

WEST BERKSHIRE LOCAL PLAN REVIEW 2022-2039

DRAFT Representations on behalf of Atomic Weapons Establishment

2nd March 2023

Policy SP4 - Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield

AWE welcomes reference in the Policy to the Detailed Emergency Planning Zone (DEPZ) by way of an update to Policy CS 8 of the West Berkshire Core Strategy (2006 - 2026) to the regime of consultation

AWE supports the policy and footnote 10 which recognises that the DEPZ criteria may change over time and it is the Council's intention to follow the latest ONR guidance which may change from time to time.

Policy SP4 recognises the land use implications of the two licenced nuclear installations at AWE A and AWE B, for future development in the area. Policy SP4 also recognises the need to consult ONR, as a body with sufficient technical experience, to advise on future land use compatibility issues and risks.

We note that the interactive mapping available via the Council's website does not currently show the OCZ or wider 12km consultation zone. It is assumed that this will be rectified in line with the policy once adopted.

Para 4.37 (supporting text to SP4)

AWE is seeking some alignment across the plan as to how the function of the sites is explained.

Para should read

"Both AWE sites as <u>Government research and defence establishments</u> are core to sustaining the UK gGovernment's nuclear deterrent and support national defence and security and in particular the delivery of the warhead contribution to the national and international nuclear deterrent"

Para 4.40 (supporting text to SP4)

Paragraph incorrectly refs para 95 of the NPPF, not 97, correction required.

Para 4.56 (supporting text to SP4)

The word 'normally' should be removed, and the supporting text should set out very clearly the circumstances in which the Council will not follow the ONR's advice.

Para 4.57 (supporting text to SP4)

AWE welcomes the flexibility afforded by this paragraph to any changes in the inputs to the ONR's process.

Para 4.58 (supporting text to SP4)

AWE welcomes the flexibility to the application of Policy SP4 in the event the DEPZ is amended under the REPPIR legislation.

SP14 Sites allocated for residential development in the Eastern Area

AWE fully supports the non-allocation of the Grazeley Garden Town under this Policy, given its location within the DEPZ for AWE Burghfield.

AWE **object** to the re-allocation of land adjoining Pondhouse Farm, Clayhill Road. Despite this allocation being within the current local plan, due to the redefining of the DEPZ during the plan period, this allocation for 100 residential units would now be in direct contravention of SP4 as the site is located within the Burghfield DEPZ; in applying policy SP4 the allocation is "likely to be refused planning permission..... especially when the ONR and/or MOD have advised against the development and/or object".

Para. 6.35 (supporting text to SP14)

AWE is supportive of no additional sites being brought forward through Neighbourhood Plans in the Eastern Area given that Burghfield Parish lies within the DEPZ for AWE Burghfield.

Policy DM33 – Development within AWE

AWE supports the inclusion of this policy which continues the express policy support for development at Aldermaston (AWE A) and in Burghfield (AWE B). This will enable AWE efficiently to develop, modernise, rationalise and consolidate its estate footprints in accordance with the Government's investment programme, which responds to the Government's policy commitment to UK's defence and security needs. AWE's land use requirements and aspirations for AWE A and AWE B are dynamic, reflecting the mix of buildings and uses on the sites and the Government's investment programme which is focussed, inter alia, on enhancing the sites' science, research and development capabilities together with related production facilities.

The Policy is in accordance with Paragraphs 20 (b), 97 (b) and 187 of the NPPF in terms of a strategic policy which sustains, protects and promotes the established strategic uses at the two sites and their important national security and local employment functions.

Para 12.12 (supporting text to DM33)

AWE requests an amendment to the paragraph in order to align with the NPPF reference and also provide consistency through the Local Plan as to how the function of the sites is explained

"Both AWE sites as Government research and defence establishments are core to sustaining the UK Government's national defence and security and in particular the delivery of the warhead contribution to the national and international nuclear deterrent."

Para 12.13 (supporting text to DM33)

AWE is broadly supportive of this paragraph but should also refer to other enabling works in connection with the development and uses covered under Policy DM33.

Suggested text "Planning permissions should also positively consider any enabling works and/or the temporary use of land needed in connection with site optimisation and phased delivery of the development"

DM42 – Transport Infrastructure

The policy advises that 'travel activity will be expected to be minimised by the design of developments that support low levels of travel with a focus on local journeys that can be made sustainably.' However, travel activity should only be expected to be minimised by car. Travel activity by other sustainable modes should be welcomed for the economic benefits that accrue from travel.

The policy fails to reference accommodating electric scooters in the event that their use on the external highway network becomes legal. This should be rectified to allow flexibility in approach should such legislation change during the plan period.

DM44 – Parking

It is understood that the 'Cycling and Motorcycling Advice and Standards for New Development' guidance document referred to within the policy does not currently exist and so it is not possible to advise if AWE consider the provision to be correct. However, providing AWE is consulted on the guidance document when it is produced then this is considered acceptable.

