

From: [REDACTED]
To: [REDACTED]
Subject: Representation to Proposed Main Modification 8
Date: 31 January 2025 18:37:13
Attachments: [REDACTED]

This is an **EXTERNAL EMAIL**. **STOP. THINK** before you **CLICK** links or **OPEN** attachments.

Dear Sir/Madam,

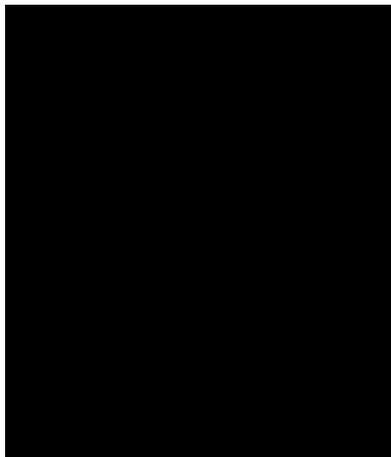
Please find attached a duly complete representation form and statement detailing objections to proposed main modification 8.

I would be grateful if you could acknowledge receipt of this representation.

Yours faithfully,

Graham Ritchie [REDACTED]

Woolf Bond Planning Ltd



Woolf Bond Planning
Chartered Town Planning Consultants

IMPORTANT: This e-mail (including any attachments) is intended only for the recipient(s) named above. It may contain confidential or privileged information and should not be read, copied or otherwise used by any other person. If you are not a named recipient please contact the sender and delete this e-mail from your system.

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**West Berkshire Local Plan Review 2022-2039 (LPR)
 Consultation on Proposed Main Modifications
 (6 December 2024 – 31 January 2025)**

Representation Form

Ref:
 (For official use only)

Please complete and return this form:	By email: [Redacted]
	By post: Planning Policy, Development and Housing, Council Offices, Market Street, Newbury, RG14 5LD
Return by:	11:59pm on Friday 31 January 2025

Please read the **Guidance Note**, available on the Council's website <https://www.westberks.gov.uk/lpr-proposed-main-modifications>, before making your representations.

This form has two parts:
 PART A – Your details
 PART B – Your representation(s)

Please complete a new form for each representation you wish to make.

<u>PART A: Your details</u>		
<i>Please note the following:</i>		
<ul style="list-style-type: none"> • We cannot register your representation without your details. • Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published. 		
	1. Your details	2. Agent's details (if applicable)
Title	Mr	
First Name*	Graham	
Last Name*	Ritchie	
Job title (where relevant)		
Organisation (where relevant)	Woolf Bond Planning Ltd	
Address* <i>Please include postcode</i>	[Redacted]	
Email address*	[Redacted]	
Telephone number	[Redacted]	
Consultee ID (if known)		

*Mandatory Field

3. If you have answered 'No' to question 2a or 2b above, please provide details of why you consider the Proposed Main Modification or Proposed Policy Map Change is not legally compliant or is unsound, including any changes you consider necessary to make the Plan legally compliant or sound.

You will need to say why this change will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

<p><i>See enclosed statement</i></p>

Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)

4. Do you have any comments on the updated Sustainability Appraisal/Strategic Environmental Assessment Report – Proposed Main Modifications (November 2024)?
(Please be as precise as possible)

Page number	
Paragraph number	
Comments:	

Habitats Regulations Assessment

5. Do you have any comments on the addendum to the Habitats Regulations Assessment of the Proposed Main Modifications (November 2024)?

(Please be as precise as possible)

Page number	
Paragraph number	
Comments:	

Notification of Progress of the Local Plan Review

6. Do you wish to be notified of any of the following?

(please tick/mark 'X' all that apply)

<i>The publication of the report of the Inspector appointed to carry out the examination</i>	X
<i>The adoption of the Local Plan Review</i>	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy Team.

Signature	<i>Graham Ritchie</i>	Date	31/1/25
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Your completed representations must be received by the Council by 11:59pm on Friday 31 January 2025.

