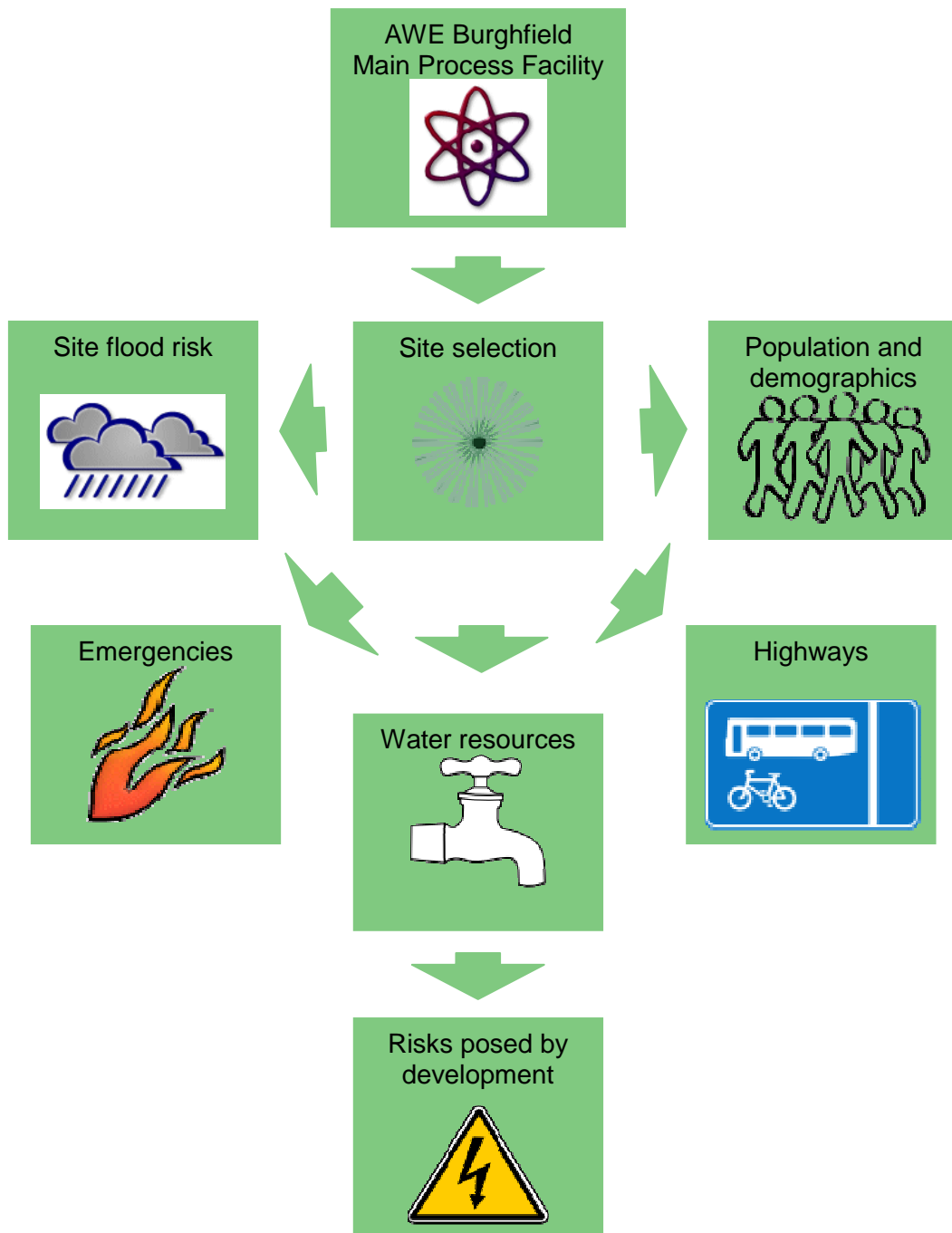


**West Berkshire Council
Planning Application 08/02287/COMIND
Main Process Facility at AWE Burghfield**



Comments from Nuclear Awareness Group (NAG)



Summary diagram: Selection of an inappropriate site for the Main Process Facility would cause a number of impacts creating risks to the public and environment. Poor approaches to consultation and Environmental Impact Appraisal create a barrier to fully understanding these risks.

Summary and Key Recommendations

The new main process facility at AWE Burghfield (also known as Project Mensa) would be built to assemble and dismantle nuclear weapons. There are fundamental concerns about the suitability of the AWE Burghfield site for this purpose and so NAG wishes to **object** to the planning application which has been submitted. Given the complex nature of the proposed development, which is located in a strategically important area, has a national significance, and has a substantial potential impact on other major developments in the area, we request that West Berkshire Council refers the planning application to the Secretary of State for determination.

- The Ministry of Defence claims that the AWE Burghfield site is the only possible location for this development. No evidence has been provided to support this assertion, and as recently as 2002 there were plans to close the site and transfer operations to AWE Aldermaston. Given the known flood history of the AWE Burghfield site and its proximity to Reading, one of the largest urban areas in the South of England, there are significant questions as to whether the Burghfield site is appropriate for development of a new nuclear facility.

Planning permission should be withheld until a convincing justification for choice of the site has been provided to the public and the local planning authority.

- No information about the risks that the development poses to the public and the environment has been disclosed in the documents submitted to West Berkshire Council in support of this planning application. The Council and the public are therefore expected to accept the development without any understanding of the scale or nature of the risks posed by the nuclear operations which will take place in the main process facility. This is not acceptable in a modern democracy.

