



Office for
Nuclear Regulation

ONR Report

Proof of Evidence

Emergency Preparedness and Response

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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.

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1. Background

1.1. Qualifications and experience

1. I am a Chartered Radiation Protection Professional and hold a certificate of competence as a Radiation Protection Adviser.
2. I have 22 years' experience in the field of emergency preparedness and response ("EP&R") for radiological emergencies covering participation in on- and off-site emergency exercises, preparation of emergency plans, and regulation of emergency arrangements across most of the UK's nuclear sites.
3. I represent the UK and ONR at the pre-eminent domestic and international meetings in the field of EP&R for nuclear and radiological emergencies. I am the UK's representative at the International Atomic Energy Agency ("IAEA") Emergency Preparedness and Response Standards Committee ("EPR_{ES}C") which develops the international standards that the UK has committed to adopt. I represent ONR and the UK at the Nuclear Energy Agency's Committee on Radiological Protection and Public Health and its Working Party on Nuclear Emergency Matters. Domestically, I represent ONR to promote regulatory compliance at key stakeholder forums including:
 - a) The Local Authorities Nuclear Working Group – which shares and promotes good practice in emergency preparedness between local authorities ("LA") that have nuclear sites within their jurisdiction;
 - b) The Nuclear Emergency Arrangements Forum, a nuclear operator forum that also promotes good practice;
 - c) The Lessons Learned Working Group, chaired by the Department for Energy Security and Net Zero, which sets a programme of work to improve the UK's nuclear-related emergency arrangements; and
 - d) The Blue Lights Working Group, a group that brings together the emergency services to share good practice and improve joint working with respect to preparedness for nuclear and radiological emergencies.
4. I currently work as a Principal Inspector within ONR's EP&R team as the Policy and International Lead and Deputy Head of Regulation. The EP&R team primarily focuses on the regulation of off-site emergency arrangements, and in particular compliance with the Radiation (Emergency Preparedness and Public Information) Regulations 2019 ("REPP_{IR}19").

1.2. Scope of Evidence

5. My evidence will consider the application of REPPIR19 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.
6. I have not been directly involved in the regulation of REPPIR19 for the AWE(B) site (other than being a member of the assessment team for the ALDEX 23 test referred to in Section 2.5), nor am I a specialist in land use planning matters. These activities are undertaken by my colleagues in the EP&R team. However, in order to undertake my role as Policy Lead I am kept informed of regulatory activities by the wider team.

2. ONR's Regulatory Oversight of the Off-Site Emergency Plan ("OSEP")

7. The definition of terms used in REPP19 used in this Proof of Evidence is consistent with Annex 1 of Eamonn Guilfoyle's PoE.

2.1. The Detailed Emergency Planning Zone ("DEPZ")

8. REPP19 requires the relevant LA to designate a DEPZ. The DEPZ is the geographical zone in which it is proportionate to plan for protective action in the event of a radiation emergency. The AWE(B) DEPZ is set in accordance with the process prescribed in REPP19 [CD 12.3]. ONR is the regulator for REPP19 and provided oversight of the determination of the DEPZ. ONR is satisfied that the extent of the DEPZ for AWE(B) is suitable and sufficient.
9. 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 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.
10. In coming to a judgement on whether the development can be accommodated in the DEPZ, the question is not: "what is the likelihood or severity of the radiation emergency?" It is: "will the OSEP continue to be effective in the event of an emergency?"

2.2. Purpose of the OSEP

11. The OSEP is a written document, or set of documents, that can be put into effect by responding organisations without delay. The responding organisations are not just the emergency services and include, for example, local authorities, NHS bodies, the Environment Agency and utility companies.
12. The LA must prepare the OSEP in accordance with the requirements of Regulation 11 of REPP19. Paragraph 338 of the Guidance to REPP19 provides a concise description of preparing an adequate OSEP:

The process for making an adequate plan involves:

- a) *writing the plan, including the minimum content required by Schedule 6 and meeting the principles and purposes in Schedule 7;*
- b) *implementing the necessary requirements (or seeking confirmation of this) to ensure the plan is capable of being put into effect without delay when required; and*

c) testing the plan to demonstrate its adequacy and making any necessary improvements to the plan as identified by the test.

