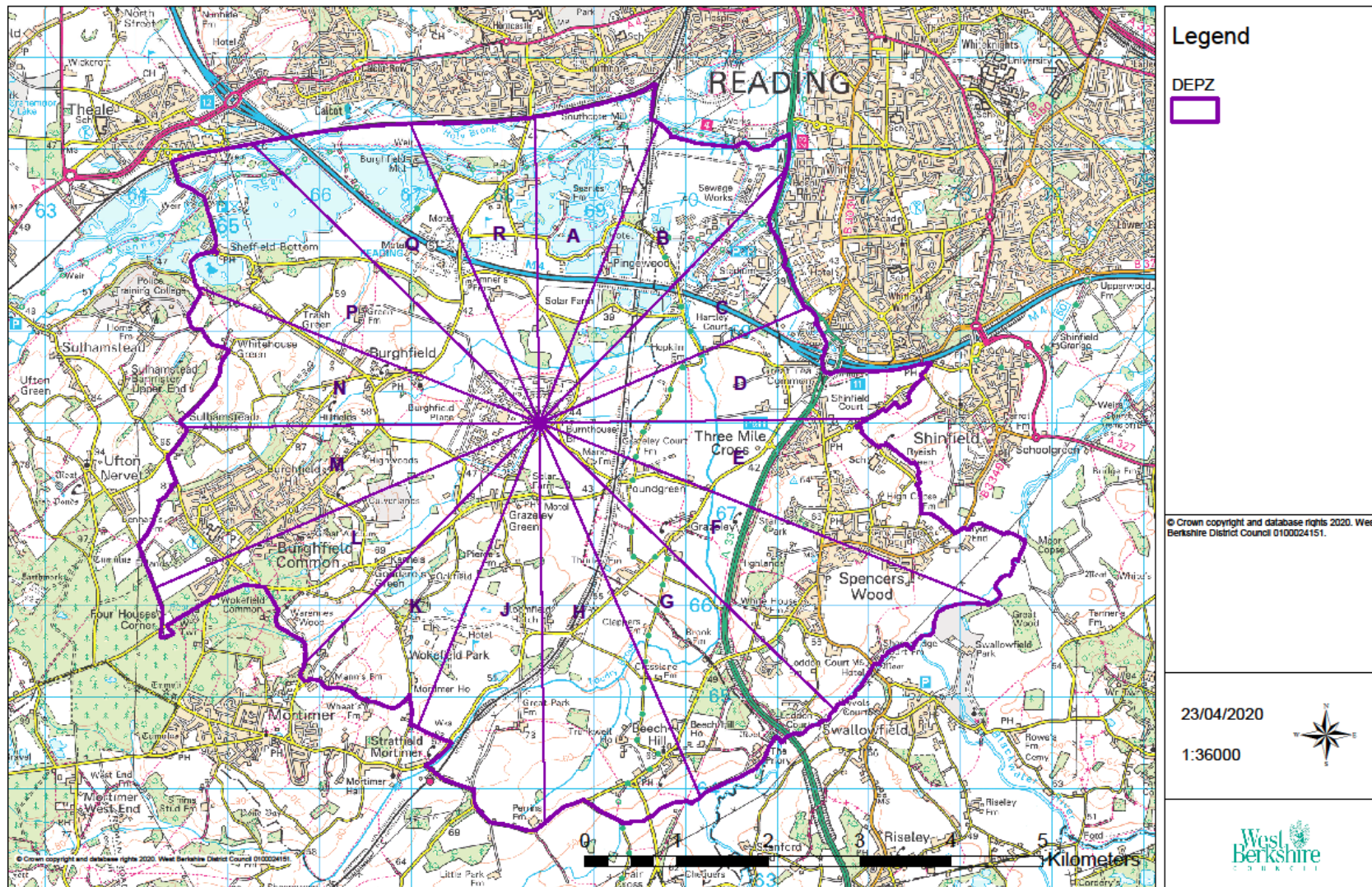
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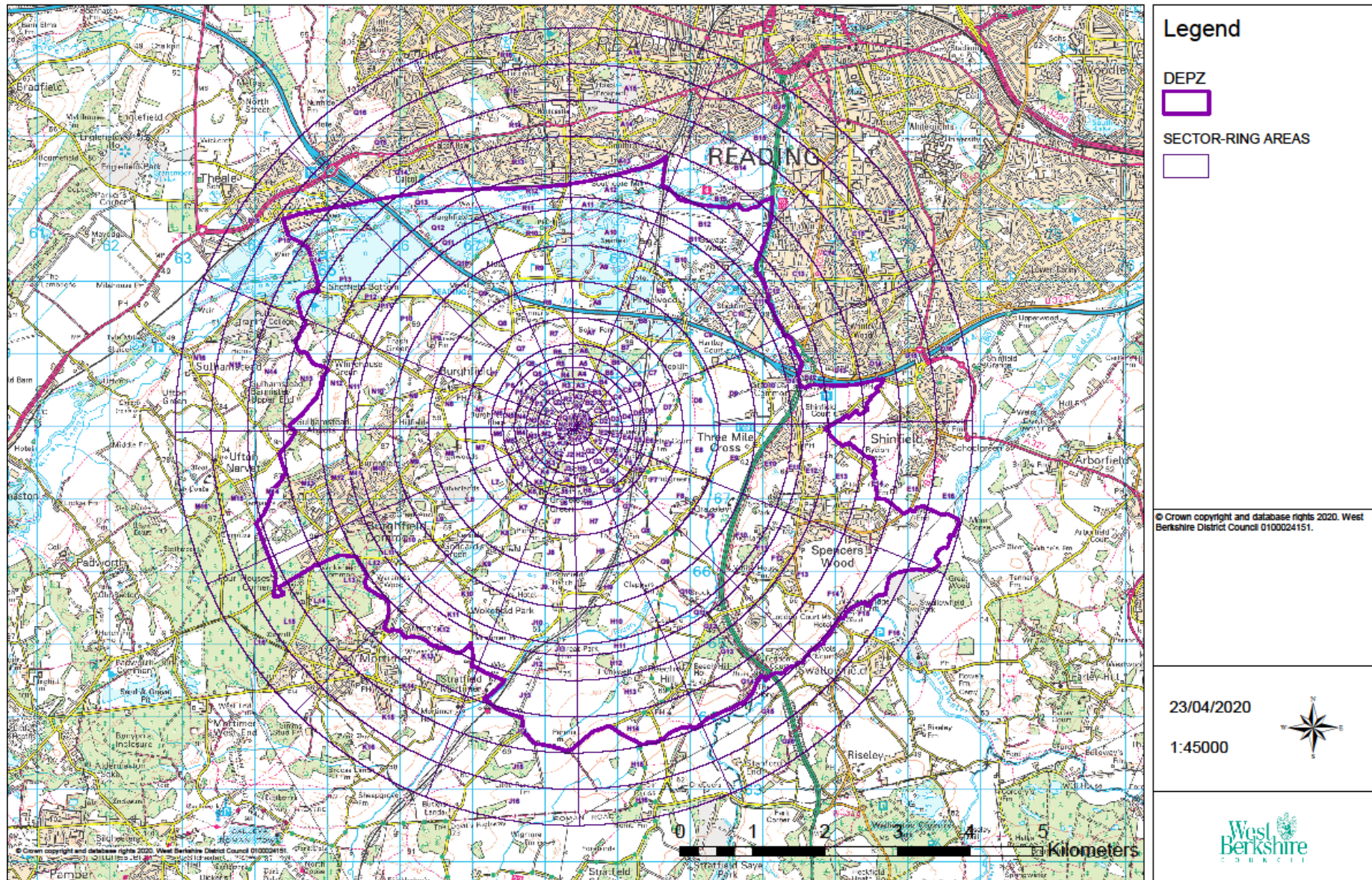
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AWE Burghfield DEPZ sectors



AWE Burghfield DEPZ sectors with subdivisions



[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

Outer Radius	Sector	Residential properties	Residents (approx 2.4/property)	Commercial	Care homes	Early years establishment	Primary Schools	Secondary Schools	Other Education

[illegible]

8.3 Outline Planning Zone (OPZ)

This plan provides detailed information in relation to the area defined by the DEPZ which is based on the HECA process and the consequences reports which provide a minimum UPA distance. In AWE's case, the immediate protective action is to shelter in place. Where the DEPZ is determined by the lead local authority, outline planning distance for defence sites is determined by the Secretary of State for Defence and provided to the council within the consequences reports.

Outline planning builds on the arrangements and capabilities in existing emergency plans to provide commensurate planning for low probability events. The OPZ operates at distances beyond the DEPZ, but can also be undertaken in the DEPZ.

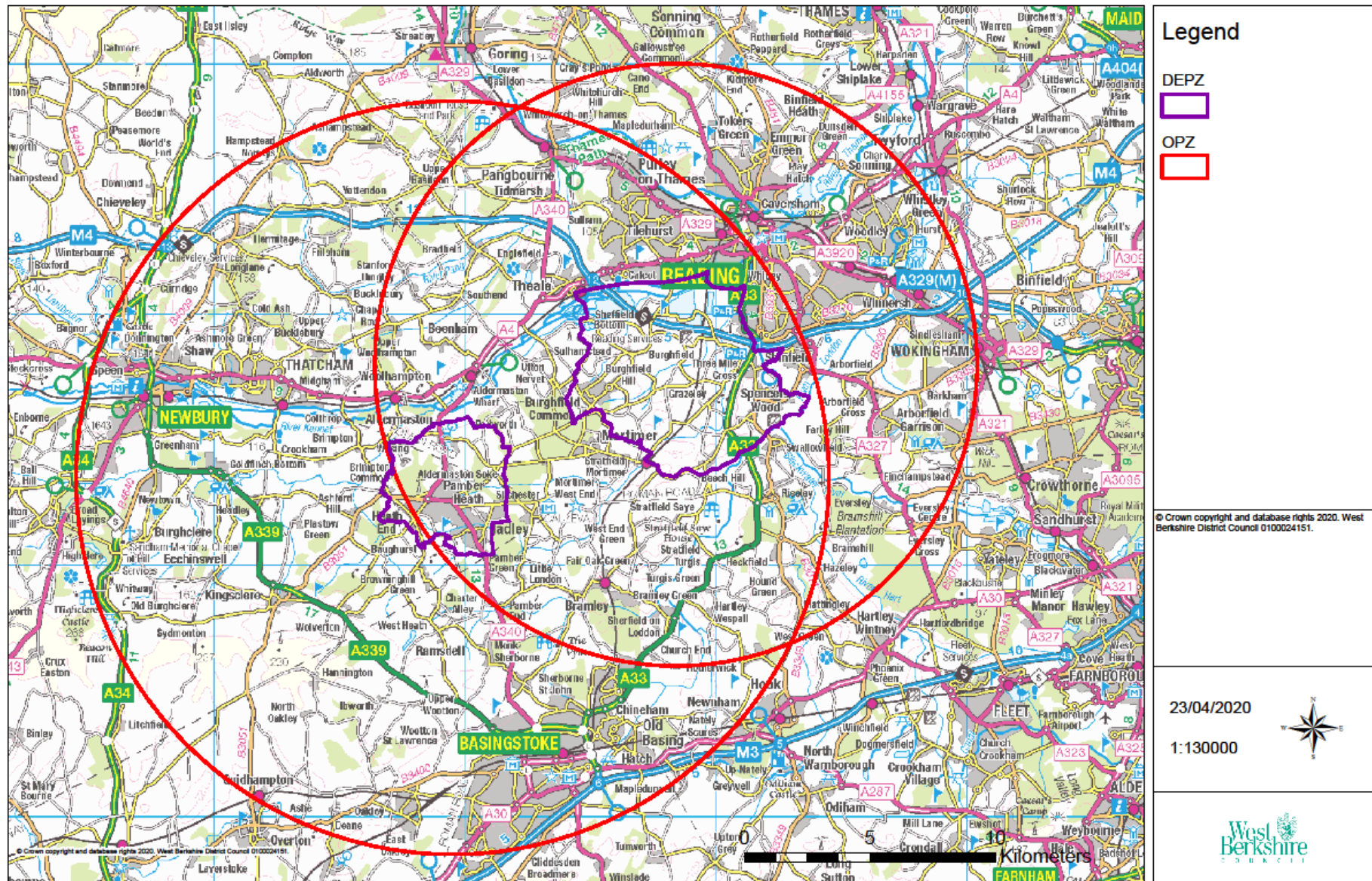
The presence of an OPZ should assist the Council in planning for extremely unlikely but more severe events. The central aim of the OPZ is to support the decision making of emergency responders in the event that detailed or generic arrangements are not sufficient.

The areas of outline planning have been zoned on maps to allow ready consideration of the areas affected. The mapping below details the both OPZs for both AWE sites. The OPZ distances are:

- AWE(A) – 15 km
- AWE(B) – 12 km

These distances are the same as the distances that were used under the previous extendibility criteria for REPPIR 01. The data provided in these OPZ distances are reviewed on each revision of this plan to allow for changes in population density and sites of interest such as vulnerable people locations in relation to the capability of the responding agencies to respond. This will include changes due to Development Control with respect to large scale, sites of interest development and increases by 'creep' (one or two small scale developments but many of them).

Outline Planning Zones around AWE Aldermaston and AWE Burghfield



Importantly the OPZ for both AWE sites would have a significant impact on the community affected and the responders in that, unlike many other nuclear sites, there are large urban areas which could be affected including Reading, Basingstoke and Newbury. Therefore there will be significant challenges.

It is important to note that there is not a requirement to prepare a detailed plan due to the improbability of such a radiation emergency that would extend into the OPZ. The information below provides guidance and considerations to responders should there be a radiation emergency that is of sufficient magnitude to extend into the region of outline planning.

Should there be a radiation emergency which is assessed to be affecting an area greater than the DEPZ then the following actions and considerations would be put in place:

Responder Actions: The responders detailed in this plan will continue as described in relation to their normal responsibilities, unless otherwise directed via the normal command and control structure.

The Strategic Coordinating Group will continually assess the requirements for all the emergency and precautionary countermeasures. This may require consideration of an extension of the area to ensure maximum protection and reassurance.

Contingency Plans: A wide number of contingency plans are maintained in a wide range of organisations to deal with various civil emergencies from the industrial accident to natural disasters such as flooding. This plan along with these other 'supporting' plans should be used in an extendibility emergency.

Protective Actions: Key to the safety of the communities affected in the OPZ is the fact that the best protective action for the vast majority will be to take shelter. As a result a means of communicating and providing assurance is critical at an early stage.

Considerations: Consider the implications and issues relating to the area affected. These considerations may include the following:

- (a) Means of warning the public
- (b) Public information
- (c) Population sizes
- (d) Vulnerable people including 'closed communities'
- (e) Businesses/factories etc.
- (f) Transport hubs
- (g) Transport diversions – these will need to be extensive and some distance from the site
- (h) Information points, reception and rest centres
- (i) Resources – staff - a larger area will have a larger impact

(j) Resources – equipment

(k) Mutual aid.

These above considerations are already in place for the DEPZ but need to be considered for the wider area. Other considerations are set out in the table below;

Areas REDACTED ON BASIS OF SECTION 38

Subject	Considerations	Actions
Time of day /day of week impacts	<p>A day time emergency would have a greater impact on response than night time.</p> <p>With the exception of between the hours of 0100-0500hrs any other time of day would have greater impact since the area is busy at all times.</p> <p>There would be an equal impact if the emergency was at weekends since less people working generally in the community however the locations involved are high density in relation to leisure activities.</p>	<p>Activate LRF Communications Plan to ensure quick, effective, accurate, joined up communications to allow those in the wider area to take shelter quickly.</p>
Size & Type of Community	<p>The larger the area and the greater the population involved then the more challenges there will be due to sheer scale.</p> <p>Different communities will have different challenges see below.</p>	<p>Urgent Mutual Aid requests to be put in place by each agency as necessary. This could be supported by the Government Liaison Officer or relevant Government Departments to allow additional resources to be sourced to support.</p>
Variations in Local Communities by way of Culture	<p>Communities will vary in their ability to understand and work together therefore to treat them all the same would be wrong.</p> <p>Reading is an urban setting as is Newbury & Basingstoke however they are very different by way of the multi-cultural challenges.</p>	<p>Assess the potential community impacts by understanding the communities by:</p> <p>Engaging local responders.</p> <p>Assessing the community by reviewing community information for the area affected:</p> <p>West Berkshire click here</p> <p>BDBC click here</p> <p>RBC click here</p> <p>WBC click here</p>

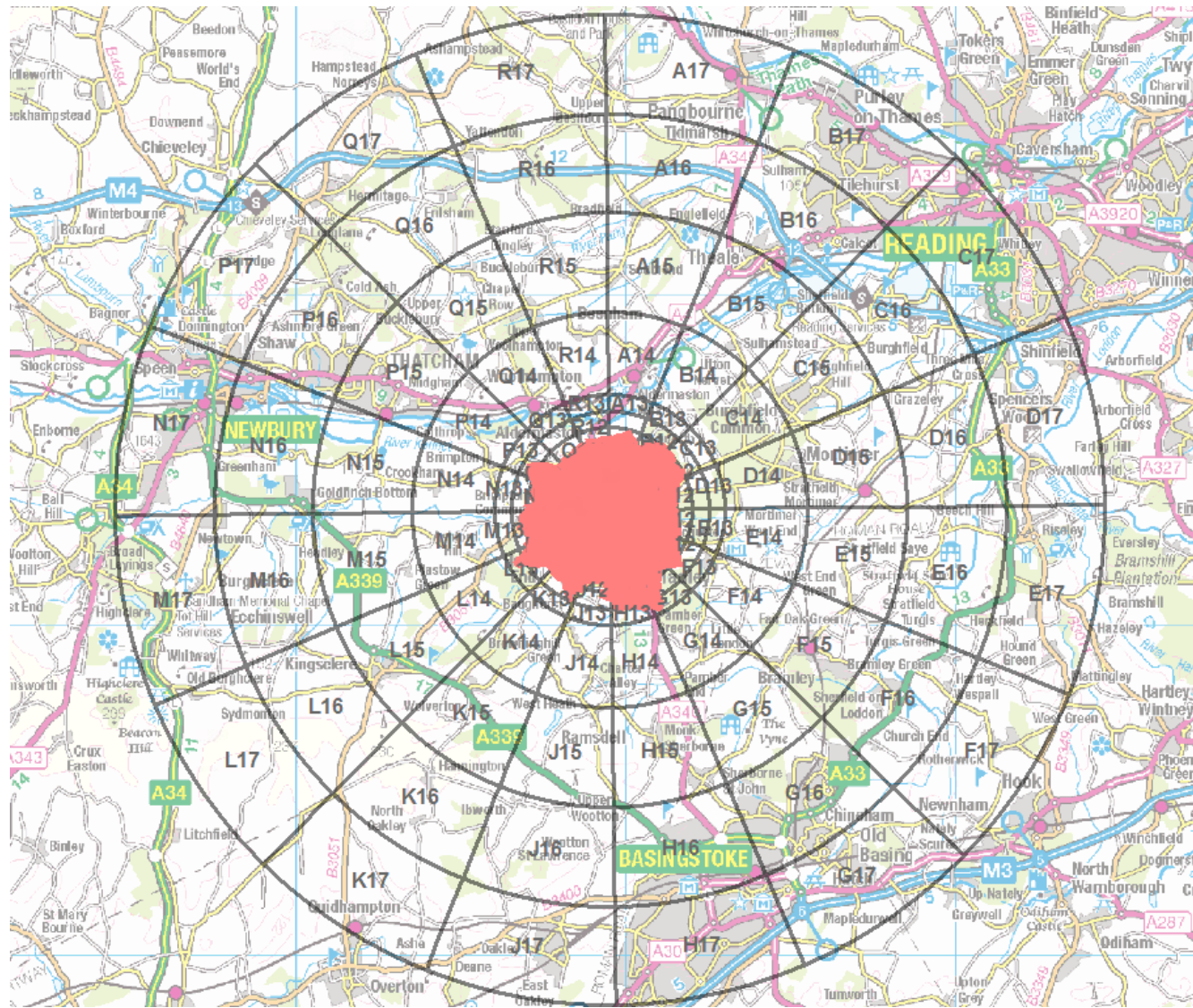
Subject	Considerations	Actions
Vulnerable communities	<p>Within any community there will be vulnerable people. These people can be in closed communities (schools, care homes, hospitals etc.); individuals in their own homes who are known to the social care/health care environment, those in their own homes who do not have support but are still vulnerable.</p> <p>The impacts of an extendibility event setting in relation to vulnerable people include:</p> <p>Identifying where the people are (using Vulnerable People Plans and Information Sharing Protocols)</p> <p>RAG rating the support needed in short, medium terms;</p> <p>Deciding on the support needed and how to provide it – which could be resource intensive, have issues with staff and equipment going into contaminated areas</p>	<ul style="list-style-type: none"> • Activate relevant Vulnerable People Plan - TVLRF Identification of Vulnerable Persons Plan / WBDC Vulnerable People Plan • Activate relevant Information Sharing Protocol • Set up a Vulnerable People Coordination Group at TCG level at least if not at SCG. • Quickly identify closed communities • Gather data regarding vulnerable people in the community and assess requirements and support needed.
Communities response actions	<p>The response of the communities cannot be guaranteed. Whilst the aim would be for people to respond as requested there is a risk that:</p> <p>People would not listen to the advice – or don't trust it so do not act as requested.</p> <p>People are less knowledgeable about the site the further away they are and believe the worst – and try to leave the area.</p> <p>There is an assumption that people are in or near home or a suitable building to shelter in.</p> <p>People may not understand due to learning difficulties, language barriers or are visiting the area and don't realise they are affected.</p> <p>As time goes on people will become more anxious and the risk of not staying in shelter increases – creating more issues.</p>	<ul style="list-style-type: none"> • Activate LRF Communications Plan to ensure quick, effective, accurate, joined up communications. • Activate Vulnerable People plan to support those with difficulties in receiving information via media. • Activate Supporting People and Rest Centre plans to consider options in relation to self-evacuation.

Subject	Considerations	Actions
	The impacts would be additional requirement for rest centres, impact on health services away for the area.	
Impact on tourism, events and local community attractions	<p>The area has a significant number of tourism attractions including:</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>Significant event locations within the area of extendibility include:</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <ul style="list-style-type: none"> [REDACTED] 	<p>Review events in the area taking place or due to take place by:</p> <ul style="list-style-type: none"> • Checking with the local responders and/or checking online events information for the areas: <ul style="list-style-type: none"> – West Berkshire here. – WBC click here – RBC click here – Hampshire click here • Checking mapping of locations, historical areas etc. online: <ul style="list-style-type: none"> – West Berkshire here.
Impact on utility outages resulting in Public Health issues	<p>The knock on consequences of utility failures could be significant not only for lack of availability but the impacts:</p> <p>Waste / sewage issues resulting in public health issues</p> <p>Power resulting in not being able to use media so readily for messages</p> <p>BT lines out – no communications within the DEPZ.</p>	Activate utility companies as part of the notification process.
[REDACTED]	[REDACTED]	[REDACTED]

Subject	Considerations	Actions
	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	<p>[REDACTED]</p>
Responding agencies resources	<p>Responding agencies will be stretched at an early stage of the response. There will therefore be impacts in relation to:</p> <p>Conflict in prioritising resources in a large scale event - early sharing of information in relation to key assets in the affected area and impact if they do not function will be required.</p> <p>Mutual aid is likely to be called up by most if not all responding agencies. There is likely to be an impact in relation to supporting the request due to lack of understanding of the risks, the requirements for PPE and training.</p>	<p>Urgent Mutual Aid requests to be put in place by each agency as necessary. This could be supported by the Government Liaison Officer or relevant Government Departments.</p>
[REDACTED]	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	<p>[REDACTED]</p> <p>[REDACTED]</p>

Subject	Considerations	Actions
	<div>[REDACTED]</div>	
Military Involvement	Due to the scale of the event then there is likely to be request for Military Aid to Civil Authorities (MACA) support. In such a response then it would be expected that a request for support for the military should be a default action.	Joint Regional Liaison Officer (JRLO) to alert via his Chain of Command potential request for MACA request.

8.3.1 OPZ around AWE Aldermaston: Outer rings equivalent to 3km, smaller rings around DEPZ/OPZ boundary in 500m increments. DEPZ in pink.

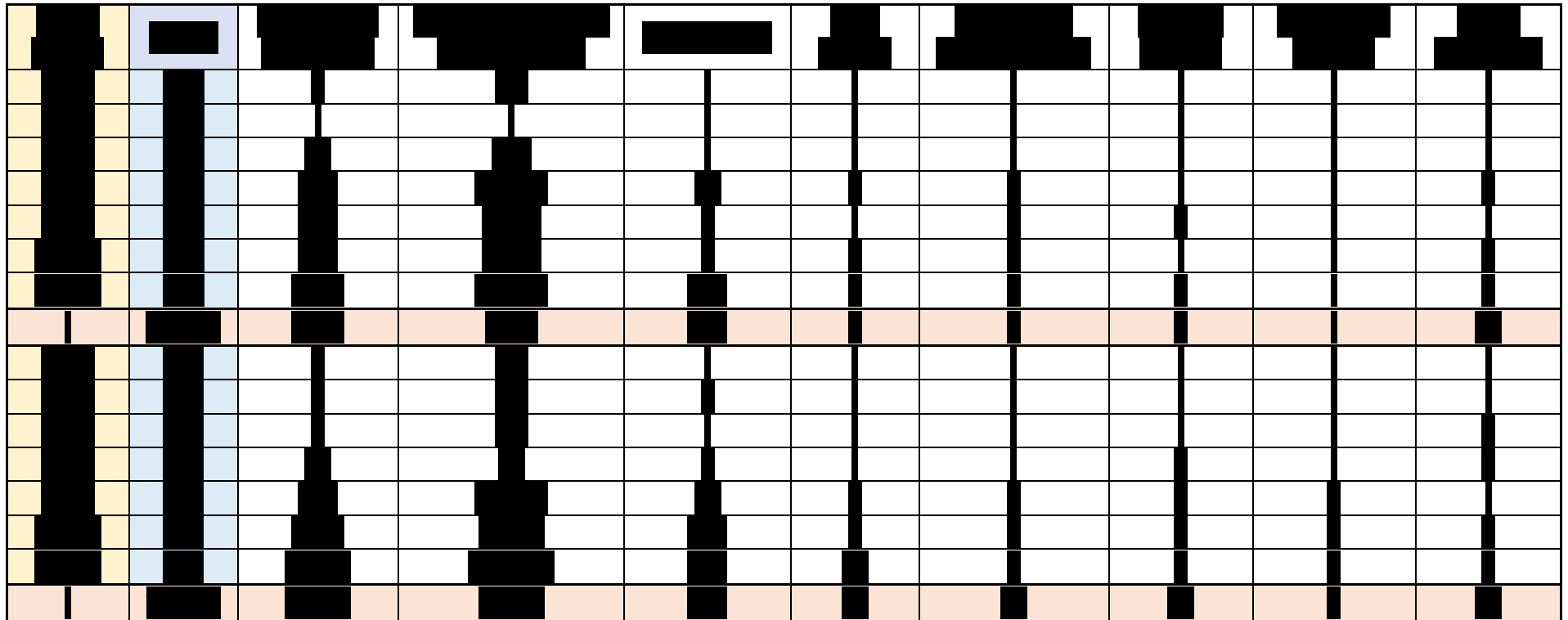


8.3.2 OPZ Sectors around AWE Aldermaston

As stated above, the OPZ distances for the sites are 15 km and 12 km for Aldermaston and Burghfield respectively. Due to the polygonal nature of the DEPZ, the interfaces between the DEPZ and OPZ are not uniform across the sectors. [REDACTED]

SECTION 38

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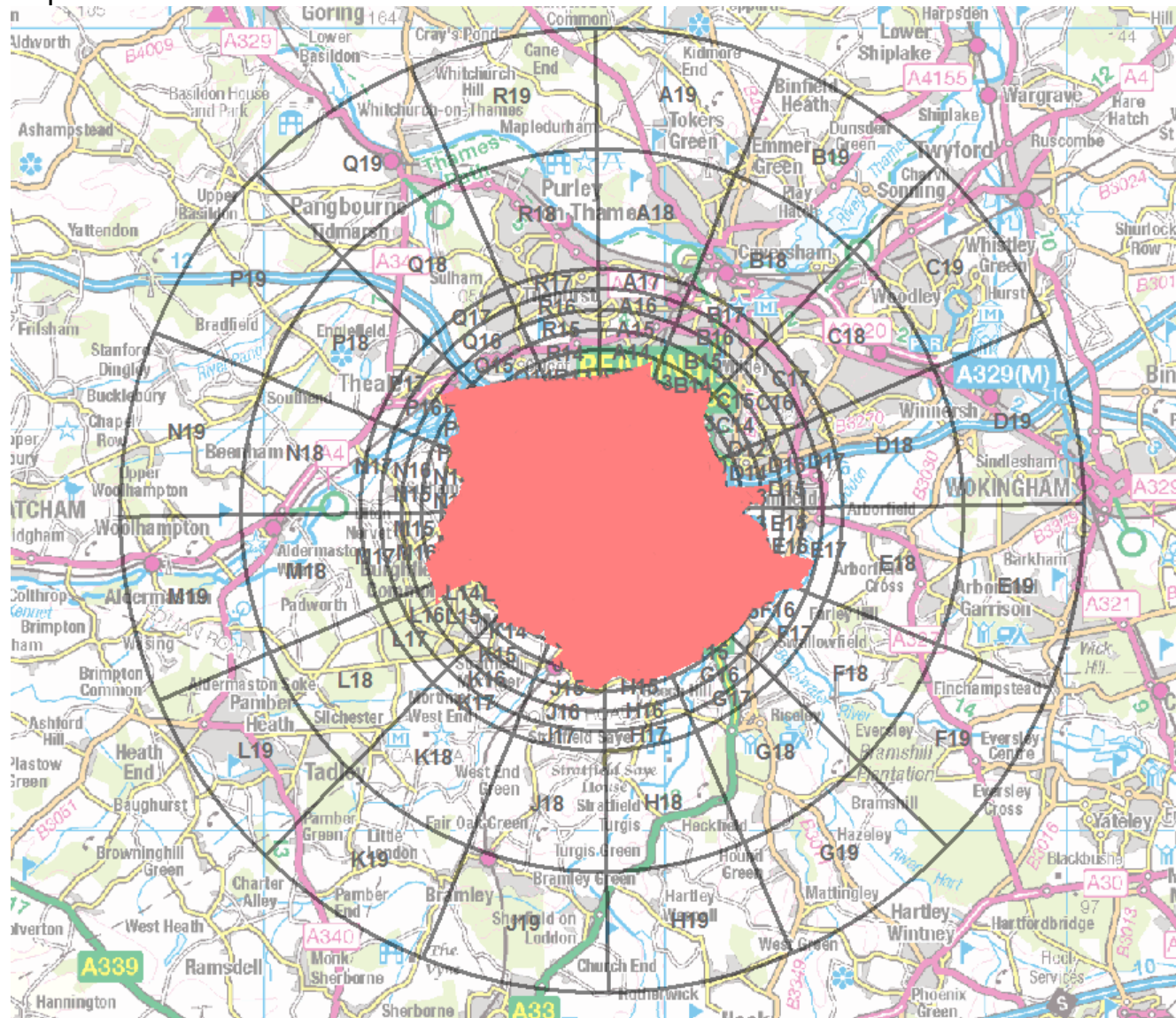
The image shows a 20x20 grid representing a 2D map. The grid is composed of cells, some of which are colored or contain black obstacles. The colors used are yellow, light blue, white, black, and light orange. The black obstacles form a complex pattern, including a large vertical structure on the left, a horizontal bar across the middle, and several smaller structures. The yellow cells are located in the top-left corner, the light blue cells are in the top-middle, and the light orange cells are in the bottom-right. The white cells fill the remaining space.

[illegible]

The image shows a 10x10 grid representing a board game. The grid is divided into four 5x5 quadrants by a central 2x2 area. The quadrants are colored: top-left is yellow, top-right is light blue, bottom-left is light orange, and bottom-right is light purple. The grid contains black and white pieces, including pawns, knights, and kings. The pieces are arranged in a way that suggests a game in progress, with some pieces missing from the board.

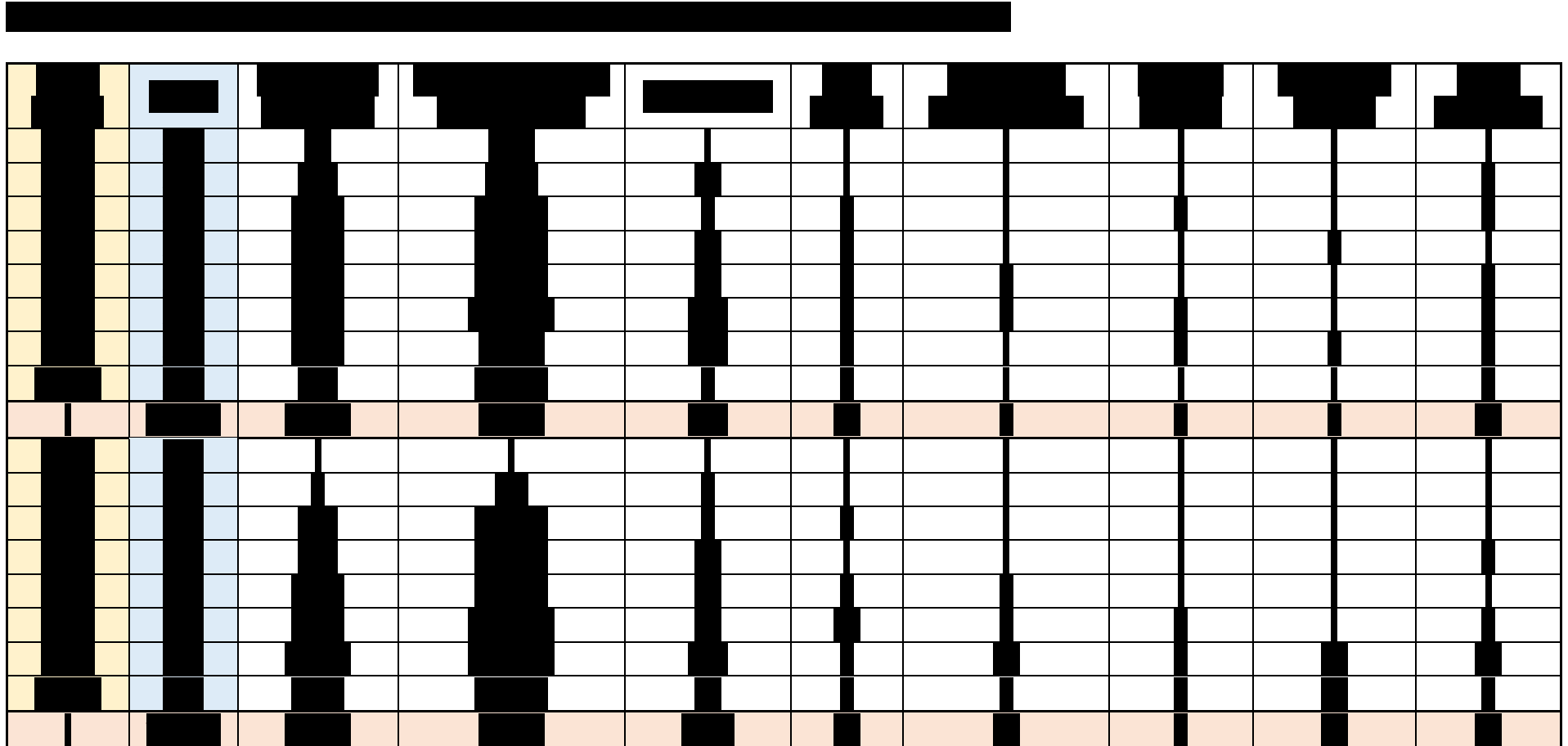
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8.3.3 OPZ around AWE Burghfield: Outer rings equivalent to 3km, smaller rings around DEPZ/OPZ boundary in 500m increments. DEPZ in pink



8.3.4 Sectors around AWE Burghfield

As with AWE Aldermaston, AWE Burghfield has a polygonal DEPZ where the interfaces between the DEPZ and OPZ are not uniform across the sectors. In the data below, the sector subdivisions start at the earliest distance that there is a crossover between the DEPZ and OPZ. **REDACTED ON BASIS OF SECTION 38**



The image shows a 20x20 grid representing a 2D map. The grid is composed of cells that are either black (obstacles), white (empty space), or colored (yellow, blue, orange). The layout is as follows:

- Top Row (Row 1):** Black cells at (1,1), (1,2), (1,3), (1,4), (1,5), (1,6), (1,7), (1,8), (1,9), (1,10), (1,11), (1,12), (1,13), (1,14), (1,15), (1,16), (1,17), (1,18), (1,19), (1,20). A blue cell at (1,10).
- Row 2:** Yellow cells at (2,1), (2,2), (2,3), (2,4), (2,5), (2,6), (2,7), (2,8), (2,9), (2,10), (2,11), (2,12), (2,13), (2,14), (2,15), (2,16), (2,17), (2,18), (2,19), (2,20). Blue cells at (2,1), (2,2), (2,3), (2,4), (2,5), (2,6), (2,7), (2,8), (2,9), (2,10), (2,11), (2,12), (2,13), (2,14), (2,15), (2,16), (2,17), (2,18), (2,19), (2,20).
- Row 3:** Yellow cells at (3,1), (3,2), (3,3), (3,4), (3,5), (3,6), (3,7), (3,8), (3,9), (3,10), (3,11), (3,12), (3,13), (3,14), (3,15), (3,16), (3,17), (3,18), (3,19), (3,20). Blue cells at (3,1), (3,2), (3,3), (3,4), (3,5), (3,6), (3,7), (3,8), (3,9), (3,10), (3,11), (3,12), (3,13), (3,14), (3,15), (3,16), (3,17), (3,18), (3,19), (3,20).
- Row 4:** Yellow cells at (4,1), (4,2), (4,3), (4,4), (4,5), (4,6), (4,7), (4,8), (4,9), (4,10), (4,11), (4,12), (4,13), (4,14), (4,15), (4,16), (4,17), (4,18), (4,19), (4,20). Blue cells at (4,1), (4,2), (4,3), (4,4), (4,5), (4,6), (4,7), (4,8), (4,9), (4,10), (4,11), (4,12), (4,13), (4,14), (4,15), (4,16), (4,17), (4,18), (4,19), (4,20).
- Row 5:** Yellow cells at (5,1), (5,2), (5,3), (5,4), (5,5), (5,6), (5,7), (5,8), (5,9), (5,10), (5,11), (5,12), (5,13), (5,14), (5,15), (5,16), (5,17), (5,18), (5,19), (5,20). Blue cells at (5,1), (5,2), (5,3), (5,4), (5,5), (5,6), (5,7), (5,8), (5,9), (5,10), (5,11), (5,12), (5,13), (5,14), (5,15), (5,16), (5,17), (5,18), (5,19), (5,20).
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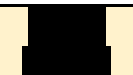
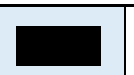
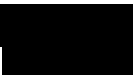






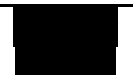


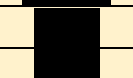
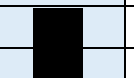
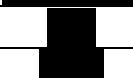
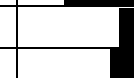

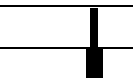
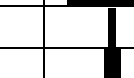

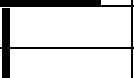
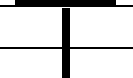

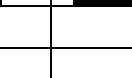

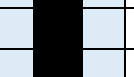

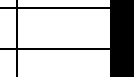
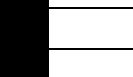
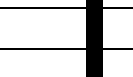
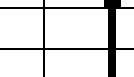
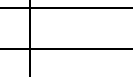
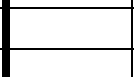

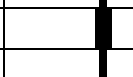
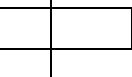



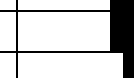


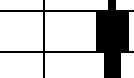
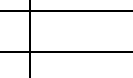
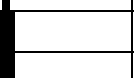
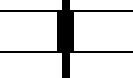
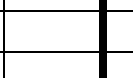
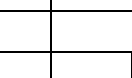

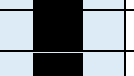

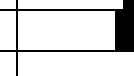


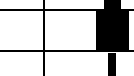

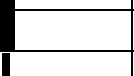
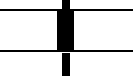
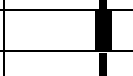
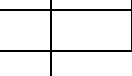
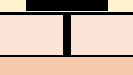





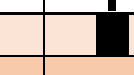
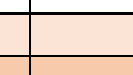

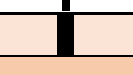

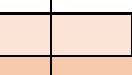






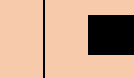





Yellow Cells (Top-Left Region): A 5x5 block of yellow cells in the top-left corner, spanning rows 1-5 and columns 1-5.