Before planning permission is granted the Ministry of Defence should provide sufficient information about the risks posed by operations at the new facility, and countermeasures to address these risks, to allow members of the planning committee and members of the public to assess the nature and scale of the threat it poses to local communities.

- The AWE Burghfield site has a history of flooding, and serious flooding at the site in July 2007 led to production work ceasing for a period of nine months. The Flood Risk Assessment for Project Mensa argues that as the proposed development is a Ministry of Defence installation it should be classified as water-compatible development for the purposes of the 'sequential test' required in government guidance to local authorities on flood issues. In fact, the proposed development would handle radioactive substances, explosives, and hazardous chemicals, and the operations which would be carried out are similar to those described as being 'highly vulnerable', and thus prohibited from development in flood risk areas using the sequential test.

A computer model used to predict the future impacts of flooding at the site has only been tested using outdated climate change scenarios, and not the most up to date predictions which suggest that the impacts of climate change will be more severe than previously expected.

As the development does not pass the 'sequential test' - a key principle of government policy aimed at reducing flood risks - it should not be permitted at the AWE Burghfield site.

- For obvious safety reasons, nuclear power stations have been built in remote locations away from centres of population. The Burghfield AWE site, however, is close to Reading's urban area and a population of over 200,000 people live within a five mile radius of the site. This raises major questions about the suitability of the site for a new nuclear development.

The Health and Safety Executive (HSE) have stated that "the current population characteristics around the AWE Aldermaston and Burghfield sites are approaching the defined limits and HSE/NII may need to advise against further planning applications." There is a possibility that future new developments which add significantly to the population around the site could therefore face a veto from HSE.

Plans for an extension of the Madejski Stadium; the Kennet Valley Park housing development; and western expansions of Green Park, and other proposed developments in the HSE consultation zone could be affected by construction of a new main process facility at AWE Burghfield. Construction of the new facility would extend the life of the AWE Burghfield site until the 2050s, potentially with major implications for future development in South and West Reading.

Before planning permission is granted the planning committee should investigate whether its construction would be likely to place any long term limits on development in the surrounding area, particularly in relation to residential developments and developments outside the West Berkshire boundary.

- Environmental assessment studies have identified a potential risk of groundwater contamination of the deep aquifer which runs beneath the AWE Burghfield site. This potentially places future drinking water supplies at risk of contamination.

Planning permission should not be granted until the Ministry of Defence have submitted a risk assessment and strategy for protecting groundwater resources in the vicinity of the proposed development.

- Local authorities and statutory agencies have limited resources to spend on emergency planning, and face competing demands for resources, particularly during a period of economic recession. An additional hazard in the vicinity will stretch these resources.

AWE plc should be required to provide financial support to local councils to ensure that emergency planning arrangements are able to address issues related to the new main process facility at Burghfield.

- Construction traffic approaching the development from the M4 motorway would be routed towards the AWE Burghfield site along the Bath Road and the Burghfield Road. Construction traffic generated by the development can be expected to increase congestion along these roads.

The delivery of loads to or from the site during peak hours should be prohibited, or the developer should be required to fund improvements to the Burghfield Road, including widening of the bridge over the River Kennet.

- The Defence Exempt Environmental Appraisal prepared by AWE plc instead of a full Environmental Impact Statement falls short of the standards which would normally be expected for a document of this nature, and does not include important information about the impact of production processes at the facility, wastes produced, or end-of-life arrangements for decommissioning the facility and restoring the site.

The process for consultation on the planning application has raised a number of concerns. The public consultation period was originally scheduled over the Christmas holiday period, neighbouring authorities were not consulted, and the developer has refused to meet members of the public to discuss details of the application.

- The planning application submitted for a new main process facility at AWE Burghfield is for a major development at a sensitive site. The development is said to be “of national and international significance” and is located in the South Reading / Kennet Valley / M4 corridor area which has considerable strategic importance in planning terms. The site is located close to a boundary point between three local authorities and requires a joint approach to be taken by these three authorities.

The development matches criteria for when it is appropriate to ‘call in’ a planning application, and therefore the planning committee should refer the application to the Secretary of State for determination rather than making a decision itself. A public inquiry would be advisable to explore the complex issues surrounding the proposed development before reaching a decision.

**West Berkshire Council: Planning Application 08/02287/COMIND
Main Process Facility at AWE Burghfield
Comments from Nuclear Awareness Group**

The Nuclear Awareness Group (NAG) would like to comment on the planning application which has been submitted to the Ministry of Defence for a Main Process Facility at the Atomic Weapons Establishment (AWE) Burghfield. NAG is a local group which was set up with support from Reading Borough Council following the 1993 Community Inquiry into AWE Aldermaston to act as a stakeholder voice on behalf of local people on matters relating to AWE.

The new main process facility at AWE Burghfield (also known as Project Mensa) would have the function of assembling and dismantling nuclear warheads. The purpose of the development raises a number of significant issues relating to the safety of the public and protection of the environment. We discuss these issues below and make a number of proposals aimed at mitigating the impact of the proposed development. However, we have fundamental concerns about the suitability of the AWE Burghfield site for this development and for these reasons we wish to **object** to the planning application which has been submitted. Given the very complex nature of the proposed development, which is located in a strategically important area; has a national significance; and has a substantial potential impact on other major developments, we request that West Berkshire Council refers the planning application to the Secretary of State for determination. We believe that a public inquiry would be advisable to explore the issues surrounding the proposed development before coming to a planning decision.