Policy RSA12 - Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common (Site Ref: HSA15)

As per comments made in relation to SP14, AWE **object** to the re-allocation of land adjoining Pondhouse Farm, Clayhill Road. Despite this allocation being within the current local plan, due to the redefining of the DEPZ during the plan period, this allocation for 100 residential units would now be in direct contravention of SP4 as the site is located within the Burghfield DEPZ; in applying policy SP4 the allocation is "likely to be refused planning permission...... especially when the ONR and/or MOD have advised against the development and/or object".

Policy EAS4, ESA5, ESA6

Whilst AWE do not object in principle to the allocations, they reserve the right to consider and make representations upon any detailed proposal in due course under the terms of Policy SP4.

AWE BURGHFIELD SDCP Illustrative Framework Plan Site Analysis and Estate Vision

How to change a Space into a Place



AWE Burghfield

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7 ILLUSTRATIVE FRAMEWORK PLAN

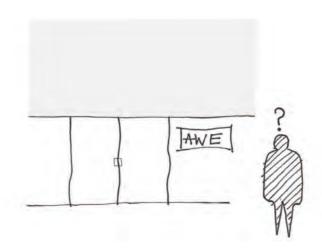
INTRODUCTION

This document has been prepared to illustrate:

- The site analysis undertaken in the preparation of the SDCP document and Illustrative Framework Plan
- The proposed key development layers that combine to create the Illustrative Framework Plan
- The environmental and aspirational vision to create a high quality Campus of Expertise to attract and retain world-renowned scientists, engineers and specialists



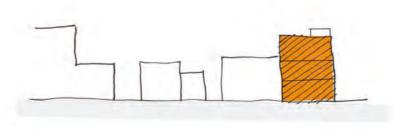
RESPONSE TO SITE



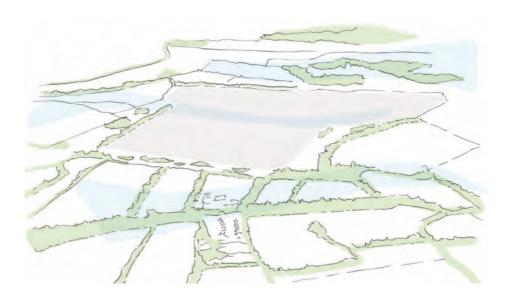
Inward facing



Need for enhanced biodiversity and sustainability

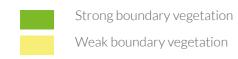


Incremental development



Weak Green Infrastructure

EXISTING KEY VEGETATION



The site perimeter generally has good mature tree planting, however a number of areas need strengthening. The core of the site is almost totally devoid of structural tree planting and is dominated by built structures.

Opportunities exist to reinforce perimeter planting and provide new internal structure planting.



EXISTING LAND USE



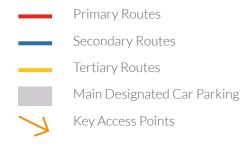
The six main land uses on site consist of:

- Heritage Gravel Gertie's
- **Visitor/Contractor entrances** Low rise reception buildings and associated parking.
- **Recreation** Sports pitches and facilities used by staff and local clubs.
- **Core production** Large scale industrial buildings.
- **Supporting Operations** Generally low rise office buildings, laboratories and parking.
- **Opportunity area** low rise buildings set to be cleared due to site optimisation.

Opportunities exist to visually separate and demarcate land uses to aid site legibility.



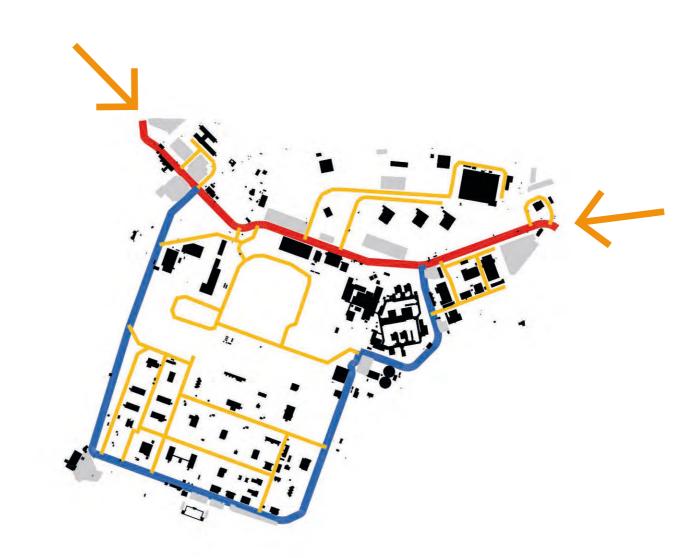
EXISTING ACCESS + CAR PARKING



The two primary vehicle access points into the site are located to the north east and north west, Visitor access is primarily via the north west entrance.

Car parking is sporadic throughout the site, but predominately located in the north of site.

Opportunities exist to optimise access and enhance parking provision.



