



**West Berkshire Local Plan Review 2022-2039 (LPR)  
 Consultation on Proposed Main Modifications  
 (6 December 2024 – 31 January 2025)**

**Ref:**  
 (For official use only)

|  |   |
|--|---|
| <b>Please complete and return this form:</b> | <b>By email:</b> [REDACTED]   |
|  | <b>By post:</b> Planning Policy, Development and Housing, Council Offices, Market Street, Newbury, RG14 5LD |
| <b>Return by:</b>                            | <b>11:59pm on Friday 31 January 2025</b>  |

**Representations made by:**

**AWE plc and AWE plc on behalf of the Ministry of Defence (MOD)**

**Part A - Personal details**

**Part B - Representations made on the following parts of the LP Proposed Main Modifications**

- Part B1MM3 Policy SP1**
- Part B2 MM6 Policy SP3**
- Part B3 MM8 Policy SP4**
- Part B4 MM30 Policy SP20**
- Part B5 MM44 Supporting Text and Table before Policy RSA6**
- Part B6 MM73 Policy DM1**
- Part B7 MM74 DM3**

**PART A: Your details**

*Please note the following:*

- *We cannot register your representation without your details.*
- *Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*

|                                  | 1. Your details                         | 2. Agent's details (if applicable) |
|----------------------------------|---|------------------------------------|
| Title                            | Mr                                      | Mr                                 |
| First Name*                      | Bryan                                   | Camilla                            |
| Last Name*                       | Lyttle                                  | Fisher                             |
| Job title<br>(where relevant)    | Estate Planning and<br>Development Lead | Technical Director – Planning      |
| Organisation<br>(where relevant) | AWE plc                                 | Tetrattech                         |

|  |                                       |  |
|--|---------------------------------------|--|
| Address*<br><i>Please include<br/>postcode</i> | AWE, Reading Road,<br>Reading RG7 4PR | 20 Western Avenue, Milton Park,<br>Abingdon OX14 4SH |
| Email address*                                 | [REDACTED]                            |  |
| Telephone number                               | [REDACTED]                            |  |
| Consultee ID<br>(if known)                     | n/a                                   | n/a  |

*\*Mandatory Field*

## **PART B1 – MM3 Policy SP1**

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| Your name or organisation<br>(and client if you are an agent): | AWE plc (and AWE plc on behalf of the Ministry of Defence (MOD)) |
|--|--|

### **Proposed Main Modifications and Proposed Changes to the Policies Map**

**1. Please indicate whether your representation relates to the Schedule of Proposed Main Modifications or the Schedule of Proposed Changes to the Policies Map and provide the modification/change number you are commenting on below:**

|   |   |
|---|---|
| Document name                                   | West Berkshire Local Plan Review (LPR) 2022-2039 Schedule of Proposed Main Modifications (MM) - November 2024 |
| Modification/Change reference number (MM / PMC) | MM3 Policy SP1  |

**2. Do you consider the Proposed Main Modification or Proposed Policy Map Change to be:**  
(please tick/mark 'X' one answer for a and one for b)

a) **Legally compliant**                      Yes                       No

b) **Sound**                                      Yes                                       No

*Please refer to the guidance notes for a full explanation of 'legally compliant' and 'soundness'*

**If you consider the Proposed Main Modification or Proposed Policy Map Change not to be sound, please identify which test of soundness your representation relates to:**  
(please tick/mark 'X' all that apply)

|  |          |
|--|----------|
| <b>Positively Prepared:</b> The LPR should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. |          |
| <b>Justified:</b> the LPR should be the most appropriate strategy, when considered against the reasonable alternatives   |          |
| <b>Effective:</b> the LPR should be deliverable  | <b>X</b> |
| <b>Consistent with national policy:</b> the LPR should enable the delivery of sustainable development in accordance with the policies of the NPPF                | <b>X</b> |

**3. If you have answered 'No' to question 2a or 2b above, please provide details of why you consider the Proposed Main Modification or Proposed Policy Map Change is not legally compliant or is unsound, including any changes you consider necessary to make the Plan legally compliant or sound.**

*You will need to say why this change will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

AWE plc (and AWE plc on behalf of the Ministry of Defence (MOD)) welcomes the clarity of the amendments which the Inspector has included in the modifications.

