

Proof of evidence by PATRICIA HUGHES on behalf of:



*Basingstoke
and Deane*

APPLICATION BY: Cala Homes

RE: Land at Boundary Hall, Aldermaston Road, Tadley.

INSPECTORATE REF: APP/H1705/V/10/2124548

LOCAL AUTHORITY REF: BDB/67609

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1 **Part 1: Introduction**

1.1 Qualifications and Experience

- 1.1.1 My name is Patricia Hughes. I hold a Bachelor of Science Degree in Environmental Health from the University of Greenwich and a Masters of Science Degree in Environmental Management from the University of Surrey. I have been a member of the Chartered Institute of Environmental Health for 17 years.
- 1.1.2 I have been employed in the field of environmental health since 1993 and have been involved in emergency planning since 1996. My professional experience is in local government, gained in environmental health at London Borough of Ealing, Hart District Council, East Hampshire District Council and Basingstoke and Deane Borough Council.
- 1.1.3 I have worked for Basingstoke and Deane Borough Council since January 2008, formally as a Senior Environmental Health Officer, then Interim Head of Community Protection (Lead Officer Emergency Planning) and more recently Interim Head of Properties and Facilities Management (Lead Officer Emergency Planning).
- 1.1.4 In my professional role, I have experience in the identification of risk, creation and review of emergency plans, planning for emergencies (including exercises and training) plus the managing of emergencies as they arise.
- 1.1.5 I am familiar with the land to which this proof of evidence relates and the surrounding area and am well acquainted with the relevant emergency planning policy framework.
- 1.1.6 The evidence which I have prepared and provide for this 'called in application' under reference APP/H1705/V/10/2124548 in this proof of evidence is true. I confirm that the opinions expressed are my true and professional opinions.

1.2 Scope of this proof

- 1.2.1 This proof will provide evidence in respect to the issues identified in paragraph 7 (c) of the Secretary of State's Call in letter dated 4 March 2010, which stands as the Secretary of State's statement under rule 6(12) of the 2000 Rules.

2 Part 2: Issue 7 (c)

2.1 For the purposes of clarity, the reason for call in as expressed by the Secretary of State was:

The extent to which the proposed development is consistent with policies to ensure that any acceptable risks to human health are identified and properly dealt with;

2.2 As the concerns under 7(c) relate to the concerns which arise as a result of the proximity of the Aldermaston Weapons Establishment (AWE), the hazards and risks posed to human health, the following sections will make direct reference to the AWE site

2.3 Aldermaston Weapons Establishment

2.3.1 AWE, the Atomic Weapons Establishment, has been central to the defence of the United Kingdom for more than 50 years. It provides and maintains the warheads for the country's nuclear deterrent, Trident. Trident is a submarine-launched, inter-continental ballistic nuclear missile weapons system, carried by Royal Navy Vanguard-class submarines.

2.3.2 The role of AWE is to manufacture and sustain the warheads for the Trident system, ensuring optimum safety and performance, but also to maintain a capability to produce a successor system should the Government require one in the future.

2.3.3 The work at AWE covers the entire life cycle of nuclear warheads; from initial concept, assessment and design, through to component manufacture and assembly, in-service support, and finally decommissioning and disposal.

2.4 Hazards at Aldermaston Weapons Establishment

2.4.1 The materials used include the radioactive materials plutonium, uranium and tritium. Of these, plutonium is potentially the most hazardous. The site also contains separate explosives areas where conventional explosive components are manufactured and tested. The transportation, use and storage of the explosives at the AWE sites are in

compliance with relevant regulations. Explosives are stored in approved and licensed storage magazines.

2.5 Safety on and off the site

- 2.5.1 Under the Nuclear Installations Act 1965 (as amended) no site may be used for the purposes of installing or operating any reactor or other specified nuclear facilities unless a nuclear site licence has been granted by the Health and Safety Executive (HSE) for that site. The licence can be subject to conditions,
- 2.5.2 The regulatory regime which HSE Nuclear Installations Inspectorate (NII) operates under the act requires that all significant actions by the licensee (essentially those having implications for nuclear safety) are subject to vetting and approval by NII. It is therefore described as a 'permissioning regime since licensees are unable, for example, substantially to modify plant or to alter operating arrangements without submitting their proposals to NII for consideration.
- 2.5.3 The nuclear permissioning process is unique in that the safety case which supports compliance with the licence is subject to continuing review. The resources and effort to deal with an individual duty holder are spread over the lifetime of the installation rather than falling at discrete periods determined by legislation.
- 2.5.4 According to the Safety Assessment Principles for Nuclear Facilities (2006) (SAP's), the purpose of the SAP's are assess the safety cases for nuclear facilities that may be operated by potential licensees, existing licensees, or other duty holders. The term 'safety case' is used to encompass the totality of a licensee's (or duty holder's) documentation to demonstrate high standards of nuclear safety and radioactive waste management, and any sub-set of this documentation that is submitted to Her Majesty's Nuclear Installations Inspectorate (NII).
- 2.5.5 Safety cases can be further defined as a suite of documents providing a comprehensive written demonstration that risks have been reduced to a level which is as low as reasonably practicable. The safety case is not a one-off series of documents prepared to obtain a nuclear site licence. It

is intended to be a living entity which underpins every safety related decision made by the licensee. The safety case is required to be updated regularly and the implications of proposed plant and other safety related changes have to be examined and, when necessary, additional demonstration of safety provided. Accordingly, the requirements to produce and maintain safety cases are embodied in conditions attached to all nuclear site licences.

2.5.6 NII examines the safety case to satisfy itself that the claims of the licensee are justified or demonstrated. For site inspections, NII uses the safety case to help to prepare for inspections and to determine parameters and values against which to judge the adequacy of safety of the plant.

2.6 Information to be included within the Safety Case

2.6.1 According to the Safety Assessment Principles for Nuclear Facilities

Siting	Population characteristics	ST.2
The safety case should demonstrate that the characteristics of the population off-site would allow for an effective off-site emergency response.		

6), safety cases should include

Siting	Through life siting issues	ST.7
The safety case should be revised to take account of off-site changes that could affect safety on a nuclear site.		

2.6.2 The SAP also advises that the safety case needs to be reviewed to take account of the potential impact of local developments on the site and that Arrangements should be in place for the relevant planning authority(ies) to be consulted throughout the facility lifecycle on any proposed land-use developments off-site that might prejudice the effectiveness of the arrangements to protect individuals and populations.

HSE makes similar arrangements to be consulted by planning authorities.

2.6.3 In considering the need to take into account the impact of local developments, the SAP notes that

“Any foreseeable variations in these factors during the expected life-cycle of the site should be identified and taken into account. The factors should be included in the periodic reviews of safety cases for the facility.”

2.6.4 The SAP goes on to state that allowing for some natural growth in the size and distribution of the population around the site, it should be shown that:

- a) it would be possible to invoke off-site countermeasures within an appropriate timescale consistent with the emergency plan (see the section on Accident management and emergency preparedness (*paragraph 639 ff.*));
- b) there are no institutions with a high concentration of relatively immobile people; or if there is any such institution, the emergency planning authority (i.e. the local authority) confirms that appropriate arrangements have been made in its emergency plan.