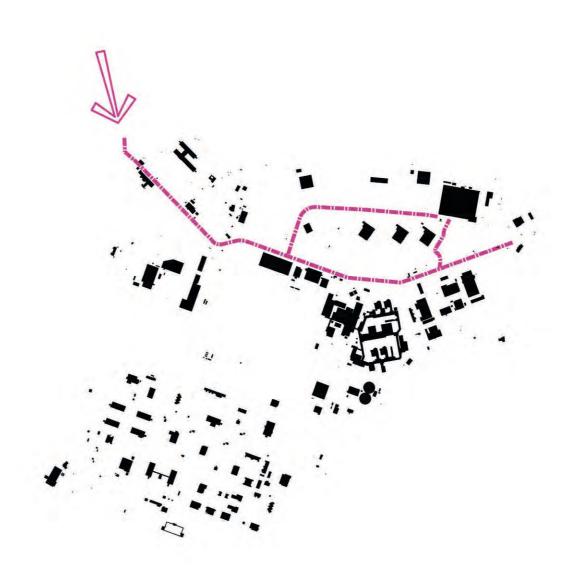
EXISTING PEDESTRIAN ACCESS

Key pedestrian movements

Internal roads are dominated by vehicular moment providing no priority to pedestrian movement and flow.

The main pedestrian movements are east-west along the primary road.

Opportunities exist to enhance and provide pedestrian priory routes.



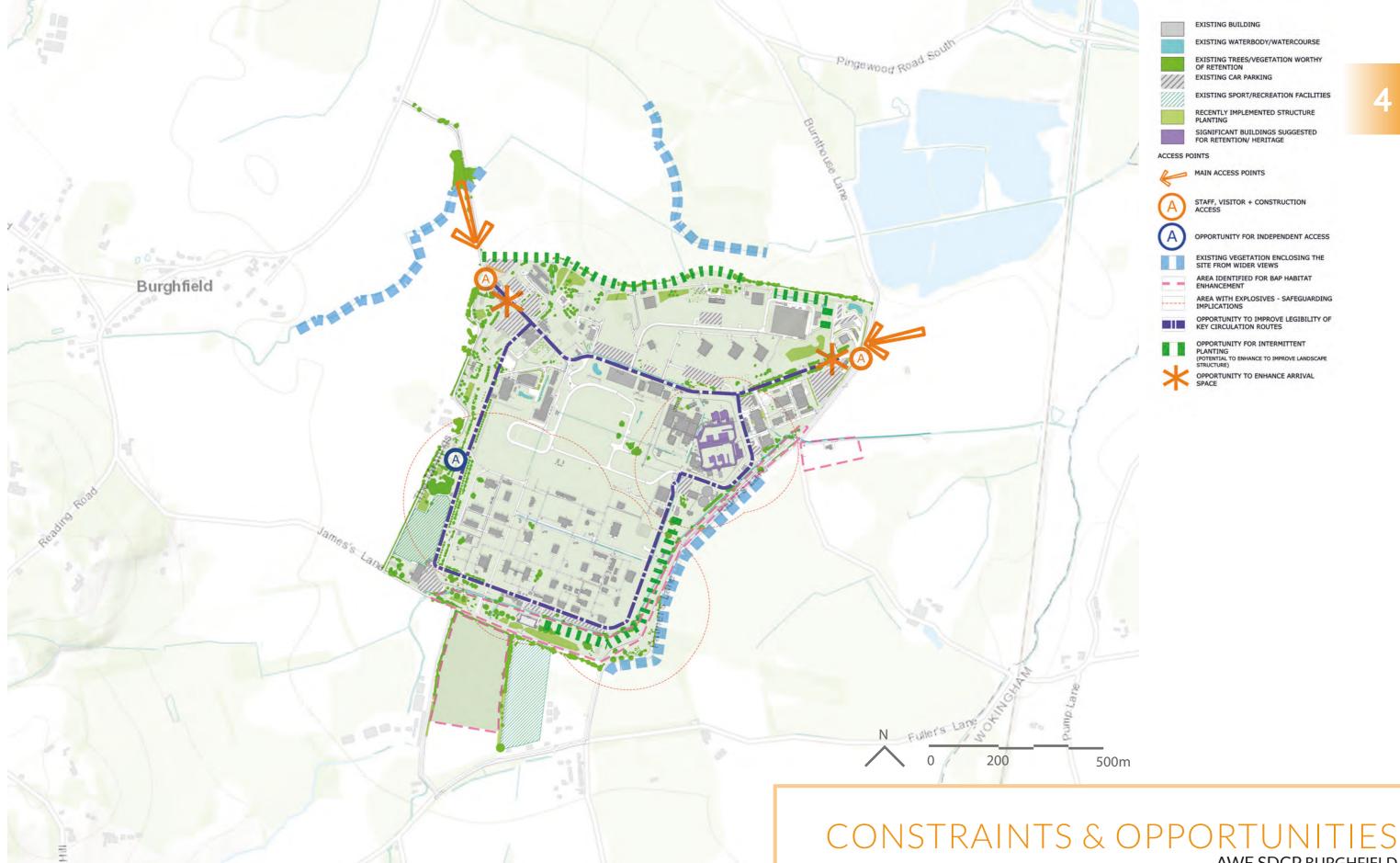
EXISTING BUILT FORM



A significant number of buildings have been identified as having potential to be replaced/optimised, subject to new facilities being provided.