Light Blue Cells (Top-Left Region): A 5x5 block of light blue cells in the top-left corner, spanning rows 1-5 and columns 6-10.

White Cells (Top-Left Region): A 5x5 block of white cells in the top-left corner, spanning rows 1-5 and columns 11-15.

Light Orange Cells (Bottom-Left Region): A 5x5 block of light orange cells in the bottom-left corner, spanning rows 16-20 and columns 1-5.

Black Obstacles: Black cells are scattered throughout the grid, forming various shapes and patterns. Notable clusters include a large black area in the top-right (rows 1-5, columns 16-20) and a large black area in the bottom-right (rows 16-20, columns 16-20).

Section Nine

9 Recovery

Whilst the timely response to an incident is essential in order to prevent additional consequences from the initial incident, the recovery phase has as much if not more importance in order to bring the community back to normality as soon as possible after the event.

More information on recovery can be obtained in the TVLRF Recovery Plan and Hampshire & Isle of Wight LRF Recovery Plans.

9.1 Role of Recovery

The overall aim of any recovery process is to consider what is required in order to bring the area and the community back to 'normality' as quickly as possible. In so doing there is support provided to assist the affected community towards management of its own recovery. It is recognised that where a community experiences a significant emergency, there is a need to supplement the personal, family and community structures which have been disrupted.

The Recovery Coordinating Group (RCG) should support strategic planning at the SCC.

9.2 Thames Valley LRF Recovery Plan

The TVLRF Recovery Plan (and where appropriate Hampshire & Isle of Wight LRF Recovery Plans) shall be used at an early stage in providing guidance to the Recovery Coordinating Group (RCG). This group will automatically be set up should an off-site incident occur at an AWE site.

The plan provides details of who would be part of the group, the role of the group, suggested terms of reference and strategies, potential subgroups plus a draft agenda.

9.2.1 Other Radiation Recovery Guidance

- (a) [Guidance on decontamination of buildings, infrastructure and open environment](#)
- (b) [PHE Radiation Recovery Guidance](#)

9.3 Recovery Coordinating Group Activation & Location

A Recovery Coordinating Group (RCG) shall normally be put in place as soon as possible after an Off-Site Emergency or Off-Site Radiation Emergency has been declared in order to start looking at the recovery requirements at an early stage.

All agencies as per the agreed membership will be invited to confirm representation and attend meetings or teleconferences in the early stages to start scoping the requirements.

Initially the RCG will normally convene at the SCC or via teleconferencing. After the emergency response phase is over the group would move to a suitable agreed location nearer to the affected area to manage longer term recovery.

It may be possible to establish a RCG outside of the SCC, if the main area of concern lies outside of the TVP area. However, this will only be acceptable, if the RCG are able to keep close communication links between the SCG and STAC.

9.4 RCG Membership & Chair

The group will normally be chaired by a Director, or senior manager from West Berkshire District Council. However depending on the area affected this may transfer, with agreement, to another affected local authority.

The Recovery Coordinating Group membership will vary however as a minimum the membership will include:

- (a) Local authority (lead) (Chair, Vice chair and minute taker) plus a number of service representation including the following either at the meeting or as a subgroup to the main group:
 - 1. Highways & Transportation Service
 - 2. Environmental Health
 - 3. Rights of Ways
 - 4. Waste Service
 - 5. Community Care
 - 6. Public Health & Wellbeing
 - 7. Education
- (b) Neighbouring LA's as necessary plus service representatives as necessary
- (c) Thames Valley Police
- (d) Hampshire Constabulary
- (e) Berkshire West and Hampshire CCGs
- (f) PHE CRCE
- (g) Royal Berkshire FRS & Hampshire FRS
- (h) South Central Ambulance NHS Foundation Trust
- (i) Environment Agency
- (j) Food Standards Agency
- (k) Highways England
- (l) Network Rail
- (m) MHCLG RED
- (n) ONR
- (o) AWE staff
- (p) MOD staff
- (q) Defra CBRN Emergencies Team
- (r) Met Office
- (s) Thames Water
- (t) Canal & River Trust
- (u) British Transport Police
- (v) Relevant Utilities companies

9.5 Specific AWE Recovery Considerations

Whilst the Thames Valley LRF Recovery Plan gives a good generic guide for members of recovery groups in general, an incident at an AWE site will provide additional challenges due to the nature of the sites and the potential contamination issues. Some considerations for the first meeting are detailed below:

#	Issues	Considerations
(a)	A common aim of the RCG would be to recover all affected areas to an agreed standard so that they are 'suitable for use' for their defined future purposes. The difficulty in this case would be initially determining how clean is clean? This can be difficult due to expectations of the population and the fact that there are always some background natural levels of radioactive substances in the environment.	There has been a great deal of environmental sampling in this area over many years therefore there is known data which will be of assistance in guiding the recovery group to the background levels. Independence of information may be necessary for public reassurance. The annual Radioactivity in Food and the Environment (RIFE) reports provide an indication of the level of radioactivity in the environment around nuclear sites. This information can be used as one component of recovery discussions on "how clean is clean", using the framework set out in the UK recovery handbooks for radiation incidents .
(b)	Agreement of environmental management systems to make the best use of technical and manpower resources and sharing information to avoid unnecessary duplication of effort.	There are a number of agencies that can get involved including AWE, PHE, EA, Local Authority, Utilities etc. therefore determining who is doing what and ensuring consistency of approach is essential to determine at the first meeting of the RCG.
(c)	Determining the priority areas for tie-down and decontamination; identification of environmental contamination containment and remediation options and propose/initiate action.	Essential here is to get accurate sample results to assess the spread of any contaminants and to what levels. Thereafter due to the location of the contaminants the priority for decontamination etc. can be prepared
(d)	Implementing a systematic and balanced remediation plan, using best practical environmental options, that is rapid and economical and produces minimal amounts of controllable wastes and disruption.	Contributors to this plan would include the Defra CBRN Emergencies Team for appropriate contractors and the Environment Agency with respect to disposal.
(e)	Liaising with higher authorities, through each agency's management chain, to ensure that early containment and remediation is not impeded or delayed by	Clarity on who is doing what and when is to be set out at the first meeting and then communicated up the chains of command. This is important to ensure a swift

#	Issues	Considerations
	conflicts of interest between departments.	response. Minutes are therefore essential to assist in this process.
(f)	Identifying the statutory responsibilities and regulatory powers of participating organisations and agreement of management responsibilities and inter-relationships during the initial phases of remediation	As with (e) above this needs to be clearly set out to prevent issues further down the recovery process.
(g)	Limiting the spread and re-suspension of contamination and protection of public health. This will be important not only in terms of preventing the spread of any contamination and therefore making the recovery process longer but having regard to public reassurance and prevention of public health concerns over a wider area than would be necessary.	Methods of operations need to be considered Speed of controlling the spread/re-suspension is important.
(h)	Determining, as necessary, a health monitoring programme of the local community and advice for other health services should there be concern from people who were in the area at the time of the incident.	A Radiation Monitoring Unit (RMU) may already be set up as part of the response by the Health agencies. If not it may be considered as part of the recovery. Guidance should be prepared for health agencies across the UK and abroad in order that self-presenters get consistent accurate support and advice.
(i)	The practicalities of the recovery also need to be considered including:	Who does the work? What equipment would be used? Where does any contaminated waste go to? What equipment is needed to prevent contamination of clean areas? Is health monitoring of personnel required?

9.6 Remediation Phases & Considerations

The early phase (days) involves prompt tie-down or containment of contamination and the recovery of items. The intermediate phase (weeks) involves the treatment of the heaviest or most significant contamination. The late phase (months) involves reduction of environmental contamination to acceptable levels.

Immediate term actions include:

- (a) Identification of the significant environmental effects of the incident and preparation of a register of environmental effects.
- (b) Identification of human health effects.
- (c) Determination of 'interim' responsibilities for operational control in respect of tie-down, containment and initial remediation.
- (d) Consideration of shelter/evacuation issues when remediation produces short-term re-suspension.
- (e) Advice on containment and tie-down measures undertaken and assessment of their implications for long term radioactive and conventional remediation.

Medium term actions include:

- (a) Identification of remediation options for all the affected areas and proposal of a remediation plan (with priorities, objectives, end-points and timescales) to higher authorities.
- (b) Identification of waste management, assay, transport and storage issues.
- (c) Identification of relocation issues.
- (d) Coordination of environmental reviews, audits and reports undertaken at the request of higher authorities.
- (e) Consideration of wider issues of public confidence and regeneration and the measures necessary to convince the public that it is safe to return to the area.

Longer term actions include:

- (a) Preparation of a long-term plan to outline the resources and support needed by the local authority for the management of the longer-term remediation issues and public consultation.
- (b) Modification of plan to suit changes in requirements.
- (c) Confirmations that appropriate radiological end-points have been chosen.
- (d) Obtaining certification for reuse of remediated areas.

9.6.1 Remediation Options

There are a number of remediation options available. However, each option needs to be considered in connection with the release, location and potential other impacts by using that form of remediation. It will be the responsibility of the group to move through this decision making process with the evidence available to them at the time.

A common strategy is to divide up the contaminated area into zones according to land use and contamination level. Then a range of alternative options is detailed for each zone. The performance of each option is assessed using indicators such as: the percentage of contamination removed and dose reduction, the volume of waste

produced, the resources required, the rate of working and cost. In addition, the advantages and limitations of each option are also considered. Hence, a recommended option is selected for each zone.

Some of the options are detailed below

Various tie-down reagents (e.g. water, bitumen emulsion, strippable paints etc.) may be applied to reduce the spread of contamination and reduce re-suspension risks.

Selection of the appropriate material and application technique is dependent on many factors (e.g. surface type, weather conditions, coverage required etc.).

Non-aggressive decontamination techniques (e.g. vacuum, brushing, hosing etc.) are relatively quick and cheap and generally produce small amounts of controllable waste. These are more applicable in areas where contamination is low level and loosely bound to the surface.

Aggressive decontamination techniques (e.g. road planning, high-pressure water, grit blasting etc.) may be required in areas where contamination is higher level and fixed to the surface. These are much slower and expensive and can generate large volumes of waste.

9.6.2 Recovery Communications

An essential part of recovery will be engagement and information to the local community quickly after the event. This process must continue thereafter on a regular basis in order to ensure everyone is aware of what is happening, why, how and when.

If during the response people have been evacuated the communications must also be made to those displaced residents and businesses in order to ensure they are kept engaged and understand the process.

Due to the nature of the site there will no doubt be a great deal of media interest and therefore it will be important to ensure the correct information is distributed in order to maintain reality on the recovery process and to prevent unnecessary panic.

Regular communications to the staff of responding organisations, town and parish councils and members is also essential to maintain during the recovery process in order to ensure everyone is accurately informed

9.6.3 Link to Scientific & Technical Advice Cell (STAC)

During the response phase the STAC would be in place to support the SCG, as well as the RCG. The RCG will work closely with the STAC to share scientific and technical information and expertise. Agencies with a remit in both cells need to consider their number of attendants at the SCG.

Once the response phase has been completed and hand over from the police to the local authority to lead on the recovery has been achieved, it may be necessary for the STAC in full or elements of it to continue to exist in order to support the RCG. If this is the case the RCG chair should raise this with the STAC chair to agree a way forward. It may be that elements of the STAC become part of the RCG main group.

9.6.4 Recovery Coordinating Group (RCG) Closure

At an early stage the group should ensure that the aims and objectives clearly define a point at which the group would no longer be necessary and the work is business as usual, or near usual, for the majority of agencies involved. This may have a proviso that the group may be reconvened should a group action or decision be necessary.

Section Ten

10 Stand Down, Debrief & Administration

10.1 Stand Down

Involvement in an emergency or Major Incident may finish at different times for different agencies. For the emergency services their direct involvement will finish when the immediate situation has been resolved. For local authorities, the longer-term issues around restoration of the community or the area affected means that they may have an active involvement for many years.

Once the decision has been taken by an agency to stand down, it is imperative that they inform partner agencies and all those stakeholders that they have been dealing with as part of the response. This can be done by sending a closing Situation Report (SitRep). The TVLRF Recovery Plan & HLOW LRF Community Recovery Plan have further information regarding the stand down and debrief process.

10.2 Debrief

After an incident and each exercise a formal debrief process will take place overseen by West Berkshire District Council and/or TVLRF. Lessons learnt from the incident or exercise debrief will be captured and assist to shape the review of plans, procedures, training and future exercises.

10.3 Record Keeping

It is important to log and retain a record of all events during an incident. This will assist if liability, compensation or reimbursement issues arise as a result of an incident. Records should include details of all actions taken, communications with outside agencies, a summary of all key decisions made and details of all expenditure incurred. This information will also be useful to record lessons learnt during the post incident debrief and to inform the review of this plan following an incident.

In order to assist with the briefing and updating of key response staff, it may prove useful to establish display, logging and incident update boards within relevant control centres. All personnel active in the response will be expected to detail their decisions and responses throughout the incident in a log. Logs should include all messages, emails, photos, handwritten notes, minutes of meetings, briefings, recordings etc. Logs once completed must not be amended, parts removed or destroyed, as they may form part of a legal investigation.

10.4 Training

All agencies identified within this plan are required to ensure their employees who are identified to implement any aspect of this plan, including those identified as emergency workers under REPPIR, are suitably and sufficiently briefed and trained in order to carry out their required role.

This plan sets out the multi-agency response arrangements and requires that each agency ensures that individual operational plans or procedures cover agency specific responsibilities. All staff who are liable to respond to an AWE radiation emergency, and thus support the implementation of this plan must be aware of its content and of the agency specific operational plans and procedures to enable them to undertake their role safely and effectively.

10.5 Exercising the plan

REPPIR Regulation 12 requires this plan to be tested though exercise at least every 3 years. The purpose of the tests are to demonstrate to the Office for Nuclear Regulation (ONR) the adequacy of the off-site emergency arrangements. There are 3 levels, the scenario of each requiring approval of the ONR:

Level 1: Concentrates on the operator's on-site procedures and communication. It may involve limited participation by the emergency services and other response organisations.

Level 2: Tests the off-site emergency arrangements. It involves participation by the emergency services, emergency response organisations, government departments and agencies, and the operator.

Level 3: A national exercise extending Level 2 by requiring involvement of Government Departments to exercise their procedures at their respective headquarters for Central Government, in order to test the interaction within and between national as well as local agencies.

In accordance with REPPIR 2019 West Berkshire District Council will agree with the regulator, the operator and emergency services the best method to test this plan.

The following table lists the level and dates of exercises held:

Date of Exercise	Notes
11 November 1998	Level 2
15 November 2001	Level 2
2 March 2005	Level 2
11 November 2007	Level 2
10 November 2010	Level 2
Caldex 10 March 2010 (Office hours)	Communications Exercise
Caldex 17 May 2011 (Office hours)	Communications Exercise
Caldex 12/1/12 (Out of office hours)	Communications Exercise
Caldex 13/12/12 (Office hours)	Communications Exercise
Caldex 10/6/13 (Office hours)	Communications Exercise
Caldex 16/9/13 (Out of office hours)	Communications Exercise
Caldex 11/12/14 (Office hours)	Communications Exercise
Aldex 13 16 Nov 2013	Level 2
Ex Recuperate 13 9 Dec 13	Recovery Exercise
Caldex 14/12/14 (Office hours)	Communications Exercise
Caldex 02/09/15	Communications Exercise
Caldex 26/07/16	Communications Exercise
Caldex 26/10/16	Communications Exercise

Aldex 16: 07 Nov 2016	Level 3
Caldex 23/07/2019 (Office hours)	Communications Exercise
Caldex 06/08/2019 (Out of office hours)	Communications Exercise

10.6 Financial Arrangements

Financial costs are incurred by responders before, during and after a major incident and this section sets out the principles.

10.6.1 Before a Major incident

In the planning, reviewing and exercising of the plan the costs of such activity by agencies is recovered from the Operator on an annual basis via the lead local authority.

10.6.2 During a Major Incident

The cost of response and recovery whilst important is not the highest priority or consideration as to how to respond. The main issue is having regard to the best way to respond, saving and protecting human life and further environmental damage. However, all costs are collected and monitored at the time for future re-charge, either under the “polluter pays” system, or under government schemes such as the Bellwin Scheme.

10.6.3 After a Major Incident

There are various issues which need to be considered via the recovery process. There is more guidance on this in the TVLRF Recovery Plan. Some of the issues include:

- (a) The Department of Social Security (Supplementary Benefits commission) is empowered to make various loans to persons who find themselves in urgent financial need as a result of a major accident or natural disaster.
- (b) Authorities or Services placing demands on outside agencies for assistance, services or materials would be responsible for the settlement of any charges which may arise
- (c) Local Authorities may be able to invoke Bellwin Scheme arrangements for the recovery of a proportion of essential costs.
- (d) Recovery of costs will, normally, be directed at the site owners.

Section Eleven

11 Roles and Responsibilities / Action Cards

It is essential in any response to a major incident that the roles and the responsibilities of responding agencies are clear and understood by the other agencies.

It is also essential that the different services within an agency know what their roles are in order to keep focused on the response and thereafter the recovery.

The following section give details as to the responding agencies and their roles, alerting procedures and responsibilities, as well as responding groups roles alerting procedures and responsibilities.

AGENCIES

- 11A AWE
- 11B Thames Valley Police
- 11C Fire: AWE Fire & Royal Berkshire Fire & Rescue Service
- 11D South Central Ambulance NHS Foundation Trust
- 11E Health Services (Other than SCAS & PHE)
- 11F Public Health England (CRCE & SE)
- 11G West Berkshire District Council (WBDC)
- 11H Reading Borough Council (RBC)
- 11I Blank
- 11J Wokingham Borough Council (WBC)
- 11K Basingstoke and Deane Borough Council (BDBC)
- 11L Hampshire County Council (HCC)
- 11M Office for Nuclear Regulation (ONR)
- 11N MHCLG Resilience & Emergency Division
- 11O Department for Business, Energy and Industrial Strategy (BEIS)
- 11P Other Government Departments and Agencies
- 11Q MOD Coordinating Authority (MCA)
- 11R Environment Agency (EA)
- 11S Food Standards Agency (FSA)
- 11T Radioactive Incident Monitoring Network (RIMNET)
- 11U Met Office
- 11V Defra CBRN Emergencies Team
- 11W Action by Utilities
- 11X Network Rail
- 11Y Highways England
- 11Z Other Organisations
 - The Military
 - Voluntary Agencies
 - Road Transport Organisations
 - Passenger Transport Organisations
 - Other Local Authorities

GROUPS

- 11AA Scientific & Technical Advice Cell (STAC)

11A AWE

Role

As the site(s) operator, AWE has three primary roles in an Off-Site Emergency:

- (a) To take such action as is necessary to stabilise the emergency on the affected site. This might include saving and protecting life, preventing or mitigating the release of hazardous materials, and monitoring to establish the extent of any contamination resulting from an emergency.
- (b) Initiate the cascade call out to responders and the alerting system to those in the community.
- (c) To provide information and advice to other responders on AWE's hazards and the status of the on-site emergency to enable other responders to discharge their own responsibilities under this plan.

REDACTED ON BASIS OF SECTION 38

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11B THAMES VALLEY POLICE

Role

The Thames Valley Police (TVP), with the support of the Hampshire Constabulary as necessary, will control and coordinate the off-site response for dealing with an incident at AWE Aldermaston (AWE(A)) or AWE Burghfield (AWE(B)) with actual or potential off-site consequences with other agencies having legislative responsibilities. Other services and agencies will provide resources and technical advice so as to offer a combined and structured response to the incident

Other roles for the police include:

- (a) In conjunction with other agencies protect and preserve the scene as necessary and thereafter lead or assist in any post incident investigation.
- (b) Support, with other agencies, the collation and dissemination of casualty information.
- (c) Support, with other agencies, the identification of casualties and coordination of the management of casualties including the remains of any deceased.
- (d) Coordination of the media response
- (e) Coordination of the public information during the response phase
- (f) Coordination and implementation of public safety measures
- (g) To assist, with other agencies, the return to normality.

Alerting Procedure

Thames Valley Police Control Room will be notified by the AWE (A) MOD Police, acting on behalf of the Aldermaston Emergency Manager, when an actual or potential off-site emergency has occurred. The AWE (A) Emergency Manager will subsequently confirm the alert and establish contact with TVP.

Thames Valley Police will notify:

- (a) RBFRS
- (b) South Central Ambulance Service NHS Foundation Trust
- (c) West Berkshire District Council
- (d) Hampshire Constabulary and other police forces as necessary
- (e) MHCLG – RED
- (f) Civil Aviation Authority (CAA) if No Fly Zone required.
- (g) SCG Activation Procedure including activation of:
 - i. Highways England
 - ii. British Transport Police and Network Rail (if the rail network is affected)
- (h) Public Information Services such as relevant radio and television stations, also relevant cable company service providers

On receipt of information from TVP, Hampshire Constabulary will notify:

- (a) Hampshire Fire & Rescue Service
- (b) Hampshire County Council

Actions REDACTED ON BASIS OF SECTION 38

[illegible]

11C FIRE: AWE FIRE, ROYAL BERKSHIRE FIRE & RESCUE SERVICE (& HAMPSHIRE FRS)

Role

The Fire & Rescue Service core remit includes:

- (a) Saving of life in conjunction with other emergency services
- (b) Assuming control of the incident when a major fire is involved
- (c) Rescue trapped casualties
- (d) Prevention of further escalation of the incident by tackling the fires, dealing with released chemicals, other hazardous situations and public decontamination, where required
- (e) Gathering of information and hazard assessment to give to the police on the need to evacuate members of the public
- (f) Liaison with the police regarding the establishment of an inner cordon and subsequent control of the inner cordon
- (g) Sectoring of the incident and to effectively define and relay this information to the Police, Ambulance Service and other agencies attending
- (h) The safety of all the personnel involved in rescue work. This includes ensuring that all non-fire service personnel entering the inner cordon are aware of and conform to the Fire and Rescue Service safety procedures and, in particular the use of the evacuation system and nominal roll procedures
- (i) Consider the effect and actions to minimise any dangers to the environment
- (j) Body recovery, in conjunction with the police as required. Participation in investigations and preparation of reports with supporting evidence for subsequent inquiries
- (k) Standing by during the non-emergency/recovery phase as appropriate

AWE has its own full-time Fire & Rescue Service and appliances at Aldermaston and Burghfield, with staff trained to deal with AWE special materials, including radioactive materials and explosives, as well as conventional fire hazards. If required, additional assistance would be sought from the Royal Berkshire Fire & Rescue Service and/or Hampshire Fire & Rescue Service as appropriate to deal with an incident on an AWE site. AWE Fire & Rescue Service trains regularly with external Fire & Rescue Services.

The Royal Berkshire Fire and Rescue Service would coordinate assistance from other County Fire and Rescue Services, should they be called upon to assist with a fire on-site, and operate within the site as agreed with the AWE Fire and Rescue Service. The senior RBFRS Officer would assume control with advice from the AWE Senior Fire Officer.

The Fire & Rescue Service also has the role of decontamination of people. In such circumstances then the deployment of specialist equipment to enable people affected or

potentially affected to be decontaminated immediately on-site, reducing any adverse effects on their health. They can then be transported safely to hospitals or shelter for further treatment or support without the risk of contaminating others. There are such resources available to local services but additional equipment and trained fire fighters would be called upon as necessary to support.

Alerting Procedure

The Royal Berks Fire & Rescue Service will be notified by Thames Valley Police in the formal channels. However through their own standing operating procedures they should also be notified by the AWE Fire and Rescue Service and/or MOD Police of an incident on or off the site.

If it is an off-site incident then the RBFRS will notify:

- (a) West Berkshire District Council
- (b) Environment Agency
- (c) Health and Safety Executive
- (d) Hampshire Fire & Rescue Service
- (e) Met Office.

Actions

The RBFRS will attend any incident to which it is requested to respond in accordance with agreed attendance protocols. Detailed arrangements exist for the Service to attend and to effectively deal with incidents in collaboration with the AWE Fire and Rescue Service and personnel. These arrangements provide for a tailored response to incidents and make provision for reinforcement and attendance at the site by appliances and personnel from other Services.

It is anticipated that any incident with off-site consequences requiring the activation of this plan will have resulted from an on-site incident to which the Fire Service will have been alerted.

In the event of the activation the following additional resources of the Royal Berkshire Fire and Rescue Service will be deployed: **REDACTED ON BASIS OF SECTION 38**

[REDACTED]

[REDACTED]

FRS activity at the incident will be directed by the Senior Fire Service Officer present. The effective control of an incident will best be achieved by the effective utilisation of personnel, equipment and information. Detailed information, equipment, including monitoring equipment and knowledge of the site is available from on-site personnel.

Suitably trained personnel should be incorporated into the Incident Command Support structure adopted for the incident.

The FRS may also request for a PACRAM or information relating to the weather via the Met Office.

The FRS has the role of decontamination of people. This will take some consideration including:

- (a) There may be a role for decontamination from conventional chemical contamination or radiation contamination. Therefore at an early stage of activation the Fire and Rescue MDU decontamination process will be considered by the service and by STAC and SCG.
- (b) Any decontamination process will normally be set up at the edge of the contaminated area in order that once people are decontaminated they can quickly move to a clean area and onwards to a suitable rest centre or a radiation monitoring unit (as set up by the Health Agencies).

The exact location of the decontamination unit will be decided by the SCG on consultation with the STAC and the LA.

A large area will be required in order to allow for the equipment, potentially large numbers of people from the affected area and potentially people who were in the area at the time of the incident who may be worried that they are contaminated returning. A strict access route and flow of people will have to be administered in order to ensure 'dirty' and 'clean' are kept separate.

11D SOUTH CENTRAL AMBULANCE NHS FOUNDATION TRUST

Role

NHS England/NHS Improvement South East (Hampshire and Thames Valley (HTV)) have the responsibility for the NHS Services to the population around the AWE sites but this responsibility has been delegated to West Berkshire Clinical Commissioning Group and Ambulance Trust. These bodies are responsible for ensuring the satisfactory Health Service arrangements are in place for dealing with major incidents. In the event of such an incident at AWE they would work in conjunction with the AWE Medical Adviser or their representative and would fulfil the following functions:

On-site treatment and evacuation of casualties, including those who might be contaminated by radioactive material.

Responsibilities

The Ambulance Service responsibilities are:

- (a) the saving of life, in conjunction with other emergency services,
- (b) the treatment and care of those injured at the scene, either directly or in conjunction with medical personnel,
- (c) to provide Tactical Commander, Tactical Advisor/NILO and Medical Incident Advisor,
- (d) the determination of the priority evacuation needs of those injured, either directly or in conjunction with medical personnel,
- (e) to determine the main designated "Receiving" and "Supporting" hospitals for the receipt of those injured,
- (f) to arrange the most appropriate means of transporting those injured to the main "Receiving" and "Supporting" hospitals,
- (g) to ensure that adequate medical personnel and support equipment resources are available at the scene,
- (h) the provision of communications facilities for NHS resources at the scene and the ability to communicate with the other emergency services present.
- (i) initial alerting of appropriate NHS Agencies and Trusts following notification by Thames Valley Police,
- (j) to lead and co-ordinate on all decontamination of people on and off site and will request support from the Fire and Rescue Service as required,
- (k) to deploy an appropriately trained and qualified Commander to lead the Decontamination process.

ALERTING PROCEDURES

In the event of an off-site emergency being declared at AWE Aldermaston or AWE Burghfield, The South Central Ambulance Service (SCAS) will be notified by the Thames Valley Police, and will in turn notify:

- (a) Public Health England South East
- (b) NHS England/NHS Improvement South East (HTV)
- (c) Designated Receiving Hospitals
- (d) Royal Berkshire Hospital
- (e) Hampshire Hospitals NHS Foundation Trust on call

Actions

Detailed arrangements exist for the SCAS to attend and assist the onsite services to deal with incidents involving casualties as required. These arrangements provide for a tailored response to incidents and make provision for reinforcements and attendance at the site by Ambulances and personnel from other NHS Ambulance Trusts.

It is anticipated that any incident with off-site consequences requiring the activation of this plan will result from an onsite incident. Where casualties have been sustained on-site, SCAS resources will already have been deployed.

In the event of a decision by the SCG to evacuate any residents in the affected area, to assist with those who are ill or disabled at home, calling on the support of the Voluntary Agencies as required.

Where on-site casualties have been sustained, dispatch if required: **REDACTED ON BASIS OF SECTION 38**

[REDACTED]

[REDACTED]

11E HEALTH SERVICES OTHER THAN AMBULANCE SERVICE

NHS England and NHS Improvement

Role

The aim of NHS England/NHS Improvement South East (NHSE/I) (Hampshire/IOW and Thames Valley (HTV)) in an incident involving AWE would be to lead and coordinate the response of all health organisations in liaison with the South East NHSE/I Regional Team including the SE Regional Communications Team.

Responsibilities

In the event of an incident at AWE NHS, England/NHS Improvement South East (HTV) team would:

- (a) Establish, maintain and disseminate the best possible understanding of the incident and its impact on the health sector;
- (b) Ensure that all necessary and available support is provided to local health responders;
- (c) Establish command, control, coordination and communications arrangements in accordance with its Incident Response Plan (IRP)/On Call Pack and supporting Action Cards and those reciprocal arrangements of its providers and commissioners;
- (d) Establish and maintain a reporting mechanism and daily cycle of command across all health organisations in line with any regional/national timelines/sitrep deadlines;
- (e) Liaise with the HTV EPRR Team initially leading the incident and agree whether and how to conduct a handover with NHS England/NHS Improvement South East (HTV) if a regional response/lead is required;
- (f) Analyse reports received to identify strategic priorities and support required;
- (g) Implement mutual aid arrangements to identify strategic priorities and support required;
- (h) Link NHS organisations across the South East area if resources and capacity are required from out of the area;
- (i) Liaise with NHS England/NHS Improvement South East Regional Team on the identification of and access to national resources, if they are required;
- (j) Set up and maintain an Incident Coordination Centre and an Incident Management Team;
- (k) Attend SCG meetings in coordination with the Integrated Care Systems (ICSs) across HTV. The ICSs across HTV will represent the NHS at the TCG, the Media Advisory Cell and any other tactical group that may be set up;

- (l) Provide a SE Regional media / comms response;
- (m) Take part in any debrief processes set up and take forward any learning identified.

Alerting Procedure

NHS England/NHS Improvement South East (HTV) would be alerted to an incident by South Central Ambulance Service Foundation Trust.

ACUTE HOSPITAL ARRANGEMENTS

Role

The Chief Executive in conjunction with the Accountable Emergency Officer (AEO) of a "Receiving Hospital" is responsible for ensuring that the resources of the hospital are fully mobilised to manage casualties. This shall include:

- (a) alerting/ calling in all necessary and additional staff and managing volunteer helpers;
- (b) establishing a Major Incident Control Team and an effective Control Centre;
- (c) organising essential facilities for the reception, treatment and admission of casualties, including (as necessary) the relocation of patients to provide sufficient accommodation including contaminated casualties;
- (d) making comprehensive arrangements for the reception and care of relatives and friends, religious and voluntary services support;
- (e) providing the media with controlled access, authoritative information and necessary administrative support in close liaison with the Police;
- (f) ensuring that tight security arrangements are in place, particularly to protect victims and relatives from unauthorised media intrusion;
- (g) activating the hospital's casualty documentation system and ensuring an effective link with the Police documentation team at the hospital;
- (h) providing the Police with appropriate office, communication and welfare support arrangements;
- (i) briefing other patients (as necessary) regarding changes in procedure due to the major incident response;
- (j) activating arrangements to preserve property and evidence;

Alerting System

The Major Incident Plans of Receiving Hospitals will be triggered by an appropriate call from Ambulance Control;

Actions REDACTED ON BASIS OF SECTION 38

[REDACTED]

[REDACTED]

[REDACTED]

Each hospital will:

- (a) Maintain site security ensuring that sites can be locked down to ensure the security of the site
- (b) Establish local command control and coordination arrangements
- (c) Provide NHS England/NHS Improvement South East (HTV) local regional office with situation reports
- (d) Monitor capacity and manage local resources appropriately
- (e) Provide a clinical response to all casualties
- (f) Ensure recovery is addressed in organisational strategic incident management meetings.

CLINICAL COMMISSIONING GROUP/ INTEGRATED CARE SYSTEM**Role**

Support NHS England/NHS Improvement South East (HTV) to manage the local impacts of the incident;

Actions REDACTED ON BASIS OF SECTION 38

- (a) Lead on escalation aspects of the incident
- (b) Ensuring that critical functions are maintained
- (c) Establishing internal command and control structures in conjunction with NHS England/NHS Improvement South East (HTV)
- (d) Attending local multi-agency meetings as required by NHS England/NHS Improvement South East (HTV)
- (e) Identifying and releasing clinical and administrative staff to support the response subject to availability and service impact

11F PUBLIC HEALTH ENGLAND (PHE)

PHE CENTRE FOR RADIATION CHEMICAL AND ENVIRONMENTAL HAZARDS (CRCE)

Role

PHE-CRCE is responsible for the provision of expert advice and information relating to the public health radiological protection aspects of an emergency to government and any strategic group set up to manage the response. PHE publishes guidance on Emergency Reference Level (ERLs) to protect the public. This guidance is accepted as a basis for the current nuclear emergency arrangements.

Alerting Procedure

PHE CRCE will be notified of an incident with off-site consequences at AWE by PHE SE

Actions **REDACTED ON BASIS OF SECTION 38**

On receipt of an alert, PHE-CRCE will determine the appropriate level of its response to the emergency. This level of response might include all or some of the following:

- (a) Deployment of senior staff to a number of key locations. These would include:
- (b) The SCC (to provide advice on the Strategic Coordinating Group (SCG), the Scientific & Technical Advice Cell (STAC)) and the Recovery Coordinating Group (RCG) on radiological protection aspects of the emergency
- (c) The Media Briefing Centre (MBC)
- (d) Scientific Advisory Group for Emergencies (SAGE)
- (e) Set up an emergency operations centre at [REDACTED]. **REDACTED ON BASIS OF SECTION 38** The key functions of this centre will be to gather relevant information (particular radiation monitoring information), to assess this information and to provide expert advice on the basis of this information.
- (f) Recommend and support sourcing an RPA for the TCG to support the non-emergency services with safety advice
- (g) Deploy radiation-monitoring teams capable of measuring environmental contamination and measurements of radioactivity on or in people. Support will be provided to Radiation Monitoring Units (RMUs) as appropriate and where resources allow
- (h) Undertake the role of national radiation monitoring coordination
- (i) Provide expert advice on radiological issues for the recovery phase
- (j) Liaise effectively with, but not confined to, the key stakeholders in the response at a local, regional and national level including the Food Standards Agency (FSA), the Environment Agency (EA), Local Authority, Environmental Health Departments and water companies.

PUBLIC HEALTH ENGLAND (PHE) SOUTH EAST**Role**

PHE SE is responsible for the provision of expert advice and information relating to the public health aspects arising from an incident at AWE and the establishment of STAC.

Alerting Procedure

PHE SE will be notified of an incident with off-site consequences at AWE by SCAS.

Actions

On receipt of an alert from SCAS, PHE SE will:

- (a) Determine the appropriate level of its response to the emergency
- (b) Alert PHE-CRCE in line with the notification process
- (c) Deploy senior staff to key response cells, either in person or virtually. These may include:
 - SCG
 - STAC
 - RCG
 - MBC
- (d) Establish and Chair STAC as outlined in the PHE SE STAC Plan (see Section 11AA)
- (e) Consider the establishment of an Incident Coordination Centre virtually, or physically at [REDACTED] **REDACTED ON BASIS OF SECTION 38** dependent on the area impacted
- (f) Provide expert advice on health protection issues for the recovery phase
- (g) Liaise effectively with key stakeholders in the response at a local, regional and national level

11G WEST BERKSHIRE DISTRICT COUNCIL

Role

The main role of West Berkshire District Council includes:

- (a) Support to the emergency services
- (b) Alerting other agencies as detailed in the activation section ([Section 3.2](#)) and set out below
- (c) Coordination and management of reception and rest centres
- (d) Coordinating the recovery process

Alerting Procedure

AWE and TVP control will, on receipt of an appropriate alert, notify West Berkshire District Councils Emergency Planning or if Out of Hours they will inform the West Berkshire District Council's Emergency Duty Officer via the Emergency Contact Operators

Actions **REDACTED ON BASIS OF SECTION 38**

WBDC will:

- (a) Record full details of the incident, immediately open a log and call back to AWE and TVP Control to verify the message.
- (b) Initiate the alerting process as detailed in the WBDC Major Incident Plan.