AWE and MOD accept that it is necessary to read and apply the plan as a whole. AWE and MOD, however, are mindful of first: the current formal Office for Nuclear Regulation (ONR) position in respect of the adequacy of the AWE Off Site Emergency Plan (OSEP) and their land use planning policy position on development which increases the population within the Detailed Emergency Planning Zone and secondly that as recent appeal decisions have demonstrated it is important to take into account the potential cumulative impact of smaller scale developments and not just the impact of one development in isolation. The impacts of cumulative development may not always be immediately apparent, and it is not possible to evidence a tipping point where an OSEP which is adequate becomes inadequate. If such evidence of impact of one development on AWE's operations were to exist, the threat to AWE's operations would have already materialised and it is imperative to avoid reaching this point given the national and international importance and irreplaceable nature of the AWE sites. Cumulative development, by whatever means (except for the purposes of development of the AWE sites and facilities themselves), within a DEPZ leads to a rise in population within the DEPZ and a proportionate increase in the consequence should a radiation emergency occur.

AWE and MOD are concerned that the importance of policy SP4 and its application to ALL policies and proposed development within the DEPZ should be restated where policies could lead to an increase in residential or non-residential population or activity. This should avoid any confusion and to avoid any suggestion that a proposal that complies with these policies but not SP4 is otherwise compliant with the plan as a whole such that a decision to grant planning permission is in accordance with the development plan. This could undermine the effectiveness of SP4 in protecting the current and future operations at AWE and public safety and therefore raises soundness concerns. AWE and MOD suggest that this soundness issue could easily be resolved by including the following text within the overall policy

**"Any development proposal, including regeneration and change in an existing built up areas or DEAs located within the Detailed Emergency Planning Zones for AWE must comply fully with policy SP4".**

**PART B2 – MM6 Policy SP3**

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| Your name or organisation<br>(and client if you are an agent): | AWE plc (and AWE plc on behalf of the Ministry of Defence (MOD)) |
|--|--|

**Proposed Main Modifications and Proposed Changes to the Policies Map**

**1. Please indicate whether your representation relates to the Schedule of Proposed Main Modifications or the Schedule of Proposed Changes to the Policies Map and provide the modification/change number you are commenting on below:**

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|---|---|
| Document name                                   | West Berkshire Local Plan Review (LPR) 2022-2039 Schedule of Proposed Main Modifications (MM) - November 2024 |
| Modification/Change reference number (MM / PMC) | MM6 Policy SP3  |

**2. Do you consider the Proposed Main Modification or Proposed Policy Map Change to be:**  
(please tick/mark 'X' one answer for a and one for b)

c) **Legally compliant**                      Yes                       No

d) **Sound**                                      Yes                                       No

*Please refer to the guidance notes for a full explanation of 'legally compliant' and 'soundness'*

**If you consider the Proposed Main Modification or Proposed Policy Map Change not to be sound, please identify which test of soundness your representation relates to:**  
(please tick/mark 'X' all that apply)

|  |          |
|--|----------|
| <b>Positively Prepared:</b> The LPR should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. |          |
| <b>Justified:</b> the LPR should be the most appropriate strategy, when considered against the reasonable alternatives   |          |
| <b>Effective:</b> the LPR should be deliverable  | <b>X</b> |
| <b>Consistent with national policy:</b> the LPR should enable the delivery of sustainable development in accordance with the policies of the NPPF                | <b>X</b> |

**3. If you have answered 'No' to question 2a or 2b above, please provide details of why you consider the Proposed Main Modification or Proposed Policy Map Change is not legally compliant or is unsound, including any changes you consider necessary to make the Plan legally compliant or sound.**

*You will need to say why this change will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

AWE plc (and AWE plc on behalf of the Ministry of Defence (MOD)) welcomes the clarity of the amendments which the Inspector has included in the modifications.

