

STATEMENT BY BOYER PLANNING FOR BLOOR HOMES

BASINGSTOKE LOCAL PLAN EXAMINATION

POLICY SS7 NUCLEAR INSTALLATIONS

Report Control

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Theme 3 – Infrastructure, including transport and waste management, implementation, phasing and monitoring, and environmental matters (Policies CN6-9; SS7, SS10-11; and EM4-12)

ISSUE 8: Infrastructure

18. Nuclear Installations: Does policy SS7 provide sufficient guidance to accord with national planning and safety policy?

- 1.1 This statement has been prepared by Boyer Planning on behalf of Bloor Homes in response to the Inspector's questions regarding the Examination in Public of the Basingstoke and Deane Council Local Plan.
- 1.2 We do not consider that Policy SS7 provides sufficient guidance to accord with national planning and safety policy because it is not "effective" as defined in paragraph 182 of the NPPF. The Inspectorate's soundness guidance states that to be effective, a plan must be deliverable and among the key questions to assess this is the question: *"are the policies internally consistent"*.
- 1.3 Policy SS7 provides guidance on how applications in land use planning consultation zones around Aldermaston and Burghfield should be considered. It sets out the characteristics of development that the Office for Nuclear Regulation (ONR) will have regard to when consulted on applications. The supporting text, at paragraph 4.67 states that *"The ONR's decision whether to advise against a particular development will be based on the extent to which the Off Site Emergency Plan can accommodate the additional population."*
- 1.4 Policy SS7 is not therefore an embargo on development in the ONR consultation zones but a guide to how such development should be considered. However, paragraph 3.1 of the Plan concludes that development is inappropriate in these areas. It states:

"The growth of Tadley is constrained given its location within the inner consultation zone of the Atomic Weapons Establishment (Policy SS7 refers) and, as such, the needs arising here will be met elsewhere in the borough."
- 1.5 Similarly, paragraph 4.4 of the Plan states:

"To maintain an effective emergency plan in relation to the Atomic Weapons Establishment (AWE), no strategic allocations for development within or around Tadley are proposed (Policy SS7 refers)."
- 1.6 These paragraphs are inconsistent with the wording and intent of Policy SS7. The policy does not indicate that the presence of a nuclear consultation zone is sufficient reason to conclude that housing needs cannot be met in that area. It is a guide to the consideration of development proposals in these areas and not a blanket ban.

- 1.7 We consider that the Council should have applied criteria (similar to those set out in Policy SS7) to give active consideration to whether housing development would impact adversely on the functioning of the emergency plan through the site selection process. The presence of the consultation zone is not sufficient to omit locations and sites from consideration for allocation.
- 1.8 We have evidence that development proposed by our clients at Tadley would not impact adversely on the functioning of the emergency plan for the Aldermaston consultation zone. Appendix 1 of this statement provides this evidence (*entitled: "An evaluation of the degree to which potential accidents with off site radiological consequences occur at AWE Aldermaston are a material consideration in defining the overall future pattern of development at Tadley"*).
- 1.9 We consider that the Plan is currently unsound because its site selection procedures assume that development should not occur at Tadley without proper justification. The Plan is also internally inconsistent on this issue with paragraphs 3.1 and 4.4 ruling out site allocations at Tadley while Policy SS7 sets out how development proposals in these locations should be considered. It is vital that the content of the report at Appendix 1 is considered in the Council's site selection process.
- 1.10 Further, Policy SS7 defers the issue of the acceptability of development in these locations to the development management process and there should be a greater lead from the plan on this question, in accordance with the primacy of development plans. NPPF paragraph 17 states as one of its 12 planning principles that planning should "*pro-actively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs*". The Plan does not adopt this approach at Tadley and presumes that development is unacceptable without justification.

Boyer Planning

24 September 2015