13. Schedule 6 of REPP19 describes the minimum content required to be included in the OSEP. Examples of this content which is directly relevant to the OSEP includes:
- a) The arrangements for co-ordinating resources necessary to implement the OSEP, including the activation, deployment, management and sustainment of specific local and national emergency response capabilities needed to provide a response at any time, without delay.
 - b) The arrangements for off-site protective action, including sheltering and evacuating members of the public, preventing people entering the affected area, controlling traffic and implementing food and water restrictions.
 - c) The arrangements for carrying out an assessment of the impacts of the radiation. This includes arrangements for environmental monitoring to quickly confirm any release of radiation and then to subsequently determine the nature and extent of any contamination and arrangements to establish a public health monitoring facility (radiation monitoring units (“**RMU**”)) to monitor members of the public who have been evacuated or to provide reassurance to people who may have been in close proximity to the premises.

2.3. The OSEP for AWE(B)

14. The potential radiological hazards from different UK nuclear sites range in type and magnitude, as well as having highly varied demographics. As a result, each associated OSEP has its own particular challenges. In respect of the AWE(B) site and its DEPZ, the challenges that create heightened demand on the OSEP include:
- a) The recommended minimum distance of the DEPZ is the second largest for a GB nuclear site (i.e. the radiation emergency requires a comparatively large geographic response);
 - b) The nature of the radiation emergency which may occur at AWE(B) provides short notice (no more than 10 minutes) for the public to shelter in order to realise any substantive benefit from the sheltering; and
 - c) The principal radionuclide that would be released in the event of a radiation emergency is of a type that is particularly difficult to detect even with specialist monitoring equipment (and so requires greater time, effort and resource from responding organisations).
15. These are important factors that provide significant challenges to implementing the OSEP and increase its sensitivity to changes in demographics, particularly when considering the need to implement sheltering and relocation.
16. The OSEP stipulates that, upon declaration of a radiation emergency by the operator, the entire DEPZ must shelter immediately (i.e. stay indoors with doors

and windows closed). All members of the public (residents, workers, visitors, etc) present in the DEPZ in all sectors surrounding the AWE(B) site, regardless of any external factors such as wind direction, are expected to take this protective action. They are expected to remain sheltering until explicitly advised to break shelter. The need to remain under shelter in respect of the assessed AWE(B) emergency may be for up to 2 days.

17. Further, some members of the public may be promptly evacuated, whereas others may be relocated during, or at the end of, the 2 day sheltering period. These protective actions are set out in the OSEP and have been communicated to the residents of the DEPZ in leaflets in accordance with Regulation 21 of REPP19.
18. On activation of the OSEP, the responding organisations come together to form the Strategic Co-ordinating Group (“**SCG**”). The role of the SCG is to consider the situation based on available information. One of the decisions open to the SCG is to advise some members of the public that they can be released from sheltering. This decision would only be made by the SCG if it has evidence (particularly environmental monitoring of radioactivity) and the advice of specialists that it is safe to break shelter in certain locations.
19. REPP19 requires that the arrangements in the OSEP ensure that prompt action is taken to offer protection to members of the public, not simply in terms of restricting exposure to radiation, but also their wider health and safety (including psychological impacts) and quality of life. The OSEP must therefore consider the wellbeing of tens of thousands of people who are sheltering, and who may then subsequently be released from sheltering or relocated.
20. Mental health and psychosocial consequences of radiation emergencies are an area of increasing focus for the international community, as reflected in the publishing of the World Health Organisation’s ‘A Framework for Mental Health and Psychosocial Support in Radiological and Nuclear Emergencies’ [**CD 25.10**], which provides the following messages:

*The lessons learned from nuclear accidents such as in Chernobyl in 1986 and in Fukushima in 2011 clearly demonstrate that in addition to direct risks to human health and the environment from radiological hazards, the impact of such accidents is linked with subsequent protective actions and negative socioeconomic changes. Similar to other disasters and emergency situations, nuclear accidents have a profound impact on mental health, psychological and social standing, which in turn affect people’s well-being, mental and physical health. **Radiation emergencies, however, carry substantial and unique stressors.***

*Radiation emergencies have unique mental health impacts. Mental health and psychosocial consequences, such as fear, anxiety, emotional and behavioural changes, **may outweigh the direct health impact of radiation exposure.***

21. The framework promotes a focus on the wellbeing of populations who may be affected by these emergencies and recognises that significant efforts are required

from responding organisations both in the preparedness and response phases so that harm can be minimised.