AWE and MOD accept that it is necessary to read and apply the plan as a whole. AWE and MOD, however, are mindful of first: the current formal Office for Nuclear Regulation (ONR) position in respect of the adequacy of the AWE Off Site Emergency Plan (OSEP) and their land use planning policy position on development which increases the population within the Detailed Emergency Planning Zone and secondly that as recent appeal decisions have demonstrated it is important to take into account the potential cumulative impact of smaller scale developments and not just the impact of one development in isolation. The impacts of cumulative development may not always be immediately apparent, and it is not possible to evidence a tipping point where an OSEP which is adequate becomes inadequate. If such evidence of impact of one development on AWE's operations were to exist, the threat to AWE's operations would have already materialised and it is imperative to avoid reaching this point given the national and international importance and irreplaceable nature of the AWE sites. Cumulative development, by whatever means (except for the purposes of development of the AWE sites and facilities themselves), within a DEPZ leads to a rise in population within the DEPZ and a proportionate increase in the consequence should a radiation emergency occur.

AWE and MOD are concerned that the importance of policy SP4 and its application to ALL policies and proposed development within the DEPZ should be restated where policies could lead to an increase in residential or non-residential population or activity. This should avoid any confusion and to avoid any suggestion that a proposal that complies with these policies but not SP4 is otherwise compliant with the plan as a whole such that a decision to grant planning permission is in accordance with the development plan. This could undermine the effectiveness of SP4 in protecting the current and future operations at AWE and public safety and therefore raises soundness concerns. AWE and MOD suggest that this soundness issue could easily be resolved by including the following text within the overall policy

**"Any strategic / non-strategic sites for housing and economic development proposed through other policies and / or neighbourhood plans which are located within AWE's DEPZs, must comply fully with policy SP4 whether or not they are located within Urban Areas, Rural Service Centres and Service Villages".**

## **PART B3 – MM8 Policy SP4**

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| Your name or organisation<br>(and client if you are an agent): | AWE plc (and AWE plc on behalf of the Ministry of Defence (MOD)) |
|--|--|

### **Proposed Main Modifications and Proposed Changes to the Policies Map**

**1. Please indicate whether your representation relates to the Schedule of Proposed Main Modifications or the Schedule of Proposed Changes to the Policies Map and provide the modification/change number you are commenting on below:**

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|---|---|
| Document name                                   | West Berkshire Local Plan Review (LPR) 2022-2039 Schedule of Proposed Main Modifications (MM) - November 2024 |
| Modification/Change reference number (MM / PMC) | MM8 Policy SP4  |

**2. Do you consider the Proposed Main Modification or Proposed Policy Map Change to be:**  
(please tick/mark 'X' one answer for a and one for b)

e) **Legally compliant**                      Yes                       No

f) **Sound**                                      Yes                                       No

*Please refer to the guidance notes for a full explanation of 'legally compliant' and 'soundness'*

**If you consider the Proposed Main Modification or Proposed Policy Map Change not to be sound, please identify which test of soundness your representation relates to:**  
(please tick/mark 'X' all that apply)

|  |          |
|--|----------|
| <b>Positively Prepared:</b> The LPR should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. |          |
| <b>Justified:</b> the LPR should be the most appropriate strategy, when considered against the reasonable alternatives   |          |
| <b>Effective:</b> the LPR should be deliverable  | <b>X</b> |
| <b>Consistent with national policy:</b> the LPR should enable the delivery of sustainable development in accordance with the policies of the NPPF                | <b>X</b> |

**3. If you have answered 'No' to question 2a or 2b above, please provide details of why you consider the Proposed Main Modification or Proposed Policy Map Change is not legally compliant or is unsound, including any changes you consider necessary to make the Plan legally compliant or sound.**

*You will need to say why this change will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

AWE plc (and AWE plc on behalf of the Ministry of Defence (MOD)) strongly support the principle of Policy SP4 and its intention to ensure the effective management of development located within the Detailed Emergency Planning Zones (DEPZ) for AWE Aldermaston and AWE Burghfield. The policy clearly recognises the land use implications of these licensed nuclear installations for future development within the Local Plan area. The policy also recognises the critical importance of land use decisions being managed in the interests of public safety, emergency response, and national security and defence requirements.

