

Alan Ridley
The Planning Inspectorate
Room 4/104
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6PN

24th August 2010

Dear Mr Ridley,

Submission to planning inquiry
Inspectorate Reference Number: APP/HI705/V/10/2124548
Location: Boundary Hall Site, Aldermaston Road, Tadley, Hampshire

I am writing on behalf of the Nuclear Awareness Group (NAG) to provide our views on the proposed development at the Boundary Hall site in Tadley, which is to be the subject of a public inquiry organised by the Planning Inspectorate.

The Nuclear Awareness Group (www.nuclearawarenessgroup.org.uk) is a Reading-based group which was formed to represent local people following the Community Inquiry into the Atomic Weapons Establishment (AWE) which was organised by Reading Borough Council and took place in Reading in March 1994. It acts as a watchdog group working to promote public awareness of nuclear safety and environmental issues related to AWE and to encourage best practice on all health and safety matters related to the handling of radioactive materials in order to prevent any environmental pollution from nuclear radiation. Our membership is drawn from a wide area around the AWE site, extending to Oxford, Reading, and Winchester, and we do not claim to represent opinion in the Tadley area.

NAG takes the view that development should be controlled in the emergency planning zones surrounding the Atomic Weapons Establishment within limits specified by the Health and Safety Executive's Nuclear Installations Inspectorate (NII). The Boundary Hall site is close to the perimeter fence at AWE Aldermaston, and falls well within the detailed emergency planning zone area. We therefore consider that the proposed housing development by Cala Homes should not go ahead. We appreciate that there is local support for the development and that the site as it currently stands has been neglected and is an eyesore, but feel strongly that public safety must come first. The site must be put to a use which is compatible with emergency planning needs.

AWE Aldermaston was originally established when the surrounding area was largely rural, and over its fifty year history the local population has increased substantially. It is important to ensure that the local population remains within limits that can be managed in the events of an emergency, and that the safety of members of the public is not put at risk by 'stealth' through a continual gradual increase in the local population.

AWE Aldermaston is a nuclear licensed site which handles radioactive materials and wastes, explosives, and hazardous chemicals in significant quantities. Although the chances of a serious accident leading to a release of radioactive material from AWE Aldermaston are small, the consequences of any such accident would be major. All reasonable precautions should be taken to protect the public from a radiological incident at AWE. NAG supports the NII's approach to safety at AWE which is based around the precautionary principle and the concept of 'defence in depth', which requires the use of a number of independent levels of protection to protect the public in the event of an accident.

Controlling the population in emergency planning zones surrounding AWE is a fundamental way of limiting the exposure of the public to radiation in the event of a release of radioactive material, and also ensures that arrangements for evacuating the public will not be swamped in the event of an emergency. The major fire which broke out at AWE Aldermaston on 3rd August 2010 required the late-night evacuation of 14 members of the public living within the emergency planning zone eastwards of the site, placing significant strains on local police resources. Had the circumstances been different, and a residential estate of the size of that proposed at the Boundary Hall required evacuation, the scale of the task would have been appreciably greater and so too would the risks to the public.

In our view NII is correct in adopting a precautionary approach and we do not consider that the Inspectorate is being over-cautious in its application of demographic criteria to control development around the Aldermaston site. Indeed, NAG would call for further safety precautions and a more robust approach than currently employed by NII.

NAG recommends the following measures to help in managing development within the emergency planning zones surrounding AWE sites:

1. AWE itself must give firm public support the concept of emergency planning zones and measures to control development around its sites. In the past the company seems to have been more interested in currying favour with local authorities by giving tacit support to developments such as the proposed development at Boundary Hall, rather than giving a frank statement in support of measures designed to protect the public from operations at its sites. AWE must provide honest advice to local communities about risks posed by its work and the safety measures needed to mitigate against such risks.
2. There appears to be limited understanding about the purpose and rationale for emergency planning zones among local councils surrounding AWE sites, particularly parishes and lower tier councils. NII needs to address this deficit and provide information in an accessible and understandable form to local councils, the public, and the media. Local authorities must take NII's advice and emergency planning considerations seriously when assessing planning applications.
3. Information about emergency arrangements at AWE sites is distributed to local residents but is harder for members of the wider public to find. AWE's website and the website for West Berkshire Council, the council responsible for leading on emergency planning issues for AWE, do not present information about emergency measures for AWE in easy to find or immediately obvious locations. Such information needs to be made available to property developers and those considering buying property in the area to help inform their decisions.
4. NII must make its process for determining the size of emergency planning zones clearer and more transparent. At present the process appears somewhat arbitrary, with the site operator

suggesting the size of the zone and NII approving the operator's recommendations. NII also seems willing to change the size of the zone to accommodate engineering improvements in process facilities at AWE, without being able to justify the rationale for this clearly to the public. The criteria for judging the size of emergency planning zones do not appear to be firm and fixed, and thus the process for establishing them is at risk of falling into disrepute and facing challenge. The current approach to determining emergency planning zones will naturally raise concerns about whether NII is applying its process correctly, and whether adequate protection is being provided for members of the public.

5. Local authorities in the vicinity of AWE's sites must accept that one of the costs of having the Establishment operating locally is that there will be a ceiling on development in the emergency planning zones surrounding the site. In the longer term this may have a considerable influence on development over a relatively wide area. Local authorities must take this factor into account when drafting their Local Development Framework and associated planning policies.

In conclusion, NAG considers that the Planning Inspector should not permit the proposed residential development at Boundary Hall, and thus signal clearly that public safety must come before the gains from development around AWE sites.

NAG is happy to arrange for a representative to attend the inquiry if this would be helpful. Please advise us in good time beforehand if you consider that this will be necessary.

I should be grateful if you would acknowledge receipt of this letter, and please also provide us with a copy of the Inspector's report when it is published following the conclusion of the inquiry.

Yours sincerely,

Jane Faulkner
Chair
Nuclear Awareness Group

cc: [REDACTED] Basingstoke and Deane Borough Council
[REDACTED] HSE Nuclear Installations Inspectorate
[REDACTED] Atomic Weapons Establishment