Activate the external alerting processes as follows:

Agency	Notes
Internal Services	who start the internal actions for the services
Hampshire County Council as appropriate	For AWE (A) Incident (or B if wind direction appropriate) request rep to go to SCC/TCG as appropriate.
Basingstoke & Deane Borough Council as appropriate	For AWE (A) Incident (or B if wind direction appropriate) request rep to go to SCC/TCG as appropriate.
Reading Borough Council as appropriate	For AWE (B) Incident (or A if wind direction appropriate) request rep to go to SCC/TCG as appropriate.
Wokingham Borough Council as appropriate	For AWE (B) Incident (or A if wind direction appropriate) request rep to go to SCC/TCG as appropriate.
All Schools and nurseries in WBDC area	Normally by Education Services
Any Residential Care Homes in WBDC affected area	Normally by Adult Social Care Service

Agency	Notes
Resilience & Emergency Division	As per contact list
Food Standards Agency	As per contact list
Highways England	As per contact list
Network Rail	As per contact list
Thames Water	As per contact list
Canal & Rivers Trust	As per contact list
Town & Parish Councils in area including local ward members	As per contact list
Other LA's in Berkshire	To be prepared to support with mutual aid
Voluntary Sector	as necessary

Arrange for the following command and control arrangements to be supported:

Location	Whom	Roles
ECC	As per MIP	As per MIP
TVP SCC - SCG	Local Authority Liaison Officer (LALO) to SCC to be the SCG representative. This person is normally a Director or other senior officer as nominated by the Chief Executive	<p>To inform the WBDC EOC Controller of requests made to the local authorities for support or action</p> <p>To provide local authority support and information to the Emergency Services.</p> <p>To authorise expenditure on behalf of the LA as necessary</p>
TVP SCC	Senior Officer	To support the Local Authority Liaison Officer (LALO). This is a competent officer who understands emergencies, in particular AWE and the role of the LA. They shall be able to stand in for the LALO as necessary. Their main role is to support and to link in with the LALO at TCG Location and WBDC EOC.
TVP SCC – Media Team	Public Relations (PR) Officer	To work with the SCG media team
TVP SCC – STAC	Principal Environmental Health Officer	To attend the STAC
TVP SCC – RCG	Head of Service(HoS)/Senior Officer	Chair Recovery Coordinating Group

Location	Whom	Roles
TVP SCC – RCG	Snr Officer	Deputises for chair of RCG
TVP SCC-RCG	Loggist	To record RCG key decisions
EOCC (A) at AWE (A)	Emergency Duty Officer	LALO at the AWE EOCC (A) To inform the WBDC ECC Controller of requests made to the local authorities for support or action To update the LALOs and WBDC ECC of up to date info regarding the incident.
TCG	Emergency Duty Officer (EDO)/HoS/Third Tier Manager	LALO at the TCG To inform the WBDC EOC Controller of requests made to the local authorities for support or action To provide local authority support and information to the Emergency Services.
Emergency Media Briefing Centre (MBC)	PR Officer	LALO at MBC
Other LALO Locations		
Hampshire TCG	WBDC LALO	To inform the WBDC EOC Controller of requests made to the local authorities for support or action To ensure cross border consistency.

Initial WBDC considerations include:

Staff Deployment:	Deploy staff to the relevant command locations as necessary
Open Emergency Operations Centre (EOC): In accordance with the WBDC Major Incident Plan	Establish the EOC and open all necessary communication links, including links to Basingstoke and Deane Borough Council, Reading and Wokingham Councils as appropriate.
Road Closures:	Initiate relevant Road Closures, as indicated in within the AWE Transport Plan on RD in conjunction with the police in Thames Valley and Hampshire. These road closures may move closer or further out from the incident as necessary.

Assist Establishment of Media Briefing Centre:	
Place Services on Stand-by: including:	EHOs with respect to water pollution to drinking supplies, contaminated land, food supply chain etc.
	Trading Standards with respect to animal health and welfare matters
	Countryside Rangers and Rights of ways staff with respect to closure of footpaths etc.
	LA Highways officers with respect to road closures and diversions
	Rest Centre Staff
	Voluntary agencies to assist with rest centres.
	Adult Social Care for vulnerable adults
	Education Services in relation to vulnerable children and schools
Consider the need for one or more Rest Centres	On basis of need and guidance from SCG rep open suitable rest centres
Consider the support required for a Radiation Monitoring Unit	The provision of a Radiation Monitoring Unit (RMU) may be requested at the SCG level, perhaps as a result of a number of worried well presenting themselves at hospitals or as a result of genuine concern regarding contaminants
	The provision of the RMU is the responsibility of health agencies however it is likely that there will be a request for a suitable location/building to be used. As a result a number of locations have been identified and considered suitable.
	Section 7.2 details the locations and the key information relating to this plan and the radiation monitoring unit plan.
Consider the need for Mutual Aid.	Due to the nature of the incident, the potential scale and as a result press and Government interest plus the potential for a long term response and recovery consideration at an early stage should be given to mutual aid support from other LA's (including LANWG) and Voluntary Agencies.
Consider the Initial, Medium and Long Term Recovery Process	Recovery is led by the Local Authorities but it is still a Multi-agency process.
	More details on recovery are in Section 9 .

11H READING BOROUGH COUNCIL

Role

Reading Borough Council (with assistance from neighbouring local authorities if necessary) would be responsible, in conjunction with West Berkshire District Council, for providing assistance to the Emergency Services in the event of an incident at AWE Burghfield with actual or potential off-site consequences.

Alerting Procedure

In the event of an off-site incident at AWE Burghfield, Reading Borough Council would be informed by West Berkshire District Council.

Actions

The Council Resilience Team or Duty Emergency Manager will:

- (a) Record full details of the incident, immediately open a log and call back to West Berkshire District Council in order to verify the message
- (b) Activate as necessary the Council emergency response in accordance with the MIP.

Reading Borough Council will provide for an incident at AWE Burghfield:

Location	Whom	Roles
ECC	As per MIP	As per MIP
TVP SCC - SCG	Local Authority Liaison Officer (LALO) to SCC to be the SCG representative. The SCG rep will normally be the SCG rep for West Berkshire District Council	To inform the EOC Controller of requests made to the local authorities for support or action To provide local authority support and information to the Emergency Services. To authorise expenditure on behalf of the LA as necessary
TVP SCC	Senior Officer	To support the LALO this is a competent officer who understands emergencies, in particular AWE and the role of the LA. They shall be able to stand in for the LALO as necessary. Their main role is to support and to link in with the LALO at TCG Location and the RBC EOC.
TVP SCC – Media Team	PR Officer	To work with the SCG media team
TVP SCC – RCG	Senior Officer	Rep on RCG

Location	Whom	Roles
TCG	Duty Officer/HoS/Third Tier Manager	LALO at the TCG To inform RBC EOC of requests made to the local authorities for support or action To provide local authority support and information to the Emergency Services.
Emergency Media Briefing Centre (MBC)	PR Officer	LALO at MBC.

Initial Reading Borough Council considerations include:

Staff Deployment:	Deploy staff to the relevant command locations as necessary.
Open EOC: In accordance with the RBC Major Incident Plan	Establish the Emergency Operations Centre the [REDACTED] REDACTED ON BASIS OF SECTION 38 and open all necessary communication links, including links to West Berkshire District Council, Wokingham Borough Council, Hampshire County Council and Basingstoke and Deane Borough Council, as appropriate.
Assist Establishment of Media Briefing Centre:	
Place Services on Stand-by: including:	EHOs with respect to water pollution to drinking supplies, contaminated land, food supply chain etc.
	Trading Standards with respect to animal health and welfare matters
	Countryside Rangers and Rights of ways staff with respect to closure of footpaths etc.
	LA Highways officers with respect to road closures and diversions
	Rest Centre Staff
	Voluntary agencies to assist with rest centres.
	Adult Social Care for vulnerable adults
	Education Services in relation to vulnerable children and schools
Consider the need for one or more Rest Centres	On basis of need and guidance from SCG rep open suitable rest centres

Consider the support required for a Radiation Monitoring Unit	The provision of a Radiation Monitoring Unit (RMU) may be requested at the SCG level, perhaps as a result of a number of worried well presenting themselves at hospitals or as a result of genuine concern regarding contaminants
	The provision of the RMU is the responsibility of health agencies however it is likely that there will be a request for a suitable location/building to be used. As a result a number of locations have been identified and considered suitable.
	Section 7.2 details the locations and the key information relating to this plan and the radiation monitoring unit plan.
Consider the need for Mutual Aid.	Due to the nature of the incident, the potential scale and as a result press and Government interest plus the potential for a long term response and recovery consideration at an early stage should be given to mutual aid support from other LA's and Voluntary Agencies.
Consider the Initial, Medium and Long Term Recovery Process	Recovery is led by the local authorities but it is still a multi-agency process.
	More details on recovery are in Section 9 .

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11J WOKINGHAM BOROUGH COUNCIL

Role

Wokingham Borough Councils (with assistance from neighbouring local authorities if necessary) would be responsible, in conjunction with West Berkshire District Council, for providing assistance to the Emergency Services in the event of an incident at AWE Burghfield with actual or potential off-site consequences.

Alerting Procedure

In the event of an offsite incident at AWE Burghfield, Wokingham Borough Council would be informed by West Berkshire District Council.

Actions

The Council Resilience Team or Duty Emergency Manager will:

- (c) Record full details of the incident, immediately open a log and call back to West Berkshire District Council in order to verify the message
- (d) Activate as necessary the Council emergency response in accordance with the MIP.

Wokingham Borough Council will provide for an incident at AWE Burghfield:

Location	Whom	Roles
ECC	As per MIP	As per MIP
TVP SCC - SCG	Local Authority Liaison Officer (LALO) to SCC to be the SCG representative. The SCG rep will normally be the SCG rep for West Berkshire District Council	To inform the EOC Controller of requests made to the local authorities for support or action To provide local authority support and information to the Emergency Services. To authorise expenditure on behalf of the LA as necessary
TVP SCC	Senior Officer	To support the LALO This is a competent officer who understands emergencies, in particular AWE and the role of the LA. They shall be able to stand in for the LALO as necessary. Their main role is to support and to link in with the LALO at TCG Location and the WBC EOC.
TVP SCC – Media Team	PR Officer	To work with the SCG media team
TVP SCC – RCG	Senior Officer	Rep on RCG
TCG	Duty Officer/HoS/Third Tier Manager	LALO at the TCG

Location	Whom	Roles
		<p>To inform the WBC EOC of requests made to the local authorities for support or action</p> <p>To provide local authority support and information to the Emergency Services.</p>
Emergency Media Briefing Centre (MBC)	PR Officer	LALO at MBC.

Initial Wokingham Borough Council considerations include:

Staff Deployment:	Deploy staff to the relevant command locations as necessary.
Open EOC: In accordance with the WBC Major Incident Plan	Establish the Emergency Operations Centre at the [REDACTED] REDACTED ON BASIS OF SECTION 38 and open all necessary communication links, including links to West Berkshire District Council, Reading Borough Council, Hampshire County Council and Basingstoke and Deane Borough Council, as appropriate.
Assist Establishment of Media Briefing Centre:	
Place Services on Stand-by: including:	EHOs with respect to water pollution to drinking supplies, contaminated land, food supply chain etc.
	Trading Standards with respect to animal health and welfare matters
	Countryside Rangers and Rights of ways staff with respect to closure of footpaths etc.
	LA Highways officers with respect to road closures and diversions
	Rest Centre Staff
	Voluntary agencies to assist with rest centres.
	Adult Social Care for vulnerable adults
	Education Services in relation to vulnerable children and schools
Consider the need for one or more Rest Centres	On basis of need and guidance from SCG rep open suitable rest centres
Consider the support required for a Radiation Monitoring Unit	The provision of a Radiation Monitoring Unit (RMU) may be requested at the SCG level, perhaps as a result of a number of worried well

	presenting themselves at hospitals or as a result of genuine concern regarding contaminants
	The provision of the RMU is the responsibility of health agencies however it is likely that there will be a request for a suitable location/building to be used. As a result a number of locations have been identified and considered suitable.
	Section 7.2 details the locations and the key information relating to this plan and the radiation monitoring unit plan.
Consider the need for Mutual Aid.	Due to the nature of the incident, the potential scale and as a result press and Government interest plus the potential for a long term response and recovery consideration at an early stage should be given to mutual aid support from other LA's and Voluntary Agencies.
Consider the Initial, Medium and Long Term Recovery Process	Recovery is led by the local authorities but it is still a multi-agency process.
	More details on recovery are in Section 9.

11K BASINGSTOKE AND DEANE BOROUGH COUNCIL

Role

Basingstoke & Deane Borough Council (BDBC) (with assistance from neighbouring local authorities if necessary) would be responsible, in conjunction with West Berkshire District Council, for providing assistance to the Emergency Services in the event of an incident at AWE Aldermaston with actual or potential off-site consequences.

Alerting Procedure

In the event of an offsite incident at AWE Aldermaston, BDBC would be informed by West Berkshire District Council, the Emergency Services or the HCC Duty Officer in accordance with the procedure in the Emergency Plan.

Actions

The local authority's Duty Emergency Manager will:

- (a) Record full details of the incident, immediately open a log and call back to West Berkshire District Council in order to verify the message.
- (b) Activate as necessary BDBC emergency response in accordance with the Borough Emergency Plan.

In the event of an incident at AWE Aldermaston Basingstoke & Deane BC will consider deploying officers to the following locations:

Location	Whom	Roles
ECC	As per MIP	AS per MIP
TVP SCC - SCG	Local Authority Liaison Officer (LALO) to SCC to be the SCG representative. The SCG rep will normally be the SCG rep for West Berkshire District Council but when an incident at AWE is affecting communities in BDBC area then a rep will be sent to the SCG. Liaison between HCC and BDBC will take place to establish which authority will deploy personnel to the locations below to avoid over-representation	To inform the ECC Controller of requests made to the local authorities for support or action To provide local authority support and information to the Emergency Services. To authorise expenditure on behalf of the LA as necessary
TVP SCC	Senior Officer	To support the LALO This is a competent officer who understands emergencies, in particular AWE and the role of the LA. They shall be able to stand in for the LALO as necessary. Their main role is to support and to link in with the LALO at TCG Location and the BDBC ECC.

Location	Whom	Roles
TVPSCC – Media Team	PR Officer	To work with the SCG media team
TVP SCC – RCG	Snr Officer	Rep on RCG
TCG	DEM/HoS/Third Tier Manager	LALO at the TCG To inform the BDBC ECC of requests made to the local authorities for support or action To provide local authority support and information to the Emergency Services.
Emergency Media Briefing Centre (MBC)	PR Officer	LALO at MBC

Initial Basingstoke & Deane BC considerations include:

Staff Deployment:	Deploy staff to the relevant command locations as necessary
Open ECC: In accordance with the WBC Major Incident Plan	Establish the Emergency Operations Centre and open all necessary communication links, including links to Basingstoke and Deane Borough Council, Reading/Wokingham and West Berkshire District Councils as appropriate.
Assist Establishment of Media Briefing Centre:	
Place Services on Stand-by: including:	EHOs with respect to water pollution to drinking supplies, contaminated land, food supply chain etc.
Consider the support required for a Radiation Monitoring Unit	The provision of the RMU is the responsibility of health agencies however it is likely that there will be a request for a suitable location/building to be used. As a result a number of locations have been identified and considered suitable. Section 7.2 details the locations and the key information relating to this plan and the radiation monitoring unit plan.
Consider the need for Mutual Aid.	Due to the nature of the incident, the potential scale and as a result press and Government interest plus the potential for a long term response and recovery consideration at an early stage should be given to mutual aid support from other LA's and Voluntary Agencies.
Consider the Initial, Medium and Long Term Recovery Process	Recovery is led by the Local Authorities but it is still a Multi-agency process. More details on recovery are in Section 9 .

11L HAMPSHIRE COUNTY COUNCIL (HCC)

Role

Hampshire County Council (with assistance from neighbouring local authorities if necessary) would be responsible, in conjunction with West Berkshire District Council, for providing assistance to the Emergency Services in the event of an incident at AWE Aldermaston with actual or potential off-site consequences.

Alerting Procedure

In the event of an offsite incident at AWE Aldermaston Hampshire County Council may be informed by West Berkshire District Council, the Emergency Services or BDBC, in accordance with the procedure in the County Emergency Plan.

Hampshire County Council will notify Basingstoke and Deane Borough Council.

Actions

The HCC Emergency Planning & Resilience Team or Duty Emergency Planning Officer will:

(a) Record full details of the incident, immediately open a log

(b) Activate as necessary the Council emergency response

(c) Provide support and assistance to Basingstoke and Deane BC as required

Provide for an incident at AWE Aldermaston including:

Location	Whom	Roles
ECC activated	As per MIP	AS per MIP
TVP SCC - SCG	Local Authority Liaison Officer (LALO) to SCC to be the SCG representative. This person is normally a Director or other senior officer as nominated by the Chief Executive	To inform the HCC & BDBC ECC of requests made to the local authorities for support or action To provide local authority support and information to the Emergency Services. To authorise expenditure on behalf of the LA as necessary
TVP SCC	Senior Officer	To support the LALO. This is a competent officer who understands emergencies, in particular AWE and the role of the LA. They shall be able to stand in for the LALO as necessary. Their main role is to support and to link in with the LALO at TCG Location and HCC ECC.
TVPSCC – Media Team	Corporate Communications Officer to	To work with the SCG media team.

Location	Whom	Roles
	liaise with HCC on all public information issues.	
TVPSCC – STAC	Public Health Consultant	To attend the STAC
TVP SCC – RCG	Snr Officer	
TCG	DEM/HoS/Third Tier Manager	LALO at the TCG To inform the HCC ECC Controller of requests made to the local authorities for support or action To provide local authority support and information to the Emergency Services.
Emergency Media Briefing Centre (MBC)	Corporate Communications Officer	LALO at MBC.
Other LALO Locations		
West Berkshire ECC	LALO	To inform the HCC ECC of requests made to the local authorities for support or action To ensure cross border consistency.

Initial HCC considerations include:

Staff Deployment	Deploy staff to the relevant command locations as necessary
Open ECC: In accordance with the HCC Major Incident Plan	Establish the Emergency Operations Centre and open all necessary communication links, including links to WBDC, BDBC, RBC and WBC as appropriate.
Road Closures	Initiate relevant Road Closures, as indicated in AWE Transport Plan in conjunction with the police in Thames Valley and Hampshire. These road closures may move closer or further out from the incident as necessary.
Assist Establishment of Media Briefing Centre	
Place Services on Stand-by: including	Trading Standards with respect to animal health and welfare matters.
	LA Highways officers with respect to road closures and diversions.

	Countryside Rangers and Rights of ways staff with respect to closure of footpaths etc.
	Rest Centre Staff
	Voluntary agencies to assist with rest centres.
	Adult Social Care for vulnerable adults
	Education Services in relation to vulnerable children and schools.
Consider the need for one or more Rest Centres	On basis of need and guidance from SCG rep open suitable rest centres.
Consider the support required for a Radiation Monitoring Unit	The provision of a Radiation Monitoring Unit (RMU) may be requested at the SCG level, perhaps as a result of a number of worried well presenting themselves at hospitals or as a result of genuine concern regarding contaminants.
	The provision of the RMU is the responsibility of health agencies however it is likely that there will be a request for a suitable location/building to be used. As a result a number of locations have been identified and considered suitable.
	Section 7.2 details the locations and the key information relating to this plan and the radiation monitoring unit plan.
Consider the need for Mutual Aid	Due to the nature of the incident, the potential scale and as a result press and Government interest plus the potential for a long term response and recovery consideration at an early stage should be given to mutual aid support from other LA's and Voluntary Agencies.
Consider the Initial, Medium and Long Term Recovery Process	Recovery is led by the Local Authorities but it is still a Multi-agency process.
	More details on recovery are in Section 9 .

11M Office for Nuclear Regulation (ONR)

Role

To provide advice to Central Government, the PHE CRCE, and the Government Technical Advisor at the SCG.

Alerting Procedure

ONR will be alerted via AWE Plc.

Actions

In order to fulfil its role and function following confirmation that the site has been involved in an off-site emergency then the ONRs approved emergency plan will be activated this will include the ONR initiating the following actions:

■ Activate the ■ **REDACTED ON BASIS OF SECTION 38**

(b) Attending the EOCC (A) at AWE (A)

(c) Attend Strategic Coordinating Centre

(d) Monitoring events on-site and the actions taken to restore the site to a safe condition

11N MHCLG RESILIENCE & EMERGENCY DIVISION (RED)

Role

The role of MHCLG RED is to:

- (a) Provide accurate and timely information on the incident and response to central government departments and COBR if activated
- (b) Provide a single point of contact to central government for local responders
- (c) Represent the interests of central government departments to local responders
- (d) Provide appropriate information, advice and support as required by local responders or central government departments
- (e) Provide a point of contact for neighbouring areas
- (f) Arrange visits to affected areas by Ministers and other government officials.

Alerting Procedure

RED will be formally alerted by TVP and West Berkshire District Council that an Off-Site Emergency has been declared at an AWE site and that the "Off-Site Plan" is being implemented.

Actions

Once an off-site incident has been confirmed, RED will activate its own Emergency Response Plan. The Regional Resilience Team (RRT) will always lead the RED response, but it may be necessary to call upon staff from other teams to support the response. RED will send a Government Liaison Officer to the Strategic Coordinating Group (SCG) to support the MOD Coordinating Authority (MCA) and Government Liaison Team (GLT). Their main duties are:

1. In the Emergency Phase:
 - a) To support the MCA and GLT in the delivery of their duties.
 - b) To assist in the co-ordination and provision of information on local consequence management to Central Government, ensuring MHCLG and Cabinet Office are fully briefed.
 - c) To assist in recovery planning from the outset of preparation; this might be expected to start in the emergency phase. For this, the MHCLG Representative will attend meetings of the Recovery Co-ordinating Group in a supporting and continuity role with other representatives of the MCA/GLT.
 - d) Where necessary, MHCLG will activate an operations centre to facilitate national co-ordination and assurance for situation reporting on national consequence management; support MHCLG staff in discharging their role; engage other necessary bodies; and communicate Top Line Briefs to Local Resilience Forums.
 - e) Where local responders are overwhelmed, or cross boundary or border co-ordination is necessary, the MHCLG Representative will facilitate preparation for and implementation of a response.
2. In the Recovery Phase:

- a) To support the MCA/GLT and ensure the handover of the GLT function to recovery at an appropriate stage as agreed with MOD.
- b) MHCLG RED will undertake the transition from response to recovery by ensuring an effective handover from the MHCLG RED Government Liaison Officers (GLOs) to LGD Officers (GLOs) to LGD Officials taking up responsibility for support local responders and the Recovery Coordinating Group

110 THE DEPARTMENT FOR BUSINESS, ENERGY AND INDUSTRIAL STRATEGY (BEIS)

Nuclear energy is a reserved matter. BEIS is Lead Government Department (LGD) in the event of an emergency at a civil nuclear site in England, Wales or Scotland. BEIS is the policy lead for civil nuclear, which includes onsite aspects of any response. Emergency plans and exercises are required for all REPPiR civil nuclear sites. Policy implications of an emergency and regulatory response will fall to BEIS.

BEIS

BEIS' main function is to provide strategic national direction on policy impacts, oversee national response and manage international liaison.

During a civil nuclear emergency, the Department for Business, Energy and Industrial Strategy (BEIS) will:

- Act as the Lead Government Department (LGD) for a civil nuclear emergency in England, Scotland or Wales.
- Activate its Emergency Operations Centre (EOC) in London.
- Provide accurate, timely briefing and situational awareness for UK Government Ministers and manage UK parliamentary interest.
- Coordinate national public messaging.
- Manage the Radiological Response Emergency Management System (RREMS)¹ and monitor the delivery of the Joint Agency Modelling (JAM)² process and products.
- Send BEIS personnel to the Strategic Co-ordination Centre (England and Wales) as part of the MHCLG led Government Liaison Team (GLT) to provide a communications link between central government and the local response, including requests for national support. The GLT, along with the MOD Joint Regional Liaison Officer if military assistance is required, will act as an escalation route for additional assistance needed to support the local response.
- Liaise with international organisations (International Atomic Energy Agency, the European Commission and countries with bilateral arrangements) on notification, information sharing and any offers of aid.
- Coordinate the deployment of national-level assets.

¹ When this system goes live

² Planned to be operationally live on 1 September

11P OTHER GOVERNMENT DEPARTMENTS AND AGENCIES

Overview

This Annex should be read in conjunction with Annex N referring to MHCLG RED. There are a number of Government Departments other than the MOD that would be involved in the response to a nuclear emergency at AWE. The Departments most likely to be involved include:

[Cabinet Office](#)

[Home Office](#)

[Department of Health and Social Care](#)

[Department for Transport](#)

[Department for Education](#)

[Department for Business, Emergency and Industrial Strategy](#)

[Department for Work and Pensions](#)

[Ministry of Housing, Communities and Local Government](#)

[Department for Environment, Food & Rural Affairs](#)

11Q MOD including MOD Coordinating Authority (MCA)

The Ministry of Defence (MOD) owns the Atomic Weapon Establishment (AWE) sites and facilities at Aldermaston & Burghfield. The day-to-day management operations and maintenance of Britain's nuclear stockpile are the responsibility of AWE Management Limited's wholly owned subsidiary, AWE plc. AWE work under contract and in close collaboration with the MOD's Defence Nuclear Organisation (DNO). In addition to its statutory and operational responsibilities, MOD is appointed as the Lead Government Department (LGD) in the event of Defence nuclear incident or emergency.

The MOD maintains a Defence Nuclear Emergency Organisation (DNEO) to respond to an incident or emergency, involving Defence nuclear assets. The MOD's Joint Service Publication (JSP 471) – Defence Nuclear Emergency Response (available on the [Gov.uk website](https://www.gov.uk)) sets MOD policy and context for planning and response requirements in the event of nuclear incidents and emergencies arising from Defence Nuclear Enterprise activities and sites.

██████████ In the event of an emergency with potential off-site consequences at AWE Aldermaston or Burghfield, the DNO will arrange for a MOD Senior Civil Servant, or suitably delegated person known as the MOD Coordinating Authority (MCA) to go to the Strategic Co-ordinating Centre (SCC) at ██████████, and attend the Strategic Coordinating Group (SCG). The MCA will be supported by a team of MOD personnel. **REDACTED ON BASIS OF SECTION 38**

The MCA is the appointed Nuclear Suitably Qualified and Experienced Personnel (NSQEP) Executive Director of the MOD's operational response in the incident area.

In the event of a nuclear Emergency, the MCA is responsible for:

- (a) Providing authoritative and timely advice concerning the progress or development of the emergency and the potential implications, including mitigation, of operations to make safe and recover the asset.
- (b) Providing the Department's LGD input to the SCG, liaising with the Joint Military Commander (JMC) as required;
- (c) Liaising with MOD HQ Defence Nuclear Emergency Organisation (HQ DNEO), London, to ensure they are kept informed on the status of the emergency and the operational response.
- (d) Acting on strategic direction from MOD HQ DNEO and seek any additional Military Force Elements (FE) required through the MOD Security, Policy and Operations Directorate (SPO), through the MOD Joint Regional Liaison Officer (JRLO), Regional Point of Command (JRLO/RPoC Brigade Commander) and the MOD's HQ Standing Joint Commander (UK (SJC UK)).

Alerting Procedure

The AWE Duty Site Manager or Emergency Manager are responsible for alerting MOD in the event of a Defence nuclear incident or emergency at AWE Aldermaston or Burghfield. They will contact the MOD First Point of Contact (FPOC), who will alert the MOD Co-ordinating Authority and Chief of Defence Staff Duty Officer (CDSDO).

11R ENVIRONMENT AGENCY

Role

The Environment Agency (EA) has a broad role to protect and enhance the environment in England. In the case of an emergency at a nuclear site, these responsibilities comprise some that are statutory, where there may be a breach of a law which the EA is responsible for enforcing, and others that are operational, where the EA effectively acts on behalf of or in support of DEFRA in providing a response and advice to multi-agency partners.

Alerting Procedure

EA will be alerted by RBFERS and AWE via the Radiation Incident Hotline number. The EA Radiation Duty Officer (RDO) will then be informed for immediate assessment and response.

Actions

The EA's roles and responsibilities, in the event of an emergency at a nuclear site, include the following:

- (a) Ensure health, safety and wellbeing of Environment Agency staff who may be involved
- (b) Provide advice to internal and external colleagues on the impact of the incident on:
 - i. water in the environment;
 - ii. radioactive and conventional waste;
 - iii. the natural and built environment;
- (c) Provide advice to multi-agency partners on the protective and remedial measures which can be taken to reduce the impact on the environment
- (d) Provide Environment Agency representatives with specialist knowledge of radioactive substances at relevant multi-agency centres, such as the Strategic Coordination Centre (SCC), DEFRA Emergency Operations Centre (EOC), BEIS EOC or MOD HQ Defence Nuclear Emergency Organisation (HQ DNEO);
- (e) Activate internal incident management structures to support the response, such as the Radiation Assessment Cell (RAC), Area Incident Room (AIR), National Incident Room (NIR) and Strategic Support Team (SST)
- (f) Advise DEFRA on technical and regulatory aspects of the response and recovery;
- (g) Provide information to the public and the media, in consultation with the Lead Government Department and the SCG associated with the affected site;
- (h) Manage flows of regulated waters if appropriate, to minimise impact;
- (i) Check for breach of site operator's environmental permit, where relevant;
- (j) Pursue relevant regulatory investigations in accordance with the Environment Agency's statutory duties;

- (k) Arrange for contractors to carry out environmental monitoring and sampling as part of the multi-agency monitoring strategy

The Agency's broader responsibilities, including fisheries, conservation, water resources, waste regulation and water quality, could come into play at some stage during the early response or during the short to long-term remediation. More extensive statutory powers could be involved if an incident also involved significant chemical contamination.

The EA does not have a specific statutory duty to monitor controlled waters for radioactive contamination. But in the event of an environmental incident involving a release of radioactive substances to controlled waters, the EA would arrange sampling and radiochemical analysis with a view to protecting the environment and advising downstream users and abstractors.

During the Recovery Phase, the Environment Agency will specifically:

- a) Ensure health, safety and wellbeing of Environment Agency staff who may be involved
- b) Provide advice to internal and external colleagues on the impact of the incident on:
 - i. water in the environment
 - ii. radioactive and conventional waste
 - iii. the natural and built environment
- c) Provide advice to multi-agency partners on the protective and remedial measures which can be taken to reduce the impact on the environment
- d) Provide Environment Agency representatives with specialist knowledge of radioactive substances at relevant multi-agency centres, such as the Strategic Coordination Centre (SCC), DEFRA Emergency Operations Centre (EOC), BEIS EOC or MOD HQ Defence Nuclear Emergency Organisation (HQ DNEO)
- e) Activate internal incident management structures to support the response, such as the Radiation Assessment Cell (RAC), Area Incident Room (AIR), National Incident Room (NIR) and Strategic Support Team (SST)
- f) Advise DEFRA on technical and regulatory aspects of the response and recovery
- g) Provide information to the public and the media, in consultation with the Lead Government Department and the SCG associated with the affected site
- h) Manage flows of regulated waters if appropriate, to minimise impact¹
- i) Check for breach of site operator's environmental permit, where relevant
- j) Pursue relevant regulatory investigations in accordance with the Environment Agency's statutory duties.

11S FOOD STANDARDS AGENCY

Roles

The Food Standards Agency (FSA) is responsible for ensuring food and animal feed safety in the event of a radiation emergency or chemical incident and does this through providing precautionary food safety advice and by implementing food restriction orders if necessary. This advice may cover different geographical areas and different time periods to other countermeasures

Specific responsibilities are:

- (a) Food Standards Agency HQ, London to provide point of contact with the SCG
- (b) To determine the level of any contamination of the food chain. Thereafter, as necessary, take legal measures to prevent unacceptably contaminated food entering the food chain by the implementation of emergency restriction orders under the Food and Environment Protection Act 1985. Such orders are commonly referred to as FEPA Orders and restrict the supply, movement or sale of produce from an affected area
- (c) To take action to ensure that food contaminated to unacceptable levels does not enter the food or feed chain
- (d) To provide advice and information to the public
- (e) To ensure, in conjunction with the Environment Agency, the safe disposal of contaminated food
- (f) To ensure that subsequent remediation takes account of food safety issues.
- (g) To assist with the enforcement of emergency restriction orders
- (h) To disseminate food safety advice, as requested


The FSA Incidents Team coordinates the Agency's response to all incidents with potential to affect the food or feed chain. This includes environmental contamination incidents (such as fires, toxic discharges, waterways contamination and accidents at industrial sites) and food contamination incidents (physical, chemical, microbiological or malicious tampering) where the food is in the distribution chain or available for sale.



Alerting System

The FSA Incidents Team will be alerted by West Berkshire District Council. The FSA Incidents Team if applicable, will invoke the FSA Non-Routine Incident Management Plan.

During such an emergency, in the first instance the FSA will always attend relevant meetings remotely via video/teleconference. If deemed necessary and safe to do so staff would be deployed to the following locations.

REDACTED ON BASIS OF SECTION 38

Location	Food Standards Agency
	The Incident Management Co-Ordination Group will set the operational response to the incident this will include


Location	Food Standards Agency
	formulating risk assessments, issuing food/feed safety advice and statutory food orders as appropriate
	Radiological expert to inform Strategic Commander on food/feed safety issues and Agency actions via STAC.
Media Briefing Centre	Spokesperson to issue advice and information on FSA's response
	Representative to liaise with other Government Departments

11T RADIOACTIVE INCIDENT MONITORING NETWORK

Role

A key component of the Government's response arrangements to the occurrence of an overseas nuclear accident with consequences for the UK is a national Radioactive Incident Monitoring Network and information management system (RIMNET).

The Met Office is responsible for maintaining, on behalf of Business, Energy and Industrial Strategy (BEIS) the operational capability of the RIMNET system. RIMNET facilities including:

- (a) Maintaining the operational capability of the RIMNET system
- (b) Ensuring the RIMNET facilities in emergency centres are properly maintained;
- (c) Providing briefing and training on the use of the system
- (d) Planning exercises to test the UK response systems, facilities and procedures
- (e) RIMNET is a UK-wide emergency management system, which was first established in 1988 following a review of the UK response to the Chernobyl accident. It consists of:
 - i. A network of 96 fixed gamma dose rate monitoring stations across the UK
 - ii.  **REDACTED ON BASIS OF SECTION 23 & 24**
 - iii. A central database accessible by all Government Departments, Agencies and Devolved Administrations
 - iv. A Geographic Information System
 - v. Statistical and analysis tools
 - vi. A robust network of links to other emergency response systems operated by Government Departments, the UK nuclear industry and international organisations
 - vii. Document management and desktop publishing facilities; and
 - viii. Diverse communications systems.

11U MET OFFICE

Role

The Met Office is responsible for providing weather and plume dispersion information as part of (PACRAM) Procedures and Communications in the event of a Release of Radioactive Material.

The 24 hour EMARC (Environment Monitoring and Response Centre) at Exeter will provide weather forecasts following the release of radioactive materials into the environment. On notification of an accident the EMARC staff will run the NAME (Numerical Atmospheric Modelling Environment) simulation having input all given information about the release. Output from the Model is in a graphical map based form, as an animation to show plume behaviour.

There is a 24 hour emergency contact point for the EMARC desk at Exeter. In addition, the Met Office Advisor (Civil Contingencies) (MOACC) for SE England can provide additional help with interpretation of the data provided by Exeter. The MOACC can also attend Strategic Coordinating Centre meetings either in person or remotely. Contact details for the MOACC: via Met Office Advisor – see AWE MA Activation Plan

Alerting Procedure

The Met Office will normally be activated by TVP and Royal Berkshire Fire and Rescue Service as required.

Actions

Provide advice, if required, through the MOACC or Met Office Exeter on the plume direction during any release and post a release in order to support response requirements.

11V DEFRA CBRN EMERGENCIES TEAM

Role

The CBRN Emergencies Team, is part of the Department for Environment, Food and Rural Affairs (DEFRA), and can provide advice and guidance on decontamination processes and providers to support those responsible for decontamination and/or remediation following an incident which can involve Chemical, Biological, Radioactive or Nuclear materials (CBRN) and from major accidental releases of hazardous materials (HAZMAT).

The CBRN Emergencies Team services are available on request (can be requested by Central Government, Emergency Services or Responsible Authorities who may be specified by statute or, in the case of a private body or company, may be the owner/agent of a building, location or asset).

Specifically the CBRN Emergencies Team can provide advice on:

- (a) Remediation options (including whether or not to decontaminate and what alternative options are available)
- (b) Capability, capacity and availability of specialist CBRN decontamination contractors in terms of decontamination of buildings, infrastructure and open environment, and transport. They may, if invited to do so, be able to offer other resources to assist in the site clearance process e.g. monitoring and sampling
- (c) Support (and facilitate where necessary) the contractual relationship between the Responsible Authority (or Agent) and specialist CBRN decontamination contractor(s) through a Framework where agreed terms, conditions and pricing schedules are already in place.

Alerting Procedure

Via DEFRA as detailed in figure below.

Actions

The actions of the CBRN Emergencies Team include:

- (a) Attend SCG with at least one representative in the STAC and the RCG
- (b) Advise the STAC and RCG of decontamination options, issues and costs
- (c) Liaise with private companies to prepare for a possible deployment for decontamination
- (d) Provide options to the RCG for clear up/decontamination
- (e) Support the decontamination process
- (f) Work with the specialist companies on specific aspects of decontamination as they might impact on their operations
- (g) Work with the RCG to develop strategies

In order for the CBRN Emergencies Team to provide the advice etc. then the following information would be requested:

- (a) The specifics and extent of contamination (What, where, how much, fixed or mobile?)
- (b) Site plans (both street and buildings – with services where possible) and rendezvous/strategic holding areas for Framework Suppliers to bring kit/staff forward to
- (c) Details of who is responsible for managing the remediation process will they accept responsibility for the cost of a specialist CBRN decontamination contractor – if not, who will?
- (d) Details as to whether the contamination been contained to prevent further spread?
- (e) Have forensic investigations been completed by the police and specialist teams (CBRN Emergencies Team specialist suppliers can assist in this process if requested) and the site handed over for remediation?

Details of the Recovery Coordination Group (RCG) and whether a decision to decontaminate has been taken? – Prioritisation of work and resources may be required. (CBRN Emergencies Team Science Team may assist with technical remediation options and can feed information into the remediation / decontamination strategy / Science and Technical Advice Cell (STAC) / Strategic Coordination Group)

In order that the decontamination process can continue then the following would be considered in the Decontamination Process:

- (a) Specific sampling and monitoring would be carried out to inform the decontamination strategy
- (b) RCG and STAC agree decontamination and waste strategy (includes agreed end point, planning to prioritise workloads, cost estimation, decisions on decontamination technology, disposal routes and monitoring processes)
- (c) Once engaged, the specialist Defra CBRN Emergencies Team contractor(s) will, in accordance with decontamination strategy, provide a plan which will include method statements and risk assessments
- (d) Decontamination carried out (various methods may apply)
- (e) Post decontamination (clearance) sampling carried out
- (f) Final clearance given by RCG / Clearance Committee
- (g) Completion report provided.

