



## **Gladman Developments Ltd**

### **Basingstoke and Deane Local Plan Examination**

#### **Issue 8 – Infrastructure**

##### **Question 18: Nuclear Installations**

###### **18.1 Does Policy SS7 provide sufficient guidance to accord with national planning and safety policy?**

18.1.1 Gladman submit that as currently prepared the Local Plan fails to provide a justified and sound strategy for providing development in the vicinity of the Aldermaston Atomic Weapons Establishment (AWE). We critically assert that the Council's proposals overlook the ability to provide further sustainable growth within the settlement of Tadley, and represent an unduly restrictive approach to meeting the town's development needs.

18.1.2 Tadley is one of the largest and most sustainable settlements in the Basingstoke and Deane authority area. Categorised as one of three borough Service Centres in the Council's Sustainability of Settlements Report (June 2008), the town is identified as a District Centre in the Local Plan's emerging retail hierarchy and is described as one of the most appropriate locations for development in the borough in the Council's adopted Local Plan proposals. With a population of 11,473 residents at the time of the 2011 Census, the town benefits from a good range of services and facilities, with excellent public transport links to Basingstoke and the wider surrounding area.

18.1.3 Despite Tadley's classification as one of only three higher tier settlements in the borough after Basingstoke town, the Local Plan fails to direct any housing growth or allocations to the settlement on the sole basis of its proximity to the AWE. Describing that this position has been reached in consultation with the AWE Off-Site Planning Group, the Council consider that is unable to make a robust case that development in the town would be suitable and deliverable at this time.

18.1.4 Whilst recognising that the Aldermaston AWE is an important consideration in the assessment of development proposals, Gladman assert that there is no sound basis or justification for the Council's decision to exclude Tadley from the Local Plan's spatial strategy. The AWE's

implications for further housing growth in Tadley has now been considered by both the Secretary of State and the Council's own planning committee in respect of the Boundary Hall<sup>1</sup> and Burnham Copse Primary School<sup>2</sup> proposals, where the very real but small risks to public safety were considered to be outweighed by the benefits of development. Gladman contend that the extremely remote likelihood of an accident with off-site consequences at the AWE does not support the Council's disproportionate policy approach.

18.1.5 To gain a clearer understanding of the Council's position, Gladman have commissioned consultants Mike Thorne Associates to assess the extent to which potential accidents at the AWE should be a material consideration in defining Tadley's role in the Local Plan. Provided in full as Appendix A to this statement and taking account of the regulatory framework within which developments in the vicinity of nuclear licensed sites must be considered, Mike Thorne's evidence demonstrates why the Council are advancing a strategy that is overly restrictive in response to Tadley's policy situation:

- The limited size of accidents with off-site consequences that could occur at the AWE means that effective radiation doses to residents of Tadley from a bounding reference accident would be relatively low, i.e. in the range of 2 to 17 mSv, even if they did not shelter, as they are advised to do. For worst case accidents effective doses could be a factor of two larger, but the frequency of such accidents would be about a factor of ten lower than for bounding reference accidents. These effective doses are similar in magnitude to those arising from natural background radiation or from a single CT scan. This is not to argue that they are of no importance, but they are within the range commonly experienced by members of the public in the course of their everyday life
- The frequency of accidents with off-site consequences are low - below one in ten thousand per year for bounding reference accidents and below one in one hundred thousand per year for worst case accidents. This means that the annual risk of death from accidents up to and including the bounding reference accident in size is no more than about one in ten million. For larger accidents, the risk of death is no more than one in fifty million. These risks are those that would arise in the absence of sheltering, which would substantially mitigate the risks. Even without sheltering, the risks are similar to, or less than, those of being killed by being struck by lightning and are more than a factor of ten below the boundary of the broadly acceptable risk region, as defined by the Health and Safety Executive (HSE)

---

<sup>1</sup> Appeal Ref: APP/H1705/V/10/2124548

<sup>2</sup> Minutes of Planning Committee held 25<sup>th</sup> February 2015

- If a bounding reference accident were to occur with the wind blowing toward Tadley and mitigation of effective doses by sheltering was not taken into account, about four deaths are projected to occur as a result of the accident. These would arise over several decades and would not be detectable against the general mortality of the population over that period. Nevertheless, this number of projected deaths emphasises why it is important to have an appropriate off-site emergency plan in place
- The AWE Off-Site Emergency Plan properly emphasises warning and informing with a view to achieving short-term sheltering. Such sheltering would very substantially reduce the effective doses incurred by individuals present downwind of the accident. Such sheltering would only be required until the atmospheric release from AWE Aldermaston had ceased. This would typically be a few hours. Provision of such advice is largely automated and does not place a heavy load on the authorities
- It is possible that if less restrictive planning requirements were imposed within the DEPZ that Tadley could increase in population relatively rapidly. Nevertheless, there is limited space for development within the current DEPZ. Together with observations of the growth in population of Wards outside the DEPZ between 2001 and 2011, it seems unlikely that the population of Tadley would grow by more than about 3,000 or 20% of the current population. In terms of sheltering, it seems likely that the new housing stock would have better control on ventilation and be more suitable for sheltering than some of the existing stock. Overall, a growth in population of up to 20% might require some detailed changes to the off-site emergency plan, but there is no reason to suppose that substantial qualitative changes would be required.
- As the off-site emergency plan has to be revised every three years, it should be straightforward to integrate updates with the implementation of proposed residential and other developments. However, it will be important to ensure that the design of these developments gives consideration to key issues in emergency planning and that access for emergency services to AWE Aldermaston is not impaired, or is enhanced
- Even if there was a significant increase in the population of Tadley, it seems clear that it would still comply with the general requirement that the general characteristics of the area around this nuclear licensed site should be preserved.

5.1.1 The Council must recognise that its strategy for Tadley will result in a number of avoidable and adverse consequences for a town that has already seen its resident population fall by 183 people between the 2001 and 2011 Census. As already acknowledged in the Council's

own Sustainability Appraisal and discussed further by consultants Rural Solutions in Appendix B to this statement, a lack of further housing development in Tadley is likely to have a number of social and economic consequences that include:

- A further exacerbation of the unhealthy population change that has taken place in the town over the past ten years, which has seen its overall population decrease by -2% compared to the average borough change of +10%, with a 19% fall in the number of residents aged 16 and under a 28% increase in the population aged 65 and over.
- A suppression of house building that is likely to create difficulties for young families and working age households looking to remain in the area, leading to a reduction in the expenditure that is available to maintain