22. The requirement to consider mental health and psychosocial impacts in emergency planning and response is already reflected in REPP19. Effective communications with the public via media channels are a key element of mitigating some of these impacts but are not effective in isolation. There will also be a significant demand on responding organisations resources to provide targeted mental health and well-being support. REPP19 guidance acknowledges that people in areas unaffected physically by any radiation release might be subject to psychological health impacts that will need to be addressed.
23. The protection of vulnerable groups is also required to be explicitly addressed by the OSEP, as they will require specialist attention from responding agencies. The guidance to Regulation 8 of REPP19 defines vulnerable groups as:

... those that are less able to help themselves in the circumstances of an emergency and can include occupants of schools, hospitals, care homes, people with mobility difficulties, mental health issues, hearing and visual impairment etc. Those who cannot readily shelter (eg caravan and mobile home dwellers, campers, walkers, farmers, outdoor visitor attractions etc) are also considered to be vulnerable.
24. The conclusion of the sheltering period is not necessarily the end of the nuclear emergency. The decision to proceed from the emergency response phase to the recovery phase of the emergency response can be complex. The decision requires input from a wide range of stakeholders. In an area that has been affected by radioactive contamination, the SCG will again require data secured by monitoring of the environment by specialists. As explained, the type of radioactive material and emitted radiation which would be involved in a radiation emergency arising from AWE(B) is challenging to detect. As a result of this challenge, it is likely that it will take longer to monitor and so in all likelihood the time taken to conclude the emergency response phase and move to the recovery phase will increase and it is reasonable to assume that there would be an ongoing perception of widespread radiological contamination by residents and responders, causing social disruption and distress. The longer the population of the DEPZ is held in the emergency response phase, the greater will be the demands on the responding agencies, and as such increasing the population who may be required to held in the emergency response phase will add further burden onto the existing OSEP.
25. Implementation of the OSEP involves a multi-agency response. It is not just emergency services. Practical implementation of the OSEP requires support from many different responders. At a local/regional level this includes the Council and neighbouring local authorities covered by the DEPZ, health and care organisations, and those with responsibilities for utilities and transport infrastructure. The response is also dependent on the national capabilities of government agencies such as the UK Health Security Agency (“**UKHSA**”), the Environment Agency, Food Standards Agency, Ministry of Housing, Communities and Local Government, Department for Environment, Food & Rural Affairs and the Met Office.

26. ONR places great emphasis on ensuring an effective dialogue between the LA and responding organisations and has assured itself that local planning groups are working effectively. The content of the OSEP reflects carefully considered advice that draws on a wide range of highly specialist expertise and the judgement of the LA reflects the agreed position of the responding organisations. Although the Appellant can express a view on the content of the OSEP, it will not have had the benefit of access to the professional insights this wider expertise provides.

2.4. General Considerations on the Adequacy of the OSEP

27. The OSEP is either adequate or it is not: it is a binary matter. Furthermore, 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, i.e. retrospectively. ONR bases its judgement of adequacy of the OSEP on the DEPZ as we find it today, based on the populations that already exist within the DEPZ. It cannot include consideration of developments that have been consented but not been built out because the OSEP cannot take account of populations that do not yet exist, where there are no residences or workplaces or people living and working in them. Testing of the OSEP is a key tool for assessing adequacy and the Council could not test the OSEP on communities that do not yet exist and do not feature in the OSEP.
28. As I have set out, the OSEP must contain the minimum content described in REPP19. ONR has been satisfied that the OSEP for AWE(B) meets that minimum standard. The next stage is for ONR to consider the adequacy of the OSEP. A vital consideration that underpins adequacy, as set out in REPP19 ACoP and Guidance, is the requirement that an OSEP “can be put into effect without delay when required”.
29. In order to reach a view on adequacy, ONR provides regulatory oversight of the development of the OSEP from the point that the geographical extent of the DEPZ that it covers is being determined. Every DEPZ and associated OSEP is unique, and so ONR is required to liaise (which ONR terms “engagements”) extensively with the operator, LA and responding organisations. This is in order to provide ONR with the necessary background information to identify:
- a) The particular risks posed by a particular nuclear site.
 - b) The particular challenges posed by the geography and demography of each DEPZ.
 - c) The protective actions required to mitigate consequences from a radiation emergency arising at the site, and the challenges of bringing them into effect.
 - d) The roles of the responding organisations, both local and national, and their respective capacities and capabilities.