Opportunities existing to optimise the existing rather sporadic facilities and provide new buildings within a Structured legible layout.



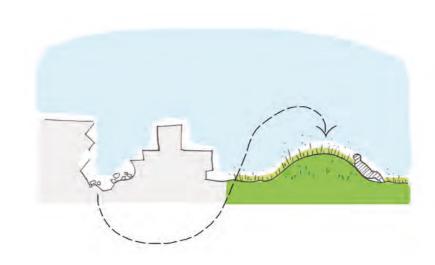


AWE SDCP BURGHFIELD 10051_LD_PLN_102.1 Rev 02

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ESTATE VISION





Positive Temporary Reuse



Enhanced Biodiversity



Strengthened Structural Landscape

AWE Burghfield Creating a Campus of Excellence

CELEBRATION OF AWE



Landscape and public realm should integrate with proposed built development to reinforce the creation of a campus environment, enhanced welcome, celebrate and support a flourishing AWE community. Showcasing the work of AWE in the broadest sense and providing a high quality environment to attract develop and retain world class scientific staff.



Enhance visitor arrival



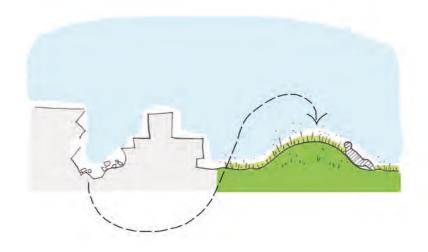
Enhance driveway entrance experience, removing driveway parking and replacing with soft landscape



Improve visitor-facing frontage with attractive landscape treatments and subtle AWE references

AWE Burghfield Creating a Campus of Excellence

POSITIVE TEMPORARY REUSE



Pro-active use of cleared sites (as part of site optimisation) to provide temporary landscapes for amenity use by staff. The temporary landscapes would enhance visual interest, reduce surface water run off, improve biodiversity and integrate a diverse mix of new and retained facilities, during the estate optimisation.



Temporary landscape treatments such as meadow creation



Potential for active recreation



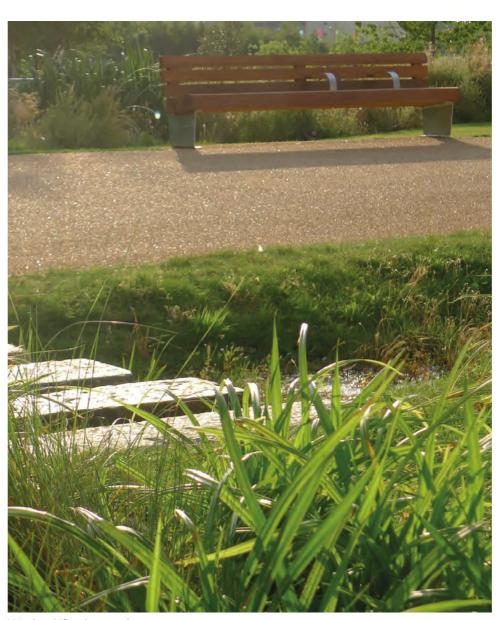
Lawn areas for informal break out spaces and recreation

AWE Burghfield Creating a Campus of Excellence ENHANCED BIODIVERSITY



Enhanced Biodiversity

Enhancement of existing ecological features, relaxation of maintenance regimes and new habitat creation. Extending habitat connectivity and bring nature up to the window pane to promote mental & spiritual wellbeing.



Wetland/Swale creation

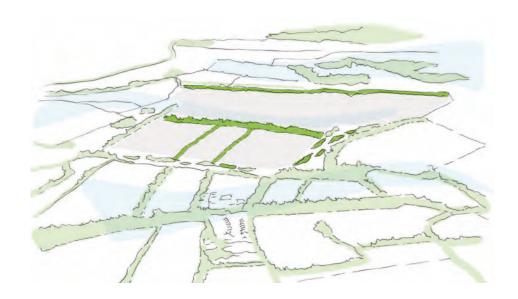


Use of native species and plants that are perfect for pollinators



Relaxation of maintenance regimes to diversify grasslands

AWE Burghfield Creating a Campus of Excellence STRUCTURAL LANDSCAPE



Strengthened Structural Landscape

Enhancement of perimeter screening and new internal structural planting to aid site legibility, provide green infrastructure, demarcate land uses and create a strong landscape framework with distinct character areas.



