

Quod

Land to the rear of the Hollies Nursing Home, Burfield Common

(PINS REF: APP/W0340/W/22/3312261)

Appendices of evidence of Sean Bashforth on Planning Matters (for AWE plc and the Ministry of Defence)

MAY 2023

Q230344

Appendices

- 1. AWE/MOD representations to West Berkshire Regulation 18 Local Plan
- 2. AWE Burghfield Illustrative Framework Plans 2005 and 2008
- 3. AWE Burghfield Recent Planning History
- 4. Officers report to planning committee for AWE Burghfield Multi Material Facility
- 5. Representations to Policy DM33 West Berkshire Local Plan Review
- 6 Extracts of West Berkshire Core Strategy Inspectors report and associated minor modifications
- 7. Extracts of Wokingham Local Plan

1	AWE/MOD Reps to Regulation 18 Local Plan



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 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.

AWE BURGHFIELD SDCP Illustrative Framework Plan Site Analysis and Estate Vision

How to change a Space into a Place



AWE Burghfield

CONTENTS

- 2 RESPONSE TO SITE
- 3 EXISTING SITE ANALYSIS

Key Vegetation

Land Use

Access & Car Parking

Pedestrian Access

Built Form

- 4 COMBINED CONSTRAINTS & OPPORTUNITIES
- 5 ESTATE VISION
- 6 PROPOSALS

Development and Clearance

Vehicular Access & Car Parking

Public Realm

Structure and Boundary Planting

Temporary Landscape

Proposed Biodiversity Enhancement

7 ILLUSTRATIVE FRAMEWORK PLAN

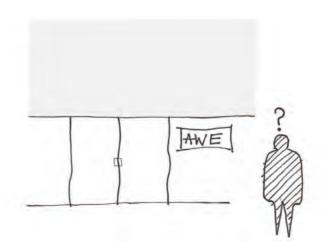
INTRODUCTION

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



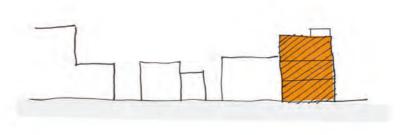
RESPONSE TO SITE



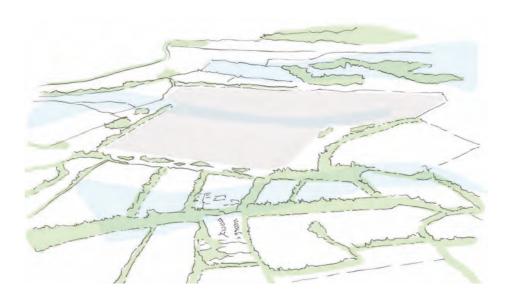
Inward facing



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.



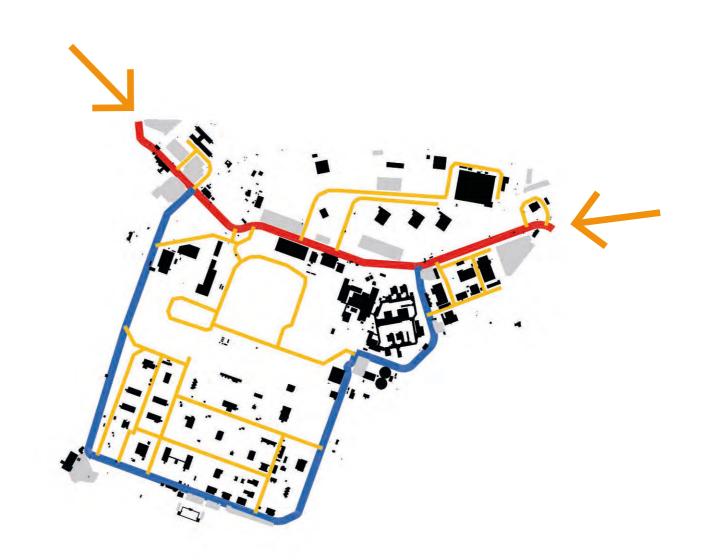
EXISTING ACCESS + CAR PARKING



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.



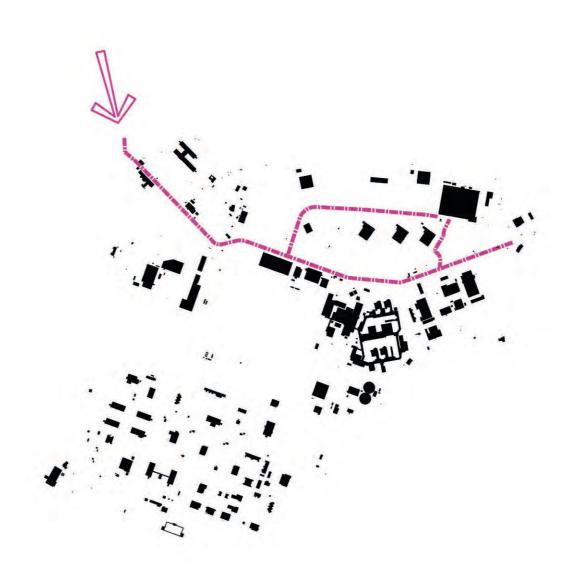
EXISTING PEDESTRIAN ACCESS

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.



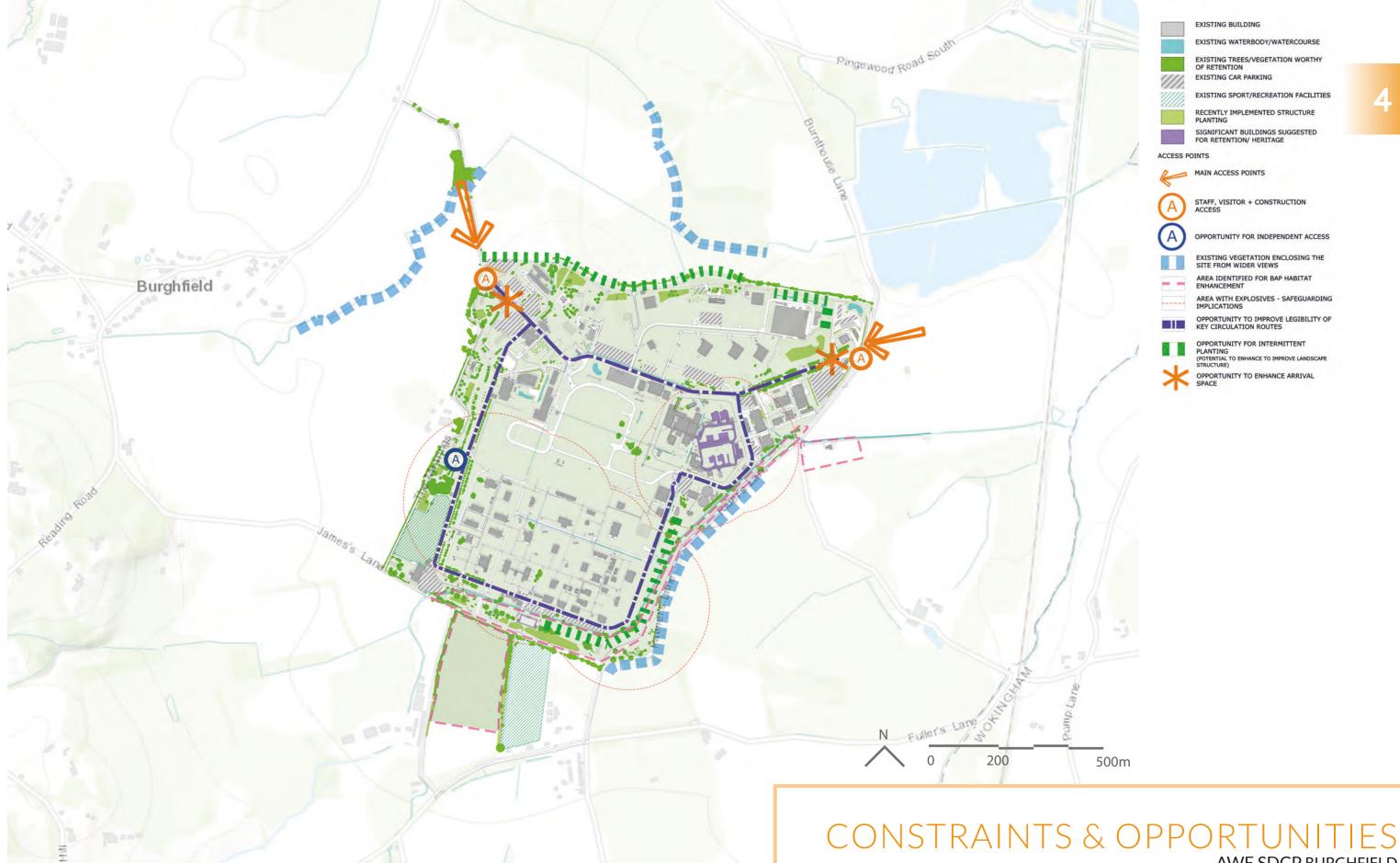
EXISTING BUILT FORM



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.