1. Strategic siting issues

Given the known flood history of the AWE Burghfield site and its proximity to Reading, one of the largest urban areas in the South of England, there are significant questions as to whether this site is appropriate for development of a new nuclear warhead assembly / disassembly facility. It is unlikely that West Berkshire Council would be willing to grant planning permission to a new commercial development handling radioactive materials, explosives, and hazardous chemicals at the same location.

We believe that the Ministry of Defence have not taken an open-minded view on where to site the new facility. The reason the existing site has been chosen appears to be for reasons of financial convenience and political expediency rather than because it is the best site in terms of safety, environmental impact, or public acceptability.

The government has established a rigorous and lengthy process of assessment and consultation for identifying and assessing sites which are strategically suitable for the location of new nuclear power stations, based around a set of technical criteria which will be used to decide whether a site is appropriate for the purpose¹. No such process has been used to determine whether the AWE Burghfield site is suitable for a new nuclear development. If an assessment exercise was to be undertaken using the same criteria as those proposed for siting of new nuclear power stations, we believe that the Burghfield site would fail the selection test.

¹ 'Towards a Nuclear National Policy Statement: Consultation on the Strategic Siting Assessment Process and Siting Criteria for New Nuclear Power Stations in the UK'. Department for Business, Enterprise, and Regulatory Reform. July 2008. <http://www.berr.gov.uk/files/file47136.pdf>

The justification for locating the proposed development at Burghfield are given in just two sentences in an Environmental Appraisal document which has a total length of 241 pages². AWE plc state that “two key constraints effectively ruled out any alternatives based at AWE Aldermaston:

- Lack of the required area of land available at AWE Aldermaston due to technical incompatibility with other facilities; and
- The need to maintain capability at the existing Burghfield facility at all times, and particularly during what would be a significant transition period between the existing facility and any new facility, meant that it would be extremely advantageous for the facilities to be located close together to enable ease of workforce movement between them.

Consequently, the range of alternatives to be considered was limited to those that could be provided at AWE Burghfield”.

No detailed justification of the need for the development to be located at Burghfield is given by AWE in documents supporting the planning application. In other technical documents the need to locate the development at the Burghfield site is presented as an assertion, rather than as an explanation with supporting evidence. The Flood Risk Assessment for the development states: “This FRA *asserts* [our emphasis] that the nature of the existing development, its security requirements and the need for a new modern replacement facility mean that there are no alternative sites that could be used to locate the proposed development.”³

However, other information included in the Environmental Appraisal document shows that location of the facility at a different site is certainly a possibility. The document states that: “In 2002 AWE produced a Site Development Strategy Plan (SDSP) which detailed the proposals for the future of the AWE sites. It was intended at this time that all activity was to transfer from Burghfield to Aldermaston with the ultimate aim that the Burghfield site would close.”⁴ No explanation is given as to how and why this decision was reversed.

We believe that a number of options exist for siting the warhead assembly / disassembly facility away from the unsuitable Burghfield site, and taking the opportunity to locate it at a more appropriate location:

- The AWE Aldermaston site might be a possible location if the site configuration was reviewed and the location of as yet unconstructed facilities changed to accommodate a new site plan. Development of the burning ground and open land to the north of AWE Aldermaston may also be a possibility.
- The AWE site at Blacknest should also be considered. If this site is not large enough for operational purposes, the possibility of transferring offices or facilities from Aldermaston to Blacknest to free up space at Aldermaston should be considered.
- The nuclear licensed site at Harwell in Oxfordshire is in close proximity to Aldermaston and is another candidate site for the development.
- Other defence sites in the South East of England which have an association with AWE should also be considered, including Fort Halstead and the Qinetiq site at Foulness.

² ‘AWE Burghfield Project Mensa Final Defence Exempt Environmental Appraisal. Volume 1.’ AWE plc. December 2008. Paragraph 4.2.1

³ ‘Project Mensa Flood Risk Assessment. Final Report.’ Atkins Ltd. 23 December 2008. Page 5

⁴ ‘AWE Burghfield Project Mensa Final Defence Exempt Environmental Appraisal. Volume 1.’ AWE plc. December 2008. Paragraph 4.2.1

Proposal to planning committee:

The reasons that the AWE Burghfield site has been chosen as the location for this development should be explained in detail by the Ministry of Defence, together with an explanation of why other sites cannot be used as alternative locations. Planning permission should be withheld until a convincing justification for choice of the site has been provided to the public and the local planning authority.

2. Risks posed by the development

No information about the risks posed by the development to the public and the environment has been disclosed in the documents submitted to West Berkshire Council in support of this planning application. The Council and the public are therefore expected to accept the development without any understanding of the scale or nature of the risks we face as a result of the nuclear operations which will take place in the main process facility, or any opportunity to scrutinise the adequacy of the countermeasures taken to reduce these risks. This is not an acceptable state of affairs in a modern democracy.

A small amount of information about nuclear warhead assembly operations at AWE Burghfield has entered the public domain via other routes, allowing us to make a very general assessment of the risks posed by the proposed development.