Reinforce boundary vegetation



Integrated blue and green infrastructure



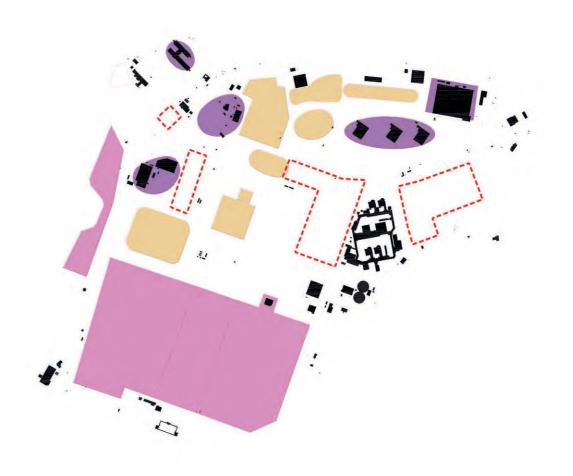
Use of native species



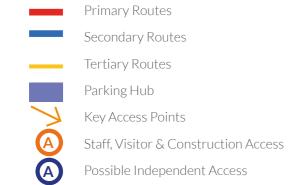
Provide new structural planting along key circulation routes

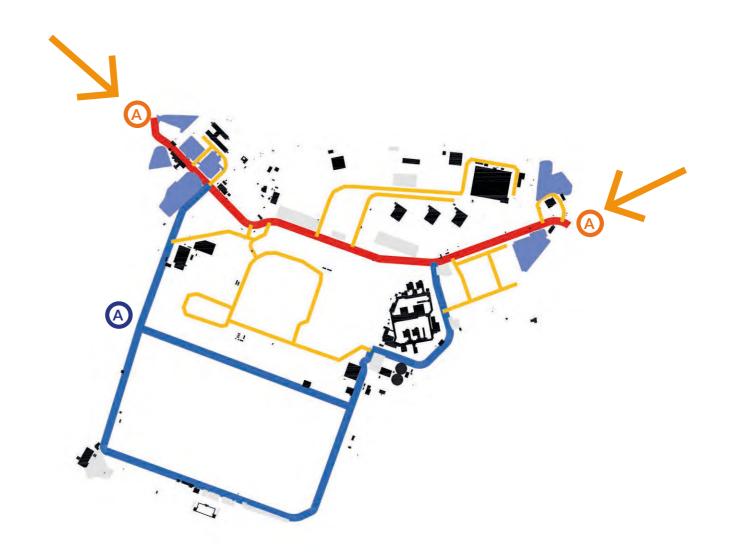
PROPOSED DEVELOPMENT + CLEARANCE





PROPOSED VEHICULAR ACCESS + PARKING





AWE Burghfield Proposed Illustrative Framework Plan

PROPOSED PUBLIC REALM



Improved Visitor-facing Frontage



Pedestrian Priority

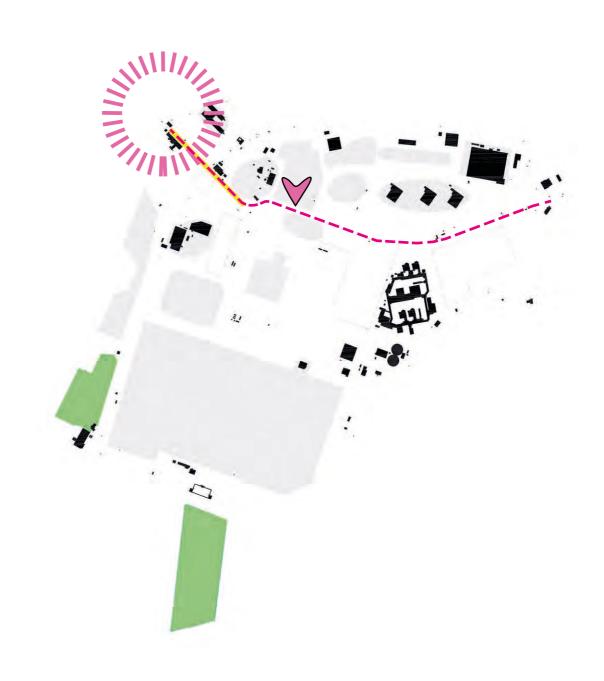
Primary Street



Recreation



Campus Heart



PROPOSED STRUCTURE + BOUNDARY PLANTING





PROPOSED TEMPORARY LANDSCAPE





AWE Burghfield **Proposed Illustrative Framework Plan**

PROPOSED BIODIVERSITY ENHANCEMENT

Existing Boundary Vegetation Retained
Existing Waterbodies Retained
Proposed Vegetation
Proposed Tree Planting
Flood Alleviation with Enhanced Biodiversity & Structure Planting
Habitat Enhancement
Heritage Feature Retained & Enhanced





AWE SDCP BURGHFIELD 10051_LD_PLN_100.1 Rev 04

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Local Plan Review 2020 – 2037: Emerging Draft (December 2020)

Comments should be returned no later than 4:30pm on Friday 5 February 2021:

- Preferably via our consultation portal at the Council's website: http://consult.westberks.gov.uk/kse
- By e-mail to: planningpolicy@westberks.gov.uk
- By post to: Planning Policy, Development and Planning, West Berkshire Council, Council Offices, Market Street, Newbury, RG14 5LD