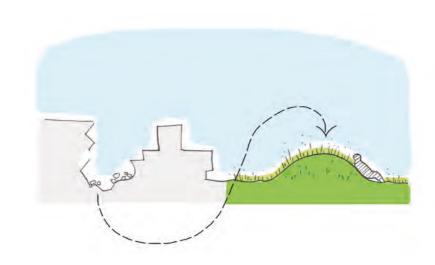


AWE SDCP BURGHFIELD 10051_LD_PLN_102.1 Rev 02

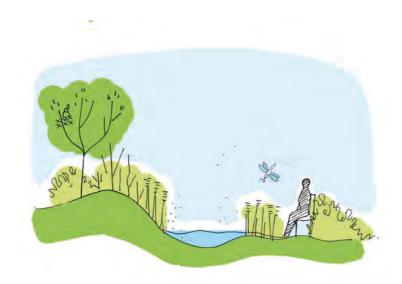
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ESTATE VISION





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



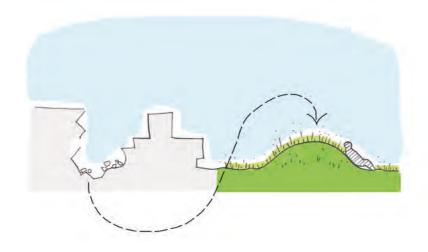
Enhance driveway entrance experience, removing driveway parking and replacing with soft landscape



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



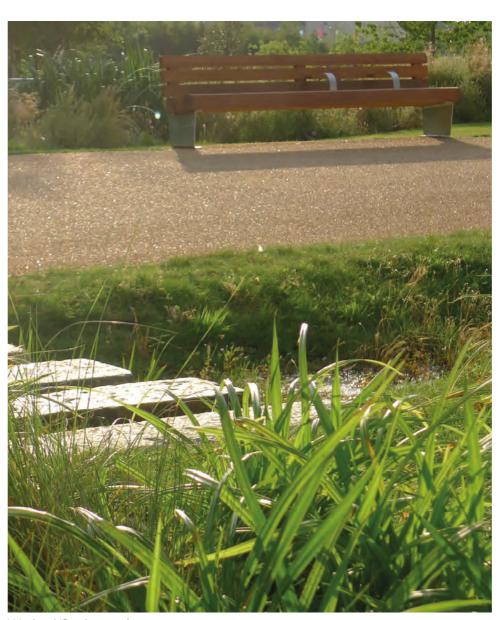
Lawn areas for informal break out spaces and recreation

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

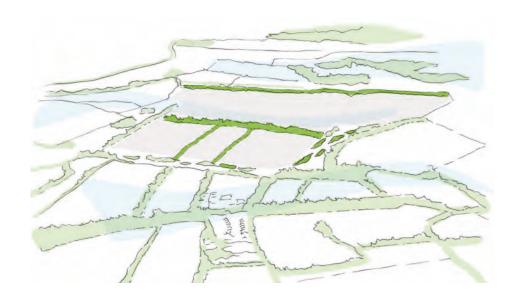


Use of native species and plants that are perfect for pollinators



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



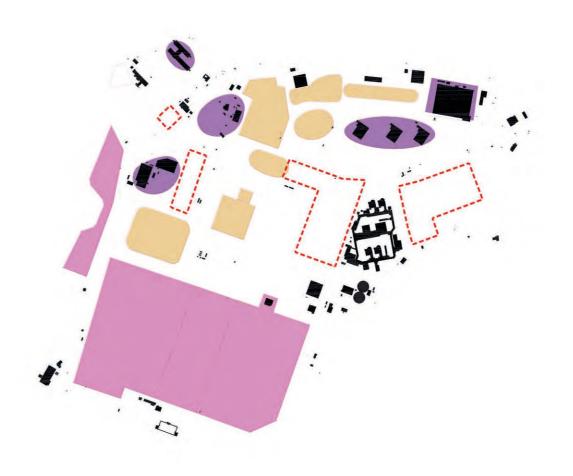
Use of native species



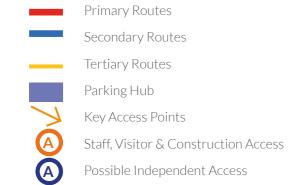
Provide new structural planting along key circulation routes

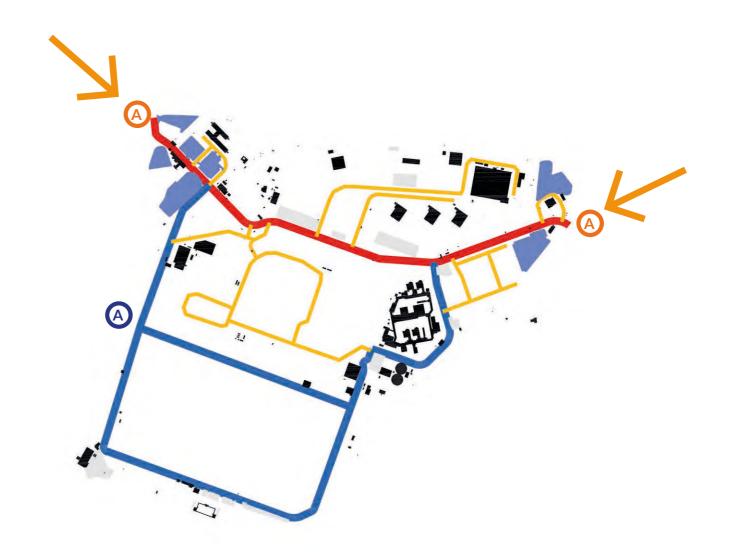
PROPOSED DEVELOPMENT + CLEARANCE





PROPOSED VEHICULAR ACCESS + PARKING





AWE Burghfield Proposed Illustrative Framework Plan

PROPOSED PUBLIC REALM



Improved Visitor-facing Frontage



Pedestrian Priority

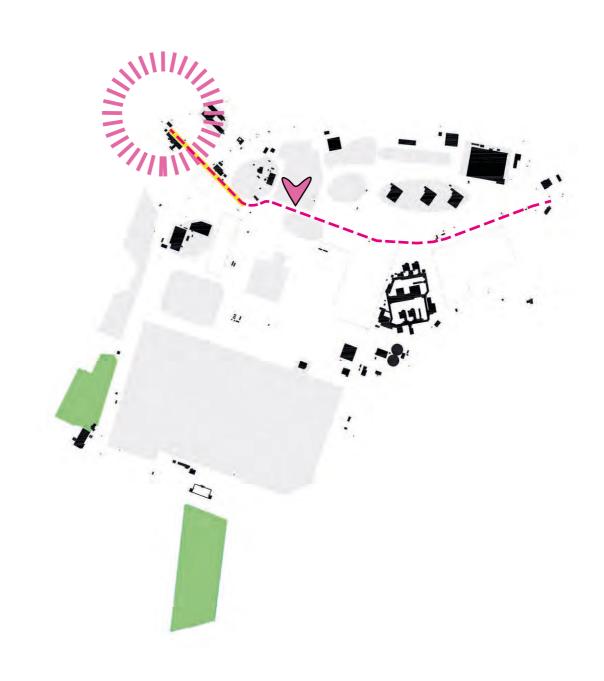
Primary Street



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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2 AWE Burghfield Illustrative Plans 2005 and 2008