11W UTILITIES

During any major incident the utilities have a role to play in order to support the emergency response make sure the situation does not get worse for the community in the long term. The following details the main responsibilities of the utilities.

WATER COMPANIES

Role

Thames Water and South East Water are the main water utility companies covering both areas around the sites. Their main responsibilities are to ensure that the public water supply meets the legal requirements and as a result is fit for human consumption.

Alerting Procedure

The Environment Agency will alert the Water Company (ies) in the affected area. The Water Companies will then alert through their own internal systems.

Actions **REDACTED ON BASIS OF SECTION 38**

The main responsibilities of the water company would be to:

- a. Assess the risk of contamination of the public water supply
- b. Sample surface and, in certain cases, underground water sources used for public supply in an area extending up to or beyond 40km from the site. The samples would be sent for analysis for radioactive materials. This would be in conjunction with the EA and PHE CRCE
- c. Consider the results obtained and any advice received from the Environment Agency in determining appropriate action
- d. Provide advice to customers on public water supplies in accordance with the Public Health guidelines
- e. Support the delivery of alternative drinking water to the affected areas as necessary
- f. Attend the SCG, STAC and/or the RCG at SCC as necessary
- g. Consider water water impacts and provide guidance to customers if alternative actions are required.

COMMUNICATION COMPANIES

Role

The main communications provider, British Telecom, operates a monitoring system for 999 calls and may be alerted to an AWE Off-Site Radiation Emergency in its early stages.

Other communication providers will also monitor their networks to ensure communications are maintained.

Alerting Procedure

Any alert to the communications company would normally be via the SCG or via the responding agencies directly.

Actions

The main actions of all the communications companies are to monitor their networks to ensure communications is maintained

- a) They may be invited to attend the SCG if there is a particular issue to be resolved.
- b) Mobile Communications network operators may be requested to activate the Mobile Telephone Preferential Access Service (MTPAS)
- c) BT on notification of an incident will specifically:
 - i. Maintain a log of all incoming and outgoing messages and a diary of events, times, dates etc.
 - ii. Establish their Emergency Control Group and nominate a BT incident control manager.
 - iii. Establish their Emergency Communications Centre and appropriate local emergency Control Point.

ELECTRICITY COMPANIES**Role**

The role and actions of the electricity companies are to:

- (a) To maintain /restore the supply of electricity
- (b) To isolate and make safe electrical apparatus as necessary.
- (c) Liaison with local authorities and other organisations as appropriate
- (d) To manage and operate electricity distribution to the conditions prevailing throughout the emergency
- (e) To respond to requests to connect and disconnect
- (f) To attend SCG as requested.

Alerting Procedure

Any alert to the electricity companies would normally be via the SCG or via the responding agencies directly.

GAS COMPANIES**Role**

The role and actions of the gas companies are to:

- (a) To maintain as necessary the gas supply

- (b) To connect or disconnect gas supplies as requested
- (c) To attend SCG as requested.
- (d) Alerting Procedure
- (e) Any alert to the gas companies would normally be via the SCG or via the responding agencies directly.

Alerting Procedure

Any alert to the gas companies would normally be via the SCG or via the responding agencies directly.

11X NETWORK RAIL

Role

Network Rail's role is to control the rail network in an emergency. As a result within the DEPZs of the AWE sites there may be a requirement for Network Rail to be involved should the wind direction etc. result in the plume affecting or likely to affect the main London-Newbury or Reading-Basingstoke rail lines.

Alerting Procedure

Depending on the sectors affected and the distances involved of potential contamination then Network Rail will be notified by the British Transport Police or West Berkshire District Council.

Actions

Network Rail will:

- (a) Ensure that the users of the lines affected are informed of the incident, including Train Operating Companies (GWR, South West Trains etc.) and Freight Operating Companies.
- (b) Inform their National Operations Centre, other affected Routes, and controlling signal boxes for the area.
- (c) Work with other agencies at the most appropriate command level to ensure the most appropriate action is taken to secure the safety of all staff, passengers, freight and trains on the affected lines.
- (d) Ensure that any affected trains are properly identified and cleaned in conjunction with advice and guidance provided by STAC and the SCG/RCG.

Follow advice from STAC and the SCG/RCG in terms of closing and re-opening lines.

11Y HIGHWAYS ENGLAND

Role

Highways England manages the strategic road network in England, comprising motorways and some A roads. This is performed by the TOS (Traffic Officer Service) and Service Provider contracted to maintain.

Highways England Traffic Officers and their Service Provider would be responsible, for providing assistance to the Emergency Services in the event of an incident at AWE Aldermaston with actual or potential off-site consequences where the need for closures on the SRN would be required.

Alerting Procedure

In the event of an offsite incident at AWE, Highways England East Regional Operations Centre (ROC) would be informed by West Berkshire District Council, the Emergency Services (Police for AWE Burghfield only) in accordance with the procedure in the Emergency Plan.

Actions

The East Duty Regional Control Centre (RCC) Manager will:

- (a) Record full details of the incident, immediately open a log and call back to West Berkshire District Council in order to verify the message.
- (b) Inform the Duty Operations Manager
- (c) Inform the South-East Emergency Planning Team
- (d) Inform Service Provider and place on standby in case any closures are to be implemented on the SRN

11Z OTHER ORGANISATIONS

Other individual organisations may be involved as and when required. It may be none or only one or two are involved. However it may be that in a significantly large incident then more organisations will be called upon to assist.

Other organisations that may be asked to assist include:

The Military - Military Aid to the Civil Authorities (MACA)

Joint Doctrine Publication (JDP) 02 (Third edition) 2017 – Operations in the UK – The Defence Contribution to Resilience (available on GOV.uk) defines the policy for operations in the UK in support of civil authorities. Following a Defence nuclear emergency, in addition to the pre-planned military support required by the MCA to deal with their tasks, the civil authorities may also require additional military aid which would be requested under MACA arrangements.

Voluntary Agencies

Would assist with Rest Centres etc. and would be coordinated by the relevant Local Authority

Road Transport organisations

To provide transport required of essential plan and machinery.

Passenger Transport Organisations

To provide transport for people in the event of any necessary temporary re-location of affected people

Other Local Authorities

To provide manpower and specialist equipment etc. under MOU agreements.

11AA SCIENTIFIC & TECHNICAL ADVICE CELL (STAC)

Role

STAC will provide timely and effective technical and health advice to the SCG in order key decisions can be made. Its remit is to:

- (a) Take advice on the scientific and health aspects of the incident from a range of experts;
- (b) Provide advice to the SCG on the health consequences of the incident including the consequences of any evacuation or sheltering policies;
- (c) Confirm with the SCG the advice to be given to the public on the health aspects of the incident;

If necessary, the STAC will:

- (a) Liaise with Department of Health and Social Care, DEFRA and other governmental bodies
- (b) Formulate advice to health professionals involved in the incident, such as hospitals, ambulance services, general practices and NHS Direct formulate advice on strategic management of the health service response to the incident.

For an AWE incident with off-site radiological consequences, a STAC should be set up automatically. In non-radiological incidents, a STAC may be requested by the Police Incident Commander but may be recommended by a senior public health professional due to the potential impact on health and the local population from an actual or evolving incident.

The composition and function of the STAC will be incident specific and tailored to local requirements and to provide the best advice to the SCG for decisions to be made.

Alerting Procedure

In the event of an off-site incident at AWE, STAC would be established by PHE SE in accordance with the procedure in the STAC Plan.

STAC Membership

The likely membership of the group for an AWE incident will include:

- (a) Public Health England
- (b) Public Health England – CRCE
- (c) West Berkshire District Council – Environmental Health
- (d) Berks LA Shared DPH Consultant
- (e) Other LA - Environmental Health - dependant on area affected.
- (f) MOD
- (g) Environment Agency
- (h) Food Standards Agency
- (i) Thames Water
- (j) AWE
- (k) ONR
- (l) Met Office
- (m) and others as deemed necessary at the time.
- (n) STAC Chair and Support

The STAC if called will be chaired by PHE as per the PHE South East STAC Plan. In order to support the STAC chair often a non STAC member is included to support the coordination. A TVP member of staff will support the STAC at the SCC

STAC Considerations re: AWE Incident

Due to the nature of the site some of the initial considerations will be:

- (a) What agents are we are dealing with? Radiation? Chemical? Both?
- (b) How much is there of it?
- (c) Where is it?
- (d) What are the likely health effects?
- (e) What is the monitoring strategy?

STAC Quick Guide to AWE Incident Considerations

In considering items in the DEPZ the following table provides some guidance:

(a)	<p>The main types of radioactive materials used at AWE are:</p> <ul style="list-style-type: none"> • Plutonium • Uranium • Tritium. <p>There are other sources of radioactivity used for safety checks and normal industrial purposes (e.g. sources for radiography). These are well controlled, pose no threat to the public and have no potential for any off-site emergency response action</p> <p>See Section 2.5 & Section 2.6</p>
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(b)	<p>A release of radioactive material off-site from either the Aldermaston or Burghfield licensed sites is unlikely to lead to a significant dose to a member of the public.</p> <p>A release of radioactive material would not lead to acute (deterministic) radiation effects.</p>
(c)	<p>Atmospheric releases may be accompanied by a visible plume of smoke. However, given the properties of the radioactive material, the association of any visible smoke plume with the deposition of radioactive material may not be accurate.</p>
(d)	<p>In the event of a major release of radioactive material, the dose to the general public would be minimised by the appropriate imposition of off-site protective actions, as implemented by Local Authorities and their support services. These include the issue of instructions for the public:</p> <ul style="list-style-type: none"> • to shelter, which reduces the inhalation and irradiation doses, and • to evacuate (short term relocation may be a better term), which prevents further exposure by moving the public from the affected area. <p>The closer to the site boundary the greater the risk for the need for urgent evacuation particularly out to approx 150m with subsequent evacuation needed out to 600m.</p> <p>Vulnerable sites are more likely to need evacuation.</p>
(e)	<p>There will be no acute effects amongst the public outside the site boundary as a result of exposure to radioactive material.</p>
(f)	<p>Contaminants may be detectable outside the Detailed Emergency Planning Zone (DEPZ) for each site following an incident.</p>
(g)	<p>Key to the decisions is monitoring data and a monitoring strategy. Section 7.1</p>

Link to other Groups

During the response phase the STAC would be in place in order to support the SCG. The STAC would also share information with SAGE (Scientific Advisory Group for Emergencies), which is the national advisory group advising the Cabinet Office Briefing Room (COBR) in an emergency. More information in relation to the procedures is found on ResilienceDirect.

The STAC would also provide advice to support the Recovery Coordinating Group (RCG).

Once the response phase had been completed and hand over from the Police to the Local Authority to lead on the recovery has been achieved it may be necessary for the STAC in full or elements of it to continue to exist in order to support the RCG. If this is the case the chair of the RCG should raise this with the chair of the STAC and agree a way forward.

It may be that elements of the STAC become part of the RCG main group or as part of a sub group as necessary.

Annexes **REDACTED ON BASIS OF SECTION 38**

Annex A: Communications Directory

This is stored on RD

Annex B: AWE Warning and Informing Plan

This is stored on RD

Annex C: AWE Transport Plan

This is stored on RD

Sources of Supporting Information

There are a number of sources of information which provides other background information relation the legislation and the sites including:

[AWE](#)

www.westberks.gov.uk

[HSE](#)

[Office for Nuclear Regulation](#)

[National Nuclear Emergency Planning and Response Guidance](#)

[Public Health Protection in Radiation Emergencies](#)

Glossary of Terms

This document uses the terms and acronyms described in the UK Civil Protection Lexicon issued by the Civil Contingencies Secretariat:

<https://www.gov.uk/government/publications/emergency-responder-interopability-lexicon>

Acronym/ Term	Meaning
ALARP	As Low As Reasonably Practicable
AWE	Atomic Weapons Establishment
AWE(A)	AWE Aldermaston
AWE(B)	AWE Burghfield
BC	Borough Council
BDBC	Basingstoke & Deane Borough Council
BEIS	Department for Business, Energy and Industrial Strategy
CAA	Civil Aviation Authority
CBRN	Chemical Biological Radiation and Nuclear
CCG	Clinical Commissioning Group
CCS	Civil Contingencies Secretariat
CMC	Crisis Management Centre
COBR	Cabinet Office Briefing Room
COI	Central Office of Information
COMAH	Control of Major Accident Hazards Regulations 2015
COP	Common Operating Picture
CRIP	Commonly Recognised Information Picture
DEFRA	Department of Environment, Food and Rural Affairs
DEM	Duty Emergency Manager
DEPZ	Detailed Emergency Planning Zone – a defined area set by WBDC where detailed and immediate off-site emergency arrangements are required to protect the public from the effects of a radiation emergency.
DERP	Defence Environmental Restoration Program
'dose'	The amount of radiation energy imparted to the human body
DNO	Defence Nuclear Organisation
DPH	Director of Public Health
EA	Environment Agency
ECC	Emergency Control Centre
EELs	Emergency Exposure Levels
EHO	Environmental Health Officer
ERL	Emergency Reference Levels - used to plan which protective actions would be most suitable in particular circumstances by means of an upper and lower level of avertable dose
EM (A)	Emergency Manager (Aldermaston)
EM (B)	Emergency Manager (Burghfield)
EMARC	Environmental Monitoring and Response Centre
'emergency exposure'	An exposure of an employee engaged in an activity of or associated with the response to a radiation emergency or potential radiation emergency in order to bring help to endangered persons, prevent exposure of other persons or save a valuable installation or goods,

Acronym/ Term	Meaning
	whereby one of the individual dose limits referred to in paragraphs 1 and 2 of Part 1 of Schedule 3 to the 2017 Regulations could be exceeded
'emergency worker'	Any person who has a defined responding role in this plan, and who might be exposed to radiation as a result of a potential or actual radiation emergency
EOC	Emergency Operations Centre
EOCC (A)	Emergency Operations and Control Centre (Aldermaston)
EOCC (B)	Emergency Operations and Control Centre (Burghfield)
EP	Emergency Planning
EPO	Emergency Planning Officer
FCP	Forward Control Point
FEPA	Food & Environmental Protection Act 1985
FPOC	Team First Point of Contact (MOD)
FRS	Fire and Rescue Service
FSA	Food Standards Agency
GLO	Government Liaison Officer
GLT	Government Liaison Team
HART	Hazardous Area Response Team
HCC	Hampshire County Council
HECA	Hazard Evaluation & Consequence Assessment
HMEPA	Hazardous Material Environmental Protection Advisor
HoS	Head of Service
HQ	Headquarters
HQ DNEO	Headquarters Defence Nuclear Emergency Organisation (MOD London)
IAEA	International Atomic Energy Agency
INES	International Nuclear Events Scale
IRR	Ionising Radiation Regulations 2017
JRLO	Joint Regional Liaison Officer
LA	Local Authority
LALO	Local Authority Liaison Officer
'lead local authority'	Where more than one local authority is involved the 'lead local authority' are the local authority in which the premises are situated
LGD	Lead Government Department
LLC	Local Liaison Committee
LO	Liaison Officer
LRF	Local Resilience Forum
MAC	Media Advisory Centre
MACA	Military Aid to the Civil Authorities
MAIC	Multi-Agency Information Cell
MBC	Media Briefing Centre
MCA	MOD Coordinating Authority
MDP	Ministry of Defence Police
MHCLG	Ministry of Housing, Communities and Local Government
MHCLG RED	MHCLG Resilience & Emergency Division
MICR	Major Incident Control Room
MIP	Major Incident Plan

Acronym/ Term	Meaning
MOACC	Met Office Advisor Civil Contingencies
MOD	Ministry of Defence
mSv	milliSieverts
NAME	Numerical Atmospheric Modelling Environment
NERO	Nuclear Emergency Response Organisation
NHS	National Health Service
OOH	Out of Hours
OiC	Officer in Charge
ONR	Office for Nuclear Regulation
ONR RCIS	Office for Nuclear Regulation Redgrave Court Incident Suite
OPZ	Outline Planning Zone - A zone beyond the DEPZ building on the existing arrangements and capabilities to provide commensurate planning for low probability events of extremely unlikely but more severe
PACRAM	Procedures and Communications in the event of a Release of Radioactive Material
PHE	Public Health England
PHE CRCE	Public Health England Centre for Radiation, Chemical and Environmental Hazards
PIC	Public Information Centre
PIO	Press and Information Officer
PPE	Personal Protective Equipment
PR	Public Relations
'protective action'	An action or actions taken in order to prevent or reduce the exposure of emergency workers, members of the public, the environment or the contamination of property from ionising radiation in the event of a radiation emergency
PROW	Public Rights of Way
'radiation emergency'	A non-routine situation or event arising from work with ionising radiation that necessitates prompt action to mitigate the serious consequences.
RBC	Reading Borough Council
RBFRS	Royal Berkshire Fire & Rescue Service
RCC	Regional Control Centre
RCG	Recovery Coordinating Group
RED	Resilience & Emergency Division (MHCLG)
REL	Rear Echelon Link
REPPIR	Radiation Emergency Preparedness and Public Information Regulations 2019
RF BDE CDR	Regional Force Brigade Commander
RIMNET	Radiological Incident Monitoring Network
RMU	Radiation Monitoring Unit
RPA	Radiation Protection Advisor
RRT	Regional Resilience Team
RVP	Rendezvous Point
SAGE	Scientific Advisory Group for Emergencies

Acronym/ Term	Meaning
SBC	Slough Borough Council
SCAS	South Central Ambulance Service
SCC	Strategic Coordinating Centre
SCG	Strategic Coordinating Group
SITREP	Situation Report
SSA	Senior Scientific Adviser
STAC	Scientific & Technical Advice Cell
TVP	Thames Valley Police
UPA	Urgent Protective Action
WBC	Wokingham Borough Council
WBDC	West Berkshire District Council

Item No.	Application No. and Parish	Statutory Target Date	Proposal, Location, Applicant
(1)	19/01063/COMIND Aldermaston	6 TH August 2019	Construction of class A1 foodstore, car parking and access and landscaping. Land south of Ravenswing Farm, Adjoining Aldermaston Road and Silchester Road, Tadley Lidl GB Limited
¹ Extension of time agreed with applicant until 13 th December 2019.			

To view the plans and drawings relating to this application click the following link:
<http://planning.westberks.gov.uk/rpp/index.asp?caseref=19/01063/COMIND>

Recommendation Summary: The Head of Development and Planning be authorised to Refuse planning permission.

Ward Member(s): Councillor Dominic Boeck.

Reason for Committee Determination: The application is called to Committee by the Development Control Manager as the application has attracted much public interest – objection and support.

Committee Site Visit: 27th November 2019.

Contact Officer Details

Name: Michael Butler
Job Title: Principal Planning Officer
Tel No: 01635 519111
Email: michael.butler@westberks.gov.uk

1. Introduction

- 1.1 This application seeks planning permission for the erection of a food store [for Lidl] of 2177m² gross floor space with a net sales area of 1,411m². Associated with the store will be 128 parking spaces for cars, [including 8 disabled spaces and 8 for parent and child] 2 motorcycle spaces and 10 “Sheffield” stands which will accommodate up to 20 cycles. Vehicular access will be derived off the Aldermaston Road to the west of the site, with a right turning lane for northbound traffic. The application is a full application with no subsequent matters reserved for planning approval i.e. at this stage the applicant is seeking approval of access, layout, appearance, landscaping and scale.
- 1.2 The application site is about 0.9ha in extent and is located at the junction of the Aldermaston Road with Silchester Road, immediately to the north of the built up area of Tadley—which lies in Basingstoke and Deane Borough Council jurisdiction. It is presently an open grass field forming part of a wider agricultural land holding. The site currently has mature hedge rows facing both principal roads as mentioned: if the development were to proceed, those to the north would be cut back considerably in order to obtain the road widening required in the highway to accommodate the right turn lane, whilst still retaining the footway. Just for clarity the site is green field and lies outside any defined settlement boundary in the Local Plan.
- 1.3 The proposed store will be single storey, 32m in width and 73m in length. Its height will be just over 7m. The external facing materials are to be of traditional style, with red facing brick, [two proposed varieties of red/brown] timber effect cladding, white panelling, and a monopitch roof with a solar panel array: this will assist the BREEAM rating of the proposed store. In addition, on the south elevation there will be full height glazing, with the standard LIDL advertisement logo [subject to separate advertisement consent should this application be approved]. For clarity the original submitted plans included a far more modern style of materials, but these have since been amended to create a less contemporary approach.
- 1.4 Surrounding the building [via the amended plans] will now be a new landscaping strip, which will serve to reduce the future visual impact of the building. This strip of land on the north and east facing boundaries is not within the original red line of the application plans, but understood to be within the control of the applicant, via contract with the existing landowner. Should permission be granted, the landscaped area will then be required to be delivered via a s106 planning obligation. It cannot be delivered via a condition. On the proposed plans the western and southern boundaries [facing the two highways] are within the red line and there is to be a minimum 5m wide buffer strip here.
- 1.5 To assist public access to the site other than by the private car, a new footpath is proposed on the south western corner which will provide direct access to Tadley town centre.
- 1.6 The applicants have made much play of the fact that if planning permission is granted, they will be the food retailer to occupy the store. Whilst the case officer has no reason to doubt this point, the Committee will need to be aware that if they elect to approve the application tonight, it will be a store for any food retailer, not the discount retailer identified. That is to grant a “personal” permission to the Company would not comply with the NPPF tests on conditions.

2. Planning History

- 2.1 The table below outlines the relevant planning history of the application site.

Application	Proposal	Decision / Date
154650/OUT	Construction of indoor sports hall, and outdoor playing fields, MUGA, and changing facilities.	Approved 2000.

- 2.2 Just for clarity the siting of the above permission lies considerably to the east of the present application site.

3. Procedural Matters

- 3.1 The site notice was originally displayed on the site on the 21st of May 2019, expiring on the 12th June. An amended plans site notice has been displayed on the 8th November with an expiry of the 29th November 2019. In addition the application was advertised as a formal departure from the Development Plan on the 21st May.
- 3.2 The application, being A1 space, will be CIL liable. The present CIL rate is just under £154/m² GIA so if the application were approved and built the CIL figure would be approximately £335,000.
- 3.3 The case officer has examined whether the application is required to be screened under the 2017 Environmental Impact Assessment Regulations. The application type is an urban development project under Schedule 2, part 10[b] of those Regulations: but it does not meet the scale thresholds identified and similarly, does not lie in a sensitive area as defined in the Regulations/DMPO. Accordingly, no environmental statement is required to be submitted with the proposal.

4. Consultation

Statutory and non-statutory consultation

- 4.1 The table below summarises the consultation responses received during the consideration of the application. The full responses may be viewed with the application documents on the Council's website, using the link at the start of this report.

Aldermaston Parish Council:	Resolved to raise no objections, but subject to the following observations –traffic concerns, reservations about building on a greenfield site, and precedent set, limited parking on the site, and if scheme does proceed, will need to re assess bus stop location on the A340. Amended plans—views awaited.
Tadley Town Council.	Do not object or support—however welcome the addition of a new food store bringing more choice and competition to local residents. However worried about the access particularly at peak periods, and the location of the bus stop.
Silchester Parish Council.	No objections, but remain worried about additional traffic movements attracted along the Silchester Road to the site—seek

	contributions towards traffic calming measures accordingly in the village.
Baughurst Parish Council.	Not invited to comment, but wish to raise concerns about local traffic increase at an already very busy road junction. Do not object to the store per se however.
WBC Highways:	Original plans –objection. Amended plans. No objections on the basis that the right turning lane is provided adjacent the site. Car parking is adequate in addition. Traffic generation is on balance acceptable, No s 106 sought. Conditional permission is recommended.
WBC Planning Policy.	Do not object per se, but it is clear that the application scheme does not comply with Development Plan policy as it lies on a greenfield site outside any defined settlement boundary. No need for new convenience store in the District, but the store will serve Tadley. Query re the sequential test in addition. Policy ADPP6 in the Core Strategy is not satisfied.
WBC Economic Development officer	Supports the application. It will provide up to 40 new jobs on the site, many of which will be part time and lower paid, which is the job profile of the employment created. In addition, the creation of more choice and cheaper food will be of economic benefit to the local population.
HCC Highways	Originally objected in terms of concerns on impact on the A340 corridor at peak periods for the AWE. However after subsequent modelling undertaken, the provision of the right turn lane for northbound traffic will alleviate the situation, so removing the objection. No s 106 sought.
Basingstoke and Deane BC.	Originally objected to the application. Concerned about retail impact upon the District centre of Tadley. Further details about future catchment, trade draw and turnover assumptions of nearby stores need to be addressed. Details supplied—objection formally removed. If approved should condition nature of the food sales to restrict the range so that it remains a discount store.
WBC Emergency Planning	The application should be rejected. This is on the basis that the site location is within the inner protection zone of the AWE, it is greenfield so will bring additional population into the zone, it will require evacuation in the event of an incident, and the ability of store staff to respond adequately is questioned. Updated Emergency Plan submitted. Not satisfactory. Further report to be submitted; views awaited-see the update sheet.
Archaeology	No objections. Site may be of interest. Written scheme of investigation required.
Minerals officer.	The site is of known interest for gravel extraction. This should be conserved according to extant policy. However given the proximity of built form and the small scale of the application site, no objections are raised.

SUDS	Further additional detail is required in order that flows from the site do not cause problems outside the site. Matter can be technically resolved .Conditional permission should approval be forthcoming.
Thames Water	The application site lies within 5m of a strategic water main—the wayleave must be protected. Conditional permission –controls the issue identified. No objections otherwise.
Natural England	No objections raised. No protected species impacted, and no sites of ecological importance.
Transport policy	The site location is sustainable, being close to bus services and large areas of population. Seek electric vehicle charging points on site plus the implementation of the travel plan. Conditions recommended.
Environmental Health.	No objections –conditional permission. Dust suppression during construction, working hours, and noise from on site plant, including air conditioning.

Public representations

4.2 At the time of writing the report there are a total of 911 contributors, 849 of which support, and 55 of which object to the proposal. 7 representations are ambiguous.

4.3 The full responses may be viewed with the application documents on the Council's website, using the link at the start of this report. In summary, the following issues/points have been raised in the **objections**.

- Building on a greenfield site.
- Outside settlement boundary.
- Traffic impact.
- Disruption to pedestrian and cycling flows through the area.
- Compromise air quality.
- Loss of agricultural land.
- Site used for the historic treacle fair.
- Impact upon ecology will be detrimental.
- Do not need another food store.
- Why not choose a brown field site?
- Visual impact –too much built up area.
- Significant effects on local noise and pollution.
- Wrong in principle for a Company to purchase land and then obtain permission.

4.4 The letters in **support** are as follows.

- The introduction of the new store will provide good competition for the existing Sainsbury's store. Food prices will fall.
- The store will provide additional jobs.
- With new housing being built in the area more food shopping choice is needed.
- Will mean fewer trips to other stores outside the Tadley area so saving time and money and fewer cars on the wider road network as a result. It will reduce costs for hard working families in the area.

4.5 The 7 letters of **ambiguity**.

- On the one hand want to see a Lidl store in Tadley, but concerned about the location in regards to taking up a greenfield site and traffic worries.

5. Planning Policy

5.1 Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The following policies of the statutory development plan are relevant to the consideration of this application.

- Policies ADPP1 [Spatial Strategy] ADPP6 [Kennet Valley] and CS8 [Nuclear Installations], CS11 [Hierarchy of Centres], CS13 [Transport] CS14 [Design Principles], CS18 [Green Infrastructure] and CS19 [Landscape Character] of the West Berkshire Core Strategy 2006-2026 (WBCS).
- Policy OVS6 [Noise] of the West Berkshire District Local Plan 1991-2006 (Saved Policies 2007).

5.2 The following material considerations are relevant to the consideration of this application:

- National Planning Policy Framework (NPPF) 2019.
- Planning Practice Guidance (PPG)
- WBC Quality Design SPD (2006)
- WBDC Landscape Character Assessment of 2019.
- West Berkshire Retail and Leisure Capacity Assessment of 2017.

6. Appraisal

6.1 The main issues for consideration in this application are:

- The principle of permitting or rejecting the development.
- The visual impact on the surrounding area in landscape terms
- The retail issues surrounding the application.
- The highways issues
- Nuclear safety issues

Principle of development

6.2 Policy ADPP1 in the WBCS sets out the overall spatial strategy behind the Local Plan for new development. It sets out a hierarchy of settlements in the District, accordingly. Aldermaston is the “lowest” in this range, being [inter alia] a Service Village: this is where there is to be a limited range of services and some limited development potential. Accordingly, by definition to permit a large food store clearly runs contrary to this policy. Having said that, to be “fair” to the applicants, the principal purpose of the application will be to serve another settlement outside the District i.e. Tadley which is effectively a small town. So, whilst the Committee will need to take into account these Council policies, they should also take into account the needs of adjoining residents nearby. In policy ADPP1, in addition, most development will be directed towards land within **or adjacent to** settlements. The application site does lie adjacent the boundary of Tadley

in the Basingstoke and Deane BC Plan and the site is greenfield as noted and forms no part of an allocation, in the West Berkshire Core Strategy.

- 6.3 Policy ADPP6 corresponds specifically to the East Kennet Valley in which the site is located. In terms of the environment section, the first bullet point identifies the fact that the character of settlements will be conserved and enhanced, by ensuring that any development corresponds positively to its local context. In this case officers consider that the introduction of a 2177m² food store on a green field site, with much associated hardstanding, will certainly detract from the attractive and soft landscape context to the north of Tadley—and so will run contrary to this part of the policy. In the Community Infrastructure and Services section, it is noted that the boundaries of retail and other services will be defined via the Site Allocations and Delivery DPD. It is apparent that no such allocation or boundary has been made in this document to allow for the new food store.
- 6.4 Policy CS8 in the WBCS corresponds to nuclear safety. This issue is considered in more detail later on in the agenda report.
- 6.5 Policy CS11 identifies the hierarchy of centres in the District. This notes that Aldermaston is a local and village centre. It would not normally be appropriate to permit such a major new retail store therefore in the parish, but as mentioned above, this store is to primarily serve Tadley. This policy can be “discounted” to that extent, without prejudice to the final officer recommendation for refusal. Policy CS13 considers transport issues which will be examined later.
- 6.6 Policy CS18 identifies green infrastructure across the District. This includes grasslands, of which the application site is comprised. The policy notes that the loss of green infrastructure will not be permitted. Accordingly this application would be contrary to the policy in hand. Secondly policy CS19 relates to Historic Environment and Landscape Character. This notes that the diversity and local distinctiveness of the landscape should be conserved and enhanced. Settlement patterns, and in particular how natural boundaries relate to the setting of built up areas, are important to protect. In this case there is little doubt in officer’s view that the incursion of such a major built form on this setting to the north of Tadley and to the south of Aldermaston parish will harm that local distinctiveness to its overall detriment: the proposal is thus taken to be contrary to policy CS19.
- 6.7 To conclude on the policy issues in the WBCS it is apparent that the application does not conform. Hence its advertisement as a departure from the Plan. Even if the Committee considered all other planning matters were acceptable on the application, it is considered that the application still remains unacceptable on this sole basis.
- 6.8 The Committee will also need to be aware of saved policy OVS6 in the WBDLP of 1991 to 2006 .This relates to noise control. It is noted that dwellings lie in fairly close proximity to the application site so it is important to take any noise issues into consideration, which might impact upon adjoining amenity, in this respect.

Landscape character

- 6.9 The Council has very recently published on its website the District Wide Landscape Character Assessment [LCA] of 2019. This is a detailed and comprehensive document which brings all the past three assessments together and updates then in regard to most recent policy in the WBCS and the NPPF of 2019. The LCA divides the whole of the District into a number of sub character areas which it then goes onto describe in some detail and to promote development management tools to conserve and enhance that landscape type in the face of ongoing pressures—such as from this application.

- 6.10 The application falls into LCA type WH5 which comprises the Burghfield Woodland and Heath land mosaic, which is largely but not wholly a plateau feature, south of the Kennet Valley. It is compromised by the significant MOD sites such as the AWE and substantial built up areas—which include Aldermaston in part and Tadley. Accordingly the landscape is not of the highest value, but remains valuable in its own right, as espoused by the NPPF. In paragraph 170 of the latter, in section b] it notes that all countryside should be recognised for its intrinsic character and beauty, whether formally designated or not. The WH5 type has no formal designation as such.
- 6.11 Section 3 of the LCA policies focusses on how to protect the open areas in WH5, and notes that the settlement fringes should be carefully managed, in order to prevent the suburbanisation of that fringe and in addition to prevent the coalescence of settlements. Officer's view is that whilst the pasture land in question may not be "high value" per se, it performs an important function in providing a soft visual backdrop to all the buildings in the vicinity as the site visit will indicate. This is helped by the strong hedgerows which will be inevitably impacted seriously by the new development, opening up the past rural views to one of built form. Notwithstanding the proposed additional landscaping proposed by the applicant in the amended plans [which is helpful to a degree in mitigating the overall visual harm caused by the new store], it is clear that the scheme will still damage the surrounding area, to its detriment, so being contrary not only to the advice in the evidence base of the LCA, but also the advice in the NPPF and policy CS19 in the WBCS.
- 6.12 The Committee should also be aware that to the north of the application site runs a public right of way [prow] which is well used by the local population: it is inevitable that the rural and tranquil experience formed by using this public right of way will be harmed by the introduction of significant new built form to the south i.e. the new store. There will be a degree of new noise and disturbance caused by the vehicle traffic movements and deliveries in addition, plus the necessary security lighting which will create cumulative harm. The LCA notes in particular the significance of tranquillity—it is accepted that the presence of the AWE and the housing near the site means tranquillity is compromised, but this is an argument to preserve what open areas remain all the more important. In addition, whilst precedent can be a circular debate, it is quite conceivable that once this development boundary is breached, pressure in the future will mount for more incursions into the green fields around the site, which will clearly be more harmful.
- 6.13 The applicants have submitted an updated LVIA on the proposed scheme. This has carefully examined the proposal in the light of the existing physical surroundings of Tadley and Aldermaston, plus the existing policy base. A total of 22 viewpoints have been examined to see if and where the new store will have a detrimental impact. It is telling to note that on a number of points the consultants conclude that the impact on views will be moderately adverse, although the wider impact on the local landscape will be less so. Your officers concur with this point. These viewpoints are primarily from the main highways which are in the public domain.
- 6.14 In conclusion it is officer's view that the presence of this major new store on the greenfield site to the north of Silchester Road "in" the Tadley area will be harmful and should not be permitted on the grounds of visual and landscape impact, contrary to policy. This will accordingly be a specific reason for refusal in the recommendation.

Retail policies

- 6.15 The Committee need to be aware, in the planning balance, in examining this application the retail issues surrounding the proposal. These are varied but basically comprise the following, in summary: whether the store is appropriately located, in terms of sustainability and the sequential test as advocated in the NPPF. Whether there is an "exceptional" need for the new store, which would override any other negative policy

views and finally whether the introduction of the store will have a harmful impact on the future viability and vitality of the centres around the site, including Tadley, albeit outside the District.

- 6.16 The NPPF in chapter 7, seeks to ensure the continuing vitality of town centres, which is becoming increasingly important in the light of far more consumer expenditure via the internet, which may now comprise circa 20% of all such retail spending. One of the methods of achieving this aim, is to apply what is known as a sequential test to any application for main town centre uses [para 86] which are neither in an existing centre, nor are in accord with an up to date plan. This is reiterated in the WBCS in the supporting text to policy CS11 in para 5.69. Basically, town centre uses should first be directed towards a centre, then edge of centre [within 300m] then out of centre, then elsewhere. Effectively the current application site is the latter. The site is certainly not allocated for new retail space in the District Local Plan. If the judgement on the sequential test was to be applied only to centres in West Berkshire, the application would certainly fail as the closest settlement would be Aldermaston to the north, and Brimpton to the west. However it is clear that it would be nonsensical to apply this strict approach in this instance, since Tadley lies immediately adjacent to the site with the centre being only some 200m to the south. Taking this into account means that having examined any future available sites sufficient to meet the space needs of this store in the immediate surrounding area, none are available. Without prejudice it is regrettable that no suitable brownfield site is available since in purely locational terms, such a site so close to the Tadley centre would be normally encouraged on the grounds of sustainability alone. Be that as it may, officers are satisfied that the sequential test is met in this proposal so no retail reason for refusal is recommended on this basis.
- 6.17 The next principal issue which the Committee will need to take into account is retail impact. This is an important matter since, if an existing centre is affected badly in retail draw terms by the introduction of a new store, this will be detrimental to its future vitality and ability to attract future investment: this in turn will affect the centres continuing attractiveness and viability, so having a negative impact on future community cohesion. Again, in this instance since the immediate catchment of the proposed store will be very largely Tadley, the impact on stores a greater distance away, such as discount stores in Newbury [e.g. Aldi], and others in West Reading, and Theale will be minimal. The most serious impact will be upon the present Sainsbury's store in Tadley town centre which is predicted to be a loss of circa 9.8% of turnover i.e. £3.8million in the projected year of 2024. A number of points to consider here: firstly it is recognised that the Sainsbury's store is "overtrading" in terms of increased turnover well above Company averages, given the lack of competition in the locality. Secondly it is pertinent to note that no objection has been received from that Company to the application. Thirdly it is germane that Basingstoke and Deane BC have not formally objected to the application on retail impact grounds, which would affect Tadley, a District centre in their Local Plan. It is also relevant that in para 89 of the NPPF where there is no locally set threshold, local planning authorities may only request an impact assessment if an application is in excess of 2500m². The Council has no locally set threshold so the figure of 2500m² applies. The Lidl application is 2177m². Notwithstanding, the applicant has submitted an impact assessment which has been helpful. To conclude on the retail impact issue this will accordingly not form any part of a reason to refuse the application. It is expected that the application will simply serve to improve Lidl's market share in the area and indeed improve price competition, whilst reducing the leakage of retail household expenditure on discount food stores outside the Tadley area. This is of substantial retail benefit.
- 6.18 The final retail issue to take into account is retail need. It is of note that retail need is now not a test in the NPPF which can be applied to such applications. However, your officers believe this is still of relevance as a) the applicants have prayed this in aid in support of the application, and b) if an exceptional need were to be demonstrated [

similar in principle to e.g. agricultural workers dwellings which then permits new development in the countryside] then on balance the application could be capable of approval. The Council has recently published in 2017 a West Berkshire Retail and leisure needs assessment. This has been on the website for some time. This report makes it very clear that no specific need for additional convenience goods is identified in this part of the District up to 2036. In fact in some areas such as Newbury there is almost “too much “space. The applicants however say this is of little relevance since it is the local needs of Tadley which must be borne in mind—which is accepted in principle. At no point however have the adjacent Borough Council actively supported the application, noting that a specific need is required to be met—they merely have not objected to the application. It is accepted that should this store be approved it would receive much local support for additional discount food shopping in the area, which is evidenced by the many hundreds of letters of support. But this level of support would presumably be for a Lidl store anywhere in the Tadley vicinity, not specifically on this greenfield site .It is the latter point which is fundamental to officers view on the application. As there are already a number of food retailers in the town, such as Budgens, the Co-op and of course Sainsbury’s, it is not as if no other food stores are available. Accordingly, to conclude on this issue, in the absence of any special justification to overrule well established and extant up to date development plan policies for the continuing protection of the countryside, the application is not supported on the basis of exceptional retail need.

