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Our Ref: PL/25/0437

Your Ref: 25/00529/COND

09/04/2025

Your contact is: Jonathan Markwell, Planning

Dear Sir/Madam

Consultation on your application no: 25/00529/COND

Application Type: Adjoining Authority Consultation

Location: READING QUARRY, BERRYS LANE, BURGHFIELD, READING, RG30 3EY

Proposal: Request for observations by Reading Borough Council to West Berkshire District Council on WBDC application 25/00529/COND: Application for Approval of Details Reserved by Conditions 27 (Landfill Gas Risk Assessment), 29 (Construction Traffic Management Plan), 33 (Contaminated Land), 38 (Pollution Prevention Plan), 39 (Landscaping (Including Hard Surfaces)), 47 (Schedule of Materials), 48 (Emergency Planning i) and 49 (Emergency Planning ii) of planning permission 20/02029/COMIND - Development of an Energy Recovery Centre and adjacent Data Centre and associated infrastructure.

Applicant: J Mould (Reading) Ltd

I refer to the consultation of the above application which was received on 21/03/2025

Thank you for consulting Reading Borough Council on this approval of details application, in line with informative 9 of the original decision notice (your ref 20/02029/COMIND).

RBC Transport Planning have confirmed that reasonable steps have been taken by the applicant within the Construction Traffic Management Plan (CTMP, as part of condition 29) to avoid peak hour traffic movements. More specifically, the CTMP has been updated (in comparison with previous application 24/02176/COND, as commented on by RBC under ref PL/24/1486) to state that travel will be outside of peak hours where possible, although it is acknowledged that some peak HGV vehicle movements are likely to occur whilst the main building is being fitted with its internal equipment during a 6 week period. However, the CTMP does state that the Principal Contractor shall seek to organise construction activities such that where practicable construction workers would not have to travel to and from the site during the AM and PM peak hours. The proposed construction traffic routing is acceptable to RBC as it avoids Reading town centre and high density residential areas. Long vehicles will be required to use the Red Route via the A4 Bath Road due to the constraints of the alternative route.

Accordingly, RBC have no objections to raise with regard to condition 29 from a transport perspective, with it recommended that you determine this using your adopted policies.

RBC Environmental Protection raises no objections to conditions 27 (Landfill Gas Risk Assessment),

29 (Construction Traffic Management Plan), 33 (Contaminated Land) or 38 (Pollution Prevention Plan) from an environmental protection perspective, with any issues only affecting the immediate surroundings of the site and not Reading Borough. Accordingly, RBC have no objections to raise with regard to conditions 27, 29, 33 and 38 from an environmental protection perspective, with it recommended that you determine these using your adopted policies.

RBC Emergency Planning has provided the following comments in relation to conditions 48 & 49 (Comprehensive Emergency Plan and Outline Emergency Plan):

Comments below are restricted to the Berrys Lane Construction Stage EPRP, for the simple reason that the construction stage presents the greatest potential risk in terms of the number of people who may be on-site and who may – in the event of an incident at AWE B that has off-site implications – need to seek shelter quickly and be provided for whilst sheltering. (The logic being that should the details be approved and the development proceed, not only will there be far fewer people on-site at any time once both the facilities become operational [no more than approximately 50 against up to approximately 300 during the development phase, with reference to the respective EPRPs], but there will also be adequate time and opportunity to refine the operation stage emergency plans for both the Energy Centre and Data Centre, if needed. If the development does not proceed, then this point is moot.)

- i. In respect of an incident at AWE B that has off-site implications, the imperatives are for those in the DEPZ who are out in the open at the time the alert is received to seek shelter as quickly as possible, and to be able to remain under shelter for up to 72 hours. Emergency arrangements outlined in a document such as the EPRP must include specific details not only as to how/where those on site will be sheltered, but also how their basic living needs (e.g. food, water, medicine, sleeping needs, etc.) will be catered-for.*
- ii. The EPRP is written to cater for a range of foreseeable incidents that could impact the development site, not just an incident at AWE B. The use of pre-planned actions set-out in the form of 'Emergency Action Plans' in respect of specified incidents is clear, useful and intuitive. (It is suggested that the 'Emergency Response Team Structure' on p.73 would be usefully moved to Part 2 'Roles and Responsibilities'.) However, the EPRP as presented should not be considered the finalised version; given that it is accepted that it may not be possible to identify certain specifics at this stage (e.g. the precise number/location of muster-points, etc.), should the details be approved and the development proceed, the further development of the EPRP should include such details as they become be an iterative process.*
- iii. Re. 3.4 'Muster Points' (p.12), reference is made to the principal muster point being the Incident Control Centre at the site entrance control cabin. The site entrance control cabin needs to be sufficiently large to act as the Incident Control Centre; if it's of 'Portakabin' size, then this may be appropriate, but if it's a smaller 'gate-guard' type facility, then it would clearly be too small to act as the Incident Control Centre.*
- iv. Re. 3.4 'Muster Points' (p.12), reference is made to on-site personnel having to 'walk in an orderly manner to the offices of J Mould Ltd, maintaining as much cover as possible' (after having mustered at the Incident Control Centre muster point and following a head-count) should the site be affected by an incident at AWE B before sufficient on-site sheltering accommodation is in place. It is suggested that this is re-visited and sheltering arrangements for this stage of the development be refined/improved.*
- v. Re. Emergency Action Plan 07 'AWE Alerts', it states (p.41) that "In the event an all-clear is not received within 48 hours, [the Site Manager is to] implement site evacuation procedure...". This is incorrect; on-site personnel should be prepared to remain under cover of shelter for up to 72 hours. (In reality, it is almost inconceivable that official directions will not have been received within 24-48 hours.)*
- vi. Although the EPRP makes several references to on-site personnel who may have been 'caught out' in the open changing their clothes and showering, it is suggested that the EPRP specifies the arrangements for showering/decontamination facilities and also for*

the provision of adequate PPE for those on site ((e.g. by the inclusion of shower facilities and PPE supplies in each of the muster points).

- vii. Re. alarms/alerts, given that the immediate actions required of on-site personnel will differ depending on the incident (e.g. immediate 'Evacuate!' to **external** muster points in the event of a fire, compared with immediate 'Take shelter!' to **internal** muster points in the event of notification of an incident at AWE B), the EPRP should specify by what means on-site personnel will be alerted to different types of incidents.*
- viii. These comments, whilst not an objection to the planning proposal, should also not be regarded in any way as approval. In this respect, it is important to bear in mind that the DEPZ for AWE B is already densely populated, and consideration needs to be given to the potential implications that new development within the DEPZ, including this development, may have on the health, safety and welfare of the community within the DEPZ overall (which the OSEP aims to ensure).*

These observations constitute **comments** on the approval of details application (and therefore do not represent either an objection or support from RBC Emergency Planning). It is respectfully suggested that these are shared with the West Berkshire Emergency Planning team to help inform your subsequent determination of conditions 48 & 49. If you wish to discuss any specific matter raised, prior to determining these conditions, please feel free to liaise further with RBC.

I trust that these comments are of assistance to you. Please feel free to contact me should you wish to discuss any matter raised in this response.

Yours faithfully,

Jonathan Markwell

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