3	AWE Burghfield Recent Planning History

AWE B – Recent Planning History

Proposal	Reference	Decision
Multi-Material Facility	20/02966/COMIND	Approved 16 th April 2021
Site-wide Flood Alleviation	15/00095/COMIND	Approved 22nd May 2015
Scheme		
Search bay shelter	12/01417/FUL	Approved 17th Aug 2012
New boiler house	11/00697/FUL	Approved 28th June 2011
Conventional Manufacturing	08/00954/COMIND subsequently	Approved 27th April 2011
Rationalisation Facility	replaced by approval	
	11/00029/XCOMIN, required to	
	extend the implementation date of	
	the original approval	
Mensa (a replacement warhead	08/02287/COMIND	Approved 6 th March 2009
assembly, maintenance and		
disassembly facility)		
Small Scale Component	07/01686/COMIND	Approved 16 th November
Manufacturing Facility		2007
Dog handlers facility	06/01932/FUL	Approved 19 th Oct 2006

4	Officers report for MMF at AWE Burfield

CASE OFFICER'S (MBB) REPORT ON APPLICATION NUMBER 20/02966/COMIND



Site: AWE Burghfield Burghfield Reading RG30 3RP

Member expiry date: 20th January 2021

EOT: 16th April 2021

SuDS pre-commencement condition agreed: 7th April 2021

INTRODUCTION

This application seeks planning permission for a Multi Materials Facility [MMF] at the north western portion/sector of the present AWE Burghfield site. It has a site area of just under 2.4ha. The building will be an important component of the overall Site Development Context Plan [SDCP] for AWE which seeks to optimise the future production of the UK capability for nuclear warhead production. As such this new modular building will make such production far more efficient and cost effective.

The MMF building would comprise a structural steel frame building occupying an area of approximate 6,553 m2 (gross external area). The building would be approximately 94 metres x 69 metres in plan, with a maximum built height (excluding ventilation flues and stacks) of 18.7 metres. The flue height will be 25.5m above the local ground level. The eaves height will be 15.5m. The AOD level at the barrel roof apex will be just over 62m, whilst the height of the catenary towers to the rear [south] are 87m to provide some comparison.

The facility will comprise several distinct areas over two-storeys, with the main features comprising the following:

- Front of house accommodation. Ground floor to contain reception and exhibition space, production office and restaurant/seating. First floor to contain conference and VR suite with gym and changing facilities, occupational health, multi-faith room.
- Production areas, comprising co-located manufacturing capability processes within secure and modular reconfigurable production cells.
- Plant rooms, forming the roof of the production cells.
- Curved roof structure, with photovoltaic cells.

In addition there is to be 991m2 of ancillary space supporting the new building, which will comprise such uses as substations, bin stores and waste compounds.

There is however to be no additional car parking laid out on the site for the additional staff required [about 50 in number who are to be largely transferred from the Aldermaston site] as the site has sufficient capacity already. The red line notes that access will be taken from the existing Pingewood Gate access to the east. HGV construction traffic will also use this principal access point.

In association with the scheme there will be a new SuDS basin and landscaped area around the building, with associated cycle parking.

PLANNING HISTORY

The history of the site is very considerable since the sites inception and there is little point in replicating all of this in this report.

However the most relevant is a pre-application enquiry number 20/00131/PREAPP, issued on the 1st October 2020. This concluded that the application was likely to be acceptable in both principle and scale.

PROCEDURAL MATTERS

EIA: On the 8th December 2020 the Council issued an EIA screening opinion letter under reference 20/02635/SCREEN which noted that NO ES was required to be submitted to accompany the planning application.

Publicity: Three site notices displayed around the site perimeter on the 23rd December 2020. Allowing for the intervening 3 bank holidays the expiry date was posted as the 16th January 2021. A public notice was also published in the Reading Chronicle on the 7th January 2021.

CIL: Whilst CIL liability would be confirmed separately by the CIL Charging Authority, the application submissions indicate that the development is unlikely to be CIL liable.

CONSTRAINTS AND DESIGNATIONS

Within the open countryside as designated in the WBCS of 2006 to 2026. In the East Kennet Valley designation.

PLANNING POLICY

Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The relevant policies of the statutory development plan for West Berkshire are listed below. These policies can be read online at www.westberks.gov.uk/planningpolicy.

West Berkshire Core Strategy 2006-2026

Policies: ADPP1, ADPP6, CS5, CS9, CS10, CS13, CS14, CS15, CS16, CS17, CS18 and CS19.

The following are relevant materials considerations:

- The National Planning Policy Framework (Feb 2019) (NPPF)
- The Planning Practice Guidance (PPG)
- West Berkshire Landscape Character Assessment 2019

CONSULTATION RESPONSES

Wokefield Parish Council: No response.

Burghfield Parish Council (adjacent): No objections.

Highway Authority: No objections raised.

Lead Local Flood Authority: After some negotiations on the proposed outfall detail, the application is recommended for conditional approval.

Environment Agency: No response received.

Office for Nuclear Regulation: Does not advise against the proposal.

Conservation Officer: No assets of heritage importance will be harmed / affected by the scheme so no objections are raised.

Tree Officer: No TPOs or conservation areas affected. The application will require the removal of one or two small trees, however this loss will be significantly offset by the planting proposed. No objections subject to landscaping being completed.

Thames Valley Police: Do not raise any security concerns in regard to the application.

Archaeology: No implications hence no objections.

Emergency Planning Officer: Accept the application as being appropriate.

Thames Water Utilities: Initially advised that a condition be placed on any permission to ensure that if any additional foul waste arose from the site a pre-condition re capacity was required. The applicant has since confirmed that all waste produced on site will be dealt with via an existing waste treatment plant, so the condition is not needed. Case officer concurs.

Environmental Health: No objections/ no conditions recommended.

PUBLIC CONSULTATION RESPONSES

Total received: Nil.

PRINCIPLE OF DEVELOPMENT

According to Policy ADPP1, most development will be within or adjacent to the settlements in the hierarchy, and related to their transport accessibility and level of services. The urban areas will be the focused for most development. The scale and density of development will be related to the site's accessibility, character and surroundings. Only appropriate limited development in the countryside (outside of the defined settlement boundaries) will be allowed, focused on addressing identified needs and maintaining a strong rural economy.

The application site is located within the East Kennet Valley, the name given to the rural south-east of the district that lies east of Thatcham and outside of the AONB. Policy ADPP6 is the spatial strategy for the East Kennet Valley. According to the policy, the character of all the settlements in this area will be conserved and enhanced by ensuring that any development responds positively to the local context. Development in the open countryside will be strictly controlled. The supporting text identifies that the Atomic Weapons Establishment (AWE) has two bases in this area, at Aldermaston and Burghfield. AWE is an important provider of local jobs but has implications for the future level of development in this area.

According to Policy CS9, business development will be supported on existing employment sites, particularly on those sites seen as strategically important for the District's economy, including, amongst others, AWE. The policy provides that proposals for business development should be in keeping with the surrounding environment, not conflict with existing uses, and promote sustainable transport. More efficient use of existing sites and premises should be made in order to attract inward investment, respond to modern business requirements, and meet the demand for employment land over the plan period. The Council will promote the intensification, redevelopment, and upgrade of (amongst others) existing employment sites and premises for business development.

Paragraph 5.60 of the supporting text notes that the Atomic Weapons Establishment (AWE) is one of three strategically important employment locations for the West Berkshire economy. It comprises a large amount of business floorspace and is a large local employer. The Council will support business development within these sites, particularly that which enhances the contribution to the local economy.

Policy CS10 identifies the need to support the rural economy. Although this policy is predominantly directed towards smaller scale schemes, the principle remains relevant in this context, given the rural location of the AWE site.

In addition, the policy in para 95[b] of the NPPF specifically encourages local planning authorities to recognise and support development for UK operational defence capability and security purposes, which the proposed MMF is one. In addition it is very clear that the application site location is brownfield, and within the context of the existing AWE site. So although it lies in the rural area in policy terms, this makes the principle of the development acceptable.

In addition the Council's Economic Development Strategy 2020-2023 was adopted in April 2020 and is thus a material consideration. It notes the importance generally of supporting the wider economy in the district, for reasons of future regeneration, prosperity, and job creation. The strategy states that the AWE is an important provider of local jobs, and that the Council will consider how it can support sustainable growth on these sites, ensuring that AWE's status as a world leader in innovation and employment opportunities is allowed to grow. In all these ways the proposal is accordingly supported, and the economic benefits are integral to the support within the Local Plan for supporting development at AWE. In addition it is clear that the new facility functions to maintain the UK Nuclear Deterrent, which is in accordance with current Government policy. In addition it is understood the DEPZ will not alter from the present situation.