2.7 The Local Plan and reasonably foreseeable development

2.7.1 On the 17 July 2006, the council formally adopted the Basingstoke and Deane Borough Local Plan 1996-2011.

2.7.2 This plan, on which the HSE(NII) was consulted stated that

“along with Basingstoke Town, the most appropriate locations for development in the Borough are considered to be Whitchurch and Overton each of which have railway stations, together with Tadley where new development can take advantage of existing levels of services. The sites identified by the Council aim to maximise the level of development on brownfield sites first, followed by development on appropriate greenfield sites.

2.7.3 Indeed it went on to identify Boundary Hall, Tadley as a site for development for a mixed residential and employment site of a minimum of 100 units.

2.8 Periodic reviews

2.8.1 The HSE (NII) carries out periodic reviews in the form of quarterly inspections. The scope of these inspections include monitoring licensee's actions on the site in relation to incidents, operations, maintenance, projects, modifications, safety case changes (including as outlined above, any reasonably foreseeable changes in off site populations) and any other matters which may affect safety.

2.8.2 According to the the HSE (NII) records of these periodic reviews since the Boundary Hall site was identified in the Local Plan for development that, whilst there have been areas identified for improvements,

“In general, the arrangements made and implemented by AWE Aldermaston and Burghfield in response to safety requirements were deemed to be adequate in the areas inspected”

2.9 Defence in depth and the role of off site emergency plans

2.9.1 The Safety Assessment Principles for Nuclear Facilities (2006) identifies that a nuclear facility should be so designed and operated that defence in depth against potentially significant faults or failures is achieved by the provision of several levels of protection. Accident management and emergency preparedness provides the final levels of defence (see Table below) to ensure that all reasonably practicable steps have been taken to minimise the radiological consequences of any accident.

Level	Objective	Essential Means
Level 1	Prevention of abnormal operation and failures by design	Conservative design, construction, maintenance and operation in accordance with appropriate safety margins, engineering practices and quality levels

Level 2	Prevention and control of abnormal operation and detection of failures	Control, indication, alarm systems or other systems and operating procedures to prevent or minimise damage from failures
Level 3	Control of faults within the design basis	Engineered safety features, multiple barriers and accident or fault control procedures
Level 4	Control of severe plant conditions in which the design basis may be exceeded, including the prevention of fault progression and mitigation of the consequences of severe accidents	Additional measures and procedures to prevent or mitigate fault progression and for accident management
Level 5	Mitigation of radiological consequences of significant releases of radioactive substances	Emergency control and on- and off-site emergency response

2.10 **The Final Level of Defence – The Atomic Weapons Establishments Off Site Contingency Plan, July 2009 (AWE –OSP)**

2.10.1 The AWE-OSP is an iterative document, regularly reviewed on a rolling programme after any exercise or after an incident or near incident on the site, or similar site from which lessons have been identified. The plan was last reviewed and agreed in July 2009. A wide variety of agencies contributed to (and are holders of) the off site plan including West Berkshire Council, Hampshire County Council, Hampshire Constabulary, HSE (NII), Berkshire Fire and Rescue and Basingstoke and Deane Borough Council.

- 2.10.2 An exercise is planned for November 2010, after which the plan will be reviewed. In accordance with the AWE-OSP, exercises are observed by the HSE (NII). There are three levels of potential scenario for any exercise and the exercise scenario must be agreed by the HSE(NII)
- 2.10.3 In accordance with the requirements of Radiation (Emergency Preparation and Public Information) Regulations 2001 (as amended), the AWE-OPS must “address each reasonably foreseeable radiation emergency”. The operators (AWE) are required to supply a schedule 5 risk assessment which summarises the hazards on the site. The last submission according to West Berkshire Council was June 2008, which was issue 3.
- 2.10.4 This risk assessment informs the AWE-OSP ‘reference accident’ which is defined as:
- “the maximum credible accident against which it is considered reasonable to prepare detailed emergency plans. For emergency planning purposes the reference accident assumes that during a release a pathway occurs that allows radioactive material to escape uncontrolled into the environment.”
- Paragraph 1.15.1, Page 18, Atomic Weapons Establishments Off Site Contingency Plan, July 2009
- 2.10.5 West Berkshire Council, as owners of the AWE-OSP have confirmed that they have not been advised either directly from the HSE(NII) or via the operator, that the Schedule 5 risk assessment or the reference accident based on this information is inappropriate to current circumstances (Appendix 1)
- 2.10.6 The AWE-OSP also includes the principle of extendibility i.e. the ability to respond in the extremely unlikely circumstances that the impact of an incident went beyond the boundaries of the DEPZ.
- 2.10.7 Included within the current AWE-OSP are the main population centres identified as:

Aldermaston		Tadley	
Grid Ref	SU590652	Grid Ref	SU601616
Population	927	Population	11,651

It should be noted that whilst factually correct, this information does not include the settlements of Baughurst or Pamber Heath which are also adjacent to the site.

2.10.8 Whilst vulnerable groups, are separately identified, the AWE-OSP has no established 'maximum' population beyond which the AWE-OSP ceases to be functional. The plan must remain flexible and extendible, to deal with any situation.

2.11 Further to this, the suggested increase in population due to the proposed development at Boundary Hall will have a limited impact in the day time or night time population of Tadley. Variances at this level of demand, in the event of an incident, should be manageable in accordance with the AWE-OSP by the Category 1 emergency response services as, depending on the level of the incident, wind direction, season, time of day etc. the quantum of population affected could be significantly different notwithstanding the development at Boundary Hall.

2.11.1 The AWE-OSP identifies that

1 There will normally be no need for the urgent evacuation of areas outside of the site and unnecessary movement in the open may pose a greater risk to members of the public due to the risk of re-suspending any hazard, therefore, the public would normally be encouraged to remain inside.

2 Paragraph 5.4.1 of the AWE-OSP stipulates that

“Exceptionally, evacuation within the first twenty four hours might be necessary for areas to 400 metres downwind from the site of the incident. Most of this area would likely be within the AWE site boundary. (See Section 8, Annexes 1 & 2).”

- 3 Subject to the findings of ground monitoring, after a few days it might be necessary to evacuate further areas, to reduce contact with deposited material and facilitate clean-up work. As a guideline only, temporary evacuation in limited downwind areas might be necessary in the sheltering zone of the site involved.

West Berkshire as owners of the AWE-OSP have confirmed that they have received no response from the HSE(NII) to suggest that the AWE-OSP is not fit for purpose.

3 Resourcing the AWE-OSP

3.1 As part of the planning process the Category 1 emergency response agencies have been consulted on the application for development at Boundary Hall.

3.2 Notwithstanding the commentary in paragraph 2.11 above, some of the emergency response agencies have expressed concern regarding the potential impact any increase in population may have in this area, considered in more detail below. Much of this concern may have been based on the HSE (NII) population increase data, which was later proven to be erroneous. However, certain responders, most notably Hampshire County Council have maintained their concerns, although they are now aware of the lower actual levels of population increase.

3.3 Responses to the Boundary Hall Application

3.3.1 Part of the rationale for the reconsideration of this matter by the Development Control Committee in February 2010 was the concern that not all of the views of the emergency responders had been available at the earlier Committee hearing.

3.3.2 These responses were included within the report to Development Control Committee in January (heard in February). A discussion regarding these responses is set out below.