2.4.1. Testing the OSEP

30. The principal opportunity to explore practically the adequacy of the OSEP is via testing, as required by Regulation 12(1) of REPP19. Here again, a key consideration of adequacy is whether the OSEP can be put into effect (paragraph 373(c) of the Guidance [**CD 12.6**]), which requires tests to demonstrate that:

the plan can be practicably implemented and will be effective in the response to a radiation emergency to secure, so far as reasonably practicable, the restriction of exposure to ionising radiation and the health and safety of workers and members of the public.

31. ONR is engaged throughout the testing process, from the earliest planning meetings, to deploying inspectors to observe the test, to participating in the closing meetings. The purpose of ONR's involvement is to seek assurance that the lessons learned from the test are included in the report of the outcome of the test which is produced under Regulation 12(8), and that those lessons are then taken forward into the subsequent review and revision of the OSEP.
32. The regulations allow for the identification of areas for improvement during tests, requiring the local authority to capture lessons learned during the test and to address them in the review and revision of the OSEP. In this manner, the adequacy of the OSEP is maintained.

2.4.2. Constraints on responding organisations

33. A significant challenge to the practical implementation of the OSEP is the constraints on the resources of responding organisations. The response to a radiation emergency draws from a limited pool of specialists, both local and national. Paragraph 334 of the Guidance [**CD 12.6**] advises that the local authority should seek:

“confirmation, so far as reasonably practicable, from responding organisations that... underpinning capabilities required to implement the plan are in place and readily available”.

34. Additionally, regulation 11(5) of REPP19 requires that, when preparing the OSEP, LAs engage with a wide variety of responding organisations. Paragraph 351 of the Guidance [**CD 12.6**] advises:

The purpose of consultation is to engage with and take account of relevant parties' views during the preparation, review and revision of the off-site emergency plan, to maximise its effectiveness. Consultation should ensure that wider specialist knowledge, responsibilities and national guidance are taken into account in developing and resourcing the off-site emergency plan.

35. The duty on LAs therefore is to consult with the relevant responding organisations both directly and typically also at planning/resilience groups and forums in order to ensure that they are adequately resourced and available. These discussions will

factor in each organisation's ability to perform its function in the emergency response. ONR recognises that there are real-world constraints which limit the capability and capacity of organisations which make up the OSEP emergency response and so ONR expects local authorities to ensure that they understand how these constraints might impact delivery of the OSEP. ONR places emphasis on the relationships between the local authority and the responding organisation to prepare and maintain an adequate OSEP, since the only accurate judgement of the capability and capacity of responding resources is from the organisations themselves.

2.4.3. Revision of the OSEP

36. REPP19 recognises that OSEPs are constantly evolving arrangements and will require revision, either because there has been a material change (such as, for instance, a change to the consequences report or the major restructuring of a responding organisation) or because an area for improvement has been identified. In the latter case, ONR accepts that areas for improvement will be identified with the OSEP, either routinely or during testing. ONR works with the local authorities to ensure such areas are identified, tracked, and addressed in a timely manner. These matters are not usually significant enough to cause the local authority or ONR to question whether the OSEP remains adequate, since, on balance, the OSEPs generally remain effective.
37. A key factor affecting the capacity, and so the adequacy, of an OSEP is the number of people living, working, or visiting within the DEPZ. All increases in population will add to the burden placed upon responders in the event of a radiation emergency, but different OSEPs and DEPZs will have different tolerances to such increases. REPP19 recognises that new developments in the DEPZ can impact the effectiveness of the OSEP. Paragraph 250 of the Guidance [CD 12.6] discusses the potential need to re-determine the DEPZ as a result of developments within or adjacent to the DEPZ. Paragraph 378 advises that the review process for an OSEP should take into account "any changes in the detailed emergency planning zone or outline planning zone; for example, a new school or hospital" in addition to "any other changes which could affect the effectiveness of the plan".

