



Office for
Nuclear Regulation

ONR Statement

**Examination of Reading Borough Council Local
Plan Partial Update: Stage 2 Hearings**

Written Statement on Question 9.2

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Project Name: Examination of Reading Borough Council Local Plan Partial Update: Stage 2 Hearings

Report Title: Written Statement on Question 9.2

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Contents

1.	Introduction.....	4
2.	Legislative background and definitions.....	4
3.	ONR's role in Land Use Planning.....	7
4.	Advice on Question 9.2	8

1. Introduction

1. This section provides the following:

- An explanation of the purpose of this submission; and
- An explanation of ONR's role.

1.1. Purpose

2. This written statement has been produced by the Office for Nuclear Regulation (ONR) in order to respond to the Planning Inspector's question 9.2.

1.2. ONR

3. ONR was established as a statutory Public Corporation on 1 April 2014 under the Energy Act 2013. We are GB's independent nuclear regulator for safety, security, and safeguards. Our mission is to protect society by securing safe nuclear operations.

4. We provide advice to the Planning Inspectorate on proposed developments located either on or in the vicinity of nuclear sites and we are participating in the Reading Borough Council Local Plan Review and the Planning Inspector's Examination because part of the Council area is within ONR's consultation zones around AWE Burghfield.

1.3. Background

5. ONR submitted a Regulation 19 Consultation Response on the Reading Borough Council Local Plan Pre-Submission Draft Partial Update on 17 December 2024 specifically relating to Policy OU2.

2. Legislative background and definitions

6. This section provides information on the background to the legislation relevant to Policy OU2 and the definitions used in that policy.

2.1. REPP19

7. In May 2019, the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPP19) came into force. REPP19 imposes duties on operators who work with ionising radiation, and local authorities to plan for a radiation emergency.

2.1.1. Radiation Emergency

8. Regulation 2(1) of REPP19 defines a Radiation Emergency as, "... a non-routine situation or event arising from work with ionising radiation that necessitates prompt action to mitigate the serious consequences of –
- (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, and
 - (v) the environment."

2.1.2. Detailed Emergency Planning Zone

9. The Detailed Emergency Planning Zone (DEPZ) is the geographical zone in where it is proportionate to make detailed plans for protective action in the event of a radiation emergency. There are two stages to the process of determining a DEPZ.
10. The first stage puts duties on the operator of premises which hold quantities of radioactive materials above specified thresholds. Regulation 4 requires the operator to undertake a written evaluation identifying all hazards arising from the operator's work which have the potential to cause a radiation emergency. This is referred to as a 'Hazard Evaluation' in REPP19.
11. Where the evaluation reveals the potential for a radiation emergency to occur, Regulation 5 requires the operator to assess a full range of possible consequences of the identified emergencies. The assessment is referred to in REPP19 as a 'Consequence Assessment'.
12. The requirements for an assessment include consideration of the range of potential 'source terms' (defined as the radioactivity which could be released which includes the amount of each radionuclide released; the time distribution of the release; and energy of the release); the different persons that may be exposed; the effective and equivalent radiation doses they are likely to receive; the pathways for exposure and the distances to which urgent protective reaction may be warranted for the different source terms when assessed against the United Kingdom's Emergency Reference Levels published by the United Kingdom Health Security Agency (UKHSA).

13. Regulation 7(1) & 7(2) of REPP19 require the operator to produce a report setting out the consequences identified by the assessment, called a 'Consequences Report', which must be sent to the local authority whose area the operator's site is located in. The Consequences Report must include a proposed minimum geographical area from the premises to be covered by the local authority's off-site emergency plan.
14. The second stage of the DEPZ determination process is the responsibility of the local authority. Regulation 8(1) of REPP19 provides that the local authority must determine the DEPZ based on the operator's recommendation and may extend that area in consideration of local geographic, demographic and practical implementation issues; the need to avoid, where practicable, the bisection of local communities; and the inclusion of vulnerable groups immediately adjacent to the area proposed by the operator.

2.1.3. Off-Site Emergency Plan

15. Regulation 11(1) & (2) of REPP19 provide that, where premises require a DEPZ, the local authority must make an adequate Off-Site Emergency Plan (OSEP) covering the zone. The plan must be designed to mitigate, so far as is reasonably practicable, the consequences of a radiation emergency outside the operator's premises.
16. When preparing or reviewing the OSEP, Regulation 11(5) of REPP19 requires the local authority to consult the operator, Category 1 & 2 responders (as per the Civil Contingencies Act 2014), relevant health authorities, the Environment Agency, UKHSA, and such other bodies it considers appropriate.

2.1.4. Testing and Review

17. Regulation 12(1) of REPP19 requires the local authority to do the following at suitable intervals not exceeding three years:
 - Review and where necessary revise the OSEP; and
 - test the OSEP to the extent necessary to ensure that the plan is effective.
18. Regulation 12(8) of REPP19 requires the local authority to produce a report on the outcome of the test, highlighting strengths and weaknesses of the OSEP. Regulation 12(4) of REPP19 requires any review of the OSEP to take into account the report of the outcome of the test.

2.1.5. Site Operations

19. Regulation 10(4) of REPP19 prevents the operator from carrying out work with ionising radiation unless the local authority has complied with its duty to produce an adequate OSEP.

2.2. External Hazards

20. External hazards are defined in paragraph 228 of the ONR Safety Assessment Principles as “those natural or man-made hazards to a site and facilities that originate externally to both the site and its processes...” such that the nuclear site operator may have very little or no control over the initiating event. They include for example fire, toxic release, missiles, electromagnetic interference and flooding.
21. The principal piece of legislation for the regulation of nuclear safety in the UK is the Nuclear Installations Act 1965 (NIA 1965). NIA 1965 requires certain installations to have a nuclear site licence. The operators of nuclear licensed sites have a duty to develop and maintain site licence compliance arrangements, which includes the requirement to produce and maintain a safety case. The safety case must address the management of risks arising from external hazards.