3.4 Hampshire County Council Response (Appendix 2)

3.4.1 Turning firstly to the response by Ian Hault's from Hampshire County Council Emergency Planning on the 24 June 2008. His comments include reference to the Buncefield Reports. The analogies between the two sites can obviously be drawn

- Both Buncefield and AWE were developed during the 1960's, a period when the planning requirements were less stringent
- Both were originally sited in locations where there was limited housing adjacent but where development occurred to house employees required for the site.

- 3.4.2 However, understandably the Buncefield reports are based on COMAH sites (control of major accidents and hazards). However the HSE have long recognised the differences between COMAH sites and nuclear sites when considering planning, management, licensing and operation and they have two different documented approaches. Indeed, many of the failings of the planning system as outlined in Recommendations on Land Use Planning and the control of societal risk around Major Hazard sites, as set out in paragraph 17, are not applicable for planning development around nuclear installations.
- 3.4.3 Other proofs of evidence from Basingstoke and Deane Borough Council will discuss the HSE (NII) population statistics upon which Mr Hoult made the comment that the 'residential capacity within the DEPZ has already be passed'. However, it is key to note there is no defined capacity for the DEPZ or any zone, within the AWE-OSP and a key aspect of this plan is extendibility, the ability to be flexible and extend the response, depending on circumstances.
- 3.4.4 It is also interesting to note that the HSE(NII) has taken the decision not to comment on single dwelling planning applications within the DEPZ.

3.5 West Berkshire Council (Appendix 3)

- 3.5.1 Carolyn Murison from West Berkshire responded on the 15 June 2009 and she too alluded to lessons learnt from other incidents near industrial sites and the issues of large scale flooding and the need for evacuation. Again, I can see the rationale for the comparison with flooding namely there is the potential for the need to arise to re-house families, very quickly, and on a relatively long term basis (in both flooding or nuclear incidents clean up and remediation can take time). However, flooding and severe weather (such as snow) is extremely unpredictable. Areas impacted by snow in December 2009 and January 2010 were not areas of previously high snow fall and as a result, planning and response to such an event, were difficult.
- 3.5.2 However, with a nuclear installation, whilst the plan must remain flexible to manage the changes in circumstances 'off site', the (albeit small) risks from AWE are well known and therefore can be prepared for. As part of

this preparatory planning, Basingstoke and Deane Borough Council as the responsible authority for re-housing of those who have been evacuated, have entered into a Memorandum of Understanding with all other local authorities across Hampshire which both recognises that we may need to call upon the help, skills and resources of other local authorities in the event of major incident and allows us flexibly and easily to do so.

3.5.3 The response from West Berkshire also mentioned that whilst the current AWE-OSP “does not specify how many people the responders could accommodate should an off-site incident occur. This plan is currently being reviewed....as part of this review it is likely, although not conclusive....that part of the plan would recommend refusal of such a development on the basis of risk to health and the impact on the local authorities and other responders in responding and accommodating the additional population”

3.5.4 However, the final AWE-OSP as produced in 2009 makes no reference to such a limit.

3.6 Thames Valley Police (Appendix 4)

3.6.1 Stated in their response of the 2 June that Thames Valley Police had no specific objection to the planning application. However they raised concerns regarding the substantial increase in population (emphasis added for the purpose of this proof – discussion of population will be covered in other evidence provided by Basingstoke and Deane but undoubtedly this will have impacted on the responses made by the emergency responders). Concern was also raised that, notwithstanding the quantum of increase in residents, any increase would lead to increased risk of gridlock by those seeking to self-evacuate, and in doing so, lead to an increased risk of contamination as well as hindering emergency services.

3.7 Royal Berkshire Fire and Rescue Brigade (Appendix 5)

3.7.1 The Royal Berkshire Fire Brigade comments referred to agreement with comments made by Julie James (Hampshire County Council) in her email of the 16 June which set out that whilst not the planning authority, “we have agreed that the identification of vulnerable people within the planning zone; the ability to warn and inform the public and the ability to shelter those evacuated within the rest centres in the vicinity would be made more difficult with an increase in population”

3.8 Hampshire Fire and Rescue (Appendix 6)

3.8.1 HFRS comments referred to agreement with comments made by Basingstoke and Deane Borough Council (see below) and Thames Valley Police (see above).

3.9 Basingstoke and Deane Borough Council (Appendix 7)

3.9.1 As a Category 1 provider the council has responded to consultations in March and July 2009. The responses are broadly similar notwithstanding the July response is considerably more detailed. In essence

- immediate evacuation was deemed to be highly unlikely,
- the proposed development did not represent population growth outside the anticipated levels for the area
- that working as part of a multi-agency approach to emergency response our arrangements are adequate.

3.10 The Health Protection Agency (Appendix 8)

3.10.1 The Health Protection Agency comments advised that as long as the suggested countermeasures detailed in the plan remain viable as required under REPPIRthen it does not affect our ability to maintain our duty of public protection during the course of a possible incident at the AWE site and we therefore have no concerns to raise

3.11 Hampshire Constabulary (Appendix 9)

- 3.11.1 Hampshire Constabulary raised no specific objection to the application but did allude to concerns that any increase in housing could lead to increased demand in an emergency.
- 3.11.2 As discussed above in 3.4.4. the HSE(NII) have taken the decision not to comment on single dwelling applications, notwithstanding that over time, this could lead to a significant increase in population and dwellings over time. However as mentioned in 3.9.1.at present, the level of development is not higher than anticipated.

4 The Environmental Statement – Responses from Category 1 providers

- 4.1 As part of the multi-agency approach and ongoing consultation, the emergency responding agencies (Category 1) have been consulted on the information set out within the applicants Environmental Statement.
- 4.2 Responses have been received from
- West Berkshire Council (Appendix 10)
 - Royal Berkshire Fire and Rescue Service (Appendix 11)
 - Hampshire County Council (Appendix 12)
 - Hampshire Constabulary (Appendix 13)
 - Basingstoke and Deane Borough Council (Appendix 14)
- 4.3 There is broad consensus in the responses that:
- In the event of this proposal being approved, the AWE-OSP would need to be reviewed
 - That the Hampshire based emergency plans have not been referred to
- 4.4 West Berkshire and Basingstoke and Deane Borough Council have both suggested the environmental statement is oversimplified with regards to the potential for possible evacuation as set out in the AWE-OSP. The AWE OSP is predicated on the maximum credible accident . In my view, the environment statement does not fully respond to the issue that an evacuation of the site within 24 hours of an incident *could* be required. Although this would be unlikely. The applicant should take this into consideration however, this does not in my

view, suggest that the environmental statement lacks validity in its broadest sense.

- 4.5 Royal Berkshire Fire and Rescue Service goes further to express concern about the potential for setting a 'precedent' and West Berkshire also queried the figures for population increase within the Environmental Statement and also suggest this does not adequately represent the risk, due to the proximity to AWE.

5 Other Material of Consideration including the Development Control Process

5.1 Draft National Policy Statement

5.1.1 Reference has been made to the Draft National Policy Statement (NPS) for Nuclear Power Generation (EN-6). Please note that in Part One, which relates to the role of the NPS in planning, paragraph 1.7 to this document states that the infrastructure covered by the scope of the NPS is significant energy infrastructure such as Nuclear power generation with a capacity of more than 50 megawatts (e) (MW) as such, the AWE site does not fall within this documents remit.