Warhead design reduces the risk of an accidental nuclear explosion to what the Ministry of Defence considers an acceptable level during the final assembly, road transport and storage of nuclear weapons. However, the Ministry accepts that certain incidents involving detonation of the 30 kg or so of conventional high explosive which surrounds the nuclear materials in the warhead could result in a release of radiation; fire; or fragmentation and dispersion of the highly radioactive plutonium core of the warhead⁵.

Incidents which are sufficiently viable to trigger an offsite release of toxic and / or radioactive substances include terrorist action, explosion or fire, flooding, or an aircraft crash. Among hazard scenarios, the dispersion of plutonium as a result of such an incident would pose the greatest hazard to the health of members of public located off-site.

2.1 Risk of explosion

The new main process facility at AWE Burghfield will conduct the most hazardous operation during the manufacture of nuclear weapons – the attachment of high explosives to the plutonium pit during assembly, and the removal of high explosives during disassembly. The High Level Nuclear Design Philosophy published by AWE for the facility states that: “The dominant risk [in the warhead assembly cell] is expected to be shown to be an explosion in the cell during operations”⁶.

Guidance from the Health and Safety Executive states that users of radioactive substances should avoid storing explosives, corrosive, or highly flammable substances in the same store as radioactive

⁵ ‘Local Authority and Emergency Services Information (LAESI) Edition 6. Defence Nuclear Materials Transport Contingency Arrangements’. Ministry of Defence. Section A. <http://www.mod.uk/NR/rdonlyres/226E622E-356E-4CB0-A2CD-979AE352B848/0/20080424LAESIV6U.pdf>

⁶ ‘Project Mensa. High Level Nuclear Design Philosophy.’ AWE plc, 23rd May 2007. Paragraph 6.1.6

substances⁷. The civil nuclear industry would not be permitted to handle explosives and nuclear materials together in the way that AWE does at Burghfield.

2.2 Risk of a criticality accident

A criticality accident occurs when a nuclear chain reaction accidentally occurs in fissile material, leading to an uncontrolled release of radiation. Under certain circumstances water can act as a neutron reflector and so the risk of a criticality accident increases if radioactive materials are immersed or submerged in water. Flooding of the process facility would therefore increase the possibility of a criticality accident, as well as potentially causing contamination of flood water through contact with radioactive materials. There is also a risk that flood water could create other hazards by triggering an electrical fire or causing alarm systems to malfunction.

Proposal to planning committee:

The local public would face serious risks in the event of an accident at the main process facility which led to a release of radioactive material. No information has been provided by the Ministry of Defence to help explain or quantify these risks, and no explanation has been given as to what precautions are to be taken to prevent such a release.

We recommend that before planning permission is granted the Ministry of Defence should provide sufficient information about the risks posed by operations at the new facility, and countermeasures to address these risks, to allow members of the planning committee and members of the public to assess the nature and scale of the threat it poses to local communities. If the Ministry of Defence can provide good reasons for withholding such information, the planning committee should ask for an independent safety assessment to be carried out by a trustworthy third party who can provide a summary of the issues and make a recommendation to the planning committee.

3. Site flood risk

3.1 Requirements of Planning Policy Statement 25

The AWE Burghfield site has a history of flooding, and serious flooding at the site in July 2007 led to production work ceasing for a period of nine months⁸. The Flood Risk Assessment prepared for the development by Atkins Ltd accepts that the proposed location for the new facility falls into Flood Zone 3 (high flood risk) as defined by Planning Policy Statement 25⁹ (PPS 25).

PPS 25 states that: “All opportunities to locate new water-incompatible developments in reasonably available areas of little or no flood risk should be explored, prior to any decision to locate them in areas of higher risk”¹⁰. Potential alternative locations for the development do exist and are listed

⁷ ‘Control of radioactive substances.’ HSE information sheet: ionising radiation protection series no.8. <http://www.hse.gov.uk/pubns/irp8.pdf>

⁸ ‘Flood Threat To Nuclear Arms Site’. Julian Rush. Channel 4 News, 13th October 2008.

<http://www.channel4.com/news/articles/society/environment/flood+threat+to+nuclear+arms+site/2513357>

⁹ ‘Planning Policy Statement 25: Development and Flood Risk’. Communities and Local Government, December 2006. The Stationery Office, London.

¹⁰ ‘Planning Policy Statement 25: Development and Flood Risk Practice Guide’. Communities and Local Government, December 2006. The Stationery Office, London. Paragraph 4.5, page 69.

above, but do not appear to have been explored by the developer before submitting an application for development at the AWE Burghfield site.

PPS 25 requires decision makers to undertake a 'Sequential Test' to determine whether or not development should be allowed at a particular location. This test is a means of ensuring that development is directed to areas with the least risk of flooding. The aim of the test is to keep all development out of medium and high flood risk areas where possible.

Land in Flood Zone 3 has a high probability of flooding and therefore only land uses defined in PPS 25 as water-compatible or less vulnerable should be allowed (Flood Zone 3a); or else it acts as a functional flood plain, in which case only water-compatible uses and certain types of essential infrastructure may be permitted (Flood Zone 3b). PPS 25 specifies that highly vulnerable land uses should not be permitted in areas which are defined as Flood Zone 3¹¹.

The Flood Risk Assessment for Project Mensa argues that the proposed development is a Ministry of Defence defence installation and should therefore be classified as water-compatible development as indicated in Table D2 of PPS 25¹². However, the proposed development would handle radioactive substances, explosives, and hazardous chemicals, and the operations which would be carried out are more akin to those described in the highly vulnerable category, which specifically lists installations requiring hazardous substances consent as a highly vulnerable use.