Representations

Schedule of Proposed Main Modifications to the West Berkshire Local Plan Review 2022-2039 (November 2024)

Prepared by:

Woolf Bond Planning Ltd

JANUARY 2025



Woolf Bond Planning
Chartered Town Planning Consultants

MAIN MODIFICATION 8 – AMENDMENTS TO POLICY SP4 – ATOMIC WEAPONS ESTABLISHMENT

Introduction and wider context for representation to the policy

- 1.1 In responding to the content of the Main Modifications to the proposed draft policy, the representations cover several inter-related points which results in our conclusion that the approach in the plan is not sound.
- 1.2 The matters of soundness whilst covering all four tests can be summarised as follows:
 - a) No consideration of differences in approach to definition of Urgent Protective Area (UPA) zones between the two facilities operated by AWE;
 - b) In the context of the currently defined DEPZ, no consideration of whether the boundary adequate accords with the guidance on REPPiR, especially on not including more people than necessary; and
 - c) No review of different approaches for defining Detailed Emergency Planning Zones (DEPZ) around nuclear facilities across the UK;
- 1.3 The Council has included a blanket restriction on further development around the AWE facilities at Aldermaston and Burghfield. The Local Plan's failure to consider these matters has resulted in an unsound document, even including the Proposed Main Modifications. Each of the above factors is explored indicating that the overall approach of the Plan results in an unsound plan.

A) *No consideration of differences in approach to definition of Urgent Protective Area (UPA) zones between the two facilities operated by AWE*
- 1.4 The Consequences Reports prepared for the AWE facilities at Aldermaston and Burghfield both detail the approach to identifying where the advocated measure to achieve the 3mSv reduction on dose should radioactive material be released should occur. In both instances, the advocated measure is to shelter, and this therefore informs the definition of the Urgent protective Actions (UPA) zone. Whilst no comments are made upon this, it is noted that for both sites, there is an assumption that there will be a warning given through landlines following the release of material following an incident.

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- 1.5 The Consequences Report for Aldermaston identifies the distance where sheltering achieves the 3mSv reduction in dose. This is at 1,540m as indicated in paragraph a of the answer to question 2 in part 2.
- 1.6 However, paragraph f of the answer to this question acknowledges that under Category F weather conditions, the plume will pass the UPA limit of 1,540m in around 13 minutes, which is less than the 15 minutes envisaged in the off-site plan to initiate the measures including activation of the landline calls to nearby residents. It is noted that the Lidl supermarket at Tadley relies upon the receipt of the call to activate their emergency measures, although based upon the Category F windspeed of 2m², the plume will travel the 600m from Aldermaston site boundary to the store in 5 minutes.
- 1.7 Therefore, although the off-site plan for both AWE sites' envisages sheltering, it is clear that this is not feasible around Aldermaston given the minimal time in order for this to occur due to the proximity of residents.
- 1.8 The Consequences Report for Burghfield notes that the 3mSV saving associated with sheltering occurs at 3,160m (paragraph b of answer to question 2 in part 2). In contrast to Aldermaston, the Consequences Report allows a 15 minute window following the release of material to enable initiation of the off-site plan and the activation of the phone messaging service. Thereafter, there is up to 10 minutes for people to shelter.
- 1.9 The Category F windspeed of 2m² means that the plume will have travelled up to 1,800m within the 15 minute window for initiation of the off-site plan. Therefore, only people between 1,800m and 3,160m from AWE Burghfield would have the opportunity to shelter, although the time available for this is dependent upon distance from the site. Nevertheless, the Consequences Report does indicate that there is scope for sheltering as an action.
- 1.10 The AWE Burghfield Consequences Report concludes that at 3,160m, sheltering is the effective measure for reduce the received dose by at least 3mSV, should there be an unlikely release of radioactive material from the site. Beyond this distance, sheltering still provides a reduction in dose, although the benefits of this within the wider off-site plan must be considered in the context of the REPIR 2019 guidance.

B) In the context of the currently defined DEPZ, no consideration of whether the boundary adequate accords with the guidance on REPPIR, especially on not including more people than necessary

- 1.11 The Report to West Berkshire's Corporate Board references the guidance in determining the boundary of the DEPZ, recognising that it must include all the land in the UPA. The REPPIR guidance on the DEPZ is detailed in Regulation 8 and referred to in section 5.6 of the Corporate Board Report.
- 1.12 Whilst the Corporate Board Reports contents are noted, especially with respect to consideration of the use of features to define the extent of the area and the need to avoid the bisection (where practicable) of existing communities, our view is that their approach has not considered the practical implementation issues, especially the impact of seeking to implement protective actions across too wide an area.
- 1.13 The Guidance associated with the implementation of REPPIR¹ clarifies these points in paragraphs 237 and 238. These states:

The zone will be determined by the local authority based on their knowledge of the local area and understanding of emergency planning in that area. The zone should be suitable and sufficient to meet the requirements of the Regulations. The determination of the zone should consider properties which may fall beyond a natural boundary where it would be necessary to enter the detailed emergency planning zone to evacuate. Where a detailed emergency planning zone has a marine component, the most effective option to determine the boundary in this area would be to use a semi-circle of defined centre co-ordinate and radius. The boundary could also be determined using a rectangle with defined corner co-ordinates or a fixed integer distance from the coast bounded by two latitudinal co-ordinates.

An adequate response should meet the requirements in the Regulations to mitigate a radiation emergency and have the capability available to ensure this happens without unnecessary delay. Although undertaking protective action can reduce the dose received, this needs to be balanced against the stress caused to affected people and the potential harm to them that could result from this action. The size of the detailed emergency planning zone and the protective action planned in it should not put people at risk of harm from unnecessary action. An excessively large area could

¹ Approved Code of Practice and Guidance from the HSE of REPPIR 2019

also divert important resource from affected areas which require the most attention. If it is considered by the operator that the local authority has increased the detailed emergency planning zone excessively so that the increase is detrimental to the effectiveness of the off-site plan, this should be discussed with the local authority and the regulator. (my emphasis)

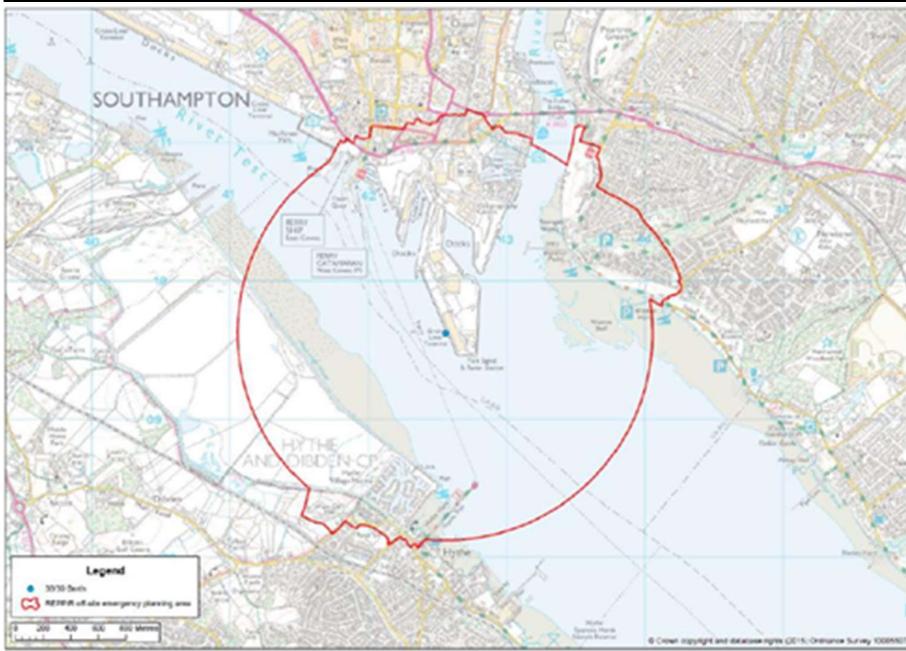
- 1.14 Although West Berkshire as the body that sets the DEPZ around the AWE facilities has referenced the guidance in REPPiR regarding the definition of the wider zone, we do not consider that it fully accords with the national guidance.
- 1.15 The consented use of the Reading FC football stadium includes an increase in its capacity of up to 36,900 attendees. This will be boosted by further people on the pitch and in support functions (security, catering, etc), in addition those living around the site as reference in the Report to West Berkshire Corporate Board.
- 1.16 The above assessment excludes others who would be located in the UPA, which depending upon the time of day could include visitors to the retail park adjoining the stadium (also within the UPA) together with users of other sites like the motorway service station at Reading. All other these would need to be accommodated within the measures (including sheltering) as detailed in the off-site plan.
- 1.17 The REPPiR guidance is clear that any expansion of the DEPZ beyond the minimum UPA must take account of the potential harm and stress for the affected people alongside the burden on emergency services that this imposes. Whilst the blue light services may be able to accommodate this, had the DEPZ been focused solely on the UPA, this additional pressure on blue light services together with harm and stress to the affected residents would be avoided.
- 1.18 The uplift from residents and Reading FC spectators within the UPA is significant and will put undue pressure on emergency services and the health of residents.
- 1.19 Reducing the DEPZ so that it is only focused on the UPA both reduces the pressure on blue light services and also means that residents in the areas are not subject to unnecessary harm or stress.