2.4.4. Regulatory action

38. Where there is robust evidence of a deficiency with an OSEP which threatens the ability to practically implement an important capability of the plan, ONR would take firmer action – potentially leading to formal enforcement where it is proportionate to do so. As I explain further below, due to the final findings from the latest ALDEX23 exercise ONR escalated its regulatory action in the time after the first inquiry.

2.4.5. "Tipping point" of the OSEP

39. 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').

40. This is because of the inherent complexity of developing an analytical approach that factors in tens of thousands of residents and workers in the DEPZ, widely varying transient populations, and the individual resources of more than 20 responding agencies who are themselves subject to fluctuating demands both locally and nationally. As a result, LAs rely on consultation with the responding organisations to determine whether the resources which form the 'underpinning capability' of the OSEP can accommodate a new development.

2.4.6. Inadequacy of the OSEP

41. I am not aware of any circumstances where ONR has found that an OSEP has not been adequate. It would be a very serious finding, since it would amount to a declaration that ONR considers that members of the public who live and work in the DEPZ would not be sufficiently protected should a radiation emergency arise. As I have stated, radiation emergencies are unique in the degree of anxiety they provoke in members of the public. A finding of inadequacy would cause a high degree of distress to people in the DEPZ and beyond. It is for this reason that ONR is very careful in how it expresses its concerns regarding the adequacy of the OSEP, as it is aware of the seriousness and implications of a finding of inadequacy. As well as the impact on the local population, as I discuss further below, there are also potential consequences in respect of UK defence which are likely to arise from an explicit finding of inadequacy of the OSEP.
42. The immediate consequence of ONR finding that the OSEP was inadequate would be that the local authority would be non-compliant with its duties under REPP19 and ONR would consider formal enforcement action. Enforcement is discretionary and is typically taken after non-compliance has occurred. Depending on the severity of the breach, enforcement may include the issue of an enforcement letter, an improvement notice, or prosecution.
43. In summary, ONR bases its judgement on the adequacy of an OSEP on evidence gathered from a range of regulatory activities, including interactions with the LA or responding organisations, assessment of the OSEP, the outcomes of inspections and the findings of tests. It re-evaluates the judgment of adequacy as new information becomes available and actively engages with duty holders to influence them to uphold the adequacy of OSEPs, which are the most vital component of emergency planning arrangements for radiation emergencies.

2.5. Specific Considerations Relevant to the Adequacy of the AWE(B) OSEP

44. As a result of the expansion of the DEPZ following the introduction of REPP19, ONR was aware that there would be a significantly increased burden on the OSEP. Therefore, ONR engaged with the Council in order to strengthen its own oversight

of development control within the DEPZ and assess whether the Council has the capability and capacity to fulfil its REPP19 obligations.