- 6.19 For clarity in the reasons for refusal, no specific retail reasons are included: the lack of retail need cannot be added in, since this is now no longer a test in the NPPF so would not be upheld at any potential appeal. The application satisfies the impact and sequential tests as identified above.

Highway issues

- 6.20 It was proposed to access the site via the A340 Aldermaston Road by a turn right lane and ghost island with a 9.0 metre wide access road. A pedestrian access is provided further to the south near the A340 Aldermaston Road / Mulfords Hill / Silchester Road traffic signal junction. Sight lines of 2.4 x 43.0 metres are provided which comply with standards set in the governments Manual for Streets. Some ‘Keep Clear’ markings will be required on the A340 southbound to ensure that traffic potentially queueing at the traffic signal junction will not prevent vehicles from turning into and from the site. Also with the traffic signal junction immediately to the south, there should be sufficient pauses in traffic flows on the A340 northbound to assist traffic turning right from the site. Highway Officers have been liaising with counterparts in Hampshire County Council. Highway Officers from both authorities are content with the proposed access. The access will need to be provided via Section 278 of the Highways Act 1980. The West Berkshire Council Parking Standards from Appendix 5 of the Local Plan Saved Policies 2007 require one space per 14 sq m gross floor equating to 156 car parking spaces. A lesser provision of 129 spaces is provided equating to one space per 17 sq m. Therefore the car parking provision does not meet the current standards. However these standards are somewhat outdated and are “maximum” provisions. Data has also been submitted from surveys of other Lidl stores submitted in the south. All show a lesser parking demand than what is proposed. While highway officers still have concerns from the above, it would be difficult to argue that there is insufficient car parking proposed for the store. Parking for cycles seems to be provided in line with the *cycle and Motorcycle Advice and Standards for New Development Guidance Note (2014)*.
- 6.21 Highway Officers are also content with the site layout including facilities for deliveries. To project traffic levels, the Trip Rate Information Computer System (TRICS) has been used. TRICS is a UK and Ireland wide database of traffic surveys including retail stores. Highway Officers have also referred to the data accepted for the new Lidl store at the

A4 Bath Road in Calcot. This was approved with planning application 15/02794/COMIND.

6.22 The following traffic projection is therefore made:

	Arrivals	Departures	Two way
Weekday 17.00 to 18.00	74	72	146
Saturday 12.00 to 13.00	126	147	273

Projected total traffic generation from the proposal

6.23 It is then common practice when assessing retail stores to consider: Linked and pass-by (non-diverted) trips that are already present on the road network fronting the site, which will turn into the site; Primary transferred trips which are trips which would otherwise choose another store. Instead, they choose to visit the proposed store. New trips that do not appear anywhere on the network prior to the opening of the development; from population data it is projected that traffic to and from the access is distributed circa 2:1 A340 south: A340 north at the proposed site access. This would seem reasonable considering that circa two thirds of Tadley is situated to the south. With the above trip type and distribution, there will be an additional 37 vehicle movements along the A340 (7 from the north, 30 from the south) during the PM peak, with an additional 60 during the Saturday peak (12 from north, 48 from the south). Therefore very little additional traffic is passing along the A340 into West Berkshire and the A340 Falcon Gyratory. Traffic surveys were undertaken at the following junctions over three days in January and March 2019:

- a. A340 / Silchester Road / Franklyn Avenue
- b. The A340 Falcon Gyratory
- c. A340 / Sainsbury

6.24 From these surveys, the above junctions have been modelled using LinSig, which is a reputable software package used for modelling the capacity of traffic signal junctions. The following scenarios have been modelled for weekday AM and weekday PM and a Saturday peak.

- 2019 Base - From observed traffic flows;
- 2024 Base - 2019, plus traffic growth to 2024
- 2024 Development - as 2024 Base, plus the development.

6.25 From the traffic modelling results, highway officers along with counterparts in Hampshire County Council have no concerns regarding traffic impact on the A340 Falcon gyratory. However there is a concern that during the Friday PM peak by 2024, the southbound traffic queue from the A340 / Sainsbury traffic signal junction will be on average 21 cars in length. This will result in an increased frequency of traffic tailing through the A340 / Silchester Road / Franklyn Avenue junction to the front of the proposed store. This added to the expected traffic queue at the A340 / Silchester Road / Franklyn Avenue junction could result with more frequent traffic queues extending towards the A340 Falcon Gyratory. Despite this there is no possible scheme to improve the A340 / Sainsbury junction. On this basis along with the proposed store projected to marginally increase the southbound traffic queue from 21 to 24 cars, it is considered difficult to raise objection on traffic grounds. Accordingly in conclusion, while some concerns remain from highway officers regarding car parking level and traffic impact on the A340 southbound, it is considered that the concerns are not sufficient to raise objection. This is having regard to the advice on these matters in the NPPF which states that planning applications should only be refused if the impact on the local network is severe.

Nuclear safety issues

- 6.26 The application site lies within the Inner Consultation zone in relation to the AWE site at Aldermaston, which lies some 600m to the north of the site. This inner zone, under policy CS8 in the Core Strategy, mandates consultation with the Office for Nuclear Regulation [ONR] for all planning applications which are either residential or “where one or more additional person may live, work or shop”. Clearly the current application falls within the latter remit. The policy states that in the interests of public safety, development in the inner zones is likely to be refused planning permission where the ONR has objected. At the time of writing this report, the ONR have a holding objection to the proposal, in the absence of a bespoke Emergency Action Plan being agreed for the site, should an emergency occur at the AWE. The Council Emergency Planning Officer has sought to agree such a document, which if the application were to be approved, would be accordingly conditioned in any permission. Again at the time of writing this has not been clarified but the update report will note the conclusions. If the officer still objects then there will be an additional reason for refusal recommended.
- 6.27 The Action Plan submitted by the applicants, in summary, seeks to achieve the following safety procedures on site, should a major incident occur at the AWE site. Firstly, the principal aim of the report is to enable a successful “lockdown” of all staff and shoppers on the site should an emergency happen. Such a lockdown should specifically not impinge upon the successful ability of all the various blue light services to effectively carry out their necessary operations during an incident: accordingly Lidl staff [or the retailer who builds out the scheme] will be trained in the required emergency procedures, how an incident will be notified, actions following that notification, and actions for continuing shelter of people during an event. Clearly the provision of both food and liquids in the store will be easy to obtain, but other matters such as ventilation and waste disposal over perhaps a 24 hour period has to be taken into account. The actions of staff in keeping shoppers calm as well is important as are any evacuation plans.
- 6.28 The applicants have played in aid the fact that many of the shoppers in the store would have been in the vicinity of the AWE site in any event as the catchment of the store is “local” by definition—see the retail section above. This is to an extent true, but the LPA must not resile from its public responsibilities in taking full account of public safety, having regard to the advice in policy CS8 in the WBCS. Accordingly, any planning decision to approve the application must not compromise future public security and health, in accord with the advice in para 95 of the NPPF. This states that [inter alia] “local planning authorities should ensure that operational sites are not adversely affected by the impact of other development proposed in the area”.

7. Planning Balance and Conclusion.

- 7.1 The application must be determined in accord with the Development Plan, unless material factors indicate that the benefits [or negative impacts/harm] caused by the development indicate otherwise. This is enshrined in planning policy advice and guidance. In this instance it is clear that the Council has an up to date plan, so an exception would need to be weighed in the planning balance if the application were to be approved—having regard to the fact that the application is clearly a departure from the Development Plan, being proposed on a green field site outside any defined settlement boundary.
- 7.2 In this instance, on the one hand, account needs to be taken of the apparent local retail need for the store in the Tadley/ Aldermaston retail catchment. On the other hand, the acceptance of this application would not only be contrary to extant policy, for protecting the countryside, but the proposal will also have a visual / landscape character impact,

in addition to a degree of highways impact. What the Committee may also wish to take into account is that having regard to overall sustainability issues and the need to reduce CO2 production where possible, if the application were approved it would reduce car travel to other discount stores in the three main surrounding towns of Reading , Basingstoke and of course Newbury. In addition, should the Council Emergency Planning Officer [via the ONR] continue to object to the application [see the update sheet] this would be a significant negative factor against the application to be taken into account.

- 7.3 So, in economic terms the application is of certain benefit, providing shoppers with the better choice than is presently the case, plus the advent of additional employment in the Town. In social terms an advantage is also gained, by a new meeting place being provided in Tadley. In environmental terms the application fails however, since it will entail the incursion of a greenfield site upon which no exceptional need has been justified. The officer advice is that the scheme, **on balance**, should be rejected for the reasons below.

8. Full Recommendation

- 8.1 To delegate to the Head of Development and Planning to REFUSE PLANNING PERMISSION for the reasons listed below.

1. The application site is located on a green field site outside any defined settlement boundary as identified in the West Berkshire Core Strategy of 2006 to 2026. Accordingly, having regard to the advice in policies ADPP1, and ADPP6 in the WBCS, the application is unacceptable having regard to the overriding need to protect the open countryside from urban growth. This is reflected in the advice contained in para 170 of the NPPF of 2019.
2. The development of this substantial retail store, at this prominent location in terms of public visibility close to main thoroughfares, with the associated access, hard surfacing, car parking and external lighting, will be harmful to both local visual amenity and be harmful to the wider landscape character /setting of the urban built form of Tadley. This in turn will be contrary to the advice in para 170 of the NPPF of 2019, policy CS18 in the WBCS [due to the loss of green infrastructure] and policy CS19 [Landscape harm]. The application is accordingly unacceptable, notwithstanding the proposed additional landscaping around the application site.
3. Potential nuclear safety reason - subject to confirmation.

Item (1)	
Application:	19/01063/COMIND
Site Address:	Land to south of Ravenswing Farm, Tadley.
Proposal:	Erection of Class A1 foodstore, car parking and access and landscaping.
Applicant:	Lidl UK Limited
Report to be considered by:	District Planning Committee
Date of Meeting:	8 th July 2020
Forward Plan Ref:	N/A

To view the plans and drawings relating to this application click the following link:

<http://planning.westberks.gov.uk/rpp/index.asp?caseref=19/01063/COMIND>

Purpose of Report:	For the District Planning Committee to determine the planning application.
Recommended Action:	The Eastern Area Planning Committee resolved that the application be approved.
Reason for decision to be taken:	The application is contrary to the statutory development plan, and is of high public interest.
Key background documentation:	Eastern Area Planning Committee Agenda Report of 4 th December 2019, the update report, and the minutes of that meeting, plus officer recommended conditions should the application be approved.

Key aims N/A

Portfolio Member Details	
Name & Telephone No.:	Councillor Hilary Cole
E-mail Address:	Hilary.Cole@westberks.gov.uk
Date Portfolio Member agreed report:	30 th June 2020

Contact Officer Details	
Name:	Michael Butler
Job Title:	Principal Planning Officer (East)
Tel. No.:	01635 519111
E-mail Address:	Michael.Butler@westberks.gov.uk

Implications

Policy:	The proposal conflicts with Policies ADPP1, ADPP6, CS18, and CS19 of the West Berkshire Core Strategy 2006-2026.
Financial:	If the application were approved and implemented, it would be liable to a CIL charge of just under £355,000.
Personnel:	N/A

Legal/Procurement:	N/A
Property:	N/A
Risk Management:	N/A
Equalities Impact Assessment:	N/A

EXECUTIVE SUMMARY

1. INTRODUCTION

- 1.1 On 4th December 2019, the Eastern Area Planning Committee (EAPC) considered the agenda and update reports for this application, which seeks full planning permission for the erection of a new freestanding discount food store. The store is proposed on a greenfield site, outside of any defined settlement boundary, on land immediately adjacent to the district administrative boundary, adjacent to the urban area of Tadley. The applicant is Lidl UK. The officer recommendation was to refuse planning permission on the grounds that it would be clearly contrary to adopted policy to protect the wider countryside in the district, it would have a harmful visual impact, and the emergency plan prepared by the applicant was not acceptable, in the light of the proximity of the application site to the licenced nuclear facility at AWE Aldermaston.
- 1.2 However, the Members of the EAPC were impressed by the extremely high local levels of support for such a new discount food store in the Tadley/Aldermaston area, which in their view was a clear indication of the significant local retail need for such a store. They also considered that if the application were to be approved and trade, it would, in the light of the continuing need to reduce levels of carbon dioxide production, reduce many private vehicle trips from local residents to discount food stores in Newbury, Reading and Basingstoke. They also considered that, whilst inevitably the store would have some localised visual impact, this would not be harmful in the wider context of the urban area of Tadley and indeed the AWE itself. In addition, regard was had to the additional employment created by the store and other economic benefits. They also agreed with officers that any harmful retail impact (if any) would be contained only to the local Sainsbury store, but that the scheme would not harm the future vitality or viability of Tadley itself.
- 1.3 The Committee were, however, concerned about the apparent lack of a satisfactory emergency lockdown plan at the store, should a radiation emergency occur at AWE Aldermaston, in the light of the requirements of Policy CS8 of the West Berkshire Core Strategy 2006 in relation to impacts of development on off-site emergency planning around AWE. The applicant was requested by the committee to improve this emergency plan prior to the DPC meeting. Officers have succeeded in achieving this, in liaison with the applicants agents. The applicants have now produced nine revised versions of the emergency plan, and it is much improved upon the original one presented to EAPC on the 4th December 2019.
- 1.4 Whilst there remain some outstanding detailed points within the latest revision of the plan which have been raised by the AWE Off-Site Emergency Planning Group, officers are now content that there is a high degree of certainty that they could be resolved under the remit of a planning condition before any development takes place. As such, it can now be concluded that the development is capable of complying with Policy CS8 subject to a condition to secure the final approval and implementation of the emergency plan. It is important for the Committee to also be aware that any permission, if granted, would not be personal to Lidl, so in the event that another retailer were to occupy the store the

emergency plan requirements would apply to any other operator, and the condition allows for necessary revisions to be agreed.

- 1.5 Since the last application was heard by EAPC the Council has received an additional 64 representations to the proposal. An additional 55 are in support and so the total at the time of writing is 904 in support. The matters raised are similar to those raised before, although a number do note that in their opinion the need for an emergency plan is not well based. An additional nine objections have been received making the total 64 in objection. Again most of these are based upon points that have previously been raised, including the traffic implications, the view that there is no need for a new store, and the loss of a greenfield site.
- 1.6 Since the EAPC meeting, the applicants have submitted further revised plans which show an emergency only access from the site onto the Silchester Road. This forms part of the updated emergency plan and seeks to ensure that in the event of an incident at the AWE, the main A340 route to the west of the site will not be unduly congested by traffic exiting the store, which could impede any responding blue light service vehicles. Consultation has been undertaken on these plans. No objections have been raised on the introduction of this access from any parties including Hampshire County Council Highways (Silchester Road is within their administrative responsibility). Aldermaston Parish Council have not objected either. No further specific public comments have been received specifically regarding this new access. The Committee needs to be aware that this access would only be used in the case of an emergency and not for general use, or indeed any routine servicing.

2. CONCLUSION

- 2.1 Members of the EAPC resolved to approve the application contrary to the recommendation of Officers. Owing to the conflict with the development plan, the implications for the determination of similar future applications across the district, and the high public interest, the Development Control Manager referred the application to be determined by the DPC.

3. OFFICER RECOMMENDATION

- 3.1 To **DELEGATE** to the Head of Development and Planning to **REFUSE PLANNING PERMISSION** on the grounds of the following grounds:
 1. The application site is located on a greenfield site outside of any defined settlement boundary as identified in the statutory development plan. Accordingly, to the proposal conflicts with Policies ADPP1 and ADPP6 of the West Berkshire Core Strategy 2006-2026, and is unacceptable having regard to the overriding need to protect the open countryside from urban growth. This is consistent with paragraph 170 of the National Planning Policy Framework
 2. The development of this substantial retail store, at this prominent location in terms of public visibility close to main thoroughfares, with the associated access, hard surfacing, car parking and external lighting, will be harmful to both local visual amenity and be harmful to the wider landscape character and setting of the urban built form of Tadley. The application conflicts with paragraph 170 of the National Planning Policy Framework, Policy CS18 (in terms of the loss of green infrastructure) and Policy CS19 (in terms of landscape and visual harm) of the West Berkshire Core Strategy 2006-2026. The application is accordingly unacceptable, notwithstanding the proposed additional landscaping around the application site.

4. APPENDICES

1. Committee agenda report for the EAPC meeting held on 4th December 2019
2. Committee update report for the EAPC meeting held on 4th December 2019
3. Approved minutes for the EAPC meeting held on 4th December 2019
4. List of recommended conditions should the application be approved

RPS Planning and Development
Chris Tookey
Park House
Greyfriars Road
Cardiff
CF10 3AF

Applicant:
Lidl Great Britain Ltd

PART I - DETAILS OF APPLICATION

Date of Application

12th April 2019

Application No.

19/01063/COMIND

THE PROPOSAL AND LOCATION OF THE DEVELOPMENT:

Construction of Class A1 foodstore with associated car parking, access and landscaping.
Land South Of Ravenswing Farm , Adjoining Aldermaston Road and Silchester Road,
Tadley,

PART II - DECISION

In pursuance of its powers under the Town and Country Planning Act 1990, West Berkshire District Council REFUSES planning permission for the development referred to in Part I in accordance with the submitted application form and plans, for the following reason(s):-

1. The application site is located on a greenfield site outside of any defined settlement boundary as identified in the statutory development plan. Accordingly, to the proposal conflicts with Policies ADPP1 and ADPP6 of the West Berkshire Core Strategy 2006-2026, and is unacceptable having regard to the overriding need to protect the open countryside from urban growth. This is consistent with paragraph 170 of the National Planning Policy Framework.
2. The development of this substantial retail store, at this prominent location in terms of public visibility close to main thoroughfares, with the associated access, hard surfacing, car parking and external lighting, will be harmful to both local visual amenity and be harmful to the wider landscape character and setting of the urban built form of Tadley. The application conflicts with paragraph 170 of the National Planning Policy Framework, Policy CS18 (in terms of the loss of green infrastructure) and Policy CS19 (in terms of landscape and visual harm) of the West Berkshire Core Strategy 2006-2026. The application is accordingly unacceptable, notwithstanding the proposed additional landscaping around the application site.

If you require further information on this decision please contact the Council via the Customer Call Centre on 01635 519111.

INFORMATIVE:

- 1 This application has been considered by West Berkshire Council, and REFUSED. Should the application be granted on appeal there will be a liability to pay Community Infrastructure Levy to West Berkshire Council on commencement of the development. This charge would be levied in accordance with the West Berkshire Council CIL Charging Schedule and Section 211 of the Planning Act 2008.
- 2 In attempting to determine the application in a way that can foster the delivery of sustainable development, the local planning authority has approached this decision in a positive way having regard to Development Plan policies and available guidance to try to secure high quality appropriate development. In this application whilst there has been a need to balance conflicting considerations, the local planning authority has also been unable to find an acceptable solution to the problems with the development so that the development can be said to improve the economic, social and environmental conditions of the area.

Decision Date :- 10th July 2020



Gary Lugg
Head of Development and Planning

TOWN AND COUNTRY PLANNING ACT 1990

Notification to be sent to an applicant when a local planning authority refuse planning permission or grant it subject to conditions

Appeals to the Secretary of State

- If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the Secretary of State under section 78 of the Town and Country Planning Act 1990.
- If you want to appeal against the local planning authority's decision then you must do so within 6 months of the date of this notice.
- Appeals must be made using a form which you can get from the Planning Inspectorate at Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN or online using the Planning Portal at www.planningportal.co.uk.
- The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.
- The Secretary of State need not consider an appeal if it seems to him that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.
- In practice, the Secretary of State does not refuse to consider appeals solely because the local planning authority based their decision on a direction given by him.

Purchase Notices

- If either the local planning authority or the Secretary of State refuses permission to develop land or grants it subject to conditions, the owner may claim that he can neither put the land to a reasonably beneficial use in its existing state nor render the land capable of a reasonably beneficial use by the carrying out of any development which has been or would be permitted.
- In these circumstances, the owner may serve a purchase notice on the Council in whose area the land is situated. This notice will require the Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town and Country Planning Act 1990.

Appeal Decision

Hearing Held on 7 July 2021

Site visit made on 8 July 2021

by J P Longmuir BA (Hons) DipUD MRTPI

an Inspector appointed by the Secretary of State

Decision date: 23 August 2021

Appeal Ref: APP/W0340/W/20/3265942

Land off Aldermaston Road, Tadley, RG26 3XJ

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Lidl Great Britain Ltd against the decision of West Berkshire Council.
 - The application Ref 19/01063/COMIND, dated 5 April 2019, was refused by notice dated 10 July 2020.
 - The development proposed is construction of Class A1 foodstore with associated car parking, access and landscaping.
-

Decision

1. The appeal is allowed and planning permission is granted for construction of Class A1 foodstore with associated car parking, access and landscaping at land off Aldermaston Road, Tadley, RG26 3XJ in accordance with the terms of the application, Ref 19/01063/COMIND, dated 5 April 2019, and the plans submitted with it, subject to the conditions in the annexe at the end of this decision.

Procedural Matters

2. During the hearing a revised landscaping plan was submitted showing various changes including a higher frontage hedge and additional trees within the site. The Council had time to consider the plan during the hearing. The plan indicates additional landscaping could be incorporated in the formal submission of a detailed scheme, as would be required by condition if permission was granted. I accepted the submission of the plan on this basis.
3. The revised National Planning Policy Framework (the Framework) was published on 20 July 2021 following the close of the hearing. Both parties were given the opportunity to make submissions in writing of any implications.
4. The appeal site lies within the remit of West Berkshire District Council, whereas Tadley, the adjacent town, is within Basingstoke and Deane Council's jurisdiction.

Main Issues

5. The main issues are:

- the effect of the proposal in terms of the building, lighting, accesses, car parking, boundary fences and landscaping, on the character and appearance of the area;
- the effect of the proposal on Green Infrastructure and;
- the need for the foodstore.

Reasons

The effect on character and appearance: the site and surroundings as existing.

6. The appeal site lies on the edge of Tadley, a town with extensive residential areas. The site is close to the Atomic Weapons Establishment (AWE) Aldermaston which occupies a substantial area surrounded by security fencing.
7. The site is not identified within any particular national or local landscape designations. It is within the National Character Area 129: Thames Basin Heaths, which is typically 25% woodland, low-grade agricultural land often rough pasture, with semi-natural habitats including wet and dry heathland and acid grassland as well as veteran trees. The West Berkshire Landscape Character Assessment identifies the site as within Burghfield Woodland and Heathland Mosaic, which notes a complex pattern of land use, including woodland, pasture and remnant heathland. The AWE and the expansion of nearby settlements are described as detracting from the landscape.
8. The appeal site fronts Silchester Road to the south and Aldermaston Road to the west, the latter of which is particularly busy as I observed at the mid-morning time of my site visit when there were few instances of no traffic. These roads cross at an extensive traffic junction by the south west corner of the site.
9. Opposite the appeal site, on the western side of the Aldermaston Road, there is an extensive residential area, including three storey flats under construction. Also, just off Aldermaston Road and close to the north of the appeal site, are Kestrel Meads and Falcon Fields, both of which are also modern developments. Similarly, to the south, the other side of Silchester Road, is a mix of residential and commercial uses, including Tadley Engineering, a partly metal clad building with a very functional appearance.
10. The appeal site's frontage along Aldermaston Road is defined by a tall and wide hedgerow. It was evident on my site visit that this is predominately hawthorn and much of the growth is at the sides and top. The hedge obscures the site from view so that the eye is drawn along the straight Aldermaston Road, particularly as the opposite side is lined with some large oak trees; these also soften the residential development behind.
11. The appeal site is more conspicuous from Silchester Road as the hedgerow here is sparse and not continuous, although this frontage is more notable for tall oak trees. The other appeal site boundaries are less defined to the east and north as the site appears part of larger fields.
12. To the north of the site off Falcon Fields, there is a bridleway where there are gaps in the intervening vegetation which allow visibility of the site.
13. The appeal site itself is part of a grass field, which is used for grazing. It adjoins several other fields. These fields are flat and featureless although they

do allow views to the edge of the town, surrounding residential buildings and the distinctive oaks and Tadley Engineering workshop on Silchester Road.

The effect on character and appearance from Aldermaston Road.

14. The proposed car park and building would lead to the loss of the grassland. The site itself is featureless, but it does allow a sense of openness and the perception of green space on the Aldermaston Road, on the approaches to the town centre. However, the appeal building would be set back into the site, and therefore to one side of the main view corridor, created by the boundary hedge and the line of trees on the western side of the road. Thus, the siting of the building would limit its visibility.
15. At the hearing the appellant stated that the boundary hedge would be maintained at 1.5m height which both parties agreed would partially screen the 7m high building and car parking. The hedge would be behind the visibility splay and so the height would be achievable. The top element of the building would be visible, particularly from the far side of Aldermaston Road. However, the multi-stock brick and timber effect walling would give a muted appearance. The roofing material and photovoltaic panels would be more discernible but due to the pitch of the roof, they would be a very small component of the view.
16. The service bay would be visible from Aldermaston Road but only from the point of the access. It would be set back into the site and therefore not prominent. The car parking would be largely screened by the boundary hedge. There would be potential for landscaping to break up its expanse which would soften the view through the access.
17. There would be some intrusion, but this viewpoint is not perceived as wholly countryside due to the residential development along the western side of Aldermaston Road.
18. The hedge would be reduced in width as detailed on the submitted landscape proposal. However, much would remain and indeed most of the growth is on the top and sides, and no evidence was produced to indicate it would not continue to flourish.
19. The proposed access on Aldermaston Road would involve the removal of the hedge to form a splay line. This would allow visibility of the building and car parking. The access would also undermine the continuity of the frontage hedge, which is a discernible feature. However, that view would be narrow being limited to the gap by the access. Additionally, being towards a corner of the site, only part of the development would be visible and largely from the north direction only, hence its impact would only be fleeting to a passing viewer.
20. The proposal would lead to traffic movements in/out of the site for much of the day. However, the tranquillity would not be impaired as Aldermaston Road is busy.
21. I therefore conclude that the proposal would lead to limited harm from this aspect.

The effect on character and appearance from Silchester Road

22. From the Silchester Road, the car parking and its hard surface would extend almost up to the edge of the site and close to the boundary of the road. The

- two sides of the building would be visible. However, the hedge would be reinforced which would give some screening particularly to the cars, although this would take approximately 10-15 years to mature. The submitted landscaping plan shows potential new planting within the car park itself.
23. The proposed planting once mature would also obscure some of the building so that only the upper part of the wall and roof would be visible. The existing oak trees would filter some of the view, so that the eye would remain focussed along Silchester Road.
24. The proposal would result in the loss of the grass field, and the loss of its openness. However, Tadley Engineering and the built up road frontage and the extensive Silchester Road/Aldermaston Road junction, give the viewpoint an urban context and so the presence of development would be accepted.
25. An emergency access is proposed cutting through the hedgerow, but this would be narrow and being towards one corner would constrain the view of the car parking and the building. Therefore, this impact would be very limited.
26. The movement of cars around the car park would be perceptible, as well as pedestrian movements accessing the site. However, Silchester Road has a significant amount of traffic and as noted above the immediate environs are not a rural context. There is an emergency access on to Silchester Road but that would only be used for such an event. Consequently, tranquillity would not be impaired.
27. I therefore conclude that from this aspect the proposal would lead to limited harm which would become very limited once the landscaping matured.

The effect on character and appearance from the bridleway

28. From the bridleway, I noted on my site visit, that there would be several viewpoints where the building, lighting columns and boundary fence would be visible, but they would be reasonably distanced which would limit their impact. The proposal includes landscaping along the north and east boundaries. It was confirmed at the hearing that the depth of actual planting would be 4.8m and an allowance was made for a maintenance strip, which accounted for the annotation of 6m depth on the submitted plans. This planting would be substantial and includes trees for much of that length; it would obscure much of the building, although that would take 10-15 years. As discussed earlier, the walling would be muted and the roofing would be a very small component of the view.
29. The submitted LVIA includes photographs of the potential viewpoints during the winter. It is evident that the visibility of the store would be more apparent, but only appreciably so whilst the planting would be maturing. There would be a considerable depth of planting and the woody stems of the specimens would collectively merge to form screening. Moreover, there is potential for some evergreen species. The planting would also soften the visible element of the building.
30. A 2.1m high close boarded timber boundary fence is proposed along the north and east boundaries, facing towards the bridleway viewpoints. This would be set behind the 4.8m new planting and so would only be prominent in the initial years following planting. In any event, such a fence would weather and become

muted, whereupon it would merge with the shades of the planting and so would help the overall appearance and screening.

31. A 1.1m high post and wire fence is shown on the boundary treatment plan. This would be in front of the landscaping however from the bridleway such a structure would not be discernible once the hedge was well established.
32. The building would be perceptible from the bridleway and would look out of place. However, this impact would be localised and would ease as landscaping matures. Consequently, I find that the proposal would cause limited harm from this aspect.

The effect on character and appearance: historic wider landscape

33. The Council considered that the site is part of a landscape which is distinctive being subject to the Parliamentary Enclosures. They consider that the site is part of the wider landscape and as such is a 'valued landscape' as included in paragraph 174 of the Framework.
34. The appellant submitted maps of the historic field pattern. These show that the boundaries around the site itself and the adjoining fields have not changed over time. But beyond the bridleway, are the Falcon Fields and Kestrels Mead developments as well as the extensive new development on the west side of Aldermaston Road and the vast expanse of the AWE. There is no intervisibility with the pre-18th century field pattern around the neighbouring Ravenswing Farm and the north of the bridleway. Consequently, the site and the remaining fields are only a small fragment of the wider landscape and are disjointed.
35. The appeal site was the Poor's Allotment, and then enclosed and sub-divided. There is no evidence of an historic connection with the appeal site. Indeed, Tadley has grown considerably in the twentieth century, around and towards the appeal site. Visually the site and surroundings do not appear as any historic landscape in terms of the nature of the fields, the field boundaries or the surrounding trees. I therefore conclude that there is nothing which takes the appeal site out from the ordinary and it would not constitute a valued landscape.

The effect on character and appearance: lighting

36. The proposal includes various lights around the site to illuminate the access, parking areas, pedestrian walkways and provide security. The submitted lighting assessment plots the luminance contours and shows that light spillage would be very limited beyond the site boundaries. At Aldermaston Road and Silchester Road there are tall streetlights orientated along the roads, so the spillage would not be obtrusive. There would be some spillage onto the adjoining fields, but this would be very limited in terms of brightness and extent.
37. The luminance of the appeal site would be perceptible. From Aldermaston Road and Silchester Road, these are edge of the town contexts so that the lighting would not be perceived as out of keeping. From the bridleway the lighting would be perceptible, but in such dusk/dark conditions it would be only apparent to a few observers.

38. Lighting columns are distributed around the access and car park. These would be visible above the boundary landscaping. Both the adjacent roads have streetlights so that intrusion would be very limited.
39. I therefore find that in this regard the proposal would have very limited impact.

The effect on character and appearance: overview conclusion

40. The Council minutes indicate that councillors were concerned that the proposal could set a precedent. However, this proposal is self-contained and has a definitive application boundary which would be clearly demarcated by new landscaping. Moreover, the access would be orientated for the foodstore which would not leave space for its continuation into neighbouring land. Additionally, there is no evidence to assume that this would lead to other development, particularly as this is a foodstore aimed at local need.
41. In consideration of the various aspects of the development and its implications, I therefore conclude that the proposal would be harmful, but that impact would be limited.
42. Policies ADPP1 and ADPP6 of the West Berkshire Core Strategy (CS) seek to contain growth and prevent urban growth in the countryside. Policy CS19 of the CS seeks to protect the diversity and local distinctiveness of landscape character and requires consideration of the sensitivity to change.
43. Paragraph 110 of the Framework highlights car parking should be sympathetic as reflected in the National Design Guide. Paragraph 126 states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. There is also a similar reference to beautiful and sustainable places in the preceding paragraph. Paragraph 130 requires developments are sympathetic to local character and history, including the surrounding built environment and landscape setting. Paragraph 174 of the Framework requires planning decisions should contribute to and enhance the natural beauty of the local environment by recognising the intrinsic character and beauty of the countryside. Reference is also made to valued landscapes but as I have found that is not applicable here. Paragraph 185 of the Framework seeks to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. The proposal would be in conflict with the above policies.
44. The Council did make reference to paragraph 134 in their final comments. This requires development to be well designed. However, the design of the building was amended during the application to be sensitive to the surroundings and I find that the above impact relates to the principle of the building.

The effect of the proposal on Green Infrastructure

45. The glossary of the revised Framework includes a wider explanation of Green Infrastructure (GI). There is some overlap with the proposed landscaping discussed in the preceding section.
46. The existing green field would be lost which would harm the Green Infrastructure (GI) of the area. However, the field's GI value as discussed above lies in its perception of providing a sense of openness. It has very limited contribution to the views and historic and social context of the town and the surrounding countryside. It is well grazed grassland and thus aside from

the boundaries limited in terms of species, habitat and foraging value to the wider ecosystem.

47. Whilst the proposed landscaping details have not been finalised, the basis has been detailed. The proposal would be likely to result in 38 new indigenous trees which in dedicated space and under a required maintenance regime should flourish. The landscaping plans also indicate a wide selection of 1,688 shrubs, which would diversify the vegetation. One tree would be removed but that is small and in poor condition.
48. The proposal does result in the loss of hedgerow for the Aldermaston Road access, a small emergency access and pedestrian gap on the Silchester Road. However, the hedgerow on the latter is very sparse and would be reinforced by the proposal. Moreover, the other side of the appeal site would be planted with 4.8m wide hedges, which would face the countryside, presenting new opportunity for wildlife in terms of habitat, foraging and movement.
49. Bat and bird boxes as well as reptile refugia are also envisaged in the appellant's ecology and biodiversity note. Provision for insects would also be possible and submission and approval of detailed management could be the subject of a condition, if the appeal was allowed.
50. The proposal would be an improvement in terms of the extent of new vegetation which would help biodiversity. Once fully established the tree and hedge planting would provide an attractive outlook for residents and visitors to the town. Whilst the loss of the grassland would be harmful but overall, I conclude that the proposal would be a marginal improvement in GI.
51. Policy CS18 of the CS requires the protection and enhancement of GI in terms of its extent and diversity. The proposal would not conflict with the policy in terms of the extent of GI because of the amount of new planting. The planting would also diversify the existing vegetation and thereby meet the other criterion in the policy. Paragraph 130 of the Framework states developments need appropriate and effective landscaping. Moreover, the newly added paragraph 131 emphasises that trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Paragraph 174 emphasises the wider benefits from natural capital and ecosystems including trees. The proposal would not be in conflict.

Need for the foodstore

52. Tadley is a town with most essential everyday facilities including banks, library, a Sainsbury's foodstore, smaller shops and health centre. The Sainsbury's supermarket appears adequate for a weekly shop and includes a café. It is broadly in the geographical centre of Tadley. There are Tesco and Co-op stores within more outlying residential areas but their limited size means they generally can only provide more everyday supplementary needs rather than wholesale shopping. The Council reasonably accepted the need for this proposed foodstore but did not find it outweighed the impact.
53. A 2017 retail study was undertaken by consultants GVA for the Council. Whilst this is slightly dated, after more population growth and now 2 Lidl stores at Newbury, it provides broad assessment of the patterns of retail demand. The findings show that Tadley and its environs only account for 35.3% of

- expenditure from its residents. Without doubt, there are substantial shopping trips outside Tadley by its residents. Indeed, many of the comments from the public on this appeal confirm their shopping elsewhere.
54. Such outward traveling for facilities will be degrading the vitality and viability of Tadley: it undermines the sense of a self-sustaining community. Indeed, I find that Tadley could become a backwater. The store would also give an opportunity for shoppers to meet other local people.
55. The traveling for foodshopping as evident from responses, takes time and creates difficult domestic arrangements, whereas this facility would be accessible to a wider section of the population including the elderly, those physically challenged and those who lack cars.
56. Moreover, the traveling to foodstores elsewhere is leading to carbon emissions from private cars. Whilst some trips may be connected with other activities such as traveling to work, many would be single purpose. Such a regular, routine activity as foodshopping will lead to carbon emissions on a frequent basis, and accumulatively will be significant for climate change and health.
57. A discount foodstore is intended which is a niche market and absent from the town. The store should also encourage shoppers into Tadley and use of other shops/services. Indeed, the proposed layout shows a pedestrian pavement in the nearest position to the town centre.
58. Policy CS13 of the CS seeks to reduce the need to travel. Similarly, the Framework in paragraphs 86-88 has an emphasis for the provision of facilities in the most accessible locations. Paragraph 152 of the Framework states the planning system should support the transition to a low carbon future in a changing climate. The proposal would accord with the above policies.
59. Policy CS11 of the CS defines a list of hierarchy towns, for the focus of facilities, whilst that can only cover West Berkshire and Tadley is in the adjoining local authority area, nonetheless the foodstore's location accords with the aims of that strategy.

Other matters

60. If the foodstore was operated by Lidl, this would involve 40 jobs as suggested in the appellants' statement; it is reasonable to assume that another operator would not be wholly different. This would be significant and would help diversify the employment base which is likely to be otherwise dominated by AWE.
61. The submitted sustainability report and the application plans show that this would be an energy efficient store, including a substantial array of photovoltaic panels on the roof. An excellent BREEAM rating would be achievable. This would add to the merits of the proposal.
62. I note the objection from Aldermaston Parish Council about the traffic impact. However, such a store would be serviced by only 3 lorries a day, so the resulting increase would be minimal. In terms of car traffic, the proposal would save outward traveling to facilities elsewhere.

63. I note that some of the public responses were concerned about the adequacy of the parking. However, I find that the proposed 127 spaces would be proportionate for the 2,177sqm store, especially in such an accessible location.

Planning Balance

64. The site is not identified in a Local Plan settlement policy area boundary and the proposal is contrary to that accompanying policy. Nonetheless I have considered the accessibility of the site and the nature of the surroundings, and these material considerations indicate otherwise. The proposal would provide an appropriate local facility in a location which is accessible to a large number of people.
65. Paragraph 8 of the Framework sets out that achieving sustainable development involves three overarching objectives. The economic objective would be met by the construction benefits of the new store and the jobs, the social objective is met by the ability of local residents to use community facilities and the environmental objective would be satisfied by providing a necessary community facility in an accessible location (and thereby saving carbon emissions from substantial outward travelling) and the benefit to biodiversity.
66. I have found that the proposal would cause limited harm to the landscape, accordingly there is conflict with that Local Plan Policy. However, there is a need for the facility both for Tadley and the prevention of outward travelling to such stores elsewhere, which are supported by particular policies. Having considered the Development Plan as a whole and the Framework, the merits of the development materially outweigh the conflict with the Development Plan policy.