2.3. AWE Burghfield

22. The AWE Burghfield nuclear site is located in West Berkshire District Council's (WBDC) jurisdiction and WBDC is responsible for producing, maintaining and testing the OSEP. However, the DEPZ extends beyond the WBDC area in to Reading Borough Council's area.
23. WBDC has determined a DEPZ for the AWE Burghfield site, in accordance with the statutory process, and has produced an Off-Site Emergency Plan (“OSEP”) for the DEPZ.

2.4. Status of the OSEP

24. ONR currently judges the OSEP for AWE Burghfield's DEPZ to be stretched, which poses challenges for accommodating new development in the area covered by the OSEP.

2.5. WBDC Local Plan

25. WBDC has produced a policy for the management of development in the vicinity of AWE Aldermaston and AWE Burghfield known as Policy SP4 and for consistency we support the inclusion of the same policy in the Reading Borough Council Local Plan. This will provide clarity for developers and consistency between local authorities.

3. ONR's role in Land Use Planning

26. We provide advice to the Planning Inspectorate for England, the Scottish Government, the Welsh Government and local planning authorities on proposed developments located either on or in the vicinity of nuclear sites.

27. We provide advice on those implications of a proposed development that are relevant to our statutory purposes, as well as impact on the statutory compliance of our dutyholders for those matters we regulate. In particular, our advice seeks to secure the following outcomes:
- Limit the potential for a development to pose an external hazard to a nuclear site,
 - Limit the radiological consequences to members of the public in the event of a radiation emergency occurring on a nuclear site;
 - Limit the consequences to members of the public in the event of a major accident occurring on a nuclear COMAH site; and
 - Prevent significant adverse effects on the environment arising from the cumulative effects of the proposed development and a nearby decommissioning nuclear site.

4. Advice on Question 9.2

9.2 Is Policy OU2 justified, supported by robust evidence, and consistent with national policy? Is the Council's approach to the Detailed Emergency Planning Zone and other consultation zones for Atomic Weapons Establishment Burghfield consistent with that of its neighbours, West Berkshire District Council and Wokingham Borough Council?

28. We consider that Policy OU2 is justified because it provides clarity for developers and consistency between local authorities affected by the DEPZ around AWE Burghfield. However, we request that the Inspector notes our comments on Policy OU2 made in our response to the Regulation 19 consultation which remain valid. This matter is also addressed in the Statement of Common Ground between Reading Borough Council, West Berkshire District Council and ONR (EX045).
29. We believe that Policy OU2 is supported by robust evidence as a very similar policy, Policy SP4, has undergone scrutiny by the Planning Inspectorate during the Examination of the West Berkshire District Council Local Plan 2022-2039. As noted previously, we reiterate our comments submitted in the Regulation 19 consultation regarding the content of Policy OU2.
30. Policy OU2 is broadly consistent with national policy as set out in the NPPF; however, the proposed changes to the NPPF which is currently going through consultation (December 2025) states in PM10 that 'Plan-making authorities should engage proactively and regularly with infrastructure

providers, neighbouring and other relevant plan-making authorities (where there are strategic interdependencies across boundaries) and other relevant bodies to identify and address cross boundary matters that need to be addressed in their plans ...'. This strengthens our proposal for Reading Borough Council to ensure that WBDC Policy SP4 and RBC Policy OU2 are the same.

31. A recent planning appeal in Wokingham on Land East of Hayes Drive, Three Mile Cross¹ was dismissed following recovery by the Secretary of State; the Secretary of State agreed that the OSEP is under significant pressure, gave great weight to the evidence of ONR's witness, and substantial weight to the risk of harm to the safety and wellbeing of future residents.
32. Reading Borough Council's approach to the DEPZ and other consultation zones around AWE Burghfield is broadly consistent in its intent with that of its neighbours. WBDC's Local Plan has been approved and published in June 2025 containing SP4 (see below). Wokingham Borough Council is in the process of its Local Plan Update and we understand, as our submission to the consultation requested, that their policy, Policy SS7, will be similarly worded for consistency and transparency.
33. Therefore, ONR supports the proposals for the Council's inclusion of Policy OU2 subject to the amendments suggested in our response to the Regulation 19 consultation and the Statement of Common Ground submitted (EX045).

[WBDC] Policy SP4

Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield

Within the Office for Nuclear Regulation (ONR) land use planning consultation zones surrounding AWE Aldermaston and AWE Burghfield development will be managed in the interests of public safety, and to ensure that any proposed developments do not adversely affect the defence related operation or capability of the AWE sites.

Development proposals within the land use planning consultation zones that pose an unacceptable risk to the operation of the AWE Off-Site Emergency Plan (OSEP) and/or adversely affect the defence related operation or capability of the AWE sites will be refused planning permission.

¹ APP/X0360/W/24/3354607 paragraph 22

In determining applications, the ONR and AWE/MOD will be consulted on development proposals in the Detailed Emergency Planning Zone (DEPZ), Outer Consultation Zone (OCZ) and 12km Consultation Zone which meets the ONR consultation criteria as detailed on the ONR website. The ONR and AWE/MOD will be consulted on any proposal that is likely to lead to any increase in the residential or non-residential population (including visitors and workers) of the DEPZ. Development within the DEPZ is likely to be refused planning permission where the ONR, as regulator of the nuclear licenced sites, advise against the proposed development.