This form has two parts: -

Part A – Personal details

Part B – Questions on the Local Plan Review 2020 - 2037 (December 2020)

Part A - Personal Details

1. Personal Details* *If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2. 2. Agent's Details (if applicable)		
Title	Mr	
First Name	John	
Last Name	Steele	
Job Title (where relevant)	AWE Head of Estate Development and Planning	
Organisation (where relevant)	AWE Plc (AWE) on Behalf of MOD	
Address Line 1	AWE Aldermaston	
Line 2	Reading	
Line 3	Berkshire	
Line 4		
Post Code	RG7 4PR	
Telephone Number		
E-mail Address	John.Steele@awe.co.uk	

Part B - Questions on the Local Plan Review to 2037 (December 2020)

Please use a separate response sheet for each separate comment

In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) comments are invited on this stage of consultation on our Local Plan Review to 2037. The consultation period will run for an eight week period from 11 December 2020 to 4:30pm on 5 February 2021.

Please read the Local Plan Review 2020 – 2037: Emerging Draft (December 2020) and provide your comments to the proposals. Please use a separate response form for each comment.

Your comments will be published on our Local Plan Consultation Portal and will be available to the public; therefore comments cannot be treated as confidential.

The Council has a duty not to accept comments of a discriminatory nature.

To which part of the document does this comment relate? Please specify the section, policy or site reference on which you are commenting.

Sections ... 4 (Development strategy and place based approach) and 7 (Fostering economic growth and supporting local communities)

Policy or Site Refs... Policies SP4 (DEPZ and OPZ) and SP21 (sites allocated for economic development).

AWE's comments build on existing policy support for development at AWE's sites at Aldermaston (AWE A) and Burghfield (AWE B) around Policy SP21. Reference is also made to Policy SP4 to ensure internal consistency between the policies in the Local Plan and to facilitate comprehensive, rather than piecemeal, plan-making for the proper sustainable planning of the area.

Question 1:

Do you agree with the proposed policy/site allocation?

Yes/No—Disagree in part. The draft policies do not go far enough. Express policy support is required for development at AWE A and AWE B, taking forward the proposals for a bespoke policy designation for these sites in current Core Strategy Policy CS9 (b).

Question 2:

What are your reasons for supporting or objecting?

Executive Summary

The Local Plan should provide direct policy support for development at AWE A and AWE B. This is required to allow AWE efficiently to develop, modernise, rationalise and consolidate its estate footprints in accordance with the Government's investment programme, which responds to the Government's policy commitment to a nuclear deterrent for the UK. The <u>additional</u> Local Plan policy put forward by AWE in this representation would ensure that the Local Plan contains a

planning policy, in accordance with National Planning Policy Framework (NPPF) paragraphs 95(b) and 182, to sustain, protect and promote the established strategic uses at the two sites and their important national security and local employment functions. Without such a policy, the Local Plan is unsound, does not reflect the requirements of Local Plan CS Policy CS9(b) and/or the NPPF.

In addition to having a bespoke policy to support appropriate development at AWE A and AWE B, there is a clear need to protect AWE A and AWE B from inappropriate development in the DEPZ and/or the OPZ, particularly given the agent of change principle set out in the NPPF.

AWE's policy analysis and wider rationale for its comments is set out below.

Current position in the emerging Local Plan

Currently, there is no direct policy support for sustaining, protecting and promoting the integrity and purpose of the existing strategic, locally and nationally significant sites and development at AWE A or AWE B.

Function of Policy SP4 (AWE Aldermaston and Burghfield)

AWE is supportive of the public safety-focussed nuclear installation safeguarding Policy SP4, which is proposed to supersede the existing safeguarding Policy CS8. The Detailed Emergency Planning Zone (DEPZ) (where no development is likely to be acceptable) and Outline Planning Zone (OPZ)¹ (where consultation with the Office of Nuclear Regulation (ONR) is required to ascertain acceptability) "safeguarding zones" for AWE A (Figure 3) and AWE B (Figure 4) follow latest advice from the ONR and are supported on this basis.

Policy SP4 recognises the land use implications of the two licenced nuclear installations at AWE A and AWE B, for future development in the area. Policy SP4 also recognises the need to consult ONR, as a body with sufficient technical experience, to advise on future land use compatibility issues and risks. **However, it does not recognise or support AWE's known land use and development needs at AWE A or AWE B.**

Function of Policy SP21 (Sites allocated for economic development)

There is some (albeit limited) support for development at AWE A and AWE B in the supporting text to the draft Local Plan, in particular, around Policy SP21.

Policy SP21 designates certain additional areas as Designated Employment Areas (DEAs), renaming and expanding upon the existing designated areas in the Local Plan, currently known as Protected Employment Areas (PEAs). Policy SP21 should be interpreted and applied alongside Policy DC 31 (DEAs), which explains how planning permissions should be determined in DEAs.