45. The first of these engagements was on 13 August 2021. ONR wrote to the Chief Executive Officers of the three LAs whose territorial jurisdiction was affected by the DEPZ [CD 12.14]. In this letter ONR expressed its concern that that further development may have the potential to impact upon the adequate implementation of the OSEP. The letter also notified the LAs that ONR's land use planning arrangements were changing to increase its scrutiny of planning applications in the DEPZ.
46. Following the issuing of this letter, ONR conducted an initial inspection of the Council on 16 March 2022, with the inspection focussing on the capability and capacity of the Council to comply with REPP19 [Annex 2¹]. As a consequence of the findings of this inspection, ONR raised a Regulatory Issue with the Council on 25 March 2022. Regulatory Issues provide the formal mechanism by which ONR records and monitors progress against the follow-up actions required to address issues identified by ONR inspectors. The Regulatory Issue related to capability and governance arrangements of the Council as a REPP19 duty holder. ONR commenced a series of three further inspections to seek assurance that the Council had adequate resources and capabilities to meet its obligations under REPP19, with the first taking place on 6 July 2022. Through the inspections, ONR sought to answer the following questions:
- a) How does the Council ensure that it has adequate organisational capability to produce, review and test the AWE off-site emergency plan;
 - b) How resilient are the resources and capabilities of the Council to produce, review and test the AWE off-site emergency plan;
 - c) How effective are the Council's arrangements for ensuring there is adequate succession planning for staff in key REPP19 compliance roles;
 - d) How does the Council manage risks to the delivery of its duty to produce, review, and test the AWE off-site emergency plan; and
 - e) How effective are the arrangements for the cooperation with local authorities for the purpose of reviewing and testing the AWE off-site emergency plan?
47. Between 11 May 2021 and 15 February 2022, the Council conducted a series of modular exercises which, collectively, formed the first statutory test of the new OSEP. This test included the participation of approximately 30 agencies, both local and national, and included ONR as an assessor. The modules of this test comprised the following:
- a) Road Closure Workshop;

¹ ONR, Proof of Evidence, Land Use Planning

- b) Rail Workshop;
 - c) AWE Displaced People Workshop;
 - d) AWE Communication Directory Exercise;
 - e) Science and Technical Advisory Cell Exercise; and
 - f) Media Briefing Centre Exercise and Workshop.
48. The Report of the Outcome of the Test was produced by the Council. The Report collated and evaluated the feedback of all of the agencies which participated in ALDEX22, and identified strengths and weaknesses in the OSEP and areas for improvement. The Report highlighted several areas of weakness in the OSEP. Of relevance, the areas of weakness included areas linked to population density within the DEPZ, including:
- a) Arrangements for people monitoring (and associated decontamination);
 - b) Arrangements relating to evacuation holding areas for displaced persons awaiting monitoring;
 - c) Arrangements for managing the numbers and scale of displaced people, both those outside the DEPZ and unable to return home and those inside the DEPZ who require evacuation; and
 - d) Arrangements for managing those who self-evacuate, especially for ensuring they undergo appropriate monitoring and decontamination.
49. A subsequent test of the OSEP, known as ALDEX23, was conducted on the 24 April 2023. This was a full live test and it represents the best available evidence as to the present strengths and weaknesses of the OSEP, especially in conjunction with the modular exercises and workshops carried out as part of the previous testing cycle. I was a member of the ONR exercise assessment team and I recognised similar issues in ALDEX23 that were evident at the previous modular exercise.
50. The Report of the Outcome of the Test 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. It required the Council to set out its plans for improving the OSEP and confirms that ONR will undertake a series of inspections to confirm that the improvements are effective.
51. There is evidence that the capacities of the underpinning capabilities that are required to deliver key elements of the OSEP have reached their limit. The weakness and concerns with the OSEP which were identified in the Letter were not matters which can be easily remedied by the Council. Since it was issued, ONR understands that the Council has been holding meetings and workshops with its

responding organisations to understand the scope of what is required and the most effective means of delivering them. However, it should be noted that the required improvements are significant and will be challenging and potentially time consuming to address, due to the limited resources of the various responding organisations. The capacities of responding organisations have real world constraints and the OSEP is not infinitely scalable.

52. 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. As explained in Para 27, ONR bases its judgement on the adequacy of the OSEP on the DEPZ as it is found 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.
53. If the proposed development is built out in addition to other already consented schemes, 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 ONR's concern that the adequacy of the OSEP may not be sustained.

3. Summary

54. ONR has had multi-layered regulatory oversight of the OSEP and considers that there is evidence that the OSEP is stretched and the capacities of the underpinning capabilities that are required to deliver key elements of the OSEP have reached their limit.
55. The Council and the organisations that support the OSEP are working hard to develop the arrangements, but these improvements will take time to implement.
56. In order to forestall the very real risk of the OSEP becoming inadequate, with the significant impacts that would follow, ONR continues to advise against the proposed development.