PPS 25 states that: "Buildings that combine a mixture of uses should be placed into the higher of the relevant classes of flood risk sensitivity"¹³. In our view, this means that the proposed development should be considered as highly vulnerable, and therefore disqualified from construction on this site.

Proposal to planning committee:

We conclude that the proposed development appears not to pass the 'sequential test' - a key principle of government policy aimed at reducing flood risks - and should therefore not be permitted at the AWE Burghfield site.

3.2 Flood modelling studies

AWE has commissioned a hydrological model to assist in flood modelling of the Burghfield site and design of the main process facility. The model has been used to investigate the impacts of climate change according to the scenario proposed in PPS 25, which requires that an additional allowance of 20% should be added to forecasts for the 1 in 100 year flood event used as the 'design scenario' for the proposed new facility.

The model does not account for the latest predictions of the impacts of climate change on future flooding, as PPS 25 climate change scenarios are based on predictions published by the UK Climate Impacts Programme in 2002 (UKCIP02)¹⁴. New climate change scenarios are due to be published by the UK Climate Impacts Programme in Spring 2009 (UKCP09)¹⁵, and these are expected to

¹¹ Planning Policy Statement 25, Annex D, Table D3, page 27.

¹² Planning Policy Statement 25, Annex D, Table D2, pages 25-26.

¹³ Planning Policy Statement 25, Annex D, Table D2, footnote 2, page 26.

¹⁴ Planning Policy Statement 25, Annex B, paragraph B2 page 14.

¹⁵ 'Delay announced to UKCIP08 launch'. UK Climate Impacts Programme. The new scenarios will be named UKCP09, not UKCIP09 as might be expected on the basis of the previously used format.

indicate that the impacts of climate change on the UK will be more severe than previously expected, in line with up-to-date predictions from the Intergovernmental Panel on Climate Change's latest assessment report¹⁶.

As the proposed development is a key operational facility on a nuclear licensed site, it is essential that no unnecessary risks are taken and the most recent information used when reaching a decision on whether to grant planning permission. PPS 25 states clearly that: "The most up-to-date guidance on climate change and flooding from the Environment Agency, Defra, Communities and Local Government and the UKCIP should be considered in the preparation of Regional Flood Risk Appraisals, Strategic Flood Risk Assessments and site specific Flood Risk Assessments."¹⁷ NAG therefore believes that no decision should be made on this planning application before flood scenarios based on the new UKCP09 become available and can be tested using AWE's hydraulic model. The UKCP09 data is expected to be released imminently, and so it is not anticipated that this will cause an undue delay to the development.

The Burghfield Brook, which flows through the AWE site and is a major factor in flooding at the site, extends upstream to Great Auclum and Burghfield Common. Over the life of the new main process facility, which will extend until the 2050s, it is more than probable that development will take place in this upstream catchment area, increasing the area of hard paved surface. This will increase surface water runoff into the Burghfield Brook, with an impact upon the AWE Burghfield site downstream. The flood modelling studies carried out by AWE's consultants have not investigated the affects of these cumulative impacts over the life of the development, and we believe that no decision should be made on this planning application until further studies have been conducted and are able to show that there will be no adverse impacts as a result of upstream development that might reasonably expected over the life of the facility.

We note that the flood model prepared by AWE's consultants was audited on behalf of the Environment Agency by Halcrows, a consulting engineering company who are engaged by AWE plc to undertake design work on the 'Project Pegasus' facility at AWE Aldermaston. We believe that Halcrows have a conflict of interest in this matter that the Planning Committee should be aware of.

Proposal to planning committee:

We conclude that the flood risk modelling work that has already been conducted in preparation for this development should be repeated to account for the impacts of up to date climate change scenarios and foreseeable upstream development in order to ensure that the environmental risks posed by flooding of the proposed development are reduced to the minimum possible.

4. Population and demographic concerns

For obvious safety reasons, nuclear power stations have been built in remote locations away from centres of population. AWE Burghfield, however, is close to the growing urban settlement of Burghfield and is just 6 kilometres from the centre of Reading, a town with a population of 144,000

http://www.ukcip.org.uk/index.php?option=com_content&task=view&id=569&Itemid=496

¹⁶ 'Climate change 2007: IPCC Fourth Assessment Report (AR4)'. Intergovernmental Panel on Climate Change.

<http://www.ipcc.ch/ipccreports/ar4-syr.htm>

¹⁷ Planning Policy Statement 25, Annex B, paragraph B.14, page 17

people. Over 200,000 people live within a five mile radius of the site¹⁸. This raises questions about the suitability of the site for a new nuclear development.

The Health and Safety Executive's Nuclear Directorate recognises that: "In respect of ensuring that the risks arising from a nuclear facility are tolerable, an important safety measure is the siting of the facility and the characteristics of the area surrounding the site involving population demographics."¹⁹ HSE's view is that limiting the population in the vicinity of a nuclear site is "the only effective non-engineered means of controlling the exposure of the population in the event of an incident leading to a release of radioactive material into the environment."²⁰

In order to prevent populations growing to unsafe levels around nuclear sites, HSE provides advice to local authorities on the suitability of development in the surrounding area. HSE is not a statutory consultee in this respect, and there is no obligation on local authorities to accept its advice, but the Executive can ask the Secretary of State to call in a planning application which a local authority intends to permit against its advice.