DESIGN, CHARACTER AND APPEARANCE

Policy CS19 states that particular regard will be given to (a) the sensitivity of the area to change, (b) ensuring that new development is appropriate in terms of location, scale and design in the context of the existing settlement form, pattern and character, and (c) the conservation and, where appropriate, enhancement of heritage assets and their settings.

The case officer has visited the application site, and has examined the submitted plans. It is acknowledged that the new MMF is a large building given its floorspace and height of nearly 19m, rising to almost 26m with the stacks. This is a scale of building which would not normally be acceptable in the open countryside designation, but exceptionally it lies within the AWE site, will be relatively well screened visually by surrounding buildings to the east, west and south [but not the north], and will be also well screened across the wider landscape given the local topography and natural features. At the specific request of the officer a "field scene" from the north elevation has been submitted based on LIDAR which provides a modelled accurate visual representation of the new building from the north elevation if it were to be viewed from the public footpath which runs to the north east of the application site. It also provides a useful benchmark against which other buildings to the east can be seen in the overall context, and the relative height of the catenary towers, which are substantially higher than the proposal [over 20 m greater]. Although this building would be lower, it would have solid mass that would increase its visibility within the landscape.

The application is accompanied by a Landscape and Visual Impact Assessment (LVIA), which is informed by the relevant landscape character assessments applicable to the area. It provides a landscape strategy for the site, and gives an assessment of the construction and operational effects of the development.

It is clear, notwithstanding the well prepared LVIA which the officer has examined, that there will be a degree of visual impact arising from the new MMF, which to a degree will be harmful. This in itself

would be contrary to policy CS19, which seeks to protect the nature and character of the quality of the countryside across the district. Having said that, the new building will be viewed in the context of existing built form, notably the catenary towers, and the fact that it is understood that the height of the building is specifically required in order to facilitate production processes for nuclear warhead purposes. This of course is in the National Defence interest so a degree of harm, is accepted on balance by the officer, in recommending approval to the application on this [part] basis.

In terms of design, the building makes no pretence of being a functional/industrial unit, which is considered to be appropriate in the context of the military-industrial and commercial character of the AWE site. The barrel roof assists in reducing the overall impact particularly on the important north elevation, i.e. the principal public view from close-range viewpoints. The proposed materials are acceptable, providing a modern and relatively attractive appearance, notwithstanding its functional design. It will certainly help to modernise the present AWE site. The flues will be an "unfortunate" but clearly necessary addition to the roof scape, but the additional harm is limited by their slim profile. In addition the introduction of the PV cells on the roof will not be viewed from "street" level so reflectivity will not be a problem in this regard.

Finally a degree of additional structural landscaping is proposed on the northern boundary, which will assist to a degree in softening the impact of the building, but only to a relative degree given the substantial mass and scale.

On balance, it is considered that given the constraints identified, the design, mass and scale and location is justifiable and so overall accords with policy CS19 and the NPPF despite a degree of landscape and visual harm.

HIGHWAYS

The Council highways officer has formally responded to the proposal. He notes that the site location is reasonably sustainable in that there are number of bus services which pass the site to the west as do a number of Sustrans Cycle Routes. As to projected increase in traffic generation due to the increase in the number of employees on site, this is to be 45 movements in the AM peak and 31 in the PM peak. It is apparent to the case officer that the impact of these additional private vehicle movements on the local highways network will not be severe in terms of paragraph 109 of the NPPF. Accordingly, in principle, the application would not be rejected on the grounds of increased and unacceptable traffic generation.

Turning to wider sustainability issues, the AWE has an existing Travel Plan which applies to all staff and it is noted in the supporting detail with the application that this would continue. The Council Transport Policy team has not however responded to the application. Related to this it is notable that a covered [and obviously secure] cycle store is intended to be provided on the application red line site. The highways officer has accepted the lack of any additional parking on site given the existing high spare capacity already at the AWE site, so there will be no additional parking impact on the local highways.

In terms of the construction phase, there will be a rise of 37 vehicle movements during the AM peak and 27 during the PM peak for light vans etc. Again this is not considered to be significant and in any event will only be on a temporary basis over the construction period. As to HGV movements these are controlled by a Code of Construction Practice which ensures no HGV movements go in or out of the site outside the hours of 8.30am to 4pm, unless of course it is an emergency or for an exceptional need.

Accordingly the case officer considers that whilst of course there will be a degree of impact upon the local network, this will be acceptable, having due regard to policy CS13 and the policy in chapter 9 of the NPPF on highways matters.

DRAINAGE

The sustainable drainage issues on the site have been resolved by the submission of additional details, which will be duly conditioned.

NOISE

The applicants have submitted a noise impact assessment of the impact on local residents of the increased construction traffic, and the noise impacts of the actual construction, involving piling and foundation works. Finally an assessment has been made of the noise impacts arising from the future operational phase of the building as a whole.

The case officer has considered this report, and in addition has noted the response of the Council EHO who has raised no objections/comments on the application.

The conclusions of the assessment all point to the lack of any noticeable impact on local amenity due to noise, and as such it is considered the scheme will comply with the aims of saved policy OVS6 in the WBDLP of 1991 to 2006. In addition the assessment concludes that there would be a negligible to low noise impact from the operation of the MMF. On the basis of the above and in conclusion, noise from the proposed development would be mitigated, through the application of best available techniques, such that it does not cause a significant adverse impact, as defined by the NPSE and PPG. The potential for noise affecting living and working conditions has therefore been minimised, in line with the requirements of the NPPF and WHO guidelines on these issues.

Air Quality

The applicant has submitted a report examining the potential impact upon local air quality arising from the scheme both during the construction and operational phases. This examines the following principal issues: emissions from construction and operational traffic; construction dust; operational emissions from the discharge flues, arising from the gas-fired Combined Heat and Power (CHP) plant and four gas-fired Low Temperature Hot Water (LTHW) boilers; and operational process emissions from the discharge stacks.

The case officer has examined the report and notes the EHO response. The conclusions of the report regarding dust emissions and the emissions are accordingly accepted.

HERITAGE

Policy CS19 sets out the need for the Council as LPA to examine any new development in the light of future potential impacts on the archaeological resource, and that of other heritage assets such as listed buildings and conservation areas. The applicants have submitted a helpful Heritage report in this regard.

The conclusions are that no archaeological value is attached to the localised application site itself, given the historic and substantial amount of past works undertaken on the site itself being part of the ROF and then the AWE. The Council archaeologist has accepted this in her response. In addition there are no listed buildings in close proximity to the application site whose setting would be detrimentally affected and so harmed by the MMF. The Council conservation officer has agreed this in his view on the pre-application enquiry. Accordingly, having due regard to the policy in Chapter 16 of the NPPF and policy CS19 it is anticipated that the scheme will not harm any matters of heritage significance.

PLANNING BALANCE AND CONCLUSION

The application before the Council comprises a very significant investment in the national defence infrastructure for the country. The local economic benefit of supporting development at AWE is substantial, and in accordance with the aforementioned policies of the Local Plan. This weighs heavily in the planning balance, in economic terms, but also in terms of wider national defence/security issues having regard to the NPPF.

In environmental terms there will inevitably be a degree of short term impact during the construction phase on local traffic movements, noise and dust, but during the operational phase the principal impact will be landscape and visual. The case officer notes that there will be a degree of harmful visual impact caused by the MMF, but these impacts must be viewed in the context of existing development at the established AWE site. This has to be weighed against the wider benefits noted above, including increased employment, particularly during the construction phase. In social terms the development impact is taken to be generally neutral.

In policy terms the application is considered to be in accordance with the statutory development plan, and the relevant material considerations do not otherwise indicate that permission should be refused.

RECOMMENDATION

Grant conditional planning permission.

5 Representations to Policy DM33 West Berkshire Local Plan Review

Judith Montford (Environment Agency)

03 Mar 2023



Representation Form

Please give reasons for your answer

We have reviewed the policies and site allocations in relation to our remit (flood risk, biodiversity and conservation of fisheries and the water environment, groundwater quality and contaminated land, water quality and water resources) and have provided you with comments below. These comments are not soundness issues but will provide some clarity to the plan.