Conditions

67. Paragraph 56 of the Framework and the Planning Practice Guidance (PPG) provide the tests for the imposition of conditions. The Council has suggested conditions and the appellants have confirmed their agreement. There was only one disagreement, whereby the Council sought to limit the Bank Holiday opening hours. However, as I have found above the area lacks tranquillity and I do not find the living standards would be so impaired.
68. Some of the conditions are pre-commencement and are agreed as such by the parties, because that is the necessity of their purpose.
69. The Council emphasised the importance of the conditions on the precise nature of the retail operation and the need to confirm its role as a discount store particularly as the planning system cannot guarantee that the operator would be Lidl. This is justified to complement and not duplicate the role of Sainsbury's and discourage outward travel to discount stores. The Council also emphasised the importance of the submission and updating of an emergency plan in the event of an incident at AWE. This is indeed justified bearing in mind its proximity.
70. Conditions on the timing and approved plans provide certainty. Conditions on the archaeology are necessary to ensure that any remains can be appreciated. The construction arrangements, water, drainage, refuse, parking and highway works conditions ensure that basic infrastructure is in place. The tree conditions ensure their retention which as I have found above is important. The landscaping, materials and external lighting details are similarly necessary to

aid the appearance. A condition on biodiversity improvements is imposed to ensure a net gain in ecology and together with the landscaping will provide green infrastructure. The BREEAM rating, travel plan, electric charging and cycle parking all help sustainability. The restrictions on store opening and deliveries would limit some illumination and I have added the timing of the lighting to the details to be approved.

Conclusion

71. I therefore conclude that the appeal should be allowed subject to the conditions in the conditions annexe below.

John Longmuir

INSPECTOR

CONDITIONS ANNEXE

1) The development hereby permitted shall begin not later than three years from the date of this decision.

2) The development hereby permitted shall be carried out in accordance with the following approved plans/documents: • Site location plan ref. AD100 Revision E; • Proposed site layout plan ref. AD110 Revision N; • Proposed building plan ref. AD111 Revision A; • Proposed site finishes ref. AD114 Revision L; • Proposed boundary treatments ref. AD115 Revision L; • Proposed layout with topo overlay ref. AD117 Revision C; • Elevations plan ref. 18004-054 Revision A.

3) No development (including any demolition or other site works) shall take place until a written scheme of investigation for a programme of archaeological work has been submitted to and approved in writing by the Local Planning Authority. Thereafter, the development shall not take place unless the programme of archaeological work has been undertaken and/or has been incorporated into the demolition/construction phase, in accordance with the approved details.

4) No development shall take place until a Construction Method Statement (CMS) has been submitted to and approved in writing by the Local Planning Authority. The CMS shall include measures for: (a) Parking of vehicles of site operatives and visitors; (b) Loading and unloading of plant and materials; (c) Storage of plant and materials used in constructing the development; (d) Erection and maintenance of security hoarding including any decorative displays and/or facilities for public viewing; (e) Temporary access arrangements to the site, and any temporary hardstanding; (f) Provision and use of wheel washing facilities; (g) Measures to control dust, dirt, noise, vibrations, odours, surface water run-off, and pests/vermin during construction; (h) A scheme for recycling/disposing of waste resulting from demolition and construction works; (i) Hours of construction and demolition work; (j) Hours of deliveries and preferred haulage routes; (k) An emergency plan providing policies and procedures for the preparedness and response to a radiation emergency at AWE Aldermaston during demolition and construction work. Thereafter the demolition and construction works shall incorporate and be undertaken in accordance with the approved statement.

5) No development shall take place until information detailing how the developer intends to divert the water main (Thames Water asset) or align the development,

so as to prevent the potential for damage to subsurface potable water infrastructure, has been submitted to and approved in writing by the Local Planning Authority (in consultation with Thames Water). No construction shall take place within 5 metres of the water main. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.

6) No development shall take place until details of existing and proposed ground levels, and finished floor levels of the buildings hereby permitted, have been submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be carried out in accordance with the approved details.

7) No development shall take place until details of sustainable drainage measures to manage surface water within the site have been submitted to and approved in writing by the Local Planning Authority. These details shall: (a) Incorporate the implementation of Sustainable Drainage methods (SuDS) in accordance with the Non-Statutory Technical Standards for SuDS (March 2015), the SuDS Manual C753 (2015) and West Berkshire Council local standards; (b) Include construction drawings, cross-sections and specifications of all proposed SuDS measures within the site; (c) Include detailed run-off calculations, discharge rates, infiltration and storage capacity calculations for the proposed SuDS measures based on a 1 in 100 year storm +40% for climate change at a maximum rate of 4.4l/s; (d) Include a management and maintenance plan for the lifetime of the development. This plan shall incorporate arrangements for adoption by an appropriate public body or statutory undertaker, management and maintenance by a management company or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime; (e) Written confirmation is required from Highways Authority of their acceptance of the discharge from the site into the existing ditch and confirmation that the downstream network has the capacity to take this flow. Thereafter the development shall not be first occupied until the approved measures have been provided in accordance with the approved details. The measures shall be retained, managed and maintained in their approved condition.

8) No development shall take place until a site-specific Emergency Plan, tailored to the first occupants of the premises, has been submitted to and approved in writing by the Local Planning Authority. The Emergency Plan shall provide policies and procedures for the preparedness and response to an incident at AWE Aldermaston. Thereafter, the premises shall be constructed in accordance with the approved details. The premises shall not be operated without the implementation of the latest approved revision of the Emergency Plan. The plan shall be kept up-to-date, and relevant to the current occupant at all times, through regular reviews at intervals of no more than 2 years. An amended version of the plan may be submitted to the Local Planning Authority for approval pursuant to this condition. The Local Planning Authority may at any time require the amendment of the plan by giving notice pursuant to this condition; in which case the amended plan shall be submitted to the Local Planning Authority for approval within 1 month of notice being given. The premises shall not be occupied for the first time by any new occupant until a site-specific Emergency Plan tailored to that specific occupant has been submitted to and approved in writing by the Local Planning Authority.

9) No development (including site clearance and any other preparatory works) shall take place until an arboricultural watching brief has been secured for the development, in accordance with a written scheme of site monitoring, which has

been submitted to and approved in writing by the Local Planning Authority. Site monitoring shall thereafter take place in accordance with the approved details.

10) The development shall not be carried out without implementing in full the Arboricultural Method Statement and tree protection measures outlined within the Tree Survey and Arboricultural Impact Assessment by RPS (Revision D dated March 2019, incorporating drawing 71D – rev B Jan 19). This includes no-dig surfaces detailed in RPS drawing 400 Jan 2019. No changes shall be made to the works unless amendments have been submitted to and approved in writing by the Local Planning Authority, whereby the submission shall include details of any changes to the implementation, supervision and monitoring of all temporary tree protection and any special construction works within any defined tree protection area.

11) No development above ground/slab level shall take place until a schedule of materials to be used in the construction of the external surfaces of the development has been submitted to and approved in writing by the Local Planning Authority. Samples shall be made available upon request. Thereafter the development shall be carried out in accordance with the approved materials.

12) The development shall achieve an “Excellent” rating under BREEAM (or any such equivalent national measure of sustainable building which replaces that scheme). No later than three months after the building is operational, a copy of the final certificate certifying that this rating has been achieved shall be submitted to the Local Planning Authority.

13) The development shall not be first occupied until all vehicular, pedestrian and cycle accesses to the site have been completed in accordance with the approved plans.

14) The development shall not be first occupied until visibility splays of 2.4 metres by 43.0 metres have been provided at the new site access onto the A340. The visibility splays shall, thereafter, be kept free of all obstructions to visibility above a height of 0.6 metres above carriageway level at all times. This condition shall also apply to the Silchester Road emergency access.

15) The development shall not be first occupied until a right-hand turn lane off the A340 into the site has been completed in accordance with the approved plans.

16) The development shall not be first occupied until the parking spaces, internal site circulation, and manoeuvring spaces have been provided (including surfacing and marking out) in accordance with the approved plans. Thereafter these spaces shall be kept available for parking and internal vehicle circulation at all times.

17) No development above ground/slab level shall take place until details of electric vehicle charging points have been submitted to and approved in writing by the Local Planning Authority. The development shall not be first occupied until the charging points have been installed and made operational in accordance with the approved details. Thereafter the charging points shall be retained and kept available for the use of electric vehicles.

18) No development above ground/slab level shall take place until details of cycle parking/storage have been submitted to and approved in writing by the Local Planning Authority. The development shall not be first occupied until the cycle parking/storage facilities have been provided in accordance with the approved details. Thereafter the facilities shall be maintained and kept available for that purpose at all times.

19) No development above ground/slab level shall take place until details of refuse storage have been submitted to and approved in writing by the Local Planning Authority. The development shall not be first occupied until the refuse storage areas have been provided in accordance with the approved details. Thereafter the facilities shall be maintained and kept available for that purpose at all times.

20) The development shall not be first occupied until the hard landscaping of the site has been completed in accordance with a hard landscaping scheme that has first been submitted to and approved in writing by the Local Planning Authority. The hard landscaping scheme shall include details of any boundary treatments and hard surfaced areas to be provided as part of the development.

21) Prior to the first occupation of any part of the development hereby permitted full details of all soft landscaping works shall have been submitted to and approved, in writing, by the Local Planning Authority. All soft landscaping works shall be completed in accordance with the approved soft landscaping scheme within the first planting season following completion of building operations / first occupation of the development (whichever occurs first). Any trees, shrubs, plants or hedges planted in accordance with the approved scheme which are removed, die, or become diseased or become seriously damaged within five years of completion of this completion of the approved soft landscaping scheme shall be replaced within the next planting season by trees, shrubs or hedges of a similar size and species to that originally approved.

22) No development above ground/slab level shall take place until a schedule for biodiversity management and provision of habitats including but not limited to bat and bird boxes and reptile refugia have been submitted to and approved in writing by the Local Planning Authority. The development shall not be first occupied until the measures have been provided in accordance with the approved details. Thereafter the agreed management and provisions shall be maintained for that purpose.

23) No external lighting shall be installed until a lighting strategy has been submitted to and approved in writing by the Local Planning Authority. Such details shall include the location, height, type and direction of any light sources and the intensity and timing of their illumination. Any lighting, which is so installed, shall not thereafter be altered without the prior consent in writing of the Local Planning Authority other than for routine maintenance that does not change its details.

24) The development shall not be first occupied until a Travel Plan for staff/employees at the premises has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall be implemented from the date that the development is first brought into use in accordance with timescales set out in the plan and any subsequent revisions. The Travel Plan shall include provisions for it to be reviewed, and if necessary updated within 6 months of first implementation, and annually thereafter.

25) The premises shall be used solely as a foodstore and for no other purpose, including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 2020 (or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification). This restriction shall apply notwithstanding any provisions in the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification).

26) At no time shall more than 3500 individual lines of goods be sold at the retail premises hereby permitted. Only food and convenience goods sales shall be permitted in the store.

27) The premises shall not be open to customers outside of the following hours: Mondays to Saturdays: 07:00 to 22:00, Sundays: 10:00 to 16:00.

28) No deliveries shall be made to the site outside the following hours: Mondays to Fridays: 07:00 to 21:00 Saturdays: 08:00 to 20:00 Sundays and public holidays: 11:00 to 15:00.

END OF CONDITIONS ANNEXE

LIST OF APPEARANCES

FOR THE APPELLANT

Chris Tookey BA(Hons) BTP MRTPI	Technical Director RPS
Corinna Demmar BA(Hons) Dip LA CMLI	RPS Senior Director
Rodri Price Lewis QC	Landmark Chambers
Dr Nikki Cook BA(Hons) PhD CIfA	RPS Technical Director
Mike Barker BSC MSC CIEEM	RPS Director Ecology
Richard Broad BSc MCIHT MILT	Mayer Brown
Oliver McGuinness	Lidl
James Mitchell	Lidl
Douglas Symington	Lidl

FOR THE COUNCIL

Michael Butler BSc(Hons) MPhil MRPI	Principal Planning Officer
Liz Allen CMLI	Consultant Landscape Architect

INTERESTED PARTIES

Councillor Ken Rhatigan	Leader Basingstoke and Deane Borough Council
Emlyn Evans	Local Resident

From: Emergency Planning
Sent: 19 October 2021 12:51
To: Michael Butler
CC: Douglas Symington; Chris Tookey
Subject: RE: Consultation on Planning Application 21/02343/COND1 Land Adjacent To Ravenswing Farm Winkworth Lane Aldermaston Reading
Attachments: Emergency Action Plan - Lidl Tadley Version 10 (19th October 2021) EP co....pdf; EAP - customer details form vA - EP comments.pdf

Afternoon Michael,

Following the changes **I'm happy the condition can be discharged.**

Please find attached some minor comments to both attached documents for consideration. One element missed in the cross over of emails, although I am happy this amendment will be picked up by Lidl. It was appreciated the customer details form being shared, thank you.

Kind Regards

Amy

Amy Gower (she/her)
Emergency Planning Officer
Team: 01635 503535 | emergencyplanning@westberks.gov.uk (office hours only)



From: Chris Tookey [mailto:TookeyC@rpsgroup.com]
Sent: 19 October 2021 11:46
To: Michael Butler <Michael.Butler@westberks.gov.uk>
Cc: Emergency Planning <EmergencyPlanning@westberks.gov.uk>; Douglas Symington <Douglas.Symington@lidl.co.uk>
Subject: RE: Consultation on Planning Application 21/02343/COND1 Land Adjacent To Ravenswing Farm Winkworth Lane Aldermaston Reading
Importance: High

This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

Michael,

Your email came just in time as I was about to send an amended version of the EAP to you!

The attached EAP version 10 (19th October) now incorporates all of Amy's comments/requests; I had deleted Appendix A at her suggestion but I've now reinstated it so it includes the Public Health England and CDC guidance on self-decontamination.

In relation to the references to Lidl staff gathering information from sheltering customers, Amy has said she isn't sure all the information is necessary. However the info listed is geared towards giving the store manager what he needs to manage the situation, rather than for the emergency services (although it can be provided to them if necessary). She also said that a form could be created to reassure people as to why the info is being requested and what will be done with it. I have therefore drafted the attached 'customer details form' that will be provided to the store manager – he will either have copies printed off in the emergency supplies, or will have it on his computer to print off as needed. I do not believe this form needs to be included in the EAP, but I'm providing it for Amy's information.

Hopefully Amy can look through the attached version 10 and swiftly confirm that her suggestions/requests have been taken on board, and then respond to you to confirm the EAP is now satisfactory and you can discharge Condition 8.

Kind regards.

Chris

Chris Tookey BA(Hons) BTP MRTPI

Technical Director
RPS | Consulting UK & Ireland
T +44 2920 668 662
E tookeyc@rpsgroup.com

From: Michael Butler <Michael.Butler@westberks.gov.uk>

Sent: 19 October 2021 10:40

To: Chris Tookey <TookeyC@rpsgroup.com>

Subject: FW: Consultation on Planning Application 21/02343/COND1 Land Adjacent To Ravenswing Farm Winkworth Lane Aldermaston Reading

CAUTION: This email originated from outside of RPS.

Fyi Chris. Please accommodate the request as noted.

Regards

Michael Butler
Principal Planning Officer
East Area Planning Development Management.
West Berkshire Council

07769 725180

-----Original Message-----

From: Emergency Planning

Sent: 19 October 2021 10:28

To: Michael Butler <Michael.Butler@westberks.gov.uk>; Planapps <Planapps@westberks.gov.uk>

Cc: Emergency Planning <EmergencyPlanning@westberks.gov.uk>

Subject: RE: Consultation on Planning Application 21/02343/COND1 Land Adjacent To Ravenswing Farm Winkworth Lane Aldermaston Reading

Morning Michael,

I have received a response from UK Health Security Agency (formally PHE). They are content for the CDC infographic to be used alongside the attached document. Therefore I've amended some comments on the previous document I provided.

Once we've received the next revision of the plan, following comments in the attached plan being addressed, I feel we should be in a position to discharge the condition.

Kind Regards

Amy

Amy Gower (she/her)

Emergency Planning Officer

Team: 01635 503535 | emergencyplanning@westberks.gov.uk (office hours only)

-----Original Message-----

From: Emergency Planning

Sent: 18 October 2021 11:54

To: Planapps <Planapps@westberks.gov.uk>; Michael Butler <Michael.Butler@westberks.gov.uk>

Cc: Emergency Planning <EmergencyPlanning@westberks.gov.uk>

Subject: RE: Consultation on Planning Application 21/02343/COND1 Land Adjacent To Ravenswing Farm Winkworth Lane Aldermaston Reading

Morning Michael,

Apologies for the delay in responding with comments. I have been waiting for a response from UK Health Security Agency (formally PHE) to come back to me and approve the areas regarding decontamination processes. This is to ensure public health is not placed at risk through conflicting information provided by the store and UK Health Security Agency during an incident.

In the interest of progressing the plan and the condition to be signed off I have amended my comments within the attached to remove specific decontamination actions and guidance to those within the store, and to take actions upon advice provided by the UK responders.

Once these comments have been addressed I feel we should be in a position to agree the plan and as a result sign off the condition.

Alternatively, if Lidl wish to wait for UK Health Security Agency's response I shall pass this information on.

Kind Regards

Amy

Amy Gower (she/her)

Emergency Planning Officer

Team: 01635 503535 | emergencyplanning@westberks.gov.uk (office hours only)

-----Original Message-----

From: Planapps

Sent: 15 September 2021 16:47

To: Emergency Planning <EmergencyPlanning@westberks.gov.uk>

Subject: Consultation on Planning Application 21/02343/COND1 Land Adjacent To Ravenswing Farm
Winkworth Lane Aldermaston Reading

Please see attached

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RPS Group Plc web link: <http://www.rpsgroup.com>

If this Emergency Action Plan has been activated, refer immediately to the *Lidl Tadley Emergency Action Plan – Actions on Notification in sections 4 & 5.*

EMERGENCY ACTION PLAN

**Lidl Store
Tadley**

Version 10 – 19th October 2021



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Appendices

Appendix A – Guidance on self-decontamination

Emergency Action Plan

Lidl - Tadley

Document Control and Distribution

The Emergency Action Plan (EAP) is currently maintained by Lidl Great Britain Ltd, but responsibility will devolve to any subsequent occupier of the building should Lidl depart from the site.

The Plan is distributed in accordance with West Berkshire Council, AWE Emergency Off-Site Plan version 1.8 January 2019.

This Plan is predicated upon the existence and maintenance of the Aldermaston Atomic Weapons Establishment (AWE) Off-Site Emergency Response Plan.

Document authors:	Lidl Great Britain Ltd
Relevant to:	Lidl Store - Tadley
Responsibility for development of this Emergency Action Plan, which forms part of the Lidl Store Operating procedures:	Lidl Great Britain Ltd or any other building occupier.
Responsibility for monitoring and review of this Emergency Action Plan:	Lidl Great Britain Ltd or any other building occupier.
Original effective date:	TBC
Date(s) modified:	TBC
Next review date:	TBC

Links to other Plans & Information

The plan should be used in conjunction with the following:

- West Berkshire Council - Emergency Planning Community Resilience Guidelines
- Control of Major Accident Hazard Regulations 2015 (COMAH)
- Radiation (Preparedness and Public Information) Regulations 2019 (REPPIR)
- Civil Contingencies Act 2004
- National Counter Terrorism Security Office guidance documents
- Health and Safety at Work Act 1974
- Management of Health and Safety at Work Regulations 1999
- Lidl Health & Safety Policy
- Lidl Business Continuity Plan

INTRODUCTION

The Atomic Weapons Establishment (AWE), has been central to the defence of the United Kingdom for more than 50 years. It provides and maintains the warheads for the country's nuclear deterrent, Trident.

The work at AWE covers the entire life cycle of nuclear warheads; from initial concept, assessment and design, through to component manufacture and assembly, in-service support, and finally decommissioning and disposal.

The AWE Aldermaston (A) site is located in Berkshire, between Tadley and Aldermaston on the Berkshire/Hampshire Border. The AWE Burghfield (B) site is located in Berkshire between Burghfield Village and Reading.

Purpose & Rationale

This plan is designed to manage the movement, access and egress of people in response to an identified threat or risk which could impact on the safety of persons and/or assets or the capacity of the Store to continue to operate.

If this Emergency Action Plan has been activated, refer immediately to *Lidl Tadley Emergency Action Plan – Action on Notification in sections 4 & 5.*

The Emergency Action Plan will be implemented by the Store Manager as part of a major incident.

The purpose of this plan is to provide instruction to managers and staff to enable them to manage an area which is under their jurisdiction.

The plan should be read in conjunction with the following:

- West Berkshire Council - Emergency Planning Community Resilience Guidelines
- Control of Major Accident Hazard Regulations 2015 (COMAH)
- Radiation (Preparedness and Public Information) Regulations 2019 (REPPPIR)
- Civil Contingencies Act 2004
- National Counter Terrorism Security Office guidance documents
- Health and Safety at Work Act 1974
- Management of Health and Safety at Work Regulations 1999
- Lidl Health & Safety Policy
- Lidl Business Continuity Plan

Emergency Action Plan

Lidl - Tadley

Scope

This plan applies to the building under the control of Lidl employees at Lidl Tadley (or any other building occupier following Lidl's departure). This will require collaborative working with other external agencies or organisations.

Aim of the plan

The aim of the Plan is to articulate an emergency response at its store at Aldermaston Road, Tadley in order to protect the safety of customers, employees and visitors.

The objectives of this plan are to:

- A. Protect the safety and wellbeing of customers, employees and visitors.
- B. Ensure that the plan supports the emergency services' emergency plans without placing additional burden on any services dealing with the emergency.
- C. Confirm roles and responsibilities of employees involved with implementing the plan.
- D. Provide a planning checklist for use in line with national guidance and best practice.

This plan sets out the emergency arrangements for Lidl and/or any other building occupier's employees and customers in response to any on-site emergency with actual or potential off-site consequences at the AWE Aldermaston. Off-site emergency arrangements are also a requirement of the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPPIR).

Overview

Serious failures in plant operation or process conditions and/or physical damage to a research or production facility at AWE Aldermaston may conceivably lead to a release of radioactive material or other hazards which could present a local problem within the site.

Other than radiation hazards, the other significant hazards that may pose a risk to persons on the AWE site and, in extreme circumstances, members of the public include:

- A. Explosives
- B. Chemicals
- C. Environmental Pollutants

The hazards identified along with the potential impact of the hazards and emergency countermeasures that are to be implemented to protect persons on and off the site are detailed in the West Berkshire Council, AWE Emergency Off-Site Plan version 1.8 January 2019.

The likelihood that such a scenario could endanger the public outside the site is considered to be extremely remote. However, due to the potential hazards from the AWE site and the possibility of a release of radioactive or toxic material, sufficient in severity to necessitate action to be taken to protect employees and members of the public, this plan has been developed.

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Training & Exercising the Plan

Employee Training

Lidl will assess the training requirements of all employees who will be responsible for implementing the EAP and provide the necessary training to be able to implement the plan effectively.

Taking into account the staff turnover in terms of shift patterns, holidays etc. Lidl will:

- Train all store managers and deputies in their roles and responsibilities (detailed in Sections 4 & 5 of this Plan) for taking control for implementing the plan in an emergency situation (Lidl will make this training a pre-requisite of employment and will include this in all Employee Induction Training for this store);
- Train all staff on assisting the store managers and deputies for implementing the plan in an emergency situation (Lidl will make this training a pre-requisite of employment and will include this in all Employee Induction Training for this store).
- The store manager and deputy manager will have basic first aid training, to ensure a first aider is present on site at all times.

Employment Induction Training will consist of, but not limited to:

- Risk assessment training so as to ensure employees are able to assess risks and implement control measures;
- Emergency preparedness training to ensure all employees are suitably trained to identify emergency situations and follow emergency plans;
- Crowd Management Training to equip employees with the skills to manage a large crowd in an emergency situation and how to calm an emergency situation to avoid unnecessary panic;
- Fire marshal training to ensure employees are equipped with the skills to manage an evacuation of the building in an emergency and accounting for all occupants where possible;
- Emergency procedures training to ensure employees are familiar with the requirements of Lidl internal procedures to be followed in an emergency.

Records of training will be maintained for all employees.

Further training will be provided to new employees upon recruitment and as part of their induction. Refresher training on all of the above training will be undertaken annually (or every 3 years in the event of first aid training).

Where the ownership of the building changes, the new occupiers must review employees training requirements to ensure their employees are suitably trained to implement the plan in the event of an emergency at the AWE.

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Exercising the plan

Prior to opening the store Lidl will conduct a simulated emergency practice run of the action plan to ensure it works and to implement improvements in the plan where findings dictate. Lidl will invite any interested parties to the simulation practice run from the AWE and off-site planning group.

Lidl will conduct periodic practice drills following the opening of the store to ensure the plan remains effective in the event of an emergency situation. As the store will trade 7 days a week, the practice drills will be carried out:

- Prior to the store opening in the first instance (as mentioned above).
- Every 3 months within the first year of trading.
- Every 6 months thereafter.

All training will be carried out when the store is closed and in simulation mode only.

Plan Review

So as to ensure the effectiveness of this plan in the event of an emergency at the AWE sites, this plan will be reviewed and amended where necessary on an annual basis or when situations change, such as when a new store manager is appointed or where changes to the ownership of the building has taken place.

Where the ownership of the building changes, the new occupiers must review the plan in line with their own internal procedures and update where necessary and re-submit for review to the emergency planning officer at West Berkshire Council.

A log of each review will be kept within any store managers office for inspection purposes and updated following each review.

Formal review and de-briefing of the training will be undertaken following each training session to ascertain the effectiveness of the plan and to update where required.

Distribution

This plan will be distributed to the following:

- A copy kept on the Lidl Important Information board
- Lidl Store Manager and Store Employees
- Lidl Trading Compliance Department
- Lidl External Health & Safety Advisors
- Lidl Property and Facilities Department
- West Berkshire Council planning department

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- West Berkshire Council emergency planning officer
- AWE Aldermaston

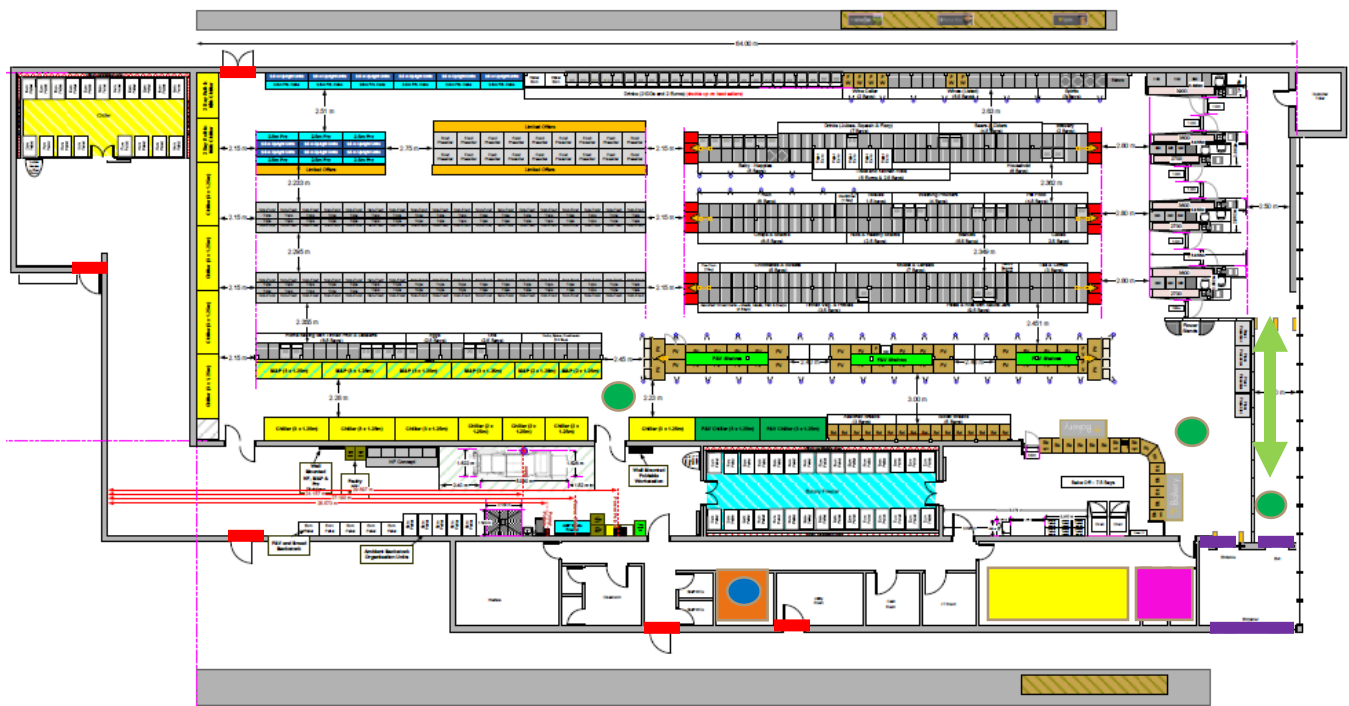
Copies of the plan will be made available to other relevant parties upon request.

1. DETAILS ABOUT THE SITE

Site location

The Lidl site is located at the junction of the A340 Aldermaston Road and Silchester Road, Tadley, RG26 4QB, grid reference is easting 459722 and northing 162391.

Lidl are a discount food retail store selling groceries and goods for retail consumption.



	Maglocked Doors		Main Entrance Doors		Emergency Showers		Store Managers Office
	Lidl Store Manager		Lidl Employees		EMP Storage Area		Store Egress Route

Numbers on Site

Maximum Number of Lidl employees / employees per day	5 to 8
Minimum Number of Lidl employees / employees per day – (minimum number of employees reflect the expected number of customers at different times of the day)	4
Maximum Number of customers at any one time per day (approximately)	75
** Please Note: In the event of an employee calling in sick, Lidl store manager will immediately call upon a reserve employee to attend to ensure 4 employees are available in store at all times	

2. PRE-INCIDENT PREPARATIONS

In preparation of an emergency at the AWE site, Lidl will communicate with representatives of the AWE site in order to obtain relevant contact names and numbers so as to distribute the plan and to liaise with in the event of an emergency.

In addition, Lidl will liaise with the emergency services, Police, Fire & Ambulance, so as to obtain necessary names and contact numbers for distribution of the plan and liaison in the event of an emergency.

All relevant contact names and numbers will be entered into the plan and a copy displayed on the Lidl notice board, within the store managers office and the staff welfare area.

The Lidl Store Manager will be responsible for ensuring the emergency contact names and numbers remain up to date. To do this the Lidl Store Manager will review the emergency contact list every 6 months and update the list accordingly.

The contact list will include:

- | | |
|-----------------------------------|---|
| • Thames Valley Police | 101 or 999 (alternatively - 01865 841148) |
| • Royal Berkshire Fire & Rescue | 01189 452888 |
| • South Central Ambulance Service | 999 – (alternatively 01869 365000) |
| • AWE | 0118 981 4111 |
| • West Berkshire Council | 01635 551111 |
| • Environment Agency | 0370 850 6506 |

Lidl have discussed various engineering options with our designers, H&S consultants and contractors to seek out ways in which to engineer solutions to ensure the plan can be implemented effectively and which gives assistance to the Lidl store staff in an emergency situation.

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As part of the engineering solutions Lidl will/have installed:

- A system that, on the push of one 'emergency' button, will maglock all doors and close off the ventilation system.
- A separate button that will allow the store manager to remotely close off the main site access from Aldermaston Road and open an emergency vehicular access out on to Silchester Road; and
- A tanyo system within the store managers office that can be used by the store manager to communicate to anyone inside or outside of the building.

Automatic bollards will be installed across the vehicular access from Aldermaston Road and the emergency access on to Silchester Road. To enable emergency services to access the site Lidl will install a combination-locked box fastened to the wall of the building opposite the site entrance, within which will be a second set of buttons to control the bollards on the main access.

The code to the combination lock will be provided to all emergency services control centers, who can then pass this code on to emergency response teams attending the site.

The emergency access will be kept closed off and the bollards only lowered in the event of an emergency at which time those on the main access will be simultaneously raised. Any vehicles on the site that insist on leaving will then be required to exit on to Silchester Road and directed to turn left, away from Aldermaston Road and Mulfords Hill.

*** Please Note: All mag-locked doors can only be opened by resetting the emergency lockdown button in the store managers office or by activating the fire alarm, such as breaking the glass on a manual break glass call point***

By installing these engineering solutions, it will enable all employees and customers to be alerted to the emergency as soon as is practicable following the incident notification to the store manager and will be built into the design of the store.

These designed engineering mechanisms for sealing off the ventilations systems and closing down and locking the store will effectively secure all persons contained within the store with a view to ensuring minimal or zero exposure to contaminants and remove the burden on emergency and other services who may be already dealing with the incident.

Please refer to page 10 of this report for a detailed plan indicating store entrance, exits and fire doors and locations of persons in the event of an emergency.

CONSULTATION

The following list of people will be consulted, as required, on any review of this EAP:

- Lidl Property Office & Trading Compliance Department
- West Berkshire Council Planning Department
- West Berkshire Council Emergency Planning Officer
- Lidl External Health & Safety Advisors
- Lidl Facilities & District Managers
- AWE
- Lidl M&E Consultants

EQUALITY AND DIVERSITY

An Equality and Diversity assessment has been undertaken of this document. It is recommended that when implementing this emergency plan that:

- Consideration will be given to the needs of people who may not be able to easily move around the premises in the event of a lockdown situation e.g. the elderly, disabled persons and people who may not understand written or verbal information/instructions.
- Consideration will be given to the needs of people who may not use English as their first language.
- Consideration will be given to the needs of those who are pregnant, as they may not be able to easily move around the premises in the event of a lockdown situation.

3. NOTIFICATION OF AN AWE INCIDENT

Notification to Lidl will be by way of the notification criteria as set out in the West Berkshire Council, AWE REPPiR (Radiation Emergency Preparedness and Public Information Regulations) Leaflet (available at <https://info.westberks.gov.uk/awe>).

The notification will come via telephone call into the designated Lidl landline and is anticipated the notification will come from AWE (via an automatic telephone alerting system).

The Lidl Store Manager or their deputy will have access to the Lidl landline telephone at all times by way of a mobile telephone unit which will be taken onto the shop floor by the Lidl store manager or deputy when they are not in the office.

The Lidl Store Manager (or Deputy Store Manager) will receive the call in the first instance and implement the actions set out in this emergency action plan.

