

Re: Application Ref 22/00244/FULEXT Appeal Reference APP/W0340/W/22/3312261

Sir,

I have to take issue with the Appellant's dismissive assessment of the potential risk to residents associated with a radioactive release at AWE Burghfield. These risks exist and are successfully and competently managed by relevant authorities that have procedures in place to safeguard both the Site and the local population. I know from personal experience that both establishments have two main priorities, (1) public safety and (2) UK security. AWE/MOD have no reason to make anything other than a reasoned statement, they are not motivated by the profit motive that TA Fisher have. The consultants employed by TA Fisher are precisely that, paid to deliver an opinion that will assist in enabling the development to proceed. This surely must be regarded as a conflict of interest since the consultants are unlikely to provide a viewpoint which is not favourable to their employers.

Pro Vision/T A Fisher state that the development itself would:

*'not have an adverse impact upon the nation's security by constraining operations on the AWE site'* however no justification is given for this view. The planning officer's decision notice, informed by ONR and AWE under REPPiR guidance as well as the Council's own Emergency Planners, considers that:

*'future public safety would be compromised if the development were to proceed, and potential harm would occur to the future capability and capacity of AWE Burghfield to operate effectively'*.

The developers also state that the most likely predicted accidents would spread material by explosive distribution 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. They also state that *"the potential impact of inhalation of radioactive material is therefore minimal."* There is no minimal level of contamination, the most dangerous method of personal contamination is ingestion, either by inhalation or swallowing which can in no way be called minimal.

Pro Vision on behalf of T A Fisher argue that *'the risk occurs only whilst the plume passes and only to those unable to shelter in time'*. Again, this ignores the risks laid out in the Consequences Report, Burghfield Site Regulation 7(1) of REPPiR 2019:

*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.*

The Appeal document goes on to state:

1.18 *'Even if it were the case that the Council could not prepare an adequate emergency plan to cover the additional population arising from this development, the Secretary of State has the power to exempt AWE from any requirement or prohibition imposed by the regulations.'*

The fact that this is even suggested demonstrates a gross lack of understanding of the situation. Given that the activities of AWE sites are secret it is not possible for the precise nature of some risks to be explained to the general public.

With the ongoing conflict between Russia and Ukraine, and it's potential for escalation, it is vital that our nuclear sites and deterrent capability are not compromised.

Additionally, the developers' reply to the two questions (1) Are there any new public rights of way to be provided within or adjacent to the site? And (2) Do the proposals require any diversions/extinguishments and/or creation of rights of way? is "No" but the developers T A Fisher have surreptitiously created a new access from the development. They show a footpath running past the side of The Oaks, turning at a right angle and joining a private drive to exit onto Reading Road, slightly closer to the village but at a point where there is no footpath. This may not be strictly a planning consideration but it does concern the council as it is an unsafe although shorter route which could potentially be used by the 75 anticipated new residents from the development as well as the existing Regis Manor Road inhabitants who at present use the safe crossing point provided. This new footpath exits directly onto the private drive serving 5 houses. Traffic on the drive would not have any warning of a pedestrian exiting directly onto a roadway and no way of avoiding an accident. At the junction of the private drive and the main road there is no safe accessway for anyone to avoid the main road traffic.

Importantly, the West Berkshire Housing land supply has been met so there is even less reason to consider jeopardising the safety of residents by allowing this site to be developed.

To sum up, there are two opposing viewpoints here, one is that of the Council, AWE and The MOD who are responsible for safeguarding the public should, for whatever reason, a radioactive release occur, and the viewpoint of developers TA Fisher who are concerned solely with making profit from the development -which, as stated above, is not necessary as West Berkshire has sufficient new home capacity from other sites.