We make no comments or suggest amendments to policies SP4 or DM33 of the draft plan. The Environment Agency is part of an offsite planning group who are consulted by West Berkshire District Council on any development proposals in the Detailed Emergency Planning Zone (DEPZ) of the AWE sites. We have permitted a number of activities and installations within AWE sites under our regulatory requirements and influences and would expect that AWE, or any other organisation undertaking new activities in developments considered under DM33 to consult with us if their activities would require environmental permits.

Paul Hinton (Defence Infrastructure Organisation)

03 Mar 2023

Representation Form

1. Do you consider the Local Plan Review is legally compliant?

Yes

2. Do you consider the Local Plan Review is sound?

Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.

No

Please give reasons for your answer

Please find set out below specific representations submitted on behalf of the Secretary of State for Defence on the consultation. Please note that these comments should be read in addition to those to be provided by colleagues in respect of MOD Safeguarding interests. The comments set out below relate to wider MOD estate related interests.

1. Background

- 1.1 The Defence Infrastructure Organisation (DIO), on behalf of the Ministry of Defence (MOD) welcomes the opportunity to comment on the West Berkshire Local Plan Review Proposed Submission (Regulation 19) Consultation. The DIO is the estate expert for defence, supporting the armed forces to enable military capability by planning, building, maintaining, and servicing infrastructure on behalf of the MOD.
- 1.2 The MOD has significant land interests within the area covered by West Berkshire, including both of the Atomic Weapons Establishments (AWE) at Aldermaston and Burghfield, Denison Barracks and RAF Welford. These are important operational defence sites with an enduring requirement to support national defence outputs.

2 National Planning Policy Framework

- 2.1 The Council will be aware of the requirements of paragraphs 97 and 187 of the National Planning Policy (NPPF) as quoted below:
- "97. Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:
- b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area."
- "187. Planning policies and decisions should ensure...Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established."

3 Representations

- 3.1 Whilst not directly referencing paragraph 97 of the NPPF paragraph 12.11 of the West Berkshire Local Plan Review 2022-2039 explains that planning policies and decisions should recognise and support development required for operational defence and security purposes. This paragraph forms the supporting text for proposed policy DM33.
- 3.2 Policy DM33 supports development where it directly sustains the functioning of each of the AWE sites as Government research and defence establishments. DIO **supports** this Policy.
- 3.3 Denison Barracks and RAF Welford are operational defence sites and for the same

reasons as DM33, these sites should also have a local plan policy that supports development at these sites where it is required for operational defence and security purposes. Please see enclosed plans of these two sites.

- 3.4 As currently proposed Policy DM33 of the Local Plan is very helpful to the decision maker when dealing with development proposals that sustains the function of each of the AWE sites. Whereas at Denison Barracks and RAF Welford the decision maker would have before them a defence related policy but would be unable to afford it weight as it directly relates to two different establishments, albeit establishments that also fall within the description of paragraph 97 of the NPPF and with the same purpose to provide defence outputs.
- 3.5 Paragraph 16d) of the NPPF sets out that Plans should 'contain policies that are

clearly written and unambiguous, so it is evident how a decision maker should react to development proposals'. We contend that whilst the principle of Policy DM33 is correct, the absence of a similar policy does not assist the decision maker when it comes to making decisions for any future planning applications for developments at both Denison Barracks and RAF Welford.

- 3.6 To ensure that it is clear to the decision maker how to react to development proposals at Denison Barracks and RAF Welford, and for consistency with the approach the Plan takes for the other two defence sites at Aldermaston and Burghfield, DIO requests that an additional policy for these two sites is also included in the Local Plan.
- 3.7 Paragraph 4.41 of the West Berkshire Local Plan Review 2022-2039 quite rightly quotes parts of paragraphs 97 and 187 of the NPPF in regard to the need to protect the ongoing day-to-day needs of defence sites, and to ensure that they are not affected adversely by the impact of other development proposed in the area, and to ensure that unreasonable restrictions are not placed on them as a result of development permitted after they were established.
- 3.8 These paragraphs support the provision of policy SP4 (Atomic Weapons Establishment Aldermaston and Atomic Weapons Establishment Burghfield) whose purpose is, amongst other considerations, to prevent developments that pose an external hazard to the AWE sites. While Denison Barracks and RAF Welford do not have a defined Detailed Emergency Planning Zone (DEPZ) like they do at the AWE sites, they are however, also at risk from third party developments that could affect adversely the operations of these sites and place unreasonable restrictions on them contrary to paragraphs 97 and 187 of the NPPF. For the same reasons as paragraph 4.41 and the purpose of policy SP4 the Plan should also include a policy that protects the day-to-day needs of Denison Barracks and RAF Welford.
- 3.9 As explained above, for consistency in decision making, all defence related sites must be treated in the same way. While we recognise policy SP4 is specific to the DEPZ and therefore including Denison Barracks and RAF Welford within this Policy would be ambiguous, a sentence could be included within a specific new Policy for these two sites within the Plan. This should include provision that non-defence related development in the areas around a defence site will not be supported where it would adversely affect defence related operation or capability.

4 Conclusion

- 4.1 DIO is supportive of the principle of policy DM33 which recognises the important land use role of defence establishments but has significant concerns that the Plan is not covering wider MOD interests and therefore is ambiguous by focusing on only two of the four defence sites within Plan area. Whilst we appreciate the particular consideration of AWE given the operations carried out at Aldermaston and Burghfield the Plan as currently written is inconsistent by providing support for future operational developments at the two AWE sites but is unclear to the decision maker on how to consider defence related activity and capability development proposals at Denison Barracks and RAF Welford in a fair and consistent way. Neither does the Plan make provision to protect Denison Barracks and RAF Welford from third party development proposals in the same way as it does for the two AWE sites.
- 4.2 Accordingly, as currently written the West Berkshire Local Plan Review would fail to meet the criteria of paragraph 16 of the NPPF.

Yes

4. Proposed Changes

3.10 With the above in mind and for the avoidance of doubt DIO considers that the following Policy should be included within the submission version of the Plan:

Development within and effecting Denison Barracks and RAF Welford

- a) Development within Denison Barracks and RAF Welford will be supported where it directly sustains the functioning of these defence establishments.
- b) Non-defence related development in the areas around a defence site will not be supported where it would adversely affect defence related operation or capability.
- 3.11 DIO also considers that the following text would be suitable to support the above recommended Policy:

Denison Barracks and RAF Welford provide important outputs that support national defence activities. The NPPF outlines that planning policies and decisions should recognise and support development required for operational defence and security purposes, ensuring that operational sites are not affected adversely by the impact of other development proposed in the area and existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.

- 4.3 The inclusion of DIO's recommended policy in addition to Policies SP4 and DM33 would enable the decision maker to consistently and fairly apply the following principles across all defence sites within the Plan area in accordance with paragraphs 97 and 187 of the NPPF by:
- recognising and supporting development required for operational defence and security purposes,
- ensuring that operational sites are not affected adversely by the impact of other development proposed in the area, and
- ensuring unreasonable restrictions are not placed on them as a result of development permitted after they were established.
- 4.4 Incorporation of this Policy, in addition to Policies SP4 and DM33 for AWE would ensure that for defence requirements the Plan would contain polices that are clearly written and unambiguous and which are evident to the decision maker how to react to development proposals for all defence establishments within the Plan area in accordance with Paragraph 16d) of the NPPF.

We would be grateful to receive further consultations as the Local Plan progresses and the opportunity to make further comments as necessary.

COMMENT ID: PS611

Lynn Hannawin (Stratfield Mortimer Parish Council)

via Agent: Lynn Hannawin

03 Mar 2023

Representation Form

2. Do you consider the Local Plan Review is sound?

Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.

Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

No

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.

Please give reasons for your answer

West Berkshire Council is already informed about major development plans at AWE which will impact local roads, businesses, accommodation and services but this is not referred to or taken account of in the LP

Mr John Steele (AWE)

02 Mar 2023 via Agent: Mrs Camilla Fisher (RPS)

Representation Form

1. Do you consider the Local Plan Review is legally compliant?

Yes

2. Do you consider the Local Plan Review is sound?

Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.