Supporting paragraph 4.12 (which provides support for the local planning authority's overall spatial strategy) recognises that AWE A and AWE B, which fall within the "Eastern Area" of the draft Local Plan, are important providers of local jobs in this area and the plan area as a whole. In recognition of the job creation potential of the sites and their strategic importance to the District's economy, supporting paragraph 7.14 (which supports Policy SP21) provides that:

7.14 Development will also continue to be supported on existing, non-DEA, employment sites, particularly on those sites seen as strategically important for the District's economy, such as the Atomic Weapons Establishment (AWE) at Aldermaston and Burghfield.

Whilst this supporting paragraph provides oblique policy support for development at AWE A and

¹

¹ The draft Plan refers to an Outer Consultation Zone (OCZ) which is the term used in ONR's guidance; see http://www.onr.org.uk/land-use-planning.htm. However, the Radiation (Emergency Preparedness and Public Information) Regulations 2019 has introduced the "Outline Planning Zone (OPZ)". We would therefore recommend that this term is used in the Local Plan in lieu of OCZ. We expect the ONR will be updating their guidance so the outer consultation zone is linked to or replaced by the OPZ. As the OPZ is a defined area this gives all stakeholders more certainty what the zone is.

AWE B, it does not sufficiently sustain, protect or promote AWE's locally and nationally significant operations, or the future regeneration needs of the sites in line with the Government's investment programme.

Current position in the adopted Local Plan

AWE notes that current Local Plan Policy CS 9 (b) envisaged that AWE A and AWE B would either be allocated as PEAs during the plan period, or be subject to an alternative "bespoke" designation consistent with their importance to the local economy, as follows:

Business development will be supported on existing employment sites, particularly on those sites seen as strategically important for the District's economy – New Greenham Park, Vodafone HQ, and the Atomic Weapons Establishment (AWE). The Site Allocations and Delivery DPD will assess the role and function of these three sites to determine whether they should be designated as Protected Employment Areas or an alternative bespoke designation consistent with their importance to the local economy.

Need for bespoke designation

AWE A and AWE B have not been designated as PEAs (or now, DEAs), nor - in AWE's view - should be. However, the Local Plan Review process should put forward an "alternative bespoke designation", in recognition of the sites' importance to the local economy and to national security, and to make the Local Plan consistent with Policy CS9(b) and, in any event, NPPF paragraphs 95 (b) (supporting development required for operational defence and security purposes) and 182 (reducing restrictions on existing businesses and facilities / agent of change). AWE's specific policy proposals are set out in response to Question 3.

Question 3:

What changes are you seeking / what would be your preferred approach?

Not a DEA

As above, AWE does not consider that AWE A and AWE B should be designated as general employment areas. Policies SP21 and DC31 are focused principally on proposals for new employment land in a "civilian" capability context and are relatively rigid in their operation.

By contrast, there is a need and compelling case for a stand-alone bespoke policy designation for these sites to support Government research, training and defence related activities and associated and ancillary development at AWE A and AWE B, which will (in line with supporting paragraph 7.14) help preserve the strategic significance of these sites to the District's economy.

This kind of policy, in addition to being required under Policy CS9(b) and the NPPF, is broadly consistent with the approach taken, for example, to the Theale Rail-Road site, which is expressly safeguarded under Policy DC 31, for industries requiring a rail-road transfer facility.

AWE's land use requirements and aspirations for AWE A and AWE B are much more dynamic, reflecting the mix of buildings and uses on the sites and the Government's investment programme which is focussed, inter alia, on enhancing the sites' science, research and development capabilities together with related production facilities. On this basis, AWE is putting forward a bespoke policy suitable for development at Government research and defence establishments such as AWE A and AWE B.

Proposed Bespoke Policy for AWE A and AWE B

"Development in the following categories will be supported:

- 1) New development comprising the construction of new buildings² or extensions or other refurbishments to existing buildings
- 2) Redevelopment, conversion or change of use of redundant buildings
- 3) Enabling works in connection with 1) and 2) above

Uses in the following categories will be supported:

- 4) Offices
- 5) Uses in connection with science, research and development
- 6) Manufacturing, waste management and storage
- 7) Energy and infrastructure to support, maintain and service the sites
- 8) Uses associated and ancillary to 4) to 7) above
- 9) Temporary land uses with construction, environmental and amenity functions required in connection with site optimisation and phased delivery of development

Development outside of AWE A and AWE B will be assessed against Policy SP4. Development in the DEPZ is likely to be refused planning permission, especially where the ONR has advised against that development³. In the OPZ, development proposals will be considered in consultation with the ONR, in accordance with the criteria set out in Policy SP4."

Supporting Text

"AWE A covers an approximate area of 750 acres. The site occupies a former World War II airfield and now houses advanced research, design and manufacturing facilities and associated services and development.

AWE B covers an approximate area of 225 acres. The site occupies the former Royal Ordnance Factory dating from 1940. The site includes numerous buildings and structures used for a variety of industrial processes including warhead assembly and decommissioning and associated services and development.