AWE and MOD welcomes the inclusion of amongst other things, a clear statement within Policy SP4 that “development within the DEPZ is likely to be refused planning permission where the ONR, as regulator of the nuclear licensed sites, advise against the proposed development”. Policy SP4 (as subject to the main modifications) is consistent with the strong national policy protection for existing defence sites provided for in paragraphs 102 and 200 of the NPPF.

AWE and MOD consider, however, that further strengthening of SP4 [together with other policies] is required to ensure that its application, as intended, provides adequate protection to the current and future operations at AWE Aldermaston and AWE Burghfield and public safety.

These matters arise as a consequence of:

1. The publication of the revised NPPF in December 2024, which reintroduces mandatory housing targets and the restoration of 5-year housing land supply rules together with the changes to paragraph 11 relating to the presumption in favour of sustainable development. These changes have been included to, amongst other matters, meet the recognised significant need for the provision of more housing. The MOD acknowledges this requirement but considers that these changes should not result in any change to the inappropriateness of increasing the population within the AWE DEPZs;
2. Since the Examination hearings into the West Berks Reg 19 Local Plan Update and publication of the Inspector’s interim findings 2 further Local Plan Reg 19 Updates [Wokingham Borough Council and Reading Borough Council] have been published and consultations held. Both Plans include land covered by the AWE Burghfield DEPZ. The Plans, therefore, include similar policies to SP4 with similar aims. AWE and MOD have responded to these consultations [the 2 formal responses are attached]. For consistency and clarity AWE and MOD consider that with a relatively minor addition to SP4 it would be possible to ensure clarity and consistency across all 3 Local Plans;
3. AWE and MOD accept that it is necessary to read and apply the plan as a whole. AWE and MOD, however, are mindful of first: the current formal Office for Nuclear Regulation (ONR) position in respect of the adequacy of the AWE Off Site Emergency Plan (OSEP) and their land use planning policy position on development which increases the population within the Detailed Emergency Planning Zone and secondly that as recent appeal decisions have demonstrated it is important to take into account the potential cumulative impact of smaller scale developments and not just the impact of one development in isolation. The impacts of cumulative development may not always be immediately apparent, and it is not possible to evidence a tipping point where an OSEP which is adequate becomes inadequate. If such evidence of impact of one development on AWE’s operations were to exist, the threat to AWE’s operations would have already materialised and it is imperative to avoid reaching this point given the national and international importance and irreplaceable nature of the AWE sites. Cumulative development, by whatever means (except for the purposes of development of the AWE sites and facilities themselves), within a DEPZ leads to a rise in population within the DEPZ and a proportionate increase in the consequence should a radiation emergency occur.

AWE and MOD strongly support Policy SP4 in relation to the requirements for consultation and criterion



for refusal. AWE and MOD, however, believe that an additional and more specific requirement and criteria should be inserted into the policy relating to any development proposals which could lead to ANY increase in population within the DEPZ. The inclusion of the suggested amendments will avoid any confusion and suggestion that policy SP4 covers all types of development and not only relates to any proposed larger scale residential development, and also that SP4 is a relevant consideration in determining the application of the “presumption in favour of sustainable development”. Without the inclusion of these amendments the effectiveness of SP4, in protecting the current and future operations at AWE and public safety, could be undermined therefore raising soundness concerns.

The following amendments are suggested:

1. Insert the additional wording [underlined]:

“Development proposals within the land use planning consultation zones that **will lead to any increase in residential or non-residential population and / or** pose unacceptable risk to the operation of the AWE Off-Site Emergency Plan (OSEP) and/or adversely affect the defence related operation or capability of the AWE sites will be refused planning permission.”