Yes

Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

Yes

Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.

Yes

Please give reasons for your answer

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 12.13

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

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

4. Proposed Changes

Para 12.12

In accordance with the representation made against Para 4.37, 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

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"

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

6. Notification of Progress of the Local Plan Review

The submission of the Local Plan Review for Independent Examination

The publication of the report of the Inspector appointed to carry out the examination Yes

The adoption of the Local Plan Review

Yes

Yes



Representation Form

Please give reasons for your answer

Nuleaf (the Nuclear Legacy Advisory Forum) is the Local Government Association (LGA) representative body on nuclear legacy wastes and decommissioning. We are directly supported by over 100 local authorities and national park authorities across England and Wales and speak for the wider LGA. West Berkshire Council is a member of Nuleaf, though this submission has been prepared without any engagement with representatives of the local authority.

Nuleaf's remit encompasses all aspects of the management of the UK's nuclear waste legacy. Our primary objectives are:

- to provide a mechanism to identify, where possible, a common local government viewpoint on nuclear legacy management issues;
- to represent that viewpoint, or the range of views of its member authorities, in discussion with national bodies, including the Welsh and UK Government, the Nuclear Decommissioning Authority (NDA) and the regulators;
- to seek to influence policy and strategy for nuclear legacy management in the interests of affected communities: and
- to develop the capacity of its member authorities to engage with nuclear legacy management at a local level.

Our Radioactive Waste Planning Group is an expert forum for senior land-use and waste planning officers, which aims to support the development of Local Plans and Minerals and Waste Plans. Nuleaf advocates that all Local Plans and Minerals and Waste Plans, particularly those covering areas which include parts of the UK's nuclear infrastructure, should have policies on decommissioning and radioactive waste management. More information on our suggested approach is set out in our Briefing Paper 11: Approaches to Radioactive Waste Management in Local Plans.1

The absence of clear policies leaves local authorities and communities less able to influence proposals for the disposal, storage, management or transportation of radioactive materials within their area. We therefore welcome the inclusion of Policy DM33 on Development within AWE, covering the Aldermaston and Burghfield sites. This policy is primarily aimed at facilitating appropriate development within the two sites.

We also note that the West Berkshire Minerals and Waste Local Plan 2022-37 (M&WP) includes Policy 13 that covers the management of all relevant categories of radioactive waste and requires that a need is proven before the development of any new waste facilities is permitted.

4. Proposed Changes

We would propose that DM33 is amended to reference Policy 13 of the M&WP i.e. that any new development at the AWE sites which has implications for radioactive waste management should have to demonstrate need and be based primarily in managing waste that has arisen locally.

6 Extracts of West Berkshire Core Strategy Inspectors report and associated minor modifications



Report to West Berkshire Council

by Simon Emerson BSC DipTP MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government Date 3 July 2012

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)
SECTION 20

REPORT ON THE EXAMINATION INTO THE WEST BERKSHIRE CORE STRATEGY

Document submitted for examination on 12 July 2010

Examination hearings held between 2 November 2010 and 22 May 2012

File Ref: PINS/W0340/429/5

settlements, where the landscape impact is likely to be acceptable. The SHLAA also identifies sites for up to 1,829 dwellings outside existing settlement boundaries, as informed by the landscape assessment. Achieving the landscape objective of ADPP5 on some, if not many, of the greenfield sites in the AONB may be very challenging or impossible. But only some greenfield sites need to be developed to deliver the scale of housing proposed.

- 77. The landscape assessment work undertaken on behalf of the North Wessex Downs AONB Unit is generally more critical of, or more sensitive to, landscape impacts, than the Council's study, but nonetheless broadly agrees with that evidence in respect of a number of modest greenfield sites adjoining settlements. There are also 2 large brownfield sites at Compton and Hermitage where substantial redevelopment for housing or mixed use might take place whilst achieving positive outcomes for the landscape. Accordingly, there is evidence to indicate that the scale of development could be delivered in a way likely to meet the aim of ADPP5.
- 78. It is unrealistic to seek to limit housing provision in the AONB to local needs only. Local needs, such as for affordable housing, are most likely to be met by securing a proportion of such housing from market housing developments. Equally, it would not be sound if provision of approximately 2,000 dwellings overrode the landscape objective. To be sound, the reference in policy ADPP5 to 2,000 dwellings needs to be prefaced with up to so as to make clear that it is not a minimum that has to be achieved and that delivering less is acceptable. Additional explanation of the landscape-led approach to be taken when progressing the Site Allocations and Delivery DPD is also required. There is sufficient capacity in the other spatial areas to make up any shortfall in the AONB so as to ensure that at least 10,500 dwellings are provided in the District. Two variations of possible changes to the policy to remedy this unsoundness were consulted on and I have incorporated the Council's preferred wording in MM 4.21. The other necessary and consequential modifications for soundness relating to the AONB are in MMs 4.17, 4.19 and 4.25.
- 79. Changes proposed by the Council (and now included in MM 4.21) provide an explanation for the approach to the relative scale of development to be accommodated in the various identified settlements in the AONB. These are necessary for the reasons already given in relation to the clarity of presentation in the plan. Given the landscape led approach that has to be taken there is not sufficient evidence to ascribe specific housing figures to the different settlements in the AONB.

East Kennet Valley

80. This spatial area contains 2 RSCs: Burghfield Common and Mortimer and 2 SVs: Aldermaston and Woolhampton. It is clearly the Council's intention that the 2 service centres of Burghfield Common and Mortimer will be the focus for development in the area. That focus is sound. A small change is needed to make this clear and to avoid the impression that there is any other focus for development. This is included in **MM 4.27** which also includes consequential changes arising from other matters discussed in this report. This part of the policy rightly acknowledges that there are a number of potentially developable sites which could be allocated as extensions to these villages.

- 81. Within the context of the overall scale of provision proposed in the Plan the proportion to be provided in the East Kennet Valley is justified by its more rural character, limited services and its separation from the built up area of greater Reading. It would not be justified for this location to be allocated a scale of development similar to that to be accommodated in the Eastern Area. The SHLAA has, however, identified the potential to deliver more than proposed, subject to the assessment of the cumulative impacts of nearby developments. The extent to which such potential should be explored further would best be addressed in the context of any subsequent increase in the overall housing requirement.
- 82. Policy ADPP 6 refers to the Site Allocations and Delivery DPD exploring opportunities for a more distinct centre offering shops and services in Burghfield Common. At present there is a scatter of small convenience shops across the settlement, but no specific centre and Burghfield Common is not an identified district centre in policy CS12. It is not essential for soundness for this issue to be answered in this Plan. It can be left to a subsequent part of what will be the overall Local Plan. Whilst the lack of local shops and services is cited by the Council as one reason for not allocating more housing than proposed, a new centre and/or additional provision is unlikely to change the overall accessibility and sustainability of this spatial area compared with the identified urban areas.
- 83. Policy ADPP6 refers to the presence of the 2 AWE sites in this spatial area, to the need for monitoring housing completions and population levels and the need to strictly control development within the zones set out in Appendix C of the Plan, which are the planning consultation zones defined by the Health and Safety Executive (HSE) to ensure that the HSE is satisfied that there is capacity to accommodate an increase in population. Since submission of the Plan, the Office for Nuclear Regulation (ONR) (an Executive Agency of the HSE) is the body which would provides advice in response to planning consultations around the AWE sites.
- 84. At the outset of the Examination I was concerned that the Core Strategy did not sufficiently grapple with this issue and focussed too much on the consultation process rather than the likely outcomes and any implications for the strategy. From all the information now available, I draw the following conclusions:
 - The scale and general location of development proposed in the East Kennet Valley in ADPP6 is unlikely to result in the ONR advising against such development at a later stage of the development plan process or in response to a planning application.
 - The scale of housing in this spatial area does not need to be specifically capped at the figure proposed in ADPP6 on the grounds of the constraint of the AWE sites. There is scope to accommodate more housing than proposed in the Plan if required or otherwise justified. Whether or not ONR the advise against such proposals would depend on the scale and location of the proposal, other planned developments and future updates to its modelling process arising from changed circumstances.
 - At present, the ONR is highly likely to advise against nearly all applications

for additional dwellings within the inner land use planning zones defined around the 2 AWE sites. The Council intends to follow that advice and seeks to bring clarity to this matter through the development plan.