As identified in paragraph 7.14 of this Plan, AWE A and AWE B play a strategic role in the District's economy and they also serve an important national security function.

AWE A and AWE B are owned by the Secretary of State for Defence and deliver the warhead contribution to the nationally and internationally significant UK nuclear deterrent. AWE has been at the forefront of the UK nuclear deterrence programme for more than 60 years by supporting the UK's Continuous at Sea Deterrence programme.

The Government's policy of continuing to maintain a UK nuclear deterrent was most recently confirmed, on 25 February 2020, in the Secretary of State's announcement of a programme to replace the UK's nuclear warhead. It was also confirmed in the Strategic Defence and Security Review 2015 (SDSR). AWE A and AWE B are therefore required to fulfil their unique functions for the foreseeable future – until at least 2040. (In the event that this role were to cease, the sites would require several decades of nuclear decommissioning, necessitating development activities consistent with this policy).

Reflecting this policy, the Government is committed to an investment programme for the replacement and refurbishment of the ageing facilities at AWE A and AWE B. This investment programme is centred around a vision for two high quality campuses of excellence, investing, in particular (but without limitation), in the production, science and research and development capabilities at the two sites. The Government's commitment to investment in AWE A and AWE B has been consistently demonstrated since 2005 and is reiterated in the SDSR.

This policy recognises the strategic significance of the AWE A and AWE B sites to the local economy, as well as to national security. It also recognises the need to renew the existing facilities at AWE A and AWE B

² Buildings include: all built development, structures, plant and equipment

³ AWE notes that Policy SP4 states that the residential development in the DEPZ "is likely to be refused planning permission"; AWE prefers this formulation to draw out the presumption in favour of refusal albeit it recognises that some development may be deemed acceptable.

to optimise the sites' operational capabilities, particularly (but without limitation), their production, science, research and development capabilities - in order to attract and retain the world's best researchers, scientists and engineers.

This policy therefore seeks to facilitate the efficient and sustainable development, modernisation, rationalisation and consolidation of uses and operations at AWE A and AWE B, to help sustain or enhance their operational capability and in particular to nurture science, research and innovation at the sites in line with the Government's investment programme.

The strategic purpose of the policy is to attract positive socio-economic multiplier effects in the local economy, in terms of jobs, skills and inward investment.

Local Development Order

Consistent with this policy the Council will be supportive of proposals for a local development order (LDO) for each of the AWE A and AWE B sites (or a single LDO with bespoke plans and development constraints for each of the sites), to further speed up decision-making for more routine operational development and changes of use within defined design, size, scale, land-use and other environmental parameters. The Council recognises LDOs as a positive and proactive planning tool which help simplify the planning process, create a more certain planning environment and thereby make investment more sustainable, responsive and attractive."

Illustrative Framework Plans for AWE A and AWE B

This representation is accompanied by two site development context "Illustrative Framework Plans" for AWE A and AWE B together with the supporting Site Analysis and Vision report. The Illustrative Framework Plans have been subject to stakeholder involvement and were presented to the AWE Local Liaison Committee on 4 July 2018 and 13 March 2019. The plans and the report illustrate how the Government's investment programme will be accommodated within the two estates and give an indication of potential land uses up to and beyond 2030.

The Illustrative Framework Plans are intended to help the local planning authority visualise the Government's aspirations for two high quality campuses of excellence at AWE A and AWE B, designed to attract and retain world leaders in the fields of science of engineering. The Site Analysis and Vision report exemplifies how sustainability and amenity are at the core of the Government's vision.

The Illustrative Framework Plans are intended to inform future planning applications submitted to support the sites' operational capabilities. They also, together with the Site Analysis and Vision report demonstrate how design⁴ and other environmental parameters could easily be worked up in support of a LDO or LDOs for AWE A and AWE B permitting more routine redevelopment proposals at the two sites.

Cross referencing to other emerging Policies

At a minimum, the above policy should be cross referenced at:

- Paragraph 4.13, which explains the opportunities and constrains presented by AWE A and AWE B
 in the Eastern Area.
- Paragraph 7.14, which provides indirect support for development on non-DEA employment sites such as AWE A and AWE B.
- Policy SP4, as the new policy helps reinforce the importance of the DEPZs and OPZs in Policy SP4. AWE suggest incorporation a new supporting paragraph 4.37:

⁴ Including a design guide or code, in line with new paragraph 128 in the Government's January 2021 consultation on the NPPF, which provides that design guides and codes "can be prepared on a site-specific scale" and recognises that "applicants may also elect to prepare codes for a site which they propose to develop".

"4.37 New development and uses at the AWE A and AWE B will be assessed in accordance with Policy [Bespoke Policy for AWE A and AWE B]"

Other comments

- Note comments made in relation to the term "OPZ vs OCZ and explanation in footnote no. 1
- Note definition of "buildings" in footnote no. 2
- Note also the preferred formulation of Policy SP4 as explained in footnote no.3

Question 4:

Do you know of/are you aware of any sites within the District that are available for permanent Gypsy and Traveller pitches?

N/A.