

Wokingham Borough Council Emergency Planning Unit response to Mike Thorne & Associates Ltd - Radiological Assessment Report on a Prospective Development Site: Land Rear of Diana Close, Spencers Wood, RG7 1HP

Brett Dyson BSc (Hons) Chem
Appeal ref: APP/X0360/W/19/3240232

Introduction

My name is Brett Dyson and I am Emergency Planning Manager for Reading Borough Council & Wokingham Borough Council.

I have a degree in Chemistry (BSc (Hons) Chemistry) and was previously a qualified fire fighter.

I have worked for 10 years as a Chemist & Fire Fighter on a Top Tier COMAH site regulated under the Control of Major Accident Hazard regulations 2015.

I have over 16 years experience working in Civil Contingencies/emergency planning for Reading & Wokingham Councils leading on the AWE Offsite Emergency Plan and other associated emergency plans.

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Overall Mr Thornes report appears to downplay the likelihood and impact of an emergency at AWE, and regularly neglects to remind the reader that despite that being his view, it remains a legal duty for the Local Authority to prepare an emergency plan for a scenario - which in “lay person” terms is classed as worst case and in this instance covers the area of the planning application site in question.

It is not for the Local Authority (or indeed this planning appeal) to decide “what is an acceptable level of risk to prepare an Emergency Plan for in relation to AWE”. Such an assessment has been debated by experts and prescribed into law (REPP19), which we (the Local Authority) now need to plan for.

The Local Authority has no option but to prepare for such a scenario (The scenario referred to which resulted in the expansion of the UPA and DEPZ in early 2020).

Mr Thornes report in support of the planning application, appears to focus its support/defence almost entirely on 3 areas:

- 1) The fact that the Planning application site lies outside of the 3160m Urgent Protection Area (UPA) circle, but inside of the Detailed Emergency Planning Zone (DEPZ)

- 2) That his interpretation of the health impacts to the public of an accident affecting this area, are within a range commonly experienced by members of the public
- 3) That the DEPZ has been incorrectly established and this negatively effects this planning application.

Neither of these points address the Councils objection to the planning application which is based solely upon whether or not the AWE Off Site Emergency plan and supporting emergency plans can cope with the additional development.

On this point alone the Appellant's appeal should be rejected as it has not addressed the issues raised by the Council in its objection.

However dealing with the 3 points above I will endeavour to explain why they are misleading and of no consideration to the Emergency Planning process upon which the objection is based.

- i) **UPA & DEPZ** – One of the Appellant's defences to their position, is that because the planning application site lies outside of the 3160m UPA, the application should be approved. This fact is simply irrelevant.

3160m is the "minimum" Urgent Protective Action (UPA) area that needs to be applied. NOTE - minimum NOT maximum.

The DEPZ, is in this case, slightly wider than the UPA and is wider at certain points around the AWE site to ensure that communities are not dissected and so that effective communication can occur in an emergency. Communication to "parts" of a community is simply not possible (imagine a UPA dissecting a street, with one semidetached property having to shelter and the other not - scale that up to an entire village and that is the scenario we would be in without the targeted expansion of the DEPZ), and so an entire community is grouped together within the DEPZ such that effective communication can occur in an emergency.

Our emergency plans have then been developed further to split the DEPZ into slices like those of a cake. Experts then advise that we need to plan for 3 adjacent "slices" of the DEPZ to be sheltered or evacuated depending upon the direction of the blowing wind/atmospheric conditions at the time of the emergency.

The DEPZ is therefore part of the area covered by the emergency plan (as per the name – Detailed Emergency Planning Zone) and any development in the DEPZ effects that emergency plan as new residents in the development both need to

be communicated to and worst case, sheltered, or even received as evacuees. – This is Detailed Emergency Planning.

The Appellant's defence that the planning application should be granted because the site lies outside of the UPA but within the DEPZ and that "there is no impact on responders under the emergency plan" (section 6.4), is therefore completely incorrect. It is incorrect because the Local Authority and all partner agencies in the AWE Off Site Plan have a duty to respond to an emergency in the DEPZ not just the UPA, there are impacts to the emergency plan as a result of the increased numbers of public in the DEPZ that would need to be catered for and this is obvious from the title of the zone **Detailed Emergency Planning Zone**.

- ii) **Health impacts to the public** – The Appellant's defence appears to suggest that health impacts to the public of an accident effecting the area of the planning application, are within a range commonly experienced by members of the public. This may be the case (though I haven't verified the Appellant's figures as they are irrelevant due to the legal duty placed upon us to respond to an emergency and protect the public from an unnecessary radiological dose), however we still have a legal duty to both respond to an emergency in the area of the DEPZ and to minimise the health impacts to the public (the radiological dose received – again using laypersons terms - no radiological dose is better than some, even if that some is minimal!). This is the basis for the emergency response and the protection of the public. The REPIR legislation sets out these principles and they are for us to follow and implement, not debate and apply our own subjective judgement and interpretation about whether or not they are correct

The report by Mr Thorne also suggests at 6.5 and 6.6, that the Council will simply send in its carers to the DEPZ in an emergency to look after the vulnerable because the radiological doses "are so low that visiting during the period of sheltering should be acceptable". This is incorrect. The Council would not send in its carers without being 100% confident that we aren't putting our staff at risk and this may not have been confirmed in the timescales mentioned. His statement also fails to take into account the likely reaction of people/staff/carers who will be anxious and apprehensive and may refuse to enter the area to undertake their duties even if radiological levels are confirmed as safe. This is a significant & foreseen issue for the emergency plan and we do not wish to exacerbate the situation by increasing the numbers of people living within the DEPZ.

Mr Thorne's reference in his report that "Therefore, even if visits were banned during the sheltering phase, this would be only a short hiatus." fails to recognise the severity of a failure in today's home care system. Many residents across the UK are in receipt of care packages in their own homes as they are unable to look

after themselves. They may be bed bound, unable to undertake even basic tasks and may require multiple visits a day to help them live in their own homes in a dignified manner and the reference in Mr Thornes report to a “short duration of several days” simply does not acknowledge the significant challenges that would arise as a result of an incident of several days which restricts carers visiting their customers.

These issues are real and they exist (should an incident restrict access). They appear to be being significantly downplayed in Mr Thornes report.

- iii) **The DEPZ area** – The Appellant’s report seems to suggest that the DEPZ is incorrect and therefore the planning application should be approved.

The DEPZ has been set following extensive consultation with partner agencies forming the AWE Off Site Emergency Planning Group.

The DEPZ has been agreed and implemented. This planning appeal is not the forum to challenge its validity.

Conclusion

In summary the Council objects to this planning application, as the development could not be catered for in the current emergency plan due to the aggregation of properties (and people within them) in the recently expanded DEPZ.