- The complexity of the ONR's modelling process, the scope for different outcomes from different inputs and the likely material changes in relevant data and other circumstances over the plan period preclude any firm policy beyond the inner zone.
- The need for the extendibility of countermeasures (arising from an incident at either site) beyond the detailed emergency planning zones (as outlined, for example, in CD10/98) does not need to be replicated in the land use planning approach.
- The Secretary of State's decision (16 June 2011) to allow 115 dwellings and other development at Boundary Hall, Tadley was a balanced decision on the particular circumstances of that case and does not undermine the ONR's policy approach or the need for the Council to make clear its intention to follow that advice in the inner zone. This decision does not justify the implications of the AWE sites and the ONR's views having to be considered solely on a case-by-case basis. The development plan should provide reasonable certainty for all interested parties as to the type and scale of development likely to be acceptable in different locations, avoiding the potentially wasted effort of proposals being pursued which had little prospect of success.
- 85. In the light of the above, I consider that the submitted plan is unsound in its response to the AWE sites. It is ineffective in addressing the likely spatial implications. A clear policy should be set out reflecting the high degree of constraint likely to be applied in the inner consultation zone, with a clear explanation of the implications over the wider area. A new policy to this effect was proposed by the Council as part of the first round of consultation on possible changes and refined again, with amplification of the text, following the hearings in June 2011. This new policy and related text is necessary to make the plan sound. The consolidated changes are set out in MM 5.18. Appropriate cross references to this policy are included in MM 4.27. The Council intends to show the consultation zones on the Proposals Map (as illustrated in CD07/46). As a consequence of this new policy Appendix C in the submitted plan is not needed. It is removed by MM 7.3.

Issue 3 – Is the allocation of the strategic site at Sandleford justified in principle and appropriately addressed in detail?

The nature of the proposal

- 86. As submitted, policy CS4 gives no indication as to where development would take place at Sandleford. The red line allocation on the submission Proposals Map encompasses a large area, even though the Council and site owner/promoter have consistently envisaged (since at least *Options for the Future*) built development only in the northern and western parts of the red line area. This lack of clarity makes the submitted policy unsound due to ineffectiveness.
- 87. Following the hearings in November 2010, the Council proposed (CD07/41) to

local plan and neighbourhood plan in the model wording. This change is an acceptable local preference. I have, however, retained the word *always* from the model policy in the sentence referring to the Council working proactively with applicants, since this emphasis is an important part of the approach advocated by the NPPF. The finalised wording for the policy is in **MM 1.1**.

141. No changes are required to any other policies in the Plan.

Assessment of Legal Compliance

142. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The LDS at submission was dated April 2010 (CD07/21). This expected the Core Strategy to be adopted in March 2011. Given the extended nature of this Examination, this date soon become unachievable. The Council's latest LDS is May 2012 (CD07/87) which envisages adoption in September 2012, which is still possible. The Core Strategy's content is compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI (CD07/22) was adopted in July 2006 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed changes incorporated in the main modifications.
Sustainability Appraisal (SA)	The SA/SEA report at submission failed to meet the requirements of the Regulations. For the reasons set out earlier in this report, the SA/SEA Update October 2011 and the Council's consideration of the consultation responses on this report now satisfy the requirements.
Appropriate Assessment (AA)	Natural England had some concerns with the Habitats Regulations Appropriate Assessment at submission (CD07/15B), but it was subsequently satisfied with a revised AA in August 2010 (CD07/15). The AA concludes that there would be no significant adverse effects on protected habitats. The AA is fit for purpose.
National Policy	The Core Strategy complies with national policy except where indicated and modifications are recommended.
Regional Strategy (RS)	The Core Strategy is in general conformity with the RS, the SEP.
Sustainable Community Strategy (SCS)	The SCS – A Breath of Fresh Air (CD10/02 & CD10/03) is referred to in paragraph 2.9 of the CS. Sufficient regard has been given to this document in the overall objectives and policies of the CS for this requirement to be met.
2004 Act (as amended)	The Core Strategy complies with the Act and the

and 2012 Regulations.	Regulations.

Overall Conclusion and Recommendation

- 143. The Plan has a number of deficiencies in relation to soundness for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues set out above.
- 144. The Council has requested that I recommend main modifications to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Annex (and its Appendices) the West Berkshire Core Strategy satisfies the requirements of Section 20(5) of the 2004 Act and, on balance, sufficiently meets the aims of the NPPF to be considered sound.

Simon Emerson

Inspector

The report is accompanied by an Annex setting out the Main Modifications and Appendices to the Annex.

Appendix C Schedule of Main Modifications to the West Berkshire Submission Core Strategy DPD

This Schedule of Main Modifications draws on the previous focused changes (PFC/EPFC) consulted on throughout the Examination. However, only those changes necessary to make the Plan sound, in accordance with the conclusions of the report, are included in this Schedule. Some amendments have been made to the wording of previously published changes as noted in the Origin column.

The Main Modifications are expressed within this Schedule in the conventional form of strikethrough for deletions and underlining for additions of text.

There is an accompanying separate schedule of Appendices to this Schedule.

on		Policy / Paragraph	(Submission Document)	Descripti	on of Propo	osed Focused Change	9		
MM 5.18	EPFC25	New Policy	n/a - new policy,	Insert nev	v policy, exp	lanatory text, and deliv	ery and n	nonitoring:	
F	FEPFC18	Policy CS9a,	but would be located	New Poli	cy CS9a				
	(fpmc166 embedded for	Explanatory Text, and	on page 52	<u>Nuclear I</u>	nstallations	s - AWE Aldermaston	and Burg	<u>ahfield</u>	
-	clarity)	Delivery and Monitoring		In the inte	rests of pub	lic safety, residential (ins zones (insert footnote) of AW	ert footnote) d	levelopment	t in the inner land use
		Worldoning		likely to be	e refused pla	anning permission by the	ne Counci	il when the	Office for Nuclear
				Regulatio	n (ONR) ^{(inser}	t footnote) has advised aga	ainst that	developmer	nt. All other
				development proposals in the consultation zones will be considered in consultation with					
				the ONR, having regard to the scale of development proposed, its location, population					
						a and the impact on pul			
						_			plan in the event of an
						other planning criteria dertaken with the ONF			
				application	iis wiii be ui	idertaken with the ONF	t using the	e table belo	<u>vv.</u>
				Develop	ment within	the Land Use Planning	Consulta	tion Zones:	Office for Nuclear
				Regulation					
				AWE Alc	dermaston_		AWE Bu	<u>ırghfield</u>	
				<u>Zone</u>	<u>Distance</u>	Development Type	<u>Zone</u>	<u>Distance</u>	Development Type
				<u>Inner</u>	<u>0 – 3 km</u>	All residential or non	<u>Inner</u>	<u>1 – 1.5</u>	All residential or non
						<u>residential</u>		<u>km</u>	residential
						- Where one or			- Where one or more
						more additional			additional person
						person may live, work, shop (all			may live, work, shop (all applications save

Main Modificati on	Origin	Section / Policy / Paragraph	Page (Submission Document)	Descript	ion of Prop	osed Focused Chang	e		
						applications save listed buildings, conservation area consent, house extensions, shop fronts, prior notifications and telecommunications)			listed buildings, conservation area consent, house extensions, shop fronts, prior notifications and telecommunications).
				Middle	<u>3 – 5 km</u>	Residential accommodation or non residential accommodation exceeding 50 people - 20 or more dwellings; - 1,000m2 B1 2,400m2 B8	Middle	1.5 – 3 km	Residential accommodation or non residential accommodation exceeding 50 people - 20 or more dwellings; - 1,000m2 B1 - 2,400m2 B8
				Outer	<u>5 – 8 km</u>	Residential accommodation or non residential accommodation exceeding 500 people. - 200 or more dwellings; - 11,000m2	<u>Outer</u>	3 – 5 km	Residential accommodation or non residential accommodation exceeding 500 people. - 200 or more dwellings; - 11,000m2 B1