C) No review of different approaches for defining Detailed Emergency Planning Zones (DEPZ) around nuclear facilities across the UK

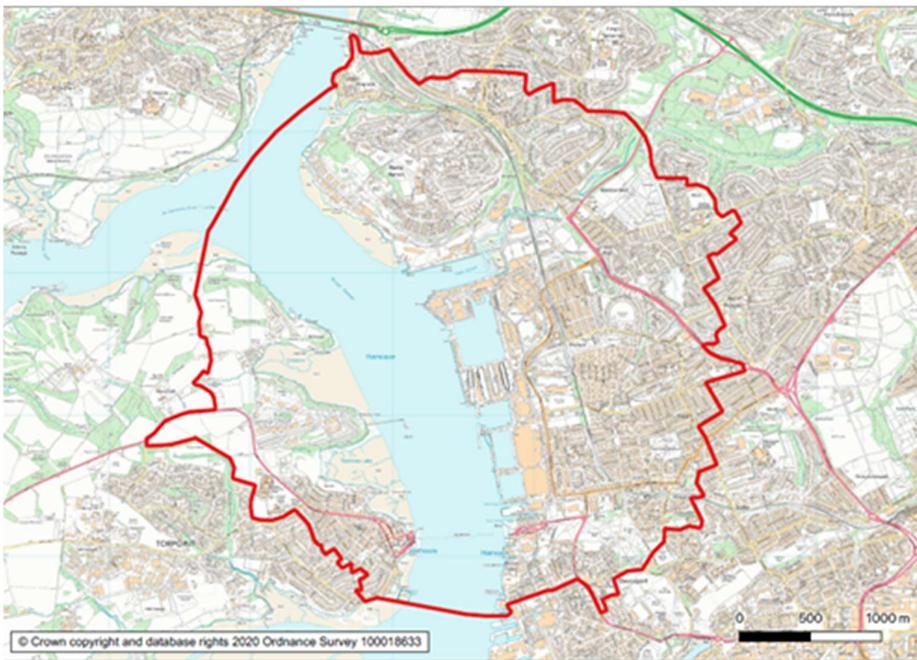
1.20 The approaches of other authorities to defining a DEPZ around nuclear sites, including where these extend across urban area is also relevant in determining consistency. This is illustrated by the maps indicating the tight focus for DEPZ boundaries of the relevant defined radius for the facility. This is especially noticeable for those around Portsmouth, Southampton and Plymouth (Devonport) which minimise the built-up areas (especially residential) of the cities and their nearby settlements (Gosport and Hythe) within the respective DEPZ. This is shown below.



DEPZ for Portsmouth Naval Base



DEPRZ for Southampton submarine mooring point



DEPRZ for Devonport, Plymouth

1.21 The approaches of other authorities is clear that existing communities can be subdivided by a DEPRZ, especially where this limits stress and harm on residents

immediately outside of the UPA. For this reason, the other locations have tightly defined DEPZ. The same should occur for AWE Burghfield.

Conclusions

1.22 Therefore, the above indicates that there has and continues to be scope to accommodate additional development within the area surround AWE facilities at Aldermaston and Burghfield.

1.23 A reduction in the extent of the DEPZ so it is solely focused on the UPA would remove the pressure and concerns arising from other residents living in the expanded area.

Consideration of legal and soundness tests of MM8

1.24 The Main Modification to the Policy is not sound for the following reasons:

- a) It is not **positively prepared** as the approach hinders the ability of the plan as a whole to address the areas assessed needs;
- b) It is also **inconsistent with national policy** as the approach to defining the zones around AWE does not accord with the guidance in REPPiR, especially regarding avoiding the inclusion of too many people within the remit of an off-site plan.

1.25 To address these matters of soundness, significant revisions to the policy are essential.