2. Insert the additional wording [underlined]:

**“The ONR and AWE / MOD will also be consulted for any development proposals within the DEPZ which would lead to any increase in population or activity (including working or visiting population)”**

**PART B4 – MM30 Policy SP20**

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| Your name or organisation<br>(and client if you are an agent): | AWE plc (and AWE plc on behalf of the Ministry of Defence (MOD)) |
|--|--|

**Proposed Main Modifications and Proposed Changes to the Policies Map**

**1. Please indicate whether your representation relates to the Schedule of Proposed Main Modifications or the Schedule of Proposed Changes to the Policies Map and provide the modification/change number you are commenting on below:**

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| Document name                                   | West Berkshire Local Plan Review (LPR) 2022-2039 Schedule of Proposed Main Modifications (MM) - November 2024 |
| Modification/Change reference number (MM / PMC) | MM30 Policy SP20  |

**2. Do you consider the Proposed Main Modification or Proposed Policy Map Change to be:**  
(please tick/mark 'X' one answer for a and one for b)

3. **Legally compliant** Yes  No

4. **Sound** Yes  No

*Please refer to the guidance notes for a full explanation of 'legally compliant' and 'soundness'*

**If you consider the Proposed Main Modification or Proposed Policy Map Change not to be sound, please identify which test of soundness your representation relates to:**  
(please tick/mark 'X' all that apply)

|  |          |
|--|----------|
| <b>Positively Prepared:</b> The LPR should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. |          |
| <b>Justified:</b> the LPR should be the most appropriate strategy, when considered against the reasonable alternatives   |          |
| <b>Effective:</b> the LPR should be deliverable  | <b>X</b> |
| <b>Consistent with national policy:</b> the LPR should enable the delivery of sustainable development in accordance with the policies of the NPPF                | <b>X</b> |

**3. If you have answered 'No' to question 2a or 2b above, please provide details of why you consider the Proposed Main Modification or Proposed Policy Map Change is not legally compliant or is unsound, including any changes you consider necessary to make the Plan legally compliant or sound.**

*You will need to say why this change will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

AWE plc (and AWE plc on behalf of the Ministry of Defence (MOD)) welcomes the clarity of the amendments which the Inspector has included in the modifications, in particular the revision to the boundary to Youngs Industrial Estate – PMC8.

AWE and MOD accept that it is necessary to read and apply the plan as a whole. AWE and MOD, however, are mindful of first: the current formal Office for Nuclear Regulation (ONR) position in respect of the adequacy of the AWE Off Site Emergency Plan (OSEP) and their land use planning policy position on development which increases the population within the Detailed Emergency Planning Zone and secondly that as recent appeal decisions have demonstrated it is important to take into account the potential cumulative impact of smaller scale developments and not just the impact of one development in isolation. The impacts of cumulative development may not always be immediately apparent, and it is not possible to evidence a tipping point where an OSEP which is adequate becomes inadequate. If such evidence of impact of one development on AWE's operations were to exist, the threat to AWE's operations would have already materialised and it is imperative to avoid reaching this point given the national and international importance and irreplaceable nature of the AWE sites. Cumulative development, by whatever means (except for the purposes of development of the AWE sites and facilities themselves), within a DEPZ leads to a rise in population within the DEPZ and a proportionate increase in the consequence should a radiation emergency occur.

AWE and MOD are concerned that the importance of policy SP4 and its application to ALL policies and proposed development within the DEPZ should be restated where policies could lead to an increase in residential or non residential population or activity. This should avoid any confusion and to avoid any suggestion that a proposal that complies with these policies but not SP4 is otherwise compliant with the plan as a whole such that a decision to grant planning permission is in accordance with the development plan. This could undermine the effectiveness of SP4 in protecting the current and future operations at AWE and public safety and therefore raises soundness concerns. AWE and MOD suggest that this soundness issue could easily be resolved by including the following text within the overall policy

***“Any development proposal located within the DEPZ for AWE sites, including on an existing DEA, within a settlement boundary or neighbourhood plan, countryside or previously developed land must comply fully with policy SP4”.***



AWE plc (and AWE plc on behalf of the Ministry of Defence (MOD)) welcomes the clarity of the amendments which the Inspector has included in the modifications in particular recognition of the constraint imposed by the AWE DEPZ upon residential development in the Eastern Area.