Because of concerns about the proximity of the two AWE sites to centres of population, HSE recently stated that "the current population characteristics around the AWE Aldermaston and Burghfield sites are approaching the defined limits and HSE/NII may need to advise against further planning applications."²¹ This raises the possibility that future new developments which add substantially to the population around the site could face a veto from HSE.

HSE has asked local authorities to consult with them before permitting certain types of development within 5 miles of AWE Burghfield (see Map 1 overleaf). Map 1 shows that large parts of South and West Reading fall within this zone, as do Burghfield Common and most of Mortimer. The middle zone with a radius of 3 km is of particular concern, as this area contains the sites of a number of significant development proposals that would influence both transient and residential population numbers, including plans for an extension of the Madejski Stadium; the Kennet Valley Park housing development; and western expansions of Green Park. The viability of these developments, and other proposed developments in the consultation zones, may be influenced by construction of a new main process facility at AWE Burghfield. Given that construction of the facility would extend the life of the site until the 2050s, its construction at this location could potentially have major implications for future development which would bring economic and social benefits to South and West Reading.

HSE organised a workshop for local authorities with an interest in the AWE sites (West Berkshire, Reading Borough, Wokingham Borough, Basingstoke and Deane, and Hampshire) in May 2008 to stress the importance of limiting populations around the two sites and the need for co-operation

¹⁸ 'Workshop on Land Use Planning and Emergency Preparedness (Demographic Margins) - Aldermaston and Burghfield Nuclear Licensed Sites'. Wokingham Borough Council Offices, 21 May 2008. Presentation by Dr John Highton. Calculated from figures in first table on page 37.

¹⁹ 'The Siting Of Nuclear Installations In The United Kingdom'. Dr John Highton and Mr David Senior, Health and Safety Executive Nuclear Directorate. Paper to the Nuclear Safety Advisory Committee, 3rd July 2008. Page 2. <http://www.hse.gov.uk/aboutus/meetings/iacs/nusac/030708/p12-sittingpaper.pdf>

²⁰ 'The Siting Of Nuclear Installations In The United Kingdom'. Page 3.

²¹ AWE Aldermaston and Burghfield. Quarterly report for 1 July to 30 September 2008.

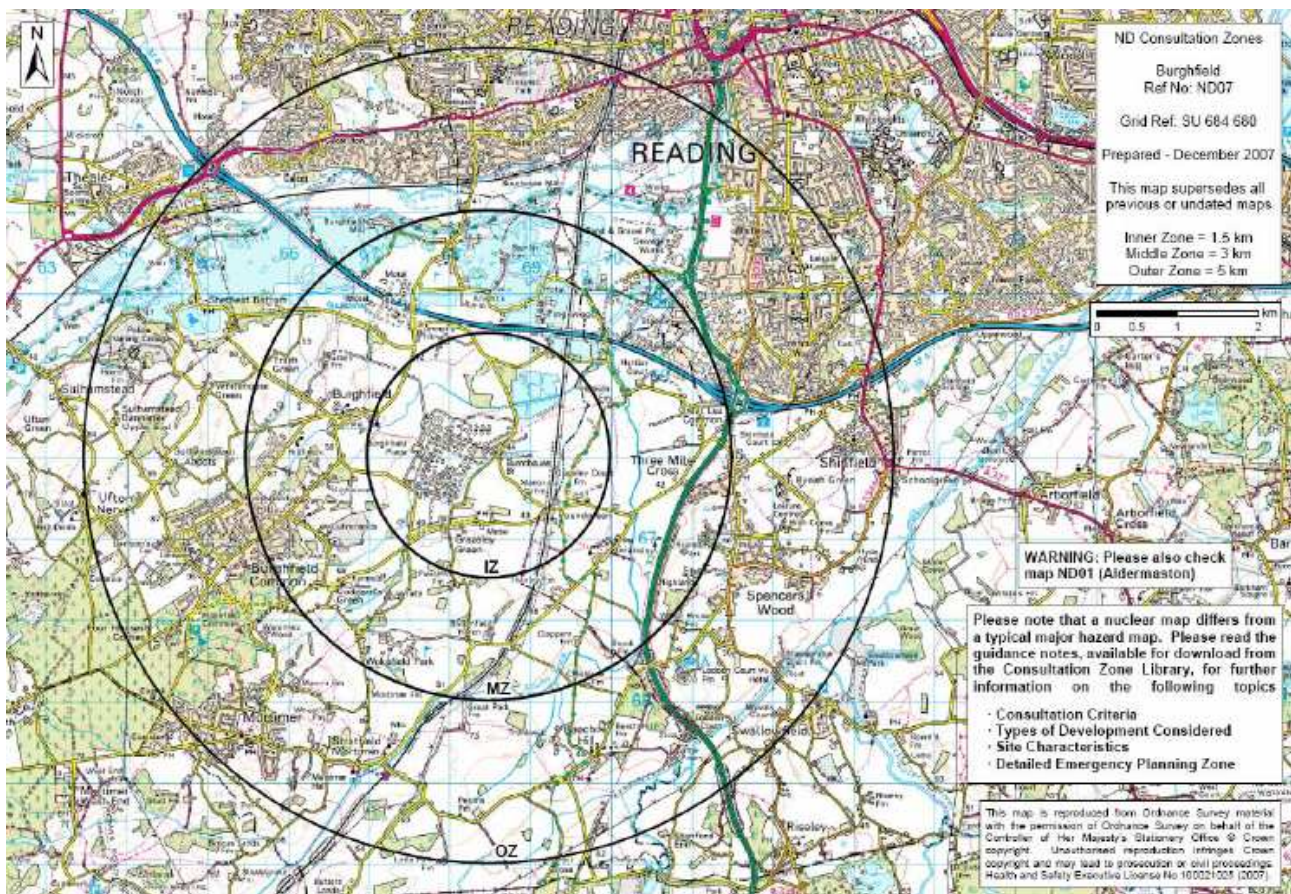
<http://www.hse.gov.uk/nuclear/llc/2008/aldermaston3.htm> See also 'Residential Developments in the Nuclear Safeguarding Zone of AWE Aldermaston.' Letter from Health and Safety Executive to Basingstoke and Deane Borough Council, 12th December 2008.