5.2 Circular 04/00 Planning Controls for Hazardous Substances

5.2.1 In Circular 04/00 annex A outlines the inter-relationship between hazardous substance consents and planning. The HSE's role in the land use planning system is to provide local authorities with advice on the nature and severity of the risks presented by major hazards to people in the surrounding area so that those risks can be given due weight, when balanced against other relevant planning considerations, in making planning decision. The HSE's role is an advisory one. It has no power to direct refusal of planning permission or of hazardous substances consent.

5.3 Development Control

5.3.1 In accordance with Circular 04/00, the HSE considers that its role has been discharged when it is satisfied that the council (in this case) is acting in full understanding of the advice received and the consequences that could follow. Essentially the HSE is seeking to ensure that the matter has been fully understood and that there is no ambiguity; it is this test that the HSE is seeking to ensure is satisfied when considering whether to ask the SOS to 'call in' the application.

5.3.2 Following the Development Control Committee resolution, officers met with the HSE to discuss the resolution in more detail. It was evident

from the meeting that the HSE has a number of concerns regarding the Development Control Committee resolution to grant planning permission; these concerns are summarised below.

- In essence, the HSE made a request to the council that the application be taken back to Development Control Committee for further consideration as they believed that not all the relevant information was put before members and question whether the information was given with appropriate clarity.

- 5.3.3 The main points raised by the HSE/NII were summarised in the report to Development Control Committee in January 2010 (heard on the 10 February 2010)
- 5.3.4 Following careful consideration of the concerns raised by the HSE and in light of the concerns expressed by the HSE in relation to public safety, the Head of Planning and Transport resolved to take the application back to Development Control Committee for further consideration.
- 5.3.5 The Head of Planning and Transport considered that the uniqueness and exceptional circumstances of this case and the concerns expressed by the HSE warranted the applications reconsideration. Information in relation to the concerns of the HSE together with any other relevant information (including comments from emergency planning agencies) was as a result provided to the Committee in January (heard in February)
- 5.3.6 It also gave the opportunity to make members aware that since this application was originally considered by Development Control Committee, it had emerged that the HSE inaccurately represented the population growth within sectors 6 and 7 between 1997 and 2008. Having undertaken an internal review of this information and following discussions with the HSE, it appeared that there was a significant flaw in the baseline data. This review indicated that the population growth within these sectors is significantly less than the 240% referenced by the HSE within correspondence and at Development Control Committee.

- 5.3.7 In fact the actual population growth in these two sectors is estimated to be an increase of approximately 17% notwithstanding this inaccuracy; the HSE maintained their position to 'advise against' the application as the population is approaching unacceptable limits within the inner DEPZ.
- 5.3.8 Neither West Berkshire nor Hampshire County Council actually raised an objection in this regard, but did raise strong concerns.
- 5.3.9 Members were advised that following further consideration of this application and the issues raised within this report, Development Control Committee has the following options available:
- Resolve to approve the application subject to the Head of Planning and Transport re-notifying the HSE of the resolution of the committee and giving a further 21 days written notice to confirm whether the HSE require the Secretary of State to 'call in' the application for determination in accordance with Circular 04/00 - 'Planning Controls for Hazardous Substances'. There is an outstanding Article 14 Direction from the SoS which does not allow the council to determine and approve the application without agreement from the SoS. Should the SoS not wish to call the application in the council could grant conditional planning consent subject to the completion of a Section 106 Agreement (to secure the matters identified previously within the report).
 - Refuse the planning application in accordance with the officer recommendation. The council would not need to refer to the HSE or SoS as the Article 14 direction only prohibits the council from 'approving' the planning application. The applicant would have a right to appeal the decision.
 - Defer the application for a specified reason.
- 5.3.10 In reaching their decision, it is my view that Members were provided with full information as requested by the HSE(NII). Officers of the HSE(NII) attended the Development Control Committee on the 10 February both to outline the concerns and the reasons for the advise against and also to respond to any questions or queries raised by members of the

Committee. I, as Lead Officer for Emergency Planning for Basingstoke and Deane Borough Council was also in attendance to answer any queries, in particular in relation to concerns regarding the AWE-OSP. There is no evidence that would suggest that the decision taken by members of the 10 February was taken without full knowledge or as a result of any ambiguity.

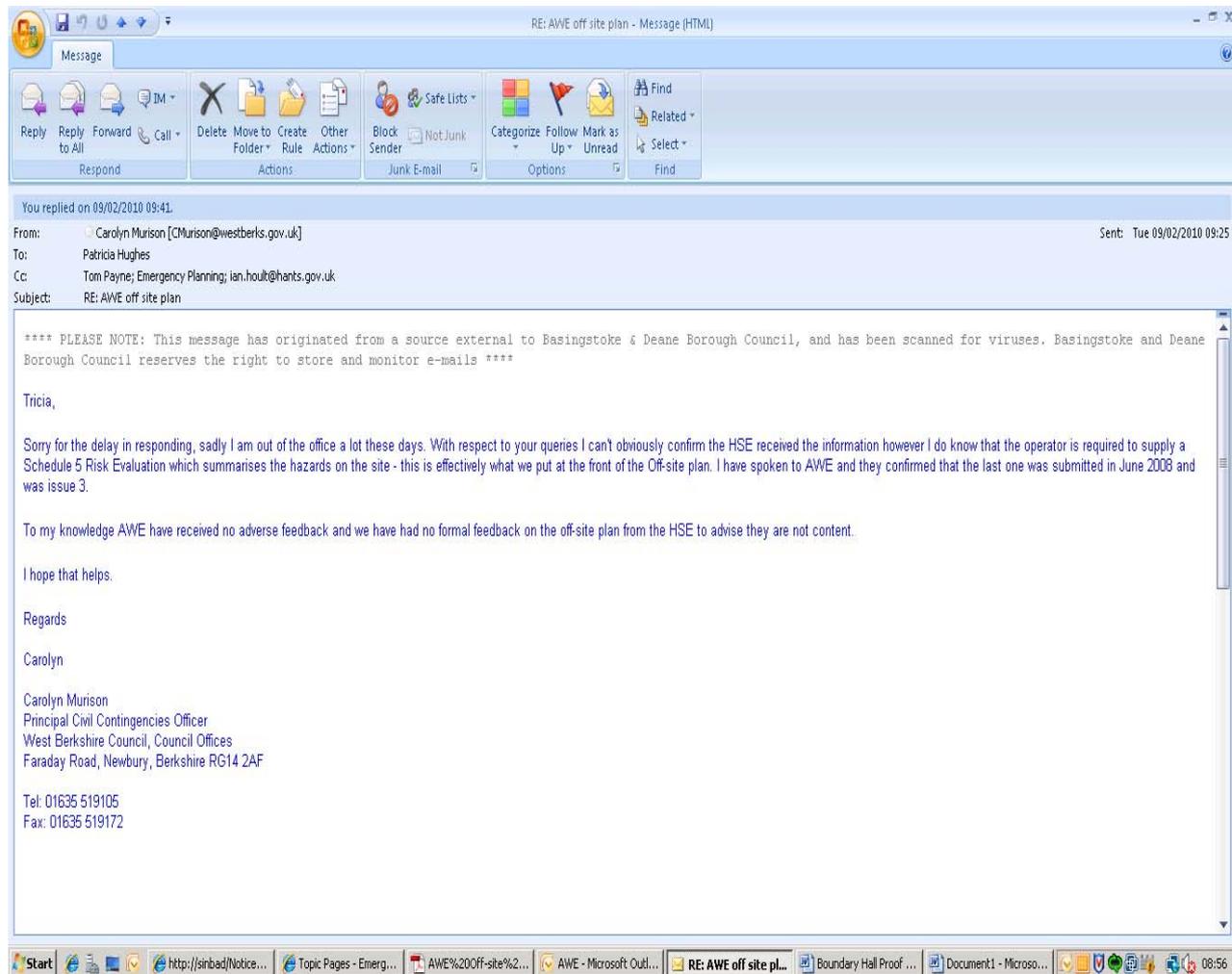
- 5.3.11 I consider that, given the emergency planning issues presented at the time of the committee and subsequent to the committee, the development would not materially add to the risks associated with an on site emergency and the off site emergency plan would not be materially prejudiced by the proposal