4. ACTIONS ON NOTIFICATION

Upon notification Lidl will implement this Emergency Action Plan (EAP) in the following manner:

Notification	
Notification of emergency:	Communication from AWE (via their emergency contact system) to the Lidl store via telephone call to the Lidl landline within the store managers office or by portable telephone unit carried by store manager at all times.
Notification for all clear:	Communication from emergency services/AWE over local radio or via automated telephone call from the AWE emergency contact system to the Lidl landline within the store managers office and/or the portable telephone unit that will be carried by the store manager at all times.
Store Manager Actions	<p>The Lidl store manager or deputy manager will notify all staff and customers of the emergency through the in-store tannoy system.</p> <p>Any external contractors (which would include delivery drivers) on site at the time of a lockdown will not be trained on the implementation of this EAP, therefore they will be treated as customers and not staff.</p> <p>In an attempt not to cause panic to customers when alerting employees to the emergency, the alert via the tannoy system will read:</p> <p><i>“This is the store manager. We have been informed of a situation outside of the premises which now requires this store to implement our Emergency Action Plan and close the store for safety reasons. All customers are required to remain inside the store during this emergency closure period.</i></p> <p><i>All customers please do not be alarmed. This is a precautionary measure to be taken for your safety. During this period, no further transactions will be placed through the tills.</i></p> <p><i>Please bear with us while we obtain further details regarding the situation.</i></p> <p><i>All staff please move to your designated EAP positions and await further instructions”.</i></p>

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Closure		Responsible Person(s)
Initial closure on notification:	<p>The Lidl store manager or deputy will:</p> <ul style="list-style-type: none">• Receive the initial notification call from the AWE.• Proceed to the store managers office and inform all employees and customers of the situation (using message above).• Activate the “emergency closure buttons” located within the store managers office.• Liaise back with Lidl employees to ensure they are in position and remind them of the procedure & their roles.• Attempt to gather further information via external means (i.e. via AWE, local radio or TV and Thames Valley Police social media channels).	Lidl Store Manager/Deputy/Employees
Rooms most suitable for gathering:	<p>Lidl store staff will gather all customers within the store area and inform them of the emergency and will monitor customer behavior throughout the emergency period to ensure everyone remains calm and informed.</p> <p>All Lidl staff and customers are to remain within the main store area at all times during the emergency closure.</p> <p>Fire doors are kept electronically locked unless a fire alarm has been sounded or the system is overridden by the store manager, therefore the only egress from the store will be through the main customer entrance/exit, which will be locked automatically and marshalled by a member of staff.</p>	Lidl Store Manager/Deputy/Employees

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Entrance points (e.g. doors and windows) will be secured:	<p>The entrance/exit doors and ventilation ducts will be locked automatically upon activation of the “emergency button” by the store manager/deputy upon initial notification of the emergency.</p> <p><u><i>**Please note – the doors will close at a slow pace to ensure customers are not trapped or segregated during the closure process.</i></u></p> <p>Fire doors remain closed via a mag-lock system at all times unless the fire alarm has been activated (such as breaking the glass on a manual call point).</p> <p>A Lidl employee will man the main entrance/exit doors via the till aisle to ensure they remain locked at all times to prevent access/egress during the emergency period.</p> <p>The entrance doors and pods can be operated manually from a distance by the store manager or their deputy, which will negate the requirement for Lidl employees to decontaminate whenever someone leaves the building.</p>	Lidl Store Manager/Deputy/Employees
Mechanical Shutdown:	<p>The entrance/exit doors and ventilation ducts will be locked automatically upon activation of the “emergency button” by the store manager/deputy upon initial notification of the emergency.</p> <p>An emergency vehicular access out on to Silchester Road is provided. On lockdown bollards can:</p> <ul style="list-style-type: none">a. Rise to close off the access from Aldermaston Road; andb. Lower to open the emergency access. <p>To ensure access for emergency services onto the site, Lidl will install a combination-locked box fastened to the wall at the entrance next to the bollards,</p>	Lidl Store Manager/Deputy

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	<p>within which would be a second set of buttons to control the bollards on the main access.</p> <p>The code to the combination lock would be provided to all emergency services control centers, who can then pass this code on to emergency response teams attending the site.</p> <p>Vehicles leaving the site will be directed to turn left and proceed along Silchester Road.</p> <p>This will take them away from the AWE and avoid any conflict with blue light services using the A340.</p> <p>Staff delegated to the front of the store to monitor the exit, will immediately inform the store manager/deputy manager if anyone is seen outside the building in the car park.</p> <p><u><i>**Please note – persons located outside the store will be permitted entry and directed immediately into the decontamination area.</i></u></p> <p>Once inside the decontamination area they will be asked to follow the decontamination process as detailed by emergency responders. Guidance on self-decontamination procedures is also provided at Appendix A of this report.</p> <p>The decontamination area will be equipped with emergency, industry standard decontamination showers, soaps and towels, plastic bags (for storing contaminated clothing into) and fresh clothing and blankets.</p> <p>All contaminated clothing will be bagged, tagged and stored in a suitable container for disposal after the emergency has passed.</p>	
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	<p>Contaminated waste-water from decontamination showers will be captured in a separate tank to that of other waste water drainage. The tank will not dispense water to any sewage system and will be captured in readiness for removal at a later date by a specialist waste water carrier, licensed in the removal of contaminated waste.</p> <p>Under normal operating conditions, the stores air handling unit (AHU) provides fresh air and extract to/from the sales floor. Local extract fans provide ventilation to the toilets, bakery and welfare areas. All these fans are ducted to the façade/roof.</p> <p>In an emergency lockdown situation the ventilation systems will be shut down by the pressing of a “emergency lockdown” button within the manager's office.</p> <p>All façade connections for the AHU and ventilation fans will be provided with motorized dampers which will also shut on activation of the lockdown button. This will help minimise infiltration into the building.</p> <p>In an emergency situation, there is a requirement to allow for 83 people to remain in the store for up to 48 hours.</p>	
Communication arrangements:	Lidl tannoy system, Internal store landline telephone, mobile telephones, internet, local radio updates, local/national TV news channels and Thames Valley Police social media channels.	Lidl Store Manager
Elderly and Disabled Persons	All Lidl stores are constructed in line with the requirements of the Equality Act and	

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	<p>as such have suitable access and facilities for, elderly and disabled persons.</p> <p>Disabled toilets are installed as part of the Lidl design requirements specification.</p> <p>All areas of the store allow for access by disabled persons.</p> <p>Lidl store staff will attend to the needs of the elderly, disabled and others who may require assistance during the closure period.</p> <p>Where the emergency extends overnight, sleeping arrangements will be allocated along shopping aisles 3, 4 & 5. Sleeping mats and blankets will be provided by Lidl and where assistance is needed for the elderly or disabled, additional assistance will be provided.</p>	
Notes:	<p>Once the building has been closed, staff, customers and visitors must not leave the building until authorised by the emergency services.</p> <p>A Lidl employee will be stationed in the location of the main entrance to prevent unauthorized access/egress.</p> <p><u>Any customers insisting on being let out of the store will be asked to sign a disclaimer before doing so.</u></p> <p>The entrance doors and pods can be operated manually from a distance by the store manager or their deputy, which will negate the requirement for Lidl employees to decontaminate whenever someone leaves the building.</p> <p>The store manager and employees will monitor the effectiveness of the closure to</p>	Lidl Store Manager/employees

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	<p>ensure no one leaves the building until it is safe to do so.</p> <p>Updates on the situation will be provided by the store manager throughout the closure period to all customers and Lidl Head Office.</p>	
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Initial Response Checklist		Responsible Person
1	<p>Upon notification of the emergency the Lidl store manager/deputy will activate the “emergency closure button” which automatically closes/locks the main entrance/exit doors and ventilation ducts. This button will be located within the store managers office. A separate button will control the bollards to close off the main access and open the emergency one.</p> <p>The store will be fitted with a tannoy system which will be operated from the store managers office and will be used by the store manager/deputy to address all occupants within the store and informing them of the emergency situation, steps to be taken for closure and appealing for calm as they seek to obtain further information.</p> <p>As staff will have been trained as to what to do if an emergency is declared, and (assuming the worst case of only 4 staff being present) the following protocol will be followed:</p> <p>a) From his/her office, the store manager will assess the situation and then issue directions to the store staff over the internal tannoy system, before then moving to assist other staff on the shop floor.</p> <p>b) The second member of staff will move to the main store entrance/exit areas via the till aisle to marshal people away and explain why, for the moment, no-one can leave the building.</p> <p>c) The third/fourth staff members will circulate within the sales area explaining to customers what is happening and asking for calm.</p> <p>Where more employees are on duty at the time of the emergency, points B&C above will be manned with more personnel.</p> <p>Lidl store manager/deputy will inform Lidl head office of the emergency situation via a telephone call.</p>	Lidl Store Manager / Deputy / Employees
2	<p>Lidl store manager, via the in-store tannoy system, will direct Lidl employees to gather all customers/visitors inside the building within the main shopping area of the store and advise on the emergency situation.</p>	Lidl Store Manager / Deputy / Employees

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3	<p>Where there are only 4 Lidl employees on duty at the time of the emergency, it is expected that there will be fewer customers to control in an emergency situation. This is generally when the store is opened in the mornings and just before closing in the evenings. At all other times the store is manned with 5 to 8 employees.</p> <p>In this event, the Lidl store manager will direct one employee to the main store entrance/exit to monitor/control during the emergency and the other two employees to the main store area to inform, calm and reassure customers.</p> <p>In the event that any customer demands to be let out of the store, then authority to unlock the door and allow them to exit will rest solely with the store /deputy manager and upon written consent from the individual(s) wishing to leave.</p>	Lidl Store Manager / Deputy / Employees
4	<p>Where persons are observed outside the store during the closure, the Lidl employee stationed closest to the entrance will notify the store manager, who in turn will switch the tannoy system to external use and inform persons externally that the store is closed due to the emergency and that access is not permitted due to the risks of contamination and that they should seek shelter in their car if they have one and leave the site via the emergency access, turning left along Silchester Road away from the AWE and the A340.</p> <p><u><i>**Please note – in extremis persons located outside the store will be permitted entry and directed immediately into the decontamination holding area.</i></u></p> <p>If decontamination guidance has not yet been received from responders, individuals allowed into the building will be asked to remain within the holding area and away from people within the store's main sales area, until such time as guidance is received from responders that either: a) they may simply proceed into the sales area; or b) they should first decontaminate themselves through showering and changing their clothes.</p> <p>The decontamination area will be equipped with emergency industry standard decontamination showers, soaps and towels, plastic bags (for storing contaminated clothing into) and fresh clothing and blankets.</p>	Lidl Store Manager / Deputy / Employees

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	All contaminated clothing will be bagged, tagged and stored in a suitable container for disposal after the emergency has passed.	
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5	<p>A key element of training for staff (other than first aid) will be teaching them how to control/keep calm a crowd of people some of whom may want to leave the store and go home/flee.</p> <p>During the closure period, Lidl will provide food and water to all staff and customers as and when required. Due to the risk of potential contamination only tinned or packaged foods will be consumed; chiller cabinets will be closed off and tarpaulins used to sheet off all fresh/open produce.</p> <p>In addition, Lidl will provide board games and puzzles in an attempt to occupy all persons inside the store during the closure period.</p> <p>After the emergency is over Lidl will consult with external consultants on the need for, and means of, disposal of any potentially contaminated items.</p> <p>Toilet facilities will be available, and chairs, sleeping mats and sleeping bags will be provided as required for all customers and staff (estimated to be around 83 maximum). Aisles 3, 4 & 5 will be allocated sleeping aisles, should the emergency extend overnight.</p>	Lidl Store Manager / Deputy / Employees
6	<p>Lidl will avoid using the store landline telephone so that the external communications can be maintained between the Store Manager/employees and Lidl Head Office.</p>	All Building Occupants
7	<p>Once the store is closed down it must remain closed until clearance to unlock has been given by the emergency services.</p> <p>A warning will be given over the tanoy informing all occupants of the requirement to maintain the store closure due to the risk of contamination.</p>	Lidl Store Manager / Deputy / Employees

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8	<p>If medical attention is required, Lidl first aid persons will assess and treat the casualty as necessary and they will liaise with the Lidl store manager/deputy and emergency services by telephone if further assistance is required.</p>	Lidl Store Manager/ Deputy/Employees/ First Aiders
9	<p>During the closure period, Lidl employees will begin to gather information from customers so as to ascertain:</p> <ul style="list-style-type: none">• The number of customers in the building.• Their age, gender & addresses.• Name & Address of GP.• If they have transport outside in the form of a car.• If they have any health issues.• If they require assistance in any way. <p>This information will be recorded and used to assist in an evacuation when the all clear is given.</p> <p>Upon given the all clear, this information will be disposed of by shredding method.</p>	Lidl Store Manager / Deputy / Employees
10	<p>After the hazard has passed through the area, the emergency services will provide an all clear message. Following instructions from the emergency services Lidl employees will begin the evacuation procedure.</p>	Lidl Manager / Deputy / Employees
11	<p>Following the all clear message from the emergency services the building is to remain unventilated until further reassurances have been received that it is safe to do so.</p>	Lidl Store Manager / Deputy / Employees

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On Site Emergency Equipment Checklist		Number	Location
1	Telephone (Landline & Mobile)	1	Managers Office
2	Television/Radio	1	Managers Office
3	First aid kits	3	Managers Office
4	Microwave oven for heating food	2	Staff Canteen
5	Hot water boiler/kettle	2	Staff Canteen
6	Sleeping mats / sleeping bags	83	Store Warehouse
7	Chairs	83	Store Warehouse
8	Decontamination showers	2	Store Warehouse
9	Towels and soap	83	Store Warehouse
10	Emergency clothing (medical scrubs, overalls & blankets)	83	Store Warehouse
11	Tarpaulins	20	Store Warehouse
Please Note: Annual inspections of relevant equipment will be undertaken by Lidl Store Manager and logged on site.			

5. ACTIONS FOR SHELTER

It is important to inform all employees and customers of the emergency situation and to provide continual updates so as to maintain a calm and disciplined environment. The closure period may be between 24 to 48 hours and thus will need to be adequately managed.

To achieve this the following procedures will be implemented:

Lidl Store Manager/Deputy - The notification of the AWE emergency will be received by the Store Manager or their deputy. Upon receipt of the notification the Store Manager or his/her deputy will assume the role of Incident Manager and:	
1	Notify all Lidl employees of the emergency using the agreed message format and instruct staff to take up their positions for immediate implementation of the EAP. Store manager to issue staff action cards to remind them of their responsibilities in an emergency situation.
2	Activate the store closure of ventilation systems doors and windows, ensuring all customers remain in store during the emergency period, and if judged safe to do so remotely raise the bollards to close off the main access and lower them on the emergency access. Closed doors and ventilation systems will be sufficiently airtight to prevent contamination from entering the building.
3	Inform all employees and customers of the emergency and inform them of the steps to be taken to reduce the risks. The store manager, or in his/her absence the deputy manager, to take a detailed headcount of staff and customers within the building and ask for anyone with any medical conditions to make themselves known."
4	Seek to calm the situation down by reassuring them that the steps being taken are for their own health and safety and the measures are also to reduce the strain on the emergency services dealing with the emergency situation externally.
5	Liaise with Lidl employees to begin next steps.
6	Monitor local radio and Thames Valley Police social media channels to ascertain the level of the emergency and its estimated duration.

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7	Liaise with Lidl Head Office to inform them of the emergency situation and keep them informed at regular intervals.
8	Record actions taken during the emergency within the store managers office by way of an action log. In addition there will be an Action Board in the manager's office to allow them to keep track of requests made (i.e. medication needs), what has been done about it (i.e. call to 111 or 999 for advice) and whether the action is open or closed.

Employee Responsibilities: The Store Manager will gather all Lidl employees and remind them of their roles and responsibilities in ensuring the effectiveness of the EAP. Lidl employees will:	
1	Assist the store manager in ensuring the effective implementation of the EAP and the store remains locked and station themselves in designated areas (such as the main entrance/exit) to control access/egress.
2	Inform all customers of the situation, the level of emergency to which we are faced, how long it is expected to last, communication channels between emergency services and Lidl, and the implications of leaving the building before advised by emergency services.
3	Inform all customers of the availability of welfare facilities/toilets within the store and seek to establish any individuals who may require assistance.
4	Provide further information to all on where to obtain updates on the emergency situation unfolding, such as local radio stations and websites and Thames Valley Police social media channels.
5	Make everyone comfortable during the initial phase of the implementation of the plan by providing chairs and other essential requirements as required.
6	Provide food and water for employees and customers as and when required.
7	During the lockdown, Lidl employees will begin to gather information from customers so as to ascertain: <ul style="list-style-type: none">• Number of customers in the building.

Emergency Action Plan

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	<ul style="list-style-type: none">• Their age, gender & addresses.• Name and address of GP.• If they have transport outside in the form of a car.• If they have any health issues.• If they require assistance in any way. <p>This information will be recorded and used to assist in an evacuation and disposed by shredding when the all clear is given.</p>
--	--

Communications

It is important to keep lines of communication open with external services as they are best placed to offer advice as the situation unfolds. The Store Manager will ask customers that any communication with the external services should be through the store manager only to minimize the number of calls to the blue light services.

In the event of a prolonged emergency or more severe scenario, emergency services, local authorities and voluntary sector organisations will work together to co-ordinate practical and emotional support to those affected. If instructed to do so by the emergency services the store manager will lower the bollards to open the main vehicular access.

Lidl will have trained first aid persons on site at all times. First aiders will be available to administer first aid where required during the implementation of the EAP. Where required, first aiders will liaise with the emergency services to seek further advice on the conditions of persons requiring such assistance within the store.

Lidl employees will cooperate with AWE and the emergency services during the closure period and will take direction as to the next steps.

Lidl will relay all communications to employees and customers as and when available to ensure all persons within the store are aware of the measures being taken by the emergency services and AWE to bring the situation under control.

Lidl will make available the store fixed telephone line for employees or customers who may not have access to a mobile phone to call family or friends to confirm they are safe and well and to the emergency situation. However, this will be limited to allow the telephone to remain free for communications with AWE and emergency services.

Lidl will make publicly available a radio which will deliver messages to those in the area as to the current situation. Local radio stations to be monitored for information will include:

- Heart Berkshire – 97, 102.9 & 103.4 MHz
- Fox FM – 102.6 MHz
- BBC Radio Berkshire – 94.6, 95.4, 104.1 & 104.4 MHz

Emergency Action Plan

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6. ACTIONS FOR EVACUATION

Prior to any evacuation of the store, Lidl will liaise with the emergency services dealing with the emergency externally and follow any instructions given to ensure a safe evacuation of the building.

Following advice, Lidl would expect to evacuate in the following order:	
1	Vulnerable persons first (injured, disabled or less mobile)
2	Less able-bodied persons
3	More able-bodied persons

The evacuation would depend on the numbers in the store at the time and the hazards faced when leaving the store.

Lidl will evacuate in accordance with guidance from emergency services and transport would depend on the hazards faced externally and the individuals to be evacuated.

The following forms of transport may be considered for evacuation:	
1	Emergency service vehicles may be required for some evacuees;
2	Customer cars may be used (depending on extent of contamination);
3	Taxi's or buses for others.

Lidl will work with the emergency services to identify a safe place to evacuate to and to support the emergency services in implementing the evacuation.

7. RECOVERY

To recover the site back to its original condition, Lidl will consult with emergency services, designers and consultants as to the effects the emergency had on the store and the building as a whole.

It would not be possible to establish the extent of any damage or recovery needed to re-open the store until after the emergency has ended and following further assessment/survey by relevant experts and consultants.

Following confirmation of the repairs required, Lidl will implement the necessary arrangements to bring the store back to a suitable condition to continue trading.

Liaison with Lidl Trading Compliance Department will be required during this phase to implement the Lidl business continuity plan as laid out in Lidl internal procedures.

Appendix A – Decontamination Procedure

Public Health England guidance for self-decontamination in a radiation emergency

STEP 1: Take off outer layer of clothing

- Taking off your outer layer of clothing can remove up to 90% of radioactive material.
- Once inside, limit your movement to prevent the spread of radioactive contamination.
- If a dust mask is available, place this over your nose and mouth before disrobing.
- Take care when removing clothing to prevent radioactive material from shaking loose.
- Where possible, avoid removing clothing over your head.
- Avoid touching your skin with the outside of your clothing.
- Put clothing in a plastic bag or other sealable container. Place the container outside or away from living areas.

STEP 2: Wash yourself off

In all situations, blow your nose and wipe your eyelids, eyelashes and ears.

If you can shower:

- Use mild soap and shampoo. Water should be tepid (i.e. not too hot or cold).
- Do not use conditioner as it may fix radioactive contamination to your hair.
- Keep your mouth and eyes closed when washing your hair and face.
- Do not scald, scrub, or scratch your skin. Only soft brushes or sponges should be used.
- Keep cuts and scrapes covered when washing to keep radioactive material away from open wounds.

If you cannot shower:

- Wash your hands, face, and other exposed body parts at a sink or tap.
- Use soap and plenty of water.
- Keep your mouth and eyes closed when washing your hair and face

If you cannot use a sink or tap:

- Use a moist wipe, clean wet cloth, or damp paper towel to wipe the parts of your body that were uncovered.
- Pay special attention to your hands and face.
- Place any waste materials in a plastic bag or other sealable container. Place this outside or away from living areas.

STEP 3: Put on clean clothes

- Put on clean clothes that have been stored indoors.
- Do not put contaminated clothes back on.

STEP 4: Helping others and pets

- Wear waterproof gloves and a dust mask if possible.
- Keep cuts and scrapes covered to keep radioactive material away from open wounds.
- Waste generated from cleaning other people or pets should be placed in a plastic bag or other sealable container. This should be placed outside or away from living areas.
- Rewash your hands, face, and parts of your body that were uncovered.

Emergency Action Plan

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STEP 5: Stay tuned
<ul style="list-style-type: none">• Stay tuned for updated information from public health officials.• Communications may come from television, radio, or official social media channels.

US Centre for Disease Control guidance on self-decontamination

DECONTAMINATION FOR YOURSELF AND OTHERS

① TAKE OFF OUTER LAYER OF CLOTHING



Taking off your outer layer of clothing can remove up to 90% of radioactive material.

Be very careful in removing your clothing to prevent radioactive dust from shaking loose.



Put the clothing in a plastic bag or other sealable container.

Put the bag in an out-of-the-way place, away from other people and pets.



② WASH YOURSELF OFF

If you can take a shower:

Use soap and shampoo. Do not use conditioner because it will cause radioactive material to stick to your hair.

Do not scald, scrub, or scratch your skin.

Keep cuts and scrapes covered when washing to keep from getting radioactive material in open wounds.



If you cannot take a shower:

Wash your hands, face, and parts of your body that were uncovered at a sink or faucet. Use soap and plenty of water.



If you cannot use a sink or faucet:

Use a moist wipe, clean wet cloth, or damp paper towel to wipe the parts of your body that were uncovered. Pay special attention to your hands and face.



Blow your nose and wipe your eyelids, eyelashes, and ears with a moist wipe, clean wet cloth, or damp paper towel.



③ PUT ON CLEAN CLOTHES

If you have clean clothes:

Clothes stored in a closet or drawer away from radioactive material are safe to wear.

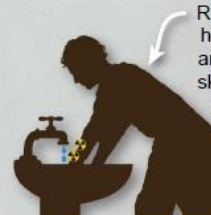


If you do not have clean clothes:

Take off your outer layer of clothing, shake or brush off your clothes, and put your clothes back on.



Rewash your hands, face, and exposed skin at a sink or faucet.



④ HELP OTHERS AND PETS



Wear waterproof gloves and a dust mask if you can.

Keep cuts and scrapes covered when washing to keep radioactive material out of the wound.



Rewash your hands, face, and parts of your body that were uncovered at a sink or faucet.

STAY TUNED FOR UPDATED INFORMATION FROM PUBLIC HEALTH OFFICIALS.



U.S. Department of
Health and Human Services
Centers for Disease
Control and Prevention

<http://emergency.cdc.gov/radiation>



Lidl, Aldermaston Road, Tadley - Emergency Action Plan

Details of Customers Sheltering Within the Store

Under Lidl's Emergency Action Plan put in place for if an emergency is declared at the AWE, staff and customers are able to shelter within the store and be protected from any airborne contamination until such time as emergency responders give the all clear for people to leave. During this time it is important that the store manager and his staff have details on the people we have sheltering, in order to assist them in allocating resources and ensuring individual needs are taken into account. We would therefore be grateful if you would to complete this form giving us your details.

The information provided will only be accessible to the store manager and his staff and will be deleted/shredded once the declared emergency is over.

Name	
Address	
Age	
Gender	
Do you have a car in the car park?	
Do you have any health issues that we should know about?	
Do you require any form of assistance?	
Name and address of your GP.	
Any other information we should note?	

From: Carolyn Richardson
Sent: 19/11/2019 11:42:47
To: Michael Butler
Cc: ONR-Land.Use-Planning@onr.gov.uk
Subject: RE: Lidl, Tadley (19/01063/COMIND)
Attachments: Lidl Tadley - Emergency Plan v1 EP Feedback.pdf

Michael

I have reviewed the plan and made a number of comments. There are a number of points I would make as follows:

1. It takes until page 13 of an 18 page document for the 'actions' to be taken to start – suggest this is reviewed – or as a minimum at the start of the document a go to page XX if this is being activated being clearly displayed.
2. Many of the actions are a bit not very specific in particular as to who owns them
3. I am concerned that if there were only 3 staff on the site how this would actually be managed
4. This plan does not show how all the actions could be coordinated and actioned on the site

It should be noted that some of the detail could enable a lockdown to occur i.e. the actions that need to be completed. The key issue for me to be satisfied that this application proposal would work relates to the number of staff able to manage all the actions and support the people on the site so this needs to be clearly demonstrated throughout the plan. As a result at this stage I cannot support this application based on the information provided to take in that I cannot be satisfied that the AWE Off-Site Emergency Plan will not be affected and that the health and welfare of those on site will be protected as a result.

Should you have any queries please let me know.

Kind Regards

Carolyn

Carolyn Richardson
Joint Emergency Planning Manager
Tel: 01635 519105 | carolyn.richardson@westberks.gov.uk



A photograph of a Lidl Food Store in Tadley, featuring a large glass-fronted building with a Lidl sign on the roof, set against a clear sky. The foreground shows a parking lot and a grassy area.

EMERGENCY ACTION PLAN

*Lidl Food Store
Tadley*

Version 1 – Nov 2019



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Emergency Action Plan

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Document Control and Distribution

The Emergency Lockdown Plan is maintained by Lidl Great Britain Limited.


The Plan is distributed in accordance with West Berkshire Council, AWE Emergency Off-Site Plan version 1.8 January 2019.

This Plan is predicated upon the existence and maintenance of the Aldermaston Atomic Weapons Establishment (AWE) Off-Site Emergency Response Plan.

Document authors:	
Relevant to:	
Responsibility for development of this Emergency Lockdown Plan, which forms part of the Lidl Store Operating procedures:	Lidl Great Britain Limited
Responsibility for monitoring and review of this Emergency Lockdown Plan:	Lidl Great Britain Limited
Original effective date:	TBC
Date(s) modified:	TBC
Next review date:	TBC

Links to other Plans & Information

The plan should be used in conjunction with the following:

- The Aldermaston Atomic Weapons Establishment (AWE) - Off-Site Emergency Plan
- West Berkshire Council - Emergency Planning Community Resilience Guidelines
- Control of Major Accident Hazard Regulations 2015 (COMAH)
- Radiation (Preparedness and Public Information) Regulations 2001 (REPPIR) 
- Civil Contingencies Act 2004
- National Counter Terrorism Security Office guidance documents
- Health and Safety at Work Act 1974
- Management of Health and Safety at Work Regulations 1999
- Lidl Health & Safety Policy
- Lidl Business Continuity Plan

INTRODUCTION

The Atomic Weapons Establishment (AWE), has been central to the defence of the United Kingdom for more than 50 years. It provides and maintains the warheads for the country's nuclear deterrent, Trident.

The work at AWE covers the entire life cycle of nuclear warheads; from initial concept, assessment and design, through to component manufacture and assembly, in-service support, and finally decommissioning and disposal.

The AWE Aldermaston (A) site is located in Berkshire, between Tadley and Aldermaston on the Berkshire/Hampshire Border. The AWE Burghfield (B) site is located in Berkshire between Burghfield Village and Reading.

Purpose & Rationale

Lockdown is the process of controlling the movement, access and egress of people in response to an identified threat or risk which could impact on the safety of persons and/or assets or the capacity of the Foodstore to continue to operate.

A lockdown may be implemented by the Foodstore manager as part of a major incident. This will be in partnership with the emergency services and external bodies, for example, The Aldermaston Atomic Weapons Establishment (AWE).

The purpose of this plan is to provide guidance to managers and staff to enable them to lockdown an area which is under their control.

The plan should be read in conjunction with the following:

- AWE - Off-Site Emergency Plan
- West Berkshire Council - Emergency Planning Community Resilience Guidelines
- Control of Major Accident Hazard Regulations 2015 (COMAH)
- Radiation (Preparedness and Public Information) Regulations 2001 (REPPIR)
- Civil Contingencies Act 2004
- National Counter Terrorism Security Office guidance documents
- Health and Safety at Work Act 1974
- Management of Health and Safety at Work Regulations 1999
- Lidl Health & Safety Policy
- Lidl Business Continuity Plan

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Scope

This plan applies to the building under the control of Lidl staff. This may require collaborative working with other agencies or organisations.

Aim of the plan

The aim of the Plan is to articulate a Lidl lockdown plan at its proposed foodstore at Aldermaston Road, Tadley in order to protect the safety of customers, staff and visitors.

The objectives of this lockdown plan are to:

- A. Protect the safety and wellbeing of customers, staff and visitors.
- B. Ensure that the lockdown plan supports the emergency services' emergency plans without placing additional burden on blue light services.
- C. Confirm roles and responsibilities of staff involved with establishing a lockdown procedure/plan.
- D. Provide a planning checklist for use in line with national guidance and best practice.

This plan sets out the emergency arrangements for Lidl staff and customers in response to any on-site emergency with actual or potential off-site consequences at the AWE Aldermaston. Off-site emergency arrangements are also a requirement of the Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPPIR).

Definitions

Lockdown: The process of controlling the movement and access, both entry and exit, of people (Lidl staff, customers and visitors) around the buildings or area in response to an identified risk, threat or hazard that might impact upon the safety of staff customers and visitors to the store.

Hazard: Source of potential danger or adverse conditions.

Overview

Serious failures in plant operation or process conditions and/or physical damage to a research or production facility at AWE Aldermaston might conceivably lead to a release of radioactive material or other hazards which could present a local problem within the sites.

Emergency Action Plan

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Other than radiation hazards the other significant hazards that may pose a risk to persons on the AWE site and, in extreme circumstances, members of the public include:

- A. Explosives
- B. Chemicals
- C. Environmental Pollutants

The hazards identified along with the potential impact of the hazards and emergency countermeasures that may be implemented to protect persons on and off the site are detailed in the West Berkshire Council, AWE Emergency Off-Site Plan version 1.8 January 2019.

The likelihood that such a scenario could endanger the public outside the site is considered to be extremely remote. However due to the potential hazards from the AWE site and the possibility of a release of radioactive or toxic material, sufficient in severity to necessitate action to be taken to protect employees and members of the public, this plan has been developed.

Training & Exercising the Plan

Staff Training



There are no specific training needs in relation to this policy, but the following staff will need to be familiar with its contents:

- Senior Managers
- Store Managers / Deputies
- Store Staff
- Lidl Trading Law Department
- Facilities & Regional Managers
- Lidl Property Department
- Lidl External Health and Safety Advisors
- Any other individual or group with a responsibility for implementing the contents of this plan and any related policy.

Lidl store management and employees will receive instructions so as to be able to effectively implement the plan in the event of an emergency. Instructions will include, but not limited to:

1. Emergency preparedness
2. First aid
3. Risk assessment
4. Fire marshal


Emergency Action Plan

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Exercising the plan

Lidl will conduct regular practice drills to ensure the plan is effective in the event of an emergency situation. As the store will trade 7 days a week, the practice drills will be carried out once every 2 years when the store is closed and in simulation only.

Plan Review

So as to ensure the effectiveness of this plan in the event of an emergency at the AWE sites, this plan will be reviewed and amended where necessary on an annual basis or when situations change, such as when a new store manager is appointed or similar situation. 

Distribution

This plan will be distributed to the following:

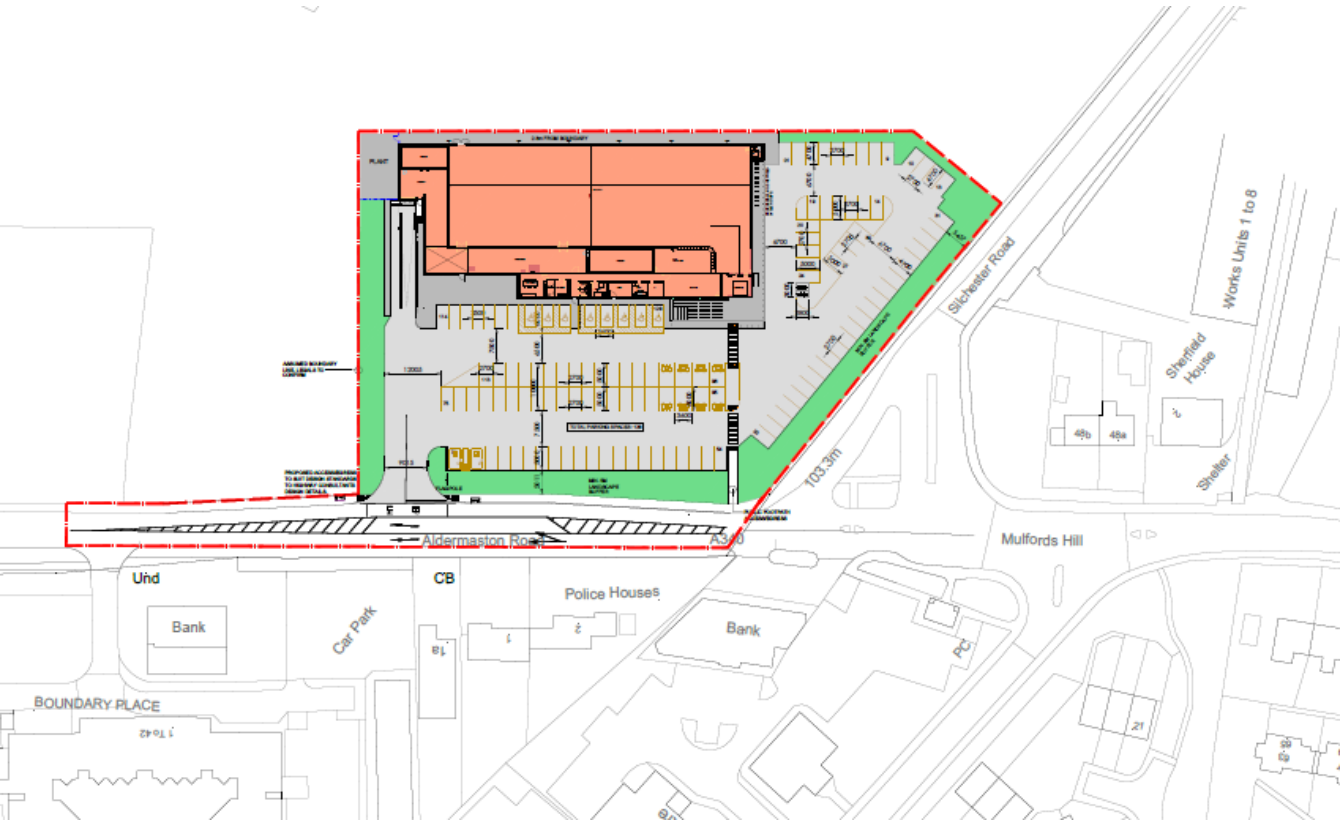
1. Lidl store manager and employees
2. Emergency services
3. West Berkshire emergency planning officer
4. AWE Aldermaston
5. Lidl Trading Law Department
6. Lidl External Health & Safety Advisors
7. Lidl Property and Facilities Department

1. DETAILS ABOUT THE SITE

Site location

The Lidl site is located at the junction of the A340 Aldermaston Road and Silchester Road, Tadley, RG26 4QB, grid reference is easting 459722 and northing 162391.

Lidl are a discount food retail store selling groceries and goods for retail consumption.



Numbers on Site

Number of Lidl staff / employees per day (maximum)	6 to 8
Number of customers at any one time per day (approximately)	75

2. PRE-INCIDENT PREPARATIONS

In preparation of an emergency at the AWE site, Lidl will communicate with representatives of the AWE site in order to obtain relevant contact names and numbers so as to distribute the plan and to liaise with in the event of an emergency.



In addition, Lidl will liaise with the emergency services, Police, Fire & Ambulance, so as to obtain necessary names and contact numbers for distribution of the plan and liaison in the event of an emergency.

All relevant contact names and numbers will be entered into the plan and a copy displayed on the Lidl notice board within the store managers office and the staff welfare area.

The Lidl store manager will be responsible for ensuring the emergency contact names and numbers remain up to date. To do this the Lidl store manager will review the emergency contact list every 6 months and update the list accordingly.

The contact list will include:

1. Thames Valley Police	01865 841148	
2. Royal Berkshire Fire & Rescue	01189 452888	
3. South Central Ambulance Service	01869 365000	
4. AWE	TBC	
5. West Berkshire Council	01635 551111	
6. Environment Agency	01635 519578	

In addition, Lidl will identify an emergency incident team  within the store who will be responsible for taking immediate action  the event of an emergency incident at the AWE site. The team will be made up of store management and employees with specific roles and responsibilities for implementing the plan.

Lidl will also discuss options with our designers, H&S consultants and contractors to seek out ways in which to engineer solutions to ensure all staff and customers can be alerted to the emergency as soon as is practicable following the incident and build into the design of the

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store, mechanisms for sealing off the ventilations systems and closing down and locking the store to effectively secure all persons contained within with a view to ensuring minimal or zero exposure to contaminants and reduce the burden on emergency services who may be already dealing with the incident.

CONSULTATION

The following list of people will be consulted:


- A. Lidl Trading Law Department
- B. Lidl Property Office
- C. Local Authority Planning Department
- D. Lidl External Health & Safety Advisors
- E. Lidl Facilities & District Managers
- F. Emergency Services
- G. AWE
- H. Lidl M&E Consultants


EQUALITY AND DIVERSITY

An Equality and Diversity assessment has been undertaken of this document. It is recommended that when implementing this emergency plan that:

- Consideration should be given to the needs of people who may not be able to easily move around the premises in the event of a lockdown situation e.g. wheelchair users and people who may not understand written or verbal information/instructions.
- Consideration should be given to the needs of people who may not use English as their first language.
- Consideration should be given to the needs of those who are pregnant, as they may not be able to easily move around the premises in the event of a lockdown situation.

3. NOTIFICATION OF AN AWE INCIDENT

Notification to Lidl will be by way of the notification criteria as set out in the West Berkshire council, AWE Emergency Off-Site Plan version 1.8 January 2019 and is anticipated the notification will come from AWE (via a telephone alerting system) or Thames valley Police. 


Lidl will provide contact details to the West Berkshire Council for inclusion onto the notification list. The Lidl store manager (or deputy store manager) will receive the call in the first instance and escalate accordingly. 

Upon receipt of the notification, Lidl will implement the actions set out in this emergency action plan.

4. ACTIONS ON NOTIFICATION









Upon notification Lidl will implement this emergency action plan (EAP) in the following manner:


Notification	
Notification for lockdown:	Communication from emergency services/AWE
Notification for all clear:	Communication from emergency services/AWE

Lockdown	
Rooms most suitable for lockdown:	All staff/customers/visitors to remain in the main shopping area. 
Entrance points (e.g. doors windows) should be secured:	External doors, fire doors, windows to be closed (internal doors should remain open).
Mechanical Shutdown:	Activate ventilation duct and windows and door shutters internally via designation shut-off point.
Communication arrangements:	Landline Telephone, Mobile Telephone, Local Radio Updates, Local TV News Updates.
Notes:	Once the building has been locked down, staff, customers and visitors must not leave the building until authorised by the emergency services.

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Initial Response Checklist - Lockdown		Responsible Person
1	Immediately gather all staff/customers/visitors inside the building 	Manager/Staff 
2	Lock and secure all entrance points (e.g. doors, windows). 	Manager/Staff
3	Turn off all extraction and ventilation systems.	Manager/Staff
4	Turn down heating thermostats to the minimum setting and turn off air conditioning systems.	Manager/Staff
5	Leave open all internal doors.	Building Occupants 
6	Avoid using Lidl store fixed line telephones so that the emergency services can contact the store manager/staff.	Building Occupants
7	Even if you see people outside do not leave the building. 	Building Occupants
8	If you need medical attention, notify the emergency services by telephone or Lidl store manager/staff. 	Building Occupants
9	After the hazard has passed through the area, the emergency services will provide an all clear message. 	Emergency Services 
10	Following the all clear message from the emergency services the building is to be ventilated by turning the extraction and ventilation systems back on.	Manager/Staff






On Site Emergency Equipment Checklist 		
1	Telephone (Landline & Mobile)	
2	Television/Radio	
3	First aid kit	
4	Microwave oven for heating food	
5	Hot water boiler	
6	Sleeping mats / sleeping bags	
7	Chairs	


5. ACTIONS FOR SHELTER

It is important to inform all staff and customers of the emergency situation and to provide continual updates so as to maintain a calm and disciplined environment. The lockdown may be for a period of between 24 to 48 hours and thus will need to be adequately managed.

To achieve this the following procedures will be implemented:


Store Manager: The notification of the AWE emergency will be received by the store manager or their deputy. Upon receipt of the notification the store manager or deputy will: 


1. Notify all Lidl staff of the emergency and instruct staff to take up their positions in readiness for implementing the EAP. 
2. Activate the lock down of ventilation systems doors and windows, ensuring all customers remain in store during the lock-down period.
3. Inform all staff and customers of the emergency and inform them of the steps to be taken to reduce the risks.  
4. Seek to calm the situation down by assuring them that this is a precautionary procedure only and to reduce the strain on the emergency services dealing with the situation externally. 
5. Liaise with the in-store emergency incident team to begin next steps.
6. Liaise with the emergency services to ascertain the level of the emergency and estimated duration of lock-down. 

Staff Responsibilities:  The store manager will gather the designated emergency incident team and remind them of their roles and responsibilities in ensuring the effectiveness of the EAP. The emergency incident team will seek to:

1. Ensure the store is in lock-down and that all ventilation systems into the store have been shut down and all windows and doors are closed.
2. Inform all customers of the situation, the level of emergency to which we are faced, how long it is expected to last, communication channels between emergency services and Lidl, and the implications of leaving the building before advised by emergency services.
3. Inform all customers of the availability of water and food within the store and seek to establish any individuals who may require assistance.
4. Provide further information to all on local radio stations and websites for updates on the emergency situation unfolding.
5. Make everyone comfortable during the initial phase of the implementation of the plan by providing chairs and other essential requirements.
6. Provide water and food for staff and customers as and when required.