AWE and MOD accept that it is necessary to read and apply the plan as a whole. AWE and MOD, however, are mindful of first: the current formal Office for Nuclear Regulation (ONR) position in respect of the adequacy of the AWE Off Site Emergency Plan (OSEP) and their land use planning policy position on development which increases the population within the Detailed Emergency Planning Zone and secondly that as recent appeal decisions have demonstrated it is important to take into account the potential cumulative impact of smaller scale developments and not just the impact of one development in isolation. The impacts of cumulative development may not always be immediately apparent, and it is not possible to evidence a tipping point where an OSEP which is adequate becomes inadequate. If such evidence of impact of one development on AWE's operations were to exist, the threat to AWE's operations would have already materialised and it is imperative to avoid reaching this point given the national and international importance and irreplaceable nature of the AWE sites. Cumulative development, by whatever means (except for the purposes of development of the AWE sites and facilities themselves), within a DEPZ leads to a rise in population within the DEPZ and a proportionate increase in the consequence should a radiation emergency occur.

AWE and MOD are concerned that the importance of policy SP4 and its application to ALL policies and proposed development within the DEPZ should be restated where policies could lead to an increase in residential or non residential population or activity. This should avoid any confusion and to avoid any suggestion that a proposal that complies with these policies but not SP4 is otherwise compliant with the plan as a whole such that a decision to grant planning permission is in accordance with the development plan. This could undermine the effectiveness of SP4 in protecting the current and future operations at AWE and public safety and therefore raises soundness concerns. AWE and MOD suggest that this soundness issue could easily be resolved by including the following text:

1. In the last sentence of the proposed paragraph 8.5: "Given the constraints in this spatial area the LPR does not propose any strategic allocations, but non-strategic allocations are proposed on the edge of existing settlements as set out below. **Any development proposal within the Detailed Emergency Planning Zone for AWE must comply fully with policy SP4**".
2. In the last sentence of the proposed paragraph 8.6: "The allocation of the site for eight permanent pitches was not considered to have an impact upon the emergency plan **as it would not lead to an increase in residential population. It is therefore compliant with policy SP4.**"
3. Insert at the end of paragraph 8.8: "**...in accordance with policy SP4**"



|   |   |
|---|---|
| <b>Effective:</b> the LPR should be deliverable   | X |
| <b>Consistent with national policy:</b> the LPR should enable the delivery of sustainable development in accordance with the policies of the NPPF | X |

**3. If you have answered ‘No’ to question 2a or 2b above, please provide details of why you consider the Proposed Main Modification or Proposed Policy Map Change is not legally compliant or is unsound, including any changes you consider necessary to make the Plan legally compliant or sound.**

*You will need to say why this change will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

AWE plc (and AWE plc on behalf of the Ministry of Defence (MOD)) welcomes the cross reference to other specific LPR policies within policy DM1

AWE and MOD accept that it is necessary to read and apply the plan as a whole. AWE and MOD, however, are mindful of first: the current formal Office for Nuclear Regulation (ONR) position in respect of the adequacy of the AWE Off Site Emergency Plan (OSEP) and their land use planning policy position on development which increases the population within the Detailed Emergency Planning Zone and secondly that as recent appeal decisions have demonstrated it is important to take into account the potential cumulative impact of smaller scale developments and not just the impact of one development in isolation. The impacts of cumulative development may not always be immediately apparent, and it is not possible to evidence a tipping point where an OSEP which is adequate becomes inadequate. If such evidence of impact of one development on AWE’s operations were to exist, the threat to AWE’s operations would have already materialised and it is imperative to avoid reaching this point given the national and international importance and irreplaceable nature of the AWE sites. Cumulative development, by whatever means (except for the purposes of development of the AWE sites and facilities themselves), within a DEPZ leads to a rise in population within the DEPZ and a proportionate increase in the consequence should a radiation emergency occur.