6 Conclusions

1. HSE(NII) were consulted on the Local Plan and raised no objections.
2. According to the Safety Assessment Principles (2006), issues of reasonably foreseeable development around the site should be considered as part of the safety case for the purposes of the licence of the site.
3. The safety case as part of a wider review is assessed on a quarterly basis by the HSE(NII). Since the adoption of the Local Plan, with the inclusion of Boundary Hall, the HSE(NII) has continued to be satisfied with the safety including the safety case presented by AWE. This would suggest that either
 - a. the Boundary Hall has been considered as part of the safety case by the AWE and the HSE(NII) are satisfied with the approach, or
 - b. the Boundary Hall site has not been considered as part of the safety case and the HSE(NII) are satisfied that the development of this site does not represent a material change.
4. The AWE-OSP is the final line of defence in depth.
5. It was created with the contribution of a wide range of Category 1 agencies including the HSE (NII), Hampshire County Council and West Berkshire. This plan does not establish any upper limits, within which the plan is functional.

6. The HSE(NII) have provided no feedback to suggest that the AWE-OSP is not fit for purpose.
7. The HSE (NII) has provided an 'advice against' in relation to the Boundary Hall site (notwithstanding the comment in 1 above). However, Circular 04/00 states that HSE's role in planning is advisory only and that the Local Planning Authority must balance other relevant planning considerations.
8. The HSE(NII) have decided not to comment on single dwelling applications.
9. the HSE considers that its role has been discharged when it is satisfied that the council (in this case) is acting in full understanding of the advice received and the consequences that could follow. Essentially the HSE is seeking to ensure that the matter has been fully understood and that there is no ambiguity; it is this test that the HSE is seeking to ensure is satisfied when considering whether to ask the SOS to 'call in' the application.
10. There is no evidence that would suggest that the decision taken by members of the 10 February was taken without full knowledge or as a result of any ambiguity.
11. Some of the Category 1 emergency response agencies have expressed concern regarding the impact such a proposal would have on the ability to respond to an incident. In my view, the current AWE-OSP is fit for purpose and critically covers the issue of extendibility, which allows the flexibility to expand the framework of response to take into account local circumstances. I consider that the development would not materially add to the risks associated with an on site emergency and the off site emergency plan would not be materially prejudiced by the proposal

Appendix 1



Appendix 2 – Response by Hampshire County Council to the Boundary Hall Application

Rebecca Fenn-Tripp

From: Hoult, Ian [ian.hoult@hants.gov.uk]
Sent: 24 June 2008 15:55
To: Rebecca Tripp
Cc: James, Julie (Emergency Planning); john.highton@hse.gsi.gov.uk
Subject: Planning Application BDB/67609

**** PLEASE NOTE: This message has originated from a source external to Basingstoke & Deane Borough Council, and has been scanned for viruses. Basingstoke and Deane Borough Council reserves the right to store and monitor e-mails ****

Dear Rebecca,

I understand from my Colleague Julie James that you are interested in receiving an opinion from this Section of Hampshire County Council on the above proposed development.

Having looked into this matter and considered the issues I have concluded that to allow the development as proposed would be erroneous.

The issues I have considered to reach this conclusion are:

The comments made within the submissions you will receive regarding this matter from Thames Valley Police, West Berkshire Unitary Authority, Hampshire Fire & Rescue Service and particularly the HSE Nuclear Installations Inspectorate.

The lessons learned from the last AWE Offsite Exercise held recently.

The Newton Report into the Buncefield Incident

This development will be within the DEPZ for AWE Aldermaston

This is a proposed residential development (we may have taken a different view if this was an industrial or commercial proposal)

The potential impact on the new residential community of an incident with offsite consequences

The fact that the maximum residential capacity within the DEPZ has already been passed

If you need any further detail do not hesitate to come back to me.

Ian Hoult

Appendix 3 – Response of West Berkshire Council to the Boundary Hall Application

15 June 2008

Rebecca Tripp,
Basingstoke and Deane Borough Council
Civic Offices
London Road
Basingstoke
Hampshire
RG21 4AH

Civil Contingencies Team
Council Offices
Faraday Road Newbury
Berkshire RG14 2AF

Our Ref: CLM/15/AWE1
Your Ref: BDB/67609

Please ask for: Carolyn Murison
Direct Line: 01635 519105
Fax: 01635 519172
e-mail: cmurison@westberks.gov.uk

Dear Rebecca

Planning Application BDB/67609

Proposal: Redevelopment of the land to include the erection of a new building to provide 945sqm of B1 use commercial floor space and erection of 115 dwellings, new public open space, car parking, new foot paths, landscaping and 2 new access roads of Almswood Road and improvement of existing access points off Aldermaston Road following demolition of existing hall and relocation of existing sub station.

Thank you for the opportunity to comment on the above application, please find attached my detailed response.

You will note that we have a great deal of concern regarding this development, mainly due to its proximity to the site (within the 3Km DEPZ), the scale of the development, the lessons identified from other incidents at locations surrounding other industrial sites and the initial lessons identified from the large scale flooding in 2007 with respect to rehoming large numbers from a community.

The current AWE off-site plan does not specify how many people the responders could accommodate should an off-site incident occur. This plan is currently being reviewed as part of its required 3 year review, in light of a level 2 exercise in 2007 and as a result of lessons identified from other incidents. As part of this review it is likely, although not conclusive until signed off by all partners, that part of the plan would recommend refusal of such a development on the basis of risk to health and the impact on the local authorities and other responders in responding and accommodating the additional population.

In conclusion, on the basis of the issues identified regarding the proximity to AWE Aldermaston site and the implications on to Off-site plan this authority has a great deal of concern regarding this application and would strongly recommend that they are considered in detail when making your decision.

You should be aware that there is an AWE off-site planning group, which meets quarterly with respect to the off-site plan. The plan is managed by West Berkshire Council as part of a multi-agency group and deals with

the response of the various agencies, should an on-site incident at AWE, Aldermaston or Burghfield become an Off-site incident.

Some members of the off-site plan have sent their comments directly to me; however I have asked them to forward their comments to you directly.

Should you have any queries regarding the above please contact me directly.

Yours Sincerely,

Carolyn Murison
Principal Civil Contingencies Officer

Annex A

West Berkshire Council response to planning application BDB/67609

Proposal: Redevelopment of the land to include the erection of a new building to provide 945sqm of B1 use commercial floor space and erection of 115 dwellings, new public open space, car parking, new foot paths, landscaping and 2 new access roads of Almswood Road and improvement of existing access points off Aldermaston Road following demolition of existing hall and relocation of existing sub station.

There are a number of concerns regarding this application as follows:

- 1. Proximity to the AWE, Aldermaston site boundary.** This application is within 500m of the AWE site boundary and therefore well within the Detailed Emergency Planning Zone (DEPZ) which in this case is a distance of 3Km surrounding the site. This DEPZ has been put in place around this site by the HSE NII due to the potential for an off-site release of radioactivity that would mean the requirement for the implementation of countermeasures. This DEPZ is defined on the basis of the most significant release of radiation from an accident, which can be reasonably foreseen. In the event of an accident being larger than the reasonably foreseeable event, arrangements are in place for extending the DEPZ consistent with the concept of 'extendibility'. In this case the DEPZ is 3km around the site in view of the risks perceived by the HSE NII of a foreseeable release of radiation from the site. As a result any building within this DEPZ and subsequent release of radiation material could result in potentially long term health issues within the population. The further away from the site the risk to long term health issues would decrease.
- 2. Population density in the areas.** The area around the AWE Aldermaston site is split into sectors in order to facilitate response from the multi-agency responders. The sector that this development would fall into is sector 7. The current information on population density for this sector within the 3km DEPZ is 3053 residents. This is second largest populated sector; sector 6 adjacent to this sector is more densely populated with 7218 residents within the DEPZ. Many of the existing houses were previously owned by the site for employees. Many are now owner occupied. As a result should there be a need for the off-site plan to be activated the impact on the LA and other responders could be to accommodate at least 3053 residents if this sector along (7) was affected.
- 3. Type of site involved.** AWE Aldermaston is for all intents and purposes an industrial site, with an obvious special component. As a result and whilst there is no direct comparison the Buncefield incident of December 2005 should be taken in to account. This incident highlighted the issue of the unthinkable happening where a number of fail safes failed. As a result whilst there are a great deal of additional safe guards regarding this site, complacency would be a mistake. Therefore consideration of any development near the site, with the DEPZ needs to be considered carefully and balanced with the risk to the people involved in the proposed development. This matter of planning close to 'industrial' site was reflected in the Buncefield Major Incident Investigation Initial Report.
- 4. Flooding 2007.** This has highlighted another issue with respect to any emergency where by a large number of homes have been affected resulting in them not being fit for habitation and therefore the pressure on the LA's to rehouse these people. Whilst in some major incidents such as a fire in the local meaning a number of residents are evacuated until such time as the fire is put out in cases of flooding

the evidence has proven that a large number of residents would be out of their homes in temporary accommodation or even formed caravan parks for a long period of time, often in excess of a year.

The relevance to the AWE site is that although not flooding it is a possibility that all the residents whilst initially would be advised to go in, stay in and tune in, it would be necessary to move them out after a period of time. This would be in order to allow the clean up. This clean up could be a long time in being resolved due to the nature of the contaminant and therefore the impact on houses, schools etc would be very high. As a result an addition of 115 homes, would result in the potential for a further 115 households to be rehoused for a long period of time. This in an area of relatively low rental properties would have a large effect on the local community and may result in households being moved further afield making recovery more difficult for the area and the residents themselves.

5. **Off-site plan.** The off-site plan is a requirement under REPPIR regarding such sites as AWE. This plan was exercised in 2007 where lessons were identified. As a result the plan is currently being revised and updated. Whilst it cannot be conclusively confirmed at this stage until the plan is approved by the multi-agency group, it is likely to recommend that additional development within the DEPZ's should be seriously considered and without strong justification why the development should go ahead, developments will be recommended for refusal. The basis of this is the additional health risk factors and the adverse impact on the local authority in being able to accommodate the additional households.
6. **Precedent.** Other LA's with nuclear sites have put or are putting in place a no development policy or restricted development policies around such sites.

Appendix 4 - Response of Thames Valley Police to the Boundary Hall Application

Re: Planning Application for 115 Houses in Tadley, Hampshire

Thames Valley Police (TVP) is a statutory body to be consulted in planning applications within their area or with impact upon their area. Due to the proximity of the proposed site of 115 houses in Tadley, Hampshire, to the AWE Aldermaston site and the location falling within the detailed emergency planning zone (DEPZ) around the AWE site, this planning application has been discussed in the AWE Off Site Working Group (OSWG). As member of the OSWG the TVP Contingency Planning Officer was invited to comment on the proposed planning application with a regard to the AWE Off Site Plan. On that basis, TVP has no specific objection to the planning application in question.

However, the TVP Contingency Planning Officer would like the planners to consider the following concerns:

The HSE Nuclear Installations Inspectorate (NII) has advised that the maximum capacity for residents to be living within the detailed emergency planning zone (DEPZ) has been reached and that a substantial increase in the resident population within the AWE Aldermaston DEPZ would increase the risk of health implications for the residents in the event of an off site incident as identified by the design basis accident scenario required under the Radiation Emergency Preparedness Public Information Regulations 2003 (REPPPIR). Due to the duty of care for the public and any potential responding Thames Valley Police (TVP) personnel within that area, TVP has to consider this advice.

Any additional houses within the DEPZ would increase the resources required to fulfil the AWE Aldermaston Off Site Emergency Plan such as fixed & mobile assets, police personnel, trained exercised and supplied with appropriate personal protective equipment in order to demonstrate compliance to the above legislation.

Any increase in the resident population within the DEPZ would result in an increase of traffic flow during "peacetime". However, in the event of an off site emergency there will be a number of people who will not heed the advice to shelter and leave the affected area. This will increase traffic flow out of the shelter zone, which could lead to gridlock on the local roads around AWE Aldermaston and increase the time spent by self evacuees within a potentially contaminated environment without adequate shelter as well as hindering the response to site by emergency responders. This in return would result in an increase in people having to be looked after by local authorities and responding health services, including increased health monitoring. In addition, the long-term health implications may be more severe and the risk of litigation from those stranded in the shelter zone without shelter against the emergency services and local authorities for failing to plan for this eventuality may be heightened.

The location of these houses will be very close to the AWE Aldermaston site. This will increase potential fatalities and health problems for the people taking up residence in this area in the event of an off site incident as defined in the design basis accident.

Sabine Furlong
Deputy Contingency Planning Officer
Thames Valley Police

2 June 2008

Appendix 5 Response of Royal Berkshire Fire and Rescue Service to the Boundary Hall Application

-----Original Message-----

From: Barry Hayward [mailto:haywardb@RBFRS.co.uk]

Sent: Mon 30/06/2008 15:52

To: Long, Martyn

Cc: Peter Gray

Subject: RE: AWE - planning application at adjacent site in Basingstoke and Dean

Martyn,

No we haven't commented although I am aware of this issue and I believe it could also impact on other potential developments.

● would also agree with the comments made by Julie James.

Regards,

Barry Hayward

Group Manager

Support Services

Royal Berkshire Fire & Rescue Service

Tel: 0118 9322760

Mob: 07818 454756

Mailto: haywardb@rbfrs.co.uk <mailto:haywardb@rbfrs.co.uk>

Appendix 6 Response of Hampshire Fire and Rescue Service to the Boundary Hall Application

From: Carr, Tom
Sent: 18 June 2008 13:09
To: Long, Martyn
Subject: RE: AWE - planning application at adjacent site in Basingstoke and Dean

Martyn my comments would be as described by Basingstoke and Deane and more especially Thames Valley Police as a first responder.

Do you know what RBFRS have said ?

Regards

Tom

Appendix 7 Response of Basingstoke and Deane Borough Council to the Boundary Hall Application

Basingstoke and Deane Borough Council	Memo
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To:	Nicky Linihan, Head of Planning & Transport				
FAO:	Rebecca Tripp, Principal Planning Officer				
CC:	Bill Flood, Head of Community Protection				
From:	Tom Payne, Environmental Protection Manager				
Date:	26 March 2008	Your Ref:	BDB/67609	Our Ref:	07/04060/HPLANA

**APPLICATION TO ERECT A NEW BUILDING AND 115 NO. DWELLINGS
BOUNDARY HALL SITE, ALDERMASTON ROAD, TADLEY, HAMPSHIRE**

I write in connection with a letter dated 15 February 2008 from Julie Maher, HSE HM Nuclear Directorate and in particular as to whether the above development can be satisfactorily incorporated into the Emergency Plan.

We have considered the implications of the additional population around the site both in the context of our role under the AWE Off-site Emergency Plan and our own Emergency Response plan and I can confirm that our existing arrangements, including the provision of rest centres, are adequate to meet this additional need.

As you are aware, West Berkshire Council maintains the AWE Off-Site Emergency Plan (formed in accordance with the Radiation (Emergency Preparedness and Public Information) Regulations 2001) and their Emergency Planning team have raised no objections regarding this particular development proposal.

If you have any further queries please contact me.

Regards,

Tom Payne
Environmental Protection Manager

Original comment by
West Berkshire is s/s.
See comments of C. Munson
dated 15 June 2008.

To:	Head of Planning and Transport		
FAO:	Rebecca Tripp		
CC:			
From:	Bill Flood, Head of Community Protection		
Date:	14 July 2008	Your Ref:	BDB/67609
		Our Ref:	07/04060/HPLANA

BDB/67609 – Redevelopment of land to include 945sq. of B1 commercial floor space and erection of 115 dwellings, new public open space, car parking, new foot paths, landscaping and 2 new access roads of Almswood Road and improvement of access points off Aldermaston Road following demolition of existing hall and relocation of existing substation.

I write with reference to the above mentioned planning application, further to previous comments made by environmental health:

- on the 3 January 2008 which related to noise, smoke and contaminated land issues on site.
- on the 26 March 2008 regarding the development and the emergency plan.

I would like to provide further detail regarding environmental health's views on this application, with regard to AWE Off-site Emergency Plan and our own Emergency Response plan.

The AWE Off-site Emergency Plan

The AWE Off-site Emergency Plan in current operation was produced in January 2004 with contributions from all major stakeholders including Police, HPA, HSE Nuclear Installations Inspectorate, DEFRA, EA, MoD, NHS and other local authorities.

In context to this application, I have reproduced sections of the off site plan, which give an indication of what actions would need to be taken, should an incident occur.

Part 1

6.4.2 Evacuation. Exceptionally, evacuation, within the first twenty four hours might be necessary for areas to 400 metres downwind from the site of the occurrence. Most of this area would be likely to be within the AWE site boundary.

6.4.3 Subsequent Evacuation. Subject to the findings of ground monitoring, after a few days it might be necessary to evacuate further areas, to reduce contact with deposited material and facilitate clean up work. As a guideline

only, temporary evacuation in limited downwind areas might be necessary in the sheltering zone of the site involved.

Part 2

1.7 Even the most serious incident that can be envisaged at an AWE site would not require the urgent evacuation of areas outside the site. In any occurrence with off site consequences requiring off site sheltering as a countermeasure, the public, in common with the employees, contractors and visitors would be advised to shelter.

Essentially, the currently approved Off-site plan is clear that the emergency evacuation of local residents is extremely unlikely and the likely requirement for the local population to take shelter would reduce congestion, allowing the emergency services the access they require to the site.

Basingstoke and Deane Emergency Plan

The application site is split between sector 6 and 7. At April 2008, Hampshire County Council's 2007-based Small Area Population Forecasts (SAPF) indicate that the estimated population within 3km DEPZ is approximately 6,160 in Sector 6 (in 2,670 dwellings), and approximately 4,010 in Sector 7 (in 1,717 dwellings): a total population of approximately 10,170 living in 4,387 dwellings, giving an average occupancy of 2.32 persons per dwelling.

The 2007-based SAPF also indicate that, by April 2014, the number of dwellings in DEPZ Sector 6 is forecast to increase by approximately 100 to reach 2,771, with a population of 6,210; in DEPZ Sector 7 the dwelling stock is forecast to increase by approximately 130 to reach 1,849, with a population of 4,160; the total forecast population within Sectors 6 & 7 of 3km DEPZ is therefore approximately 10,370 within 4,620 dwellings: an average occupancy of 2.24 persons per dwelling.

In summary, while the dwelling stock is forecast to increase by 233 homes over the next 6 years, forecast on-going reductions in average household size result in a forecast population increase of no more than 200 people. The site which is the subject of this application represents approximately half the forecast dwelling stock increase in the 3km DEPZ (Sectors 6 & 7), and therefore (subject to the mix of dwellings), is expected to result in an increase of approximately 100 additional local residents in net terms. Therefore this application does not fall outside the predicted growth levels for this area.

Were an incident to occur, we would work closely with other key stakeholders to ensure the timely evacuation of all residents in the area and call on mutual aid from other local authorities for the accommodation of evacuees and recovery operations. Having considered the implications of the additional population around the site both in the context of our role under the AWE Off-site Emergency Plan and our own Emergency Response plan and I can confirm that our existing arrangements, including the provision of rest centres, are adequate to meet this additional need.



I hope this information is sufficient, but please let me know if you require any further clarification.

Bill Flood

Bill Flood
Head of Community Protection



Appendix 8 Response of the Health Protection Agency to the Boundary Hall Application

From: Nicholas Thompson [mailto:Nicholas.Thompson@hpa.org.uk]
Sent: 12 June 2008 10:54
To: Carolyn Murison
Cc: Allan Bailey
Subject: HPA response to new houses within AWE DEPZ

Dear Carolyn,

With regard to the impact upon the Emergency Plan of new houses within the DEPZ:

The HPA holds that as long as the suggested countermeasures detailed within the plan remain viable as required under REPPiR (and as approved by the nuclear installations inspectorate), then it does not affect our ability to maintain our duty of public protection during the course of a possible incident at the AWE site and we therefore have no concerns to raise.

Kind regards,

Appendix 9 – Response of Hampshire Constabulary to the Boundary Hall Application

Re: Planning Application for 115 Houses in Tadley, Hampshire

Whilst there are some concerns regarding the possible building of an additional 115 houses in Tadley, Hampshire Constabulary has no specific objection to the planning application in question.

Hampshire Constabulary's concerns could be summarised as follows:

Additional Houses in the Tadley area will increase the residential population at risk should an off site emergency occur at the AWE Aldermaston site. This increase in risk should be taken in to account when considering the planning application.

The increase in population would also place an increased demand on emergencies services should an off-site emergency occur. Primarily this is through an increase in the numbers requiring assistance as well as increased traffic flows in the area which may hinder both emergency services access and the safe evacuation of residents.

The greater population could also potentially expose responders to increased levels of hazard through an increased likelihood of responders needing to operate in any hazard area for an extended duration. Correspondingly this has some increased resource implications for maintaining our preparedness in order to deliver an effective response to a increased population.

Matthew Hoy
Emergency Planning Officer
Hampshire Constabulary

Appendix 10 – Response to Environmental Statement by West Berkshire Council

Rebecca,

Thanks for the opportunity to look at the Environmental Statement for the above application, although I am surprised to receive it at this stage. I would also suggest that this should have gone to the Development Control elements of each agency rather than Emergency Planning leads directly due to the fact that the ES covers far more than just the Off-site Emergency arrangements. You may have done this but when I discussed it with our planners briefly this was not the case and would recommend that for completeness this is undertaken.

Having regard to the ES content I have only focused on Chapter 17 Emergency Planning since this is the area of my expertise. As indicated above it should go through our planners for comments on the document as a whole.

My comments in relation to Chapter 17 are set out below:

1. This chapter appears to be a critic of the HSE statement in relation to the appeal in relation to the Off-site Plan rather than an objective consideration of the proposal and the off-site planning arrangements.
2. There appears to be over simplification in some of the statements e.g. Para 17.1.5 where it is stated that 'evacuation will not be necessary within 24hrs' whereas in the plan is states under Section 5, 5.2 that "Sheltering' is normally the most effective countermeasure' and under section 5, 5.4 it states that 'Exceptionally, evacuation within the first twenty four hours might be necessary. However this section then goes onto state about the evacuation situations. Therefore their point I believe is misleading.
3. 17.5.5 of the chapter refers to the 'fact' that the LA Off-site plan would still be the same irrespective of the population data. This is incorrect. The DEPZ applies to both Hampshire and West Berkshire and if the population of this area was dense throughout then there would be an impact on the plan and the response of the agencies would be different.
4. There is repeated reference to the additional 268 people which over and above the 15000 already in the area is a minimal 2% increase, although from the chapter it is unclear as to whether this relates to just Hampshire or Hampshire & West Berkshire figures. This does not however reflect that they are going to be the closest residents to the site and due to the dense nature of the elements there us a potential risk that this site would be at greater risk with an increased impact on responders as a result to consider earlier evacuation. In addition there may be a number of vulnerable people within that 268 figure which again may have an additional impact on the responders.

Conclusion

There are a number of questions and inaccuracies in the chapter relating to Emergency Planning.

However should the proposal go ahead then as a minimum the impact for the Off-site Planning Group would be the requirement for the Off-site plan to be reconsidered and potentially rewritten. In so doing any additional impact on the responders would be determined in full.

Should you have any queries please contact me directly.

Kind Regards

Carolyn

Appendix 11 – Response to Environmental Statement by Royal Berkshire Fire and Rescue Service

Rebecca,

I am writing with regard to the above Environmental Statement, primarily focusing on Section 17 where I would like to make the following general comments:

Whilst I totally agree that the existing Off-Site Plan for the Atomic Weapons Establishment (AWE) should be regarded as fit for purpose, placing more people in the Detailed Emergency Planning Zone (DEPZ) can only serve to place additional pressures on the emergency responders and supporting agencies in the event of an incident.

Furthermore and of greater concern is by accepting that this development can go ahead, especially when we consider its close proximity to the AWE site, effectively risks setting a precedent for future developments within the DEPZ, potentially resulting in a further significant increase in resident population.

If you have any further questions relating to this matter please do not hesitate to contact me.

Regards,

Barry

Barry Hayward
Group Manager
Support Services
Royal Berkshire Fire & Rescue Service
Tel: 0118 9322760
Mob: 07818 454756
Mailto: haywardb@rbfrs.co.uk

Appendix 12 – Response to Environmental Statement by Hampshire County Council

Rebecca,

Ian and I met this morning to discuss the relevant information provided within the Boundary Hall Environmental Statement (BDB/67609).

In reference to Chapter 17 (Emergency Planning) 17.9.6 there is no reference to Hampshire and Basingstoke's Emergency Plans that would contribute to the response to an incident at AWE:

- Hampshire County Council Major Incident Response & Recovery Plan
- Basingstoke & Deane Borough Council Emergency Response Plan
- Hampshire County Council Prepared Rest Centre Plan
- Hampshire & Isle Of Wight LRF Media Plan
- Hampshire & Isle Of Wight Humanitarian Assistance Guidance

These plans mitigate the effects on the local community of an incident at AWE so is very important to include.

The summary at 17.10.1 details the "likelihood" and not the "impact" of the risk assessment which is equally as important. The overall Risk Rating is therefore "Medium"

Other than that, Ian has agreed with the comments submitted by Carolyn Murison in that if the development was to go ahead, the Offsite Emergency Plan would need to be reviewed.

Regards

Julie

Julie James
Senior Emergency Planning Officer
Hampshire County Council
Emergency Planning Unit
01962 846844
07931 368322

Appendix 13 – Response to Environmental Statement by Hampshire Constabulary

In reference to Chapter 17 (Emergency Planning) 17.9.6 there is no reference to Hampshire and Basingstoke's Emergency Plans that would contribute to the response to an incident at AWE. These plans mitigate the effects on the local community of an incident at AWE.:

- Hampshire County Council Major Incident Response & Recovery Plan
- Basingstoke & Deane Borough Council Emergency Response Plan
- Hampshire County Council Prepared Rest Centre Plan
- Hampshire & Isle Of Wight LRF Media Plan
- Hampshire & Isle Of Wight Humanitarian Assistance Guidance

I am in agreement with the comments submitted by Carolyn Murison in that if the development was to go ahead, the Offsite Emergency Plan would need to be reviewed.

Greg Snelgrove - Emergency Planning Officer.
Hampshire Constabulary,
Police Headquarters,
Romsey Road,
Winchester,
Hampshire.
SO22 5DB
Email: greg.snelgrove@hampshire.pnn.police.uk
Direct Dial: 01962 871088
Mobile: 07824 558 455

Appendix 14 – Response to Environmental Statement by Basingstoke and Deane Borough Council

From:  Patricia Hughes Sent: Thu 1
To: Rebecca Fenn-Tripp
Cc:
Subject: Boundary Hall - BDB/67609 Environmental Statement consultation

Dear Rebecca,

Thank you for consulting me on the Environmental Statement produced by WSP on behalf of the applicant, Cala Homes. I have a couple of comments:-

- Firstly, the Environmental Statement appears to intimate that the off site plan does not refer to evacuation in the first 24 hours. In fact, due to the need to be flexible, the plan does refer to this being a possibility, whilst sheltering will be the more usual form of counter measure.
- Secondly, it infers that, no matter how many people lived in the area, that the plan would remain the same. The plan is undoubtedly flexible and includes no "upper limit" to those it can deal with. However, this need to be flexible is, in part, due to the number of people the emergency services would have to deal with *during the day* with all the variables e.g. school term time, popular events at venues. If the number of residents living in the area were to double or triple (with the commensurate increase in 'vulnerable' people) I am sure the plan would have to alter and the level of resources available by the emergency planning community would also need to change.
- Thirdly, the Hampshire based emergency plans are not referred to within the report (mass evacuation etc.)

Should you have any queries regarding the above, please do not hesitate to contact me.

Kind Regards,

Patricia Hughes
Interim Head of Property and Facilities Management
Property and Facilities Management
Basingstoke and Deane Borough Council
Tel: 01256 845654
Fax: 01256 845200
E-Mail: patricia.hughes@basingstoke.gov.uk
Website: www.basingstoke.gov.uk