Communications

It is important to keep lines of communication open with emergency services as they are best placed to offer advice as the situation unfolds. The store manager  ask customers that any communication with the emergency services should be through them to minimize the number of calls to the blue light services.

In the event of a prolonged lockdown or more severe scenario, emergency services, local authorities and voluntary sector organisations will work together to co-ordinate practical and emotional support to those affected by any emergency. 

Lidl store staff will cooperate with the emergency services for the duration of the lockdown and will take direction as to the next steps.

Lidl will relay all communications to staff and customers as and when available to ensure all persons within the store are aware of the measures being taken by the emergency services to bring the situation under control.

Lidl will make available the store fixed telephone line for staff or customers to call family or friends to confirm they are safe and well and to the lockdown situation.

Lidl will make publicly available a radio which will deliver messages to those in the area as to the current situation. Local radio stations to be monitored for information will include:

- Heart Berkshire – 97, 102.9 & 103.4 MHz
- Fox FM – 102.6 MHz
- BBC Radio Berkshire – 94.6, 95.4, 104.1 & 104.4 MHz.

6. ACTIONS FOR EVACUATION

Prior to any evacuation of the store, Lidl will liaise with the emergency services dealing with the emergency externally and follow any instructions given to ensure a safe evacuation of the building.


Following advice Lidl would expect to evacuate in the following order: 

- Vulnerable persons first (injured, disabled or elderly)
- Women & children
- Men & more able bodied

The evacuation would depend on the numbers in lockdown at the time and the hazards faced when leaving the store.


Lidl will evacuate in accordance with guidance from emergency services and transport would depend on the hazards faced externally and the individuals to be evacuated.

Emergency service vehicles may be required for some evacuees, but local transport could be used in the form of taxi's or buses for others.

Lidl would work with the emergency services to identify a safe place to evacuate to however, if no designated location has been specified, Lidl would identify a location outside the DEPZ which would be able to facilitate the numbers to be evacuated, such as a community centre or sports hall. 

7. RECOVERY

To recover the site back to its original condition, Lidl would consult with emergency services, designers and consultants as to the effects the emergency had on the store and building as a whole.

It is expected repairs to the store would be minimal in terms of material or structural elements and stock levels would require replenishing due to depletion during the lockdown period. 

DELEGATED OFFICER REPORT



WOKINGHAM
BOROUGH COUNCIL

Application Number:	213260
Site Address:	Land North of Church Lane, Church Lane, Three Mile Cross
Expiry Date:	12 May 2022 (EoT)
Site Visit Date:	12 October 2021
Proposal: Application to vary condition No 1 of planning consent 193248 for the Full application for the proposed erection of a temporary compound to facilitate infrastructure works, including hardstanding, parking, fencing and gates, cabins and storage units. (Part retrospective). Condition No1 refers to the temporary use period of 24 months and the variation is to extend the use period to 60 months.	

PLANNING CONSTRAINTS/STATUS

Countryside location
Strategic Development Location (South of M4)
Wind turbine safeguarding zone
Landscape Character Assessment
Thames Basin Heaths Special Protection Area 5 and 7 km
Groundwater protection zone
Nuclear consultation zone
Bat Roost Habitat Suitability
Overhead Electricity Cable Consultation Zone
Contaminated land consultation zone
Ground Water Zones
AWE DEPZ Nuclear Consultation Zone
Tree Preservation Orders
SSSI Impact Risk Zones

PLANNING POLICY

National Policy	National Planning Policy Framework (NPPF) National Planning Policy Guidance (NPPG)
Core Strategy (CS)	CP1 – Sustainable Development CP3 – General Principles for Development CP4 – Infrastructure Requirements CP6 – Managing Travel Demand CP8 – Thames Basin Heaths Special Protection Area CP11 – Proposals Outside Development Limits CP15 – Employment Development CP19 – South of M4 Strategic Development Location
MDD Local Plan (MDD)	CC01 – Presumption in Favour of Sustainable Development CC02 – Development Limits CC03 – Green Infrastructure, Trees and Landscaping CC06 – Noise CC07 – Parking CC09 – Development and Flood Risk

	CC10 – Sustainable Drainage TB04 – Development in vicinity of Atomic Weapons Establishment (AWE), Burghfield TB20 – Service Arrangements and Deliveries for Employment and Retail Use TB21 – Landscape Character TB25 – Archaeology
Other	Borough Design Guide Supplementary Planning Document

PLANNING HISTORY

Application No.	Description	Decision & Date
173046	Full application for the proposed erection of a 1.8m high green mesh fence and gates to existing field entrance, replacing existing palisade fence.	Approved - 13.12.2017
193248	Full application for the proposed erection of a temporary compound to facilitate infrastructure works, including hardstanding, parking, fencing and gates, cabins and storage units. (Part retrospective)	Approved – 26.05.2020
202107	Application for submission of details to comply with the following conditions of planning consent 193248 dated 26/05/2020. Condition 4 - Visibility Splays Condition 5 - Cycle Parking Condition 6 - Routing Condition 7 - Drainage	Split decision – 09.09.20 n.b. Conditions 4, 6 and 7 discharged.
202908	Application to remove condition 5 of planning consent 193248 for the proposed erection of a temporary compound to facilitate infrastructure works, including hardstanding, parking, fencing and gates, cabins and storage units (part retrospective). Condition 5 refers to the provision of bicycle/motorcycle parking and the proposal is to remove this requirement.	Approved 24.12.20

CONSULTATION RESPONSES

Internal

WBC Environmental Health – No objection
WBC Drainage – No objection subject to condition
WBC Highways – No objection
WBC Landscape and Trees – No objection
WBC Emergency Planning – No objection subject to conditions.

External

Office for Nuclear Regulation – Do not advise against granting planning permission.

REPRESENTATIONS

Shinfield Council	Parish	Object as the proposal is no longer for 'local work' only and given environmental damage. <i>Officer comment: The existing/proposed use serves both local and regional development projects which is a significant benefit that has to be balanced against the temporary harm to the landscape (as discussed below.)</i>
Ward Member(s)		No comments received
Neighbours		No comments received

APPRAISAL

Site Description:

The application site is located on the northern side of Church Lane and forms a temporary compound that is to assist the maintenance and upgrade works to SSE's local and regional electrical supply. The site functions as a hub for deliveries and transport of materials necessary to support the upgrade works locally. The application site is used to house temporary office space/welfare units and for the storage of non-hazardous materials for distribution to the surrounding construction sites (refer to Pic. 1.0 below). The application site is located within the designated countryside. The northern side of Church Lane is visually characteristic of the countryside with little in the form of development.

Pic. 1.0: Application site



Proposal

A retrospective planning permission (personal to Southern Electric Power Distribution) was originally granted in 2020 for this facility for a temporary 2-year period which expires on 25 May 2022. The applicant has submitted this latest application proposing to extend the temporary period to 60 months, i.e. 26th May 2025, in order to allow for the continuation of the use of the compound to benefit other works in Wokingham and the wider region and also continue to provide a more sustainable approach to construction works by providing a centralised base for operations rather than requiring several satellite compounds.

Other than the AWE DEPZ (see last section of this report below), there have been no significant changes in local or national planning policy or other material considerations since the original approval (193248) was granted. However, the proposal needs to be assessed in terms of its continued use of land outside the settlement boundary for the extended temporary period sought. This is dealt with in the assessment below.

Principle of Development:

The National Planning Policy Framework has an underlying presumption in favour of sustainable development which is carried through to the local Development Plan. The Managing Development Delivery Local Plan Policy CC01 states that planning applications that accord with the policies in the Development Plan for Wokingham Borough will be approved without delay unless material considerations indicate otherwise.

The application site is located within the South of the M4 Strategic Development Location (SDL) This SDL is allocated under Core Strategy Policy CP19 for a development of up to 2,500 new homes and associated infrastructure, including extensive open space. South of the M4 Strategic Development Location Supplementary Planning Document has not identified the application site for any type of development or enhancement. Thus, the proposed continued temporary use of the land as a compound for a utility company would not have a detrimental impact upon the overarching objectives of the SDL. Moreover, the proposal would assist in delivering development in the SDL, Wokingham Borough and the wider region as it would enable essential local and regional electrical supply to be maintained and upgraded.

The site also lies out of settlement within the countryside. The original officer's report for application 193248 indicated that whilst the proposed use does not fall into any of the exceptions for countryside uses within Core Strategy Policy CP11, it should be noted that the overarching objective of this policy is to protect the separate identities of the settlement limits and maintain the quality of the environment of the countryside. In this regard, it is considered that the proposal would not result in a coalescence of different settlement boundaries and the continued temporary nature of the development would allow for the site to be suitably restored to its former position.

Hence, while the principle of the development has been established by the extant permission, any further temporary harm to the character and appearance of the site and surrounding countryside (refer to assessment below) would still have to be balanced against the benefits of the proposal, i.e. its ability to facilitate the continued

delivery of essential utilities infrastructure to support existing and future sustainable development.

Character of the Area:

Core Strategy Policy CP3 states that planning permission will be granted for proposals that are of an appropriate scale of activity, mass, layout, built form, height, materials and character, together with a high quality of design without detriment to the amenities of adjoining land users, including open spaces or occupiers and their quality of life. Core Strategy Policy CP1 requires developments to maintain or enhance the high quality of the environment. Core Strategy Policy CP11 deals with development proposals outside development limits. It is a restrictive policy designed to protect the separate identity of settlement limits and maintain the quality of the environment. CP11 states that development will not normally be permitted outside of development limits except where it meets certain exceptions.

The on-site operational development to facilitate the proposed use includes portacabin style temporary structures for office/welfare use and storage containers and a mix of timber and herras fencing. It also includes the majority of the site being surface of Type 1 MOT hardstanding, with a smaller section of an asphalt parking area close to the entrance for parking. These forms of development are not typical of the characteristics of the open countryside on the northern section of Church Lane and would normally be resisted.

However, the temporary nature of the development would mean that harm to the character and appearance of the site and surrounding countryside would result in a short-term negative impact. Moreover, Condition 1 of the extant permission is recommended to be 'carried over' to any new permission to ensure that the site is restored to its former condition within 6 months of the cessation of the use. Hence, subject to compliance with this condition, the proposal would not have a long-term detrimental impact upon the character and appearance of the area and, while not directly complying with Core Strategy Policy CP11, would on balance be acceptable with regard to Policies CP1 and CP3 of the Core Strategy.

Neighbouring Amenity:

Policy CP3 of the Core Strategy aims to protect neighbouring amenity. Policy CC06 of the MDD seeks to ensure that proposals must demonstrate how they have addressed noise impacts to protect noise sensitive receptors

The application site is located approximately 150m from the closest residential properties to the south-west. This is a sufficient distance which helps to avoid any concerns in relation to residential amenity impacts. Specifically in relation to potential noise impacts, officers commented on the original application (193248) that noise levels would be negligible and unlikely to be audible above background noise levels by the M4 to the north of the site. Environmental Health Officers have raised no objection to this latest proposal identifying that no complaints have been received by Environmental Health regarding nuisances arising from the compound.

As such, the proposal adheres to the aims of Policy CP3 of the Core Strategy and Policy CC06 of the MDD and is acceptable in this respect.

Highway Access and Parking Provision:

Core Strategy Policies CP1, Sustainable Development and CP6, Managing Travel Demand seek to manage travel demand by a variety of measures. New development to be located to minimise the need to travel and where there are (or will be at the time of development) a choice of modes of transport available. It should also improve the existing infrastructure network, mitigate adverse impacts on the network, enhance road safety and avoid highway or traffic related environmental problems.

The application site is accessed from the northern side of Church Lane and provides 13 car parking spaces, with scope for additional parking if required. Given that the application site is located within the countryside and there are no bus or train routes within the immediate vicinity, it is considered that the application is not located in a sustainable location. As such, Condition 5 (Cycle Parking) on the extant permission was removed from the original permission via subsequent application 202908. Given the fact that the proposal is for use for essential infrastructure purposes and is only for a temporary period, it is considered that the lack of sustainable transport options to the site would not substantiate a reason for a refusal.

Additional information in respect of visibility splays have already been submitted and approved pursuant to Condition 4 (as discharged under application 202107) on the extant permission and the condition is recommended to be 'carried over' to any new permission to ensure that these measures are maintained operable and effective on site for the length of the period the proposal.

Thus, subject to visibility splay condition, the proposal is considered to adhere to Policies CP1 and CP6 of the Core Strategy in respect of highway access and vehicle parking provision.

Flooding and Drainage:

In accordance with the sequential approach established by the NPPF, Core Strategy Policy CP1 and MDDL Policies CC09 and CC10 establish that new development should avoid increasing and where possible reduce flood risk (from all sources) by first developing in areas with lowest flood risk (Flood Zone 1).

The application is within Flood Zone 1 and WBC Drainage Officers have reviewed the submitted information, stating that they have no objection to the proposed development in principle subject to a condition to secure suitable drainage measures for the site. However, such measures have already been submitted and approved pursuant to Condition 7 (as discharged under application 202107) of the extant permission and the condition is recommended to be 'carried over' to any new permission to ensure that the drainage measures shall be maintained operable and effective on site for the length of the period of the proposal.

Landscape and Trees:

Policy CC03 of the MDD Local Plan aims to protect green infrastructure networks, promote linkages between public open space and the countryside, retain existing trees and establish appropriate landscaping and Policy TB21 requires consideration of the landscape character.

The application site is located within the countryside with the Oak trees on the south-

western boundary of the site protected by a TPO (1577/2017). There have been no trees removed to facilitate the development which has already taken place. The WBC Landscape and Tree Officer raises no objection to the proposal in relation to harm upon trees or the landscape. As mentioned, a restoration condition to be 'carried over' to any new permission would require the submission and approval of a restoration plan which may need to assess the condition of the TPO trees and include details of mitigation works following removal of the temporary hard surfacing. Subject adherence to this condition, the proposal would adhere to Policies CC03 and TB21 of the MDD in this respect.

Impact on Burghfield Detailed Emergency Planning Zone (DEPZ):

The application site lies within the DEPZ for the Atomic Weapons Establishment (AWE) at Burghfield. The extent of the DEPZ was increased in 2020 and this has been informed by physical features such as development limits or field boundaries rather than a concentric circle which was used prior to the updated DEPZ. Policy TB04 of the MDD Local Plan sets out how development in the vicinity of the AWE at Burghfield will be assessed. This requires that any application within the area for commercial or residential uses needs to be accommodated within the Off-Site Emergency Plan.

The application was considered by the Office for Nuclear Regulation and the Council's Emergency Planning Officer. The Office for Nuclear Regulation have advised that they do not advise against granting planning permission following detailed assessment by the Council's Emergency Planning Officer who has raised no objection to the proposals subject to a condition to secure an emergency plan for the continued occupation of the site for the temporary period applied for.

The Council's Emergency Planning Officer, in co-ordination with the Office for Nuclear Regulation and the AWE Emergency Planning Group (led by West Berkshire), shall monitor the implementation of the emergency plan as submitted pursuant to the above condition and this will be done in co-ordination with the aims of Council's AWE Off-Site Emergency Plan.

Subject to compliance with the above condition, the proposed development would not put significant additional pressure on the Council's AWE Off Site Emergency Plan and therefore fulfils the requirements of policy TB04 and guidance within the NPPF in this respect.

Other:

The Public Sector Equality Duty (Equality Act 2010):

In determining this application, the Council is required to have due regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief. There is no indication or evidence (including from consultation on the application) that persons with protected characteristics as identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application and there would be no significant adverse impacts as a result of the development.

RECOMMENDATION	
Conditions agreed:	Yes
Recommendation:	APPROVE
Date:	09 May 2022
Earliest date for decision:	28 October 2021

Recommendation agreed by: (Authorised Officer)	
Date:	10.05.22

Draft Conditions:

Condition 1 now reads:

- Temporary Use Period

The use hereby permitted shall be discontinued on or before 26 May 2025 in accordance with a scheme of work that shall have first been submitted to and approved in writing by the local planning authority. The land shall be restored to its former condition within 6 months of the cessation of the use hereby approved.

Reason: To ensure the maintenance of the long-term quality of the countryside environment. Relevant policy: Core Strategy Policies CP1, CP3 and CP11.

Nothing herein contained shall be deemed to affect or vary the other conditions imposed by planning permission 193248 (as varied by application 202908), dated 24/12/2020, which conditions shall remain in full force and effect save in so far as they are expressly affected, varied or added to by this planning permission, viz:

- Personal Permission

The temporary use hereby permitted shall be carried on only by Southern Electric Power Distribution (or any such successor organisation that may occupy the compound similarly for the provision of essential electrical supply infrastructure), unless otherwise agreed in writing with the local planning authority.

Reason: In granting this permission the local planning authority has had regard to the special circumstances of the case, being the need to ensure the provision of essential infrastructure supply and maintenance. Relevant policy: Core Strategy policies CP1.

- Approved plans
3. This permission is in respect of the submitted application plans and drawings numbered 19.1_A, 20.1_A, 21.1_A, 21.2, 21.3, 21.4, 22.1, 23.1 and 24.1 received by the local planning authority on 13/01/2020 pursuant to application 193248. The development shall be carried out in accordance with the approved details unless otherwise agreed in writing by the local planning authority.
Reason: For the avoidance of doubt and to ensure that the development is carried out in accordance with the application form and associated details hereby approved.
- Visibility Splays
4. The visibility splays for this condition (as approved and discharged under application 202107) shall be maintained free of obstruction to vision for the length of the permission hereby granted.
Reason: In the interests of highway safety and convenience. Relevant policy: Core Strategy policies CP3 & CP6.
- Cycle Parking
5. Condition removed by application 202908
- Routing
6. All traffic above 7.5T serving the development hereby permitted shall enter and leave the site only from the east via Church Lane and Brookers Hill and not via Church Lane to the west.
Reason: In the interests of highway safety and convenience. Relevant policy: Core Strategy policies CP3 & CP6.
- Drainage Details
7. The drainage details for this condition (as approved and discharged under application 202107) shall be maintained operable and effective on site for the length of the permission hereby granted.
Reason: This is to prevent increased flood risk from surface water run-off. Relevant policy: NPPF Section 10 (Meeting the Challenge of Climate Change, Flooding and Coastal Change), Core Strategy policy CP1 and Managing Development Delivery Local Plan policies CC09 and CC10.
- Contamination
8. Should any unforeseen contamination be encountered during the development, the developer shall inform the LPA immediately. Any subsequent investigation/remedial/protective works deemed necessary by the LPA shall be carried out to agreed timescales and approved by the LPA in writing. If no contamination is encountered during the development, a letter confirming this fact shall be submitted to the LPA upon completion of the development.
Reason: To protect future occupiers and users of the site from the harmful effects of contamination.

9. AWW DEPZ - End User Emergency Plan

An End User Emergency Plan(s) for the development hereby approved shall be submitted to within 1 month of the date of this decision and approved in writing by the Local Planning Authority. The End User Emergency Plan(s) shall plan to accommodate the maximum average number of customers, visitors and staff and include a range of emergency scenarios.

The End User Emergency Plan(s) shall include (where applicable):

- Triggers for activation of the plan;
- Means and location of sheltering for a period of no less than 72 hours;
- Means of support for visitors and staff whilst in sheltering conditions;
- Means of evacuation and recovery;
- Method of and frequency of review.

The approved Emergency Plan(s) shall be implemented immediately following written approval by the Local Planning Authority and maintained in accordance with the approved details for the lifetime of the development.

The final contact details and names for those responsible for the monitoring, review and activation of the plan (e.g. business unit operator and management/owners), shall be included within the End User Emergency Plan(s) and also submitted to the Wokingham Borough Council Emergency Planning Officer.

Reason: As insufficient information is contained within the application submission and in order to provide assurance that an effective End User Emergency Plan will be put in place to protect occupants should there be an incident at AWE Burghfield in accordance with MDD Local Plan policy TB04 (Development in vicinity of Atomic Weapons Establishment (AWE), Burghfield) and Core Strategy policy CP3 (General Principles for Development).

Informative:

I01 – Reason for approval

1. The development accords with the policies contained within the adopted / development plan and there are no material considerations that warrant a different decision being taken.
2. The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received. This planning application has been the subject of positive and proactive discussions with the applicant in terms of assessing the implication of the site's location within the Burghfield Atomic Weapons Establishment (AWE) Detailed Emergency Planning Zone (DEPZ) and agreeing with the applicant the imposition of a relevant and necessary condition in this respect. The decision to grant planning permission in

accordance with the presumption in favour of sustainable development as set out in the NPPF is a positive outcome of these discussions.

3. The application site falls within the Burghfield Atomic Weapons Establishment (AWE) Detailed Emergency Planning Zone (DEPZ) and the Condition above has been imposed to secure emergency plans to protect the wellbeing of construction workers, staff and the public in the event of an incident at AWE. The applicant should be aware that the Wokingham Borough Council's Emergency Planning Officer, in co-ordination with the Office for Nuclear Regulation (ONR) and the AWE Emergency Planning Group (led by West Berkshire Council) are responsible for monitoring the implementation of emergency plans and undertake audits on approved developments.



**WOKINGHAM
BOROUGH COUNCIL**

TOWN AND COUNTRY PLANNING ACTS

**TOWN AND COUNTRY
PLANNING (ENGLAND) 1990**

Mr Rory Hollings
Dalcour Maclaren
4 Bredon Court
Brockridge Park
Twynning
GL20 6FF

NOTIFICATION OF APPROVAL OF PLANNING PERMISSION

Application Number: 213260
Applicant Name: SSE plc
Site Address: Land North of Church Lane, Church Lane, Three Mile Cross
Proposal: Application to vary condition No 1 of planning consent 193248 for the Full application for the proposed erection of a temporary compound to facilitate infrastructure works, including hardstanding, parking, fencing and gates, cabins and storage units. (Part retrospective). Condition No1 refers to the temporary use period of 24 months and the variation is to extend the use period to 60 months.

Wokingham Borough Council in pursuance of its powers under the above Acts and Regulations hereby **grants permission** for the above development to be carried out as stated in the application and the accompanying plans submitted to the Council subject to compliance with the following conditions, the reasons for which are specified hereunder.

Conditions and Reasons

1. Condition 1 now reads:

Temporary Use Period

The use hereby permitted shall be discontinued on or before 26 May 2025 in accordance with a scheme of work that shall have first been submitted to and approved in writing by the local planning authority. The land shall be restored to its former condition within 6 months of the cessation of the use hereby approved.

Reason: Reason: To ensure the maintenance of the long-term quality of the countryside environment. Relevant policy: Core Strategy Policies CP1, CP3 and CP11.

Nothing herein contained shall be deemed to affect or vary the other conditions imposed by planning permission 193248 (as varied by application 202908), dated 24/12/2020, which conditions shall remain in full force and effect save in so far as they are expressly affected, varied or added to by this planning permission, viz:

2. Personal Permission

The temporary use hereby permitted shall be carried on only by Southern Electric Power Distribution (or any such successor organisation that may occupy the compound similarly for the provision of essential electrical supply infrastructure), unless otherwise agreed in writing with the local planning authority.

Reason: Reason: In granting this permission the local planning authority has had regard to the special circumstances of the case, being the need to ensure the provision of essential infrastructure supply and maintenance. Relevant policy: Core Strategy policies CP1.

3. Approved plans

This permission is in respect of the submitted application plans and drawings numbered 19.1_A, 20.1_A, 21.1_A, 21.2, 21.2, 21.3, 21.4, 22.1, 23.1 and 24.1 received by the local planning authority on 13/01/2020 pursuant to application 193248. The development shall be carried out in accordance with the approved details unless otherwise agreed in writing by the local planning authority.

Reason: Reason: For the avoidance of doubt and to ensure that the development is carried out in accordance with the application form and associated details hereby approved.

4. Visibility Splays

The visibility splays for this condition (as approved and discharged under application 202107) shall be maintained free of obstruction to vision for the length of the permission hereby granted.

Reason: Reason: In the interests of highway safety and convenience. Relevant policy: Core Strategy policies CP3 & CP6.

5. Cycle Parking

Condition removed by application 202908

Reason: Reason: In the interests of highway safety and convenience. Relevant policy: Core Strategy policies CP3 & CP6.

6. Routing

All traffic above 7.5T serving the development hereby permitted shall enter and leave the site only from the east via Church Lane and Brookers Hill and not via Church Lane to the west.

Reason: Reason: This is to prevent increased flood risk from surface water run-off. Relevant policy: NPPF Section 10 (Meeting the Challenge of Climate Change, Flooding and Coastal Change), Core Strategy policy CP1 and Managing Development Delivery Local Plan policies CC09 and CC10.

7. Drainage Details

The drainage details for this condition (as approved and discharged under application 202107) shall be maintained operable and effective on site for the length of the permission hereby granted.

Reason: Reason: To protect future occupiers and users of the site from the harmful effects of contamination.

8. Contamination

Should any unforeseen contamination be encountered during the development, the developer shall inform the LPA immediately. Any subsequent investigation/remedial/protective works deemed necessary by the LPA shall be carried out to agreed timescales and approved by the LPA in writing. If no contamination is encountered during the development, a letter confirming this fact shall be submitted to the LPA upon completion of the development.

Reason: Reason: As insufficient information is contained within the application submission and in order to provide assurance that an effective End User Emergency Plan will be put in place to protect occupants should there be an incident at AWE Burghfield in accordance with MDD Local Plan policy TB04 (Development in vicinity of Atomic Weapons Establishment (AWE), Burghfield) and Core Strategy policy CP3 (General Principles for Development).

9. AWW DEPZ - End User Emergency Plan

An End User Emergency Plan(s) for the development hereby approved shall be submitted to within 1 month of the date of this decision and approved in writing by the Local Planning Authority. The End User Emergency Plan(s) shall plan to accommodate the maximum average number of customers, visitors and staff and include a range of emergency scenarios.

The End User Emergency Plan(s) shall include (where applicable): - Triggers for activation of the plan;

- Means and location of sheltering for a period of no less than 72 hours;
- Means of support for visitors and staff whilst in sheltering conditions;
- Means of evacuation and recovery;
- Method of and frequency of review.

The approved Emergency Plan(s) shall be implemented immediately following written approval by the Local Planning Authority and maintained in accordance with the approved details for the lifetime of the development.

The final contact details and names for those responsible for the monitoring, review and activation of the plan (e.g. business unit operator and management/owners), shall be included within the End User Emergency Plan(s) and also submitted to the Wokingham Borough Council Emergency Planning Officer.

Reason: As insufficient information is contained within the application submission and in order to provide assurance that an effective End User Emergency Plan will be put in place to protect occupants should there be an incident at AWE Burghfield in accordance with MDD Local Plan policy TB04 (Development in vicinity of Atomic Weapons Establishment (AWE), Burghfield) and Core Strategy policy CP3 (General Principles for Development).

Informatives

1. The development accords with the policies contained within the adopted / development plan and there are no material considerations that warrant a different decision being taken.

2. The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received.

This planning application has been the subject of positive and proactive discussions with the applicant in terms of assessing the implication of the site's location within the Burghfield Atomic Weapons Establishment (AWE) Detailed Emergency Planning Zone (DEPZ) and agreeing with the applicant the imposition of a relevant and necessary condition in this respect. The decision to grant planning permission in accordance with the presumption in favour of sustainable development as set out in the NPPF is a positive outcome of these discussions.

3. The application site falls within the Burghfield Atomic Weapons Establishment (AWE) Detailed Emergency Planning Zone (DEPZ) and the Condition above has been imposed to secure emergency plans to protect the wellbeing of construction workers, staff and the public in the event of an incident at AWE. The applicant should be aware that the Wokingham Borough Council's Emergency Planning Officer, in co-ordination with the Office for Nuclear Regulation (ONR) and the AWE Emergency Planning Group (led by West Berkshire Council) are responsible for monitoring the implementation of emergency plans and undertake audits on approved developments.

Signed

MHead

Marcia Head
Head of Development Management - Place & Growth
Date: 10 May 2022

PLEASE READ THE NOTES ISSUED WITH THIS DECISION NOTICE BELOW



WOKINGHAM BOROUGH COUNCIL

TOWN AND COUNTRY PLANNING ACTS TOWN AND COUNTRY PLANNING (ENGLAND) 1990

Other statutory legislation: This decision notice relates to the above stated acts and regulations only and does not constitute approval under any other legislation.

The Town & Country Planning (Development Management Procedure)

Order: This decision has been made in accordance with the requirements of the National Planning Policy Framework (NPPF) and in the requirement to work with the applicant in a positive and proactive manner.

Officer Report: An officer report explaining the decision will be available to view online.

Purchase notices: If either the local planning authority or the Secretary of State refuses permission to develop land or grants it subject to conditions, the owner may claim that the owner can neither put the land to a reasonably beneficial use in its existing state nor render the land capable of a reasonably beneficial use by the carrying out of any development which has been or would be permitted. In these circumstances, the owner may serve a purchase notice on the Council which will require the Council to purchase the owner's interest in the land in accordance with the provisions of Chapter I of Part VI of the Town and Country Planning Act 1990.

Appeals to the Secretary of State: If your application has been **refused** by the Borough Council or **granted subject to conditions** that you are not happy with, you have the right to appeal to the Planning Inspectorate (under Section 78 of the Town and Country Planning Act 1990). This must be within the timeframes set out below. Please note an extension of time for lodging an appeal is unlikely to be granted except in special circumstances.

12 weeks from the decision date above in the case of a refusal of a 'householder' application:
Being the refusal of an application for planning permission to alter or extend a house, or for works within the curtilage of a house; or,
Being the refusal to approve details submitted as required by a condition imposed on a permission granted for a householder application.

12 weeks from the decision date above in the case of a refusal of a 'minor commercial' application:
Being the refusal of an application for development of an existing building or part

of a building currently in use for purposes in Use Classes A1, A2, A3, A4 and A5 where the proposal does not include a change of use, a change to the number of units, development that is not wholly at ground floor level and/or does not increase the gross internal area of the building.

6 months from the decision date above in the case of all other appeals made under s78(1) or s20 of the above Acts relating to a decision on a planning application or listed building/conservation area consent application.

6 months from the decision date above in the case of any appeal made under s78 (2) of the Act in respect of a failure to give a decision within the statutory period.

The Planning Inspectorate is an Executive Agency reporting to the Secretary of State for Communities and Local Government. The Inspectorate has an online appeals service as set out on the [.gov.uk](http://www.gov.uk) website which contains information and guides on the appeal process. Alternatively you can obtain a form from the Planning Inspectorate at Temple Quay House, 2 The Square, Temple Quay, Bristol, BS1 6PN, 0303 444 5000 or through the [Planning Inspectorate website](http://www.planninginspectorate.gov.uk). Please note all documents will be published online by the Planning Inspectorate and therefore you should not include personal information you do not wish to be displayed in this way. This includes personal information of third parties.

Discharge of Conditions: This consent may contain conditions that require further approval by submission of an application for approval of details reserved by condition and the appropriate fee. Application forms can be obtained for this purpose by visiting the [Planning Portal](http://www.planningportal.gov.uk).

Street Naming and Numbering for new dwellings: If this notice relates to approval of new dwellings, please ensure that you contact the Council at least 16 weeks before the commencement on site to arrange for an address and post code to be allocated. Details can be obtained from streetnamingandnumbering@wokingham.gov.uk. Failure to contact the street naming and numbering department at least 16 weeks before commencement on site will result in the addressing and post code for the development being delayed.

Access to privately owned land: The applicant is reminded that this permission does not give right of entry to land not in the ownership of the applicant. Permission must be sought from any other landowner(s) if access is required.

Gas Mains and Services: Building over a gas main or service that is located within your site could cause damage to pipework or potential gas leaks within buildings. You should check for information relating to services within your site at [Home - LinesearchbeforeUdig \(lsbud.co.uk\)](http://www.lsbud.co.uk) and contact the Plant Protection Team at SGN on 0800 912 1722 or plantlocation@sgn.co.uk.

Building Regulations: The development subject to this permission may also require Building Regulation approval to ensure it is built to national safety, design, and environmental standards. The Council's Local Authority Building Control

(LABC) service offers a full range of plan approval, inspection, and associated services through an ISO9001 nationally accredited team of qualified building surveyors. These surveyors work closely with the Council's planning department to ensure the appropriate construction of your build. To find out more visit the Council's [Building Control website](#) or call 0300 790 0580 to speak to a member of the team.

Fire Regulations: In accordance with the Berkshire Act 1986, when Building Regulation applications are submitted for building(s) or extensions, the Local Authority will reject the plans unless, after consultation with the fire authority, they are satisfied that the plans show the following:

- i) That there will be adequate means of access for the fire brigade to the building(s) or the extended building(s); and,
- ii) That the building(s) or extension(s) will not render inadequate any existing means of access for the fire brigade to a neighbouring building.

Atomic Weapons Establishment (AWE)- Detailed Emergency Planning Zone (DEPZ)

End User Emergency Plan - Land North of Church Lane, Church Lane,
Three, Mile Cross

This document should be displayed clearly on site and all personnel either working or visiting should be made aware of this action plan.

Operator of Site: SSE plc.

Site Manager: Glenn Beard 07767 851546 (SSEN Site Manager)

Emergency Contacts:

- Glenn Beard 07767 851546 (SSEN Site Manager)
- Miles Crossley 07453276553 (SSEN Lead Construction Manager)

Maximum average no. personnel on site: 4 (Peak: 10)

In the event of an emergency

In the unlikely event of a radiation emergency at the nearby AWE site (Burghfield), personnel on site will be notified by a pre-recorded telephone message (landline only) from the AWE Alerting System. In addition, notifications may be received via local radio (Heart Berkshire: 97.0 and 102.9 MHz FM; BBC Radio Berkshire: 95.4 and 104.1 MHz FM), TV (e.g. BBC South, ITV Meridian), news websites or social media. The Site Manager will immediately notify all personnel on site to stop activities. If anyone on site receives notification prior to the Site Manager, they should make the Site Manager aware immediately. The Site Manager will ask that:

- Ensure that all vehicles, plant and machinery are fully turned-off, locked and secured.
- Ensure other colleagues and personnel have acknowledged the emergency (e.g. those wearing ear defenders)
- Do not finish off any activities – immediately stop, make safe the working area and leave towards the welfare cabins.

All personnel on site, including visitors, without exception must immediately make their way safely to the welfare units on site (adjacent to the entrance of the site) to receive instruction from the site manager or other responsible person. Maximum occupancy of welfare cabins is 10 persons, do not exceed this number.

Site manager to register all people on site into the designated emergency-use cabin on site. It is anticipated that 1 cabin will be required to accommodate all personnel on site; this cabin will be made obvious to all present on site during induction. Use of alternative welfare cabins will not be allowed.

- All windows and vents should be closed immediately. No air conditioning units are to be used.
- Where possible, avoid making landline or mobile phone calls for at least 30mins following the emergency notification to avoid overloading the local networks.
- The Site Manager will notify relevant authorities of presence of personnel on the site.
- Do not, unless expressly told to do so by trained persons or the emergency services leave the cabins.
- Listen to local radio for updates.

You should not attempt to leave or evacuate the site unless told to do so by emergency services.

Although it is unlikely, you may be required to stay in the welfare cabins for 72hrs or longer before being told to leave the area.

Whilst in the cabins, only consume food which has been stored either in containers, in the fridge/freezers, or is tinned. Water should only be drunk from the tap. Do not consume any food which has been left out. You may be required to rest/sleep within the welfare cabins.

Once instructed to, you will be able to leave the construction site towards Shinfield to the east. You should walk 400m to the east along Church Lane, then turn right at Brookers Hill into Shinfield where it is anticipated transport will be available as this is outside the exclusion zone. **Do not** leave the site towards Three Mile Cross and do not attempt to use personal vehicles which have been kept in the site car park as these may be contaminated. It is unlikely that you will be able to travel west along the M4, be prepared to travel east towards London. Do not panic, travel calmly and listen to the advice of emergency services.

Implementation and Review

This End User Emergency Plan shall be implemented immediately, and provisions for welfare for a minimum of 4 persons to sustain them for at least 72hours will be made available on site.

It is the responsibility of the Site Manager to ensure that suitable provisions for 4 persons, including; sleeping bags, a non-perishable food supply for up to 72hrs and can opener, flashlights, dust-mask, and hand-crank radio are all maintained and easily available within the relevant cabin.

This End User Emergency Plan is the responsibility of the Site Manager, and should be reviewed every 6 months (version number of this document and date to be updated, as required). If required any amendments to be made to this plan should be confirmed in writing with the Wokingham Borough Council Emergency Planning Officer.

If, following review of the Plan, it is established that a higher number of personnel are utilising the site regularly, the provisions to be kept on site in the event on an emergency should be adjusted accordingly, and so too the number of cabins to used in the event of an emergency if the maximum average persons exceeds 10.

It is the responsibility of the Site Manager to maintain records for each permanent or regular person on site in a locked, secure facility on site, within the relevant cabin for emergency use. These records should include details of relevant contact numbers for next of kin. Any visitors should be asked to provide an emergency contact at site induction.

An emergency landline connection will be installed to the relevant welfare cabin on-site which has been designated as the safe accommodation during the emergency.

Yamanaka, Akira

(Response from webform)

Title: Mr

First name: Akira

Last name: Yamanaka

Would you like to include the contact details of an agent(s)?: No

To which part of the Local Plan does this representation relate?: H5 Standards for New Housing

Do you consider the Local Plan is legally compliant?:

Do you consider the Local Plan is sound?: No

Do you consider the Local Plan complies with the Duty to co-operate?:

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy H5 4.4.44 -i 'Minimum floor to ceiling height is 2.3m' We consider this too low. The recommended minimum height in London is 2.5m. There is no reason Reading should adopt a lower standard than London.

Policy TR5 4.5.22 'Parking Standards and Design Supplementary Planning Document (SPD). ', 'It will continue to apply until it is superseded by any more up-to-date version.' We consider that The SPD is out-of-date. In section 7.0, Car Parking Layout and Dimensions, "Parking spaces are recommended to be designed at 5000mm long x 2500mm wide, however..." The Council should consider the 'Manual for Street' standards of 4800mm long x 2400mm wide as an alternative to larger standards in their SPD. Larger cars are generally less sustainable, and minor differences in standards cause a lot of additional work for everyone involved, so we would recommend Reading revise its parking standards to align with the national standard described in 'Manual for Streets'.

Policy H14 'loss of parking areas or garages' It would be good if this included a definition of 'loss of garages'. When garages have not been in use for a prolonged period, they should not be counted as garages. The lack of clarity on this causes an additional burden to designers and developers.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

Please upload any supporting information (if necessary).

Do you wish to make further comments concerning another paragraph, policy or area of the policies map?: No

If you wish to participate in the hearing session(s) please outline why you consider this to be necessary:

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Author name: Akira Yamanaka