between the authorities on development planning in the area²². Despite this, there seems to have been little or no liaison between authorities over the planning application for a new main process

facility at Burghfield, as neighbouring authorities were not notified of the development or invited to comment by West Berkshire Council.

Proposal to planning committee:

Because of the need to control development to limit populations around AWE Burghfield, we conclude it is possible that construction of the new main processing facility at the AWE Burghfield site could prevent future development which would be desirable on economic and social grounds in the area. Before planning permission is granted the planning committee should investigate whether its construction could place any long term limits on development in the surrounding area, particularly in relation to residential developments and developments outside the West Berkshire boundary.



Map 1: Health and Safety Executive Consultation Zones around AWE Burghfield.²³

²² Workshop on Land Use Planning and Emergency Preparedness - Aldermaston and Burghfield Nuclear Licensed Sites. Wokingham Borough Council Offices, 21 May 2008. Presentations on ‘The Need for Integration’ and ‘Demographic Margins’ by Dr John Highton.

5. Risks to water resources

The proposed development falls within an Inner Source Protection Zone for a potable water supply as defined in the Environment Agency's Groundwater Protection Policy²⁴. Environmental assessment studies have identified a potential risk of groundwater contamination of the deep aquifer which runs beneath the AWE Burghfield site. This potentially places future drinking water supplies at risk of contamination.

Proposal to planning committee:

Planning permission should not be granted until the Ministry of Defence have submitted a risk assessment, remediation and mitigation strategy, and monitoring plan to provide protection to groundwater resources in the vicinity of the proposed development. We note that the Environment Agency has made a similar request in its response to consultation on this planning application.

6. Emergency planning and management

Emergency countermeasures would act as the final line of defence for the public in the event of an accident at AWE Burghfield. The response to an emergency at the AWE Burghfield main process facility would rely upon both AWE's on-site emergency teams and the civil authorities.

Local authorities and statutory agencies have limited resources to spend on emergency planning, and face competing demands for resources. An additional hazard in the vicinity will stretch these resources. In the financial climate which follows the credit crunch local authorities it is highly unlikely that local authorities will be able to provide additional finance for emergency planning.

The transport of nuclear materials to AWE Burghfield along roads and motorways in the area also creates risks for the public. It is not clear whether risk assessments have been conducted for routes which are used for the transport of nuclear materials or whether arrangements to protect the public in the event of an accident during transport are adequate.

Proposal to planning committee:

The developer should be asked to enter into negotiations with local authorities with an interest in AWE Burghfield (West Berkshire, Reading Borough, and Wokingham Borough) with the aim of providing financial support to ensure that their emergency planning arrangements are able to address issues related to the new main process facility at Burghfield.

²³ From 'Workshop on Land Use Planning and Emergency Preparedness (Demographic Margins) - Aldermaston and Burghfield Nuclear Licensed Sites'. Wokingham Borough Council Offices, 21 May 2008. Presentation by Dr John Highton. Page 23.

²⁴ 'Underground, Under Threat. Groundwater Protection: Policy and Practice.' Environment Agency. <http://publications.environment-agency.gov.uk/pdf/GEHO1006BLMW-e-e.pdf>

7. Highways

Construction traffic approaching the development from the M4 motorway would be routed towards the AWE Burghfield site along the A4 Bath Road in towards Reading and then southwards to Burghfield along the Burghfield Road. Burghfield Road is an important commuter artery leading into Reading. At peak hours the road becomes congested, particularly at the narrow bridge which crosses the River Kennet by the Cunning Man Inn which is controlled by traffic lights. Construction traffic generated by the development can be expected to increase congestion along this road.

Burghfield Road and other roads in the area are relatively narrow and heavy vehicles associated with construction loads will increase the risks to cyclists and walkers using these roads.

Proposal to planning committee:

The planning committee should consider imposing a condition on planning permission to prohibit the delivery of loads to or from the site during peak hours. Alternatively, a section 106 planning obligation should be negotiated with the developer to make improvements to the Burghfield Road, including widening of the bridge over the River Kennet and improvements to benefit cyclists and walkers.

8. Environmental Impact Assessment

The Defence Exempt Environmental Appraisal prepared AWE plc in substitution for an Environmental Impact Statement falls short of the standards which would normally be expected for a document of this nature. The document does not include important information about:

- Production processes at the facility and their impacts.
- Wastes produced as a result of construction and operation of the facility.
- End-of-life arrangements for decommissioning the facility and restoring the site.

