

**TOWN & COUNTRY PLANNING ACT 1990 (As Amended)**

**TOWN & COUNTRY PLANNING (INQUIRIES PROCEDURE) (ENGLAND) RULES 2000**

# **AWE Statement**

**APPELLANT:** **BEWLEY HOMES PLC & HP CARTER SETTLEMENT**

**APPEAL SITE:** **LAND REAR OF DIANA CLOSE, SPENCERS WOOD,  
BERKSHIRE, RG7 1HP**

**DEVELOPMENT:** **PROPOSED ERECTION OF 24 DWELLINGS WITH  
ASSOCIATED ACCESS, LANDSCAPING AND  
PARKING**

**LPA REFERENCE:** **171004**

**PINS REFERENCE:** **APP/X0360/W/19/3240232**

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**October 2020**



**WOKINGHAM  
BOROUGH COUNCIL**

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## **1.0 INTRODUCTION**

- 1.1 This additional statement has been produced at the request of the Inspector due to the site now falling within the Detailed Emergency Planning Zone (DEPZ) for the AWE site at Burghfield.
- 1.2 In addition to the reasons for refusal set out in the decision notice, the council objects to the appeal proposal due to the additional quantum of residential development within the amended DEPZ.
- 1.3 This statement sets out the council's position on this material change in circumstances and the subsequent objection raised.

### ***Background***

- 1.4 When the application was determined, the site was outside of the Detailed Emergency Planning Zone (DEPZ) for Burghfield and therefore no objection was raised to the quantum of residential development proposed.
- 1.5 The DEPZ for the AWE Burghfield site has since been re-determined by West Berkshire District Council (as the emergency planning authority for the facility) following a review of the minimum protective area for urgent action under the Radiation (Emergency Preparedness and Public Information) Regulations (REPPIR) 2019.
- 1.6 All UK nuclear sites working with 'ionising radiation' (as defined by the legislation) and the local council (West Berkshire District Council) where these nuclear sites are, had until 21 May 2020 to comply with the new regulations. This has resulted in the recent expansion of the DEPZ.
- 1.7 The appeal site now lies wholly within the re-determined DEPZ area (see Appendix 1).

## **2.0 RELEVANT LEGISLATION**

- 2.1 Under the Radiation (Emergency Preparedness and Public Information) Regulations (REPPiR) 2019, local authorities are responsible for setting Detailed Emergency Planning Zones (DEPZ) for sites where there could be a radiation emergency with off-site consequences and preparing detailed plans for responding to such an emergency, within the DEPZ area. The off-site plans are put in place to minimise and mitigate the health consequences of any significant radiological release that might occur as a result of a radiation emergency at the nuclear site.

### **3.0 POLICY**

- 3.1 Paragraph 95 of the NPPF states:

*‘Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:*

*a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and*

*b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.’*

3.2 Policy TB04 of the MDD Local Plan (Appendix 2) refers to development in the vicinity of the Atomic Weapons Establishment (AWE) at Burghfield and states:

*1. Development will only be permitted where the applicant demonstrates that the increase in the number of people living, working, shopping and/or visiting the proposal (including at different times of the day) can be safely accommodated having regard to the needs of “Blue light” services and the emergency off-site plan for the Atomic Weapons Establishment site at Burghfield.*

*2. The applicant will need to provide this information where the proposal exceeds the scale of development detailed below for the consultation zone as defined on the Policies Map.*

3.3 The proposal exceeds the scale of development referred to in criterion 2 of the policy because it would result in one or more additional persons living in the DEPZ.

#### **4.0 CONSIDERATION**

4.1 The Emergency Planning Officer has recommend that the appeal is dismissed due to the location of the proposed erection of 24 new residential dwellings within the DEPZ.

4.2 The DEPZ is the area for which the responsible local authority, supported by other responding agencies, are required to plan in more detail. Planning is required in order to protect the public in the event of a radiation emergency which has an impact outside of the nuclear site boundary.

4.3 Based on the average household size to be 2.4 persons per household, the proposed 24 dwellings would result in an increase in population within the DEPZ by approximately 57 people.

- 4.4 The application site is within a sector that comprises of residential dwellings and small business.
- 4.5 Even minor planning applications for small numbers of properties in the DEPZ have an impact on the emergency plans for AWE as the numbers of people living in those properties aggregates to become a much larger number. The recent expansion of the AWE DEPZ has already increased the numbers of properties, people and businesses within this hazard zone and whilst an emergency is extremely unlikely, such development places extreme pressure on the emergency plans and responding agencies.
- 4.6 If any residents are in receipt of care packages this will cause significant issues in the event of an emergency as carers would be unable to visit. This would impact both short term and long term sheltering.
- 4.7 In the event of an emergency, any vulnerable people living in the properties in receipt of care packages would be unable to be supported if shelter was imposed.
- 4.8 There are concerns about capacity to cater for onward care for evacuees in the event of an emergency, especially when considered in the context of the existing numbers of properties in the area and the aggregation of already approved planning applications (not yet built) within the DEPZ.
- 4.9 If evacuation of the sector is required this development would overwhelm the Councils evacuation centre capacity.
- 4.10 Any long term resident relocation requirements caused by contamination of properties would overwhelm the Councils capacity to do so.
- 4.11 Due to the impact of the development on responding agencies and the potential effect on the occupants of the proposal, it is recommended that the appeal is dismissed because it would impact on the Council's ability to implement its AWE Burghfield off-site emergency plan.

- 4.12 The Council are awaiting a formal response from the ONR. The ONR however confirm that as proposed developments on, or in the vicinity of a nuclear site could have an impact on the local emergency planning arrangements, their advice on planning applications is informed by the views of local authority Emergency Planners: The Emergency Planner has objected to this appeal proposal.
- 4.13 A recent response from the ONR for a development comprising of 34 dwellings in the DEPZ re-affirms this position (Appendix 4):

*‘Due to the scale and location of the proposed development ONR advise against this application unless the emergency planners at Wokingham which is responsible for the preparation of the Burghfield off-site emergency plan required by the Radiation Emergency Preparedness and Public Information Regulations (REPPPIR) 2019 are consulted with regard to this application and that they subsequently provide written confirmation that, in their opinion, the proposed development can be accommodated within their existing off-site emergency planning arrangements (or an amended version of it)’.*

- 4.14 Taking the above into consideration, the council objects to the appeal proposal for the following additional reason:

*The application site is situated within the Detailed Emergency Planning Zone (DEPZ) surrounding Burghfield Atomic Weapons Establishment (AWE). The proposed development would, as a result of the associated increase in population within the DEPZ, have detrimental impact on the Council’s ability to implement its AWE Burghfield off-site emergency plan. As such, the proposal would be contrary to the requirements of Policy TB04 of the MDD Local Plan and section 8 of the NPPF.*

- 4.15 The council reserves the right to address any additional evidence submitted by the Appellant. The council will continue to engage with the Appellant and the Inspectorate on this matter.
- 4.16 In addition to the other reasons for refusal, the appeal should also be dismissed for the reason set out in this statement.