AWE and MOD are concerned that the importance of policy SP4 and its application to ALL policies and proposed development within the DEPZ should be restated where policies could lead to an increase in residential or non residential population or activity. This should avoid any confusion and to avoid any suggestion that a proposal that complies with these policies but not SP4 is otherwise compliant with the plan as a whole such that a decision to grant planning permission is in accordance with the development plan. This could undermine the effectiveness of SP4 in protecting the current and future operations at AWE and public safety and therefore raises soundness concerns. AWE and MOD suggest that this soundness issue could easily be resolved by including the following text:

Add new sentence at the end of the policy: **“Any development proposal within the Detailed Emergency Planning Zone for AWE must comply fully with policy SP4”.**

**PART B7 – MM74 DM3**

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| Your name or organisation<br>(and client if you are an agent): | AWE plc (and AWE plc on behalf of the Ministry of Defence (MOD)) |
|--|--|

**Proposed Main Modifications and Proposed Changes to the Policies Map**

**1. Please indicate whether your representation relates to the Schedule of Proposed Main Modifications or the Schedule of Proposed Changes to the Policies Map and provide the modification/change number you are commenting on below:**

|   |   |
|---|---|
| Document name                                   | West Berkshire Local Plan Review (LPR) 2022-2039 Schedule of Proposed Main Modifications (MM) - November 2024 |
| Modification/Change reference number (MM / PMC) | MM74 DM3  |

**2. Do you consider the Proposed Main Modification or Proposed Policy Map Change to be:**  
(please tick/mark 'X' one answer for a and one for b)

6. **Legally compliant** Yes  No

7. **Sound** Yes  No

*Please refer to the guidance notes for a full explanation of 'legally compliant' and 'soundness'*

**If you consider the Proposed Main Modification or Proposed Policy Map Change not to be sound, please identify which test of soundness your representation relates to:**  
(please tick/mark 'X' all that apply)

|  |          |
|--|----------|
| <b>Positively Prepared:</b> The LPR should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. |          |
| <b>Justified:</b> the LPR should be the most appropriate strategy, when considered against the reasonable alternatives   |          |
| <b>Effective:</b> the LPR should be deliverable  | <b>X</b> |
| <b>Consistent with national policy:</b> the LPR should enable the delivery of sustainable development in accordance with the policies of the NPPF                | <b>X</b> |

**3. If you have answered 'No' to question 2a or 2b above, please provide details of why you consider the Proposed Main Modification or Proposed Policy Map Change is not legally compliant or is unsound, including any changes you consider necessary to make the Plan legally compliant or sound.**

*You will need to say why this change will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*



AWE plc (and AWE plc on behalf of the Ministry of Defence (MOD)) welcomes the clarity of the amendments which the Inspector has included in the modifications in particular recognition of the constraint imposed upon residential development in the Eastern Area

AWE plc (and AWE plc on behalf of the Ministry of Defence (MOD)) accept that it is necessary to read and apply the plan as a whole. AWE and MOD, however, are mindful of the current formal Office for Nuclear Regulation (ONR) position in respect of the adequacy of the AWE Off Site Emergency Plan (OSEP) and their land use planning policy position on development which increases the population within the Detailed Emergency Planning Zone (DEPZ) for AWE. AWE and MOD are concerned that the importance of policy SP4 and its application to ALL policies and proposed development within the DEPZ should be restated wherever directly relevant to policies included in the update. Given one of the key objectives of SP4 is to protect public safety, the effectiveness of SP4 could be undermined if not considered within any HIA. This raises soundness concerns.

AWE and MOD suggest that this soundness issue could easily be resolved by including the following text within policy DM3: **“Any development proposals within the Detailed Emergency Planning Zone for AWE Burghfield and AWE Aldermaston with the potential to increase the population within the DEPZ must be accompanied by an HIA which complies fully with policy SP4”.**

**Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)**

**4. Do you have any comments on the updated Sustainability Appraisal/Strategic Environmental Assessment Report – Proposed Main Modifications (November 2024)?**  
*(Please be as precise as possible)*

|                  |             |
|------------------|-------------|
| Page number      | No comments |
| Paragraph number |             |
| Comments:        |             |