Under both EU and UK law a developer is required to prepare a justification for any practice involving ionising radiation in order to ensure that workers and members of the public are not exposed to unnecessary dangers. No such justification has been prepared for the proposed new main production facility at AWE Burghfield²⁵. The Ministry of Defence claims that it is exempt from the need to prepare such a justification, although the Secretary of State for Defence's Policy Statement within the Ministry of Defence Environment Manual (JSP 418) states that "where the Ministry of Defence has been granted specific exemptions...from legislation...it will introduce standards and management arrangements that are, so far as reasonably practicable, at least as good as those required by the legislation".

Proposal to planning committee:

It does not appear that the quality of the Defence Exempt Environmental Appraisal for the development has been independently assessed by qualified experts. The planning committee should

²⁵ Letter from Gina Shikrakar, Defence Equipment and Support Policy Secretariat Submarines 1, to Peter Burt, 18th February 2009.

ask the Ministry of Defence to submit the Appraisal for assessment by an independent body registered with the Institute of Environmental Management and Assessment to ensure that it meets an adequate standard to identify and address all impacts arising from the development.

In order to address waste and end-of-life legacy issues, we recommend that the planning committee asks the Ministry of Defence to prepare a waste management strategy and a decommissioning strategy for the facility before planning permission is granted.

9. Consultation Process

NAG would like to place a number of concerns about the consultation process for this planning application on the record.

- The planning application was submitted on 17th December 2008, with the bulk of the originally planned public consultation period for the application extending over the Christmas and New Year holiday period.
- A large proportion of the population that would be affected by the planned development live in Reading Borough, which is a close neighbour to the location proposed for the development. However, Reading Borough Council does not seem to have been notified of the planning application until the beginning of February 2009, and then only in response to representations made by Reading Borough. This is a matter of concern given that the Health and Safety Executive has advised local authorities of the need to liaise on planning issues relating to AWE sites.
- Neither the Ministry of Defence nor AWE plc have been willing to meet members of the public or local voluntary sector groups to discuss issues relating to this planning application. In response for a request for a meeting the Ministry of Defence stated: “It is not our normal course of action to enter into any dialogue with respect to any of our defence planning applications. Any questions, comments or objections should be directed to the Local Planning Authority and they have a right to make representation at the Planning Committee meeting if they so wish.”²⁶ In the light of this statement AWE plc felt it would be inappropriate for its staff to meet with representatives of local groups.
- Key information about risks, operational processes, and environmental impacts caused by the proposed development has not been included with this planning application, making it impossible for members of the public to assess the true consequences of allowing the development to go ahead. Although a number of requests for information under the Freedom of Information Act have been submitted by NAG and others with the aim of filling some of the gaps in the knowledge available, the Ministry of Defence has been unable to process these requests in sufficient time to make the information available before the date when the application is due to be discussed by the planning committee.

It is difficult to avoid the conclusion that a complex and controversial planning application is being rushed through with the minimum of scrutiny and debate, preventing local people from having their say on an issue which may have considerable implications for them.

10. Conclusions

²⁶ Email from Avril Burdett, AWE plc, to Peter Burt. 19th January 2009.

The planning application submitted to West Berkshire Council for a new main process facility at AWE Burghfield is for a major development. NAG believes that both the scale and complexity of the proposed development, and its broader impact on local land use planning, warrant a decision on the development by a higher authority than a local planning committee. Our reasons for this are as follows:

- The new facility would play a critical role in the UK's nuclear weapons programme, which is seen by government to be essential for defence of the nation, and hence it is claimed that the development "is of national and international significance".²⁷
- The proposed development is located close to the boundaries of West Berkshire Council and two neighbouring authorities, Reading Borough and Wokingham Borough. The Health and Safety Executive has advised that local authorities should co-operate on planning issues in relation to AWE sites in order to avoid compromising population safety zones around these sites. There is no evidence that any co-operation has taken place with regard to this planning application.
- The South Reading area, Kennet Valley, and the M4 corridor which passes through the area have considerable strategic importance in planning terms. A number of substantial developments have been proposed for the area, including the Kennet Valley Park housing development, a western extension to the Green Park development, and an upgrade in capacity for the Madejski stadium. The commercial interests behind these developments do not appear to have been consulted on the implications of development at AWE Burghfield on their plans.
- The Core Strategy document for West Berkshire was withdrawn in December 2006, making it difficult to assess the compatibility of the proposed development against up-to-date planning policies and criteria.
- Much of the information which is needed to assess the impact of the development has not been released into the public domain, making it impossible to understand the true consequences of the development for local communities. While some of this information will understandably be withheld from scrutiny for security reasons, there is no reason why further information on issues such as strategic siting options should not be released to justify the choice of this location for the development.

We believe that these reasons match the criteria on when it is appropriate to call in a planning application, and therefore the planning committee should refer the application to the Secretary of State for determination rather than making a decision on the application itself. A public inquiry would allow the complex technical and environmental issues relating to the development to be explored in depth, and this would be our preferred method for allowing the application to be determined. Should the Secretary of State feel that a public inquiry is not appropriate, she should consider referring the matter to the new Infrastructure Planning Commission for determination.

Nuclear Awareness Group
23 February 2009

²⁷ 'Project Mensa Flood Risk Assessment.' Atkins Ltd. 23rd December 2008. Paragraph 3.2.2, page 21.