



Office for
Nuclear Regulation

ONR Report

Summary Proof of Evidence

Emergency Preparedness and Response

ONR Report

Summary Proof of Evidence

Emergency Preparedness and Response

Appeal Details	
Application Reference No.	22/00244/FULEXT
Appeal Reference No.	APP/W0340/W/22/3312261
Local Planning Authority	West Berkshire Council
Location	Land to the rear of The Hollies, Burghfield
Proposal	The erection of 32 dwellings including affordable housing, parking and landscaping. Access via Regis Manor Road.

Authored by: Grant Ingham, Policy and International Workstream Lead,
Emergency Preparedness and Response Team, ONR

Report Issue No: 1

Publication Date: August-24

Contents

Contents	3
1. Summary	4
1.1. Purpose and Scope of Evidence	4
1.2. Likelihood and Severity	4
1.3. The OSEP	4
1.4. Testing of the OSEP.....	4
1.5. Consented but Not Built	5
1.6. Conclusion	5

1. Summary

1.1. Purpose and Scope of Evidence

1. My evidence will consider the application of REPP19 as it applies to ONR's regulation of the off-site EP&R arrangements for AWE Burghfield ("AWE(B)"), and particularly on ONR's regulation of the Off-Site Emergency Plan.

1.2. Likelihood and Severity

2. Sections 4.4, 4.5, and 4.6 of ONR's Statement of Case [CD 25.1] set out ONR's position that arguments on the likelihood or severity of a radiation emergency are not relevant in respect of the DEPZ. The DEPZ has been appropriately determined by the Council and the people living, working and visiting the area it covers must be afforded the protection of an adequate OSEP which mitigates the serious consequences of a radiation emergency.

1.3. The OSEP

3. The OSEP is a written document, or set of documents, prepared by the Council that can be put into effect by responding organisations without delay. It is prepared in accordance with the requirements of Regulation 11 of REPP19 and Paragraph 338 of the Guidance.
4. The OSEP is either adequate or it is not: it is a binary matter. The judgement of adequacy is based on evidence of the present position, meaning that ONR would not know for certain that the OSEP was inadequate until evidence had become available that it had already become inadequate.
5. There is no mechanism in REPP19 or the Guidance for quantifying the impact of a proposed development on the effectiveness of the OSEP, nor determining the number of residences/workplaces that can be accommodated before the OSEP will become inadequate (i.e. a 'tipping point').

1.4. Testing of the OSEP

6. Testing of the OSEP is a key tool for assessing adequacy and the Council cannot test the OSEP on communities that do not yet exist and do not feature in the OSEP.
7. The most recent test of the Council's OSEP was ALDEX23 which was completed on 15 September 2023. This provided formal confirmation of the weaknesses with the OSEP that I had observed. As a consequence of the ALDEX23 Report, ONR issued a letter to the Chief Executive of the Council on 29 November 2023 [CD 25.4]. The Letter represented an escalation of ONR's regulatory activity.

1.5. Consented but Not Built

8. ONR is aware that there are a significant number of properties, both commercial and residential, that have been consented but not built out within the DEPZ. The increased population will add to the demands on the already stretched OSEP. ONR bases its judgement on the adequacy of the OSEP on the DEPZ as it is today, so the impacts of the new developments on that adequacy cannot be known. The Appellant's scheme adds a further 32 dwellings to an already very demanding situation, at a time where the OSEP is already stretched.

1.6. Conclusion

9. If the proposed development is built out in addition to other already consented schemes, the ONR has no confidence that the OSEP would continue to be adequate. Indeed, even if the other consented schemes are not built out, and only the Appellant's scheme comes forward, the Council's evidence supports the ONR's concern that the adequacy of the OSEP may not be sustained.