Main Modificati on	Origin	Section / Policy / Paragraph	Page (Submission Document)	Description	of Propo	osed Focused Chang	e		
						<u>B1</u> - <u>24,000m2</u> <u>B8</u>			- <u>24,000m2 B8</u>
				Explanation	of the P	olicy			
						d nuclear installations ent in Aldermaston (AV			
				Nuclear Safe states in its for scope of this they are open	ety Obliga forward the Conventerated in a	*	nergy and ther UK no to the san s a high le	d Climate C uclear facilit ne standard evel of safet	hange, Sept 2010) ies that fall outside the s, so as to ensure that y". Paragraph 17.30
				provides gen in the vicinity Government consequence	neral advi of licens policy re es to the	ng Controls for Hazard ce about the need for one ed nuclear installations garding local demogra public in the unlikely ex proceyond the nuclear site	consultations. This is a phics which which which we would be not an arm of arm arm of arm arm of arm	on about pro a requireme ch would lim accident in	nt of longstanding it the radiological volving the spread of
				prudence over operators to the control of take this into Applicants cozones provid	er and ab prevent s f develop account onsidering led by the	ove the stringent regu	latory requested NR adminurice to the ror not to thin the later to the properties.	uirements in histers the G Local Planr approve pland nd use pland posals map	nposed on nuclear lovernment's policy on ning Authority, who anning applications. ning consultation

Main Modificati on	Origin	Section / Policy / Paragraph	Page (Submission Document)	Description of Proposed Focused Change
				The land use planning consultation zones for the installations cross over into the following neighbouring councils: Basingstoke and Deane Borough Council, Reading Borough Council and Wokingham Borough Council. Given the potential cumulative effects of any population increase surrounding the installations, it will be necessary to monitor committed and future development proposals in partnership with neighbouring councils and the ONR. The Councils will monitor housing completions and commitments as part of the Annual Monitoring Report and send this information directly to the ONR for them to make informed judgements when assessing future development proposals. The ONR has no objection to the overall scale of development proposed in the East Kennet Valley in policy ADPP6. The ONR's decision whether to advise against a particular development is based on complex modelling. The ONR has indicated that on the basis of its current model for testing the acceptability of residential developments around the AWE sites, it would advise against nearly all new residential development within the inner land use planning zones defined on the Proposals Map. Policy CS9a reflects the Council's intention to normally follow the ONR's advice in the inner zones. The inner zones largely encompass countryside, but the service village of Aldermaston is within the inner zone around AWE (A). Whether or not the ONR would advise against a particular proposal beyond the inner zones depends on a variety of factors, including the scale of the development, distance from the relevant AWE site and the relationship to existing and planned developments. It is not therefore practical to express the ONR's likely advice, or the Council's response, in any further policy in this Plan. During the plan period there are likely to be changes of inputs to the ONR's model which may result in a less restrictive approach being taken by the ONR. Such changes would include information on population and household size from the 2011 Census. The successful completion

Main Modificati on	Origin	Section / Policy / Paragraph	Page (Submission Document)	Description of Proposed Focused Change
				scheduled for completion in 2016) would enable the ONR to take into account the
				revised safety case for those projects in the modelling process and may enable a less
				constraining population density criteria to be applied. As a result, the consultation zones
				may change as well as the ONR's advice on particular proposals.
				Delivery and Monitoring
				New development within the land use planning consultation zones will be monitored on an annual basis and monitoring results passed to the ONR. This will enable the ONR to give up to date advice to individual Councils regarding subsequent development applications.
				Footnotes: Residential for the purpose of this policy includes any development resulting in a permanent resident night time population, e.g. residential institutions. This policy does not preclude normal residential extensions.
				Consultation Zones as defined by the ONR and shown on the West Berkshire Proposals Map.
				Consultation arrangements with the ONR.
MM 5.19	EPFC26	Policy CS10 and	52	Delete Policy CS10 and explanatory text and replace new text as follows:
	FEPFC19	Explanatory		Policy CS10
		Text		Location and type of business development
	(fpmc162 and	(paras. 5.33		
	178	<u>–</u> 5.45)		The Council seeks to facilitate and promote the growth and forecasted change of
	embedded for	,		business development in the plan period in order to:

7	Extracts of Wokingham Local Plan









Wokingham Borough Development Plan

Adopted Managing Development Delivery Local Plan

Enhancing the Borough's environment and character through exceptional development

February 2014

WOKINGHAM BOROUGH COUNCIL

Atomic Weapons Establishment

Policy TB04: Development in vicinity of Atomic Weapons Establishment (AWE), Burghfield

- 1. Development will only be permitted where the applicant demonstrates that the increase in the number of people living, working, shopping and/or visiting the proposal (including at different times of the day) can be safely accommodated having regard to the needs of "Blue light" services and the emergency off-site plan for the Atomic Weapons Establishment site at Burghfield.
- 2. The applicant will need to provide this information where the proposal exceeds the scale of development detailed below for the consultation zone as defined on the Policies Map.

Consultation Zone (Distance from AWE Burghfield)	Scale of development
Inner	All residential or non-residential applications where one or more additional person may live, work, shop
(0 - 1.5 km) This corresponds with the Detailed Emergency Planning Zone (DEPZ) for the site	and/or visit (all applications except house extensions, shop fronts, advertisements, Listed Building, Conservation Area consent, prior notifications and telecommunications).
Middle (1.5 – 3 km)	All residential or non-residential applications where 50 or more additional people may live, work, shop and/or visit.
Outer (3 - 5 km)	All residential or non-residential applications where 500 or more additional people may live, work, shop and/or visit.

- 3.12 Whilst there are no Atomic Weapons Establishments in the Borough, there are two licensed nuclear installations located in the adjacent District of West Berkshire. These are the Atomic Weapons Establishment sites in Aldermaston (AWE A) and in Burghfield (AWE B).
- 3.13 Planning advice in Circular 04/00 'Planning Controls for Hazardous Substances' requires that the Office for Nuclear Regulation (ONR) must be consulted on developments near nuclear installations to ensure that the potential cumulative increase in either the population or numbers of people living, working, shopping and/or visiting the vicinity of these sites can be safely accommodated. Prior to 31 March 2011, responsibility for nuclear matters was overseen by the Health and Safety Executive (Nuclear Installations Inspectorate).
- 3.14 Within the context of AWE A, the edge of the outer zone is at 8km whereas for AWE B it is at 5km. Since no part of the Borough is within 8km of AWE A, the authority only needs to consult the ONR for proposals within 5km of AWE B. The ONR produces advice concerning the implications of development around nuclear installations which can be

- obtained from http://www.hse.gov.uk/nuclear/land-use-planning.htm. The zones can be seen in Appendix 5.
- 3.15 Assessments were undertaken by the ONR in December 2010 based upon development commitments that are now part of the Adopted West Berkshire Core Strategy. These assessments do not take account of any additional development that could arise in the vicinity of the site through the MDD or similar documents produced by the other authorities within the consultation zones for AWE A and AWE B (Reading Borough; West Berkshire District; Basingstoke and Deane Borough together with Wokingham Borough). Therefore, any changes in the numbers of people living, working, shopping and/or visiting the area around the AWE sites must be carefully assessed across the consultation zones.
- 3.16 To assist applicant's interpretation of the policy requirements, the following types of development are likely to include either 50 or 500 people respectively:
 - 50 or more people could be accommodated in 20 or more dwellings;
 1,000 sq m of Use Class B1 (business);
 2,400 sq m of Use Class B8 (warehousing & distribution) or
 2,000 sq m of other uses
 - 500 or more people could be accommodated in 200 or more dwellings; 11,000 sq m of Use Class B1; 24,000 sq m of Use Class B8, or 20,000 sq m of other uses.
- 3.17 These examples are illustrative and applicants will need to provide information on the likely number of people living, working, shopping or visiting the site. The Council will work with the other authorities within the consultation zones together with ONR in monitoring (through the Monitoring Report) the potential cumulative effects of any population increase surrounding these installations.
- 3.18 The boundaries of the consultation zones may be changed by ONR during the plan period to take account of implications of development both on the AWE sites and within their vicinity together with updates on the resident population.

Policy Background

National

National Planning Policy Framework (NPPF) (2012) paragraph 172 Circular 04/00 (2000) Planning for Hazardous Substances (paragraph 47)

<u>UK – Fifth National; Report on compliance with the Convention on Nuclear Safety</u> Obligations (DECC) (October 2010)

Regional

N/A

Local

Adopted West Berkshire Core Strategy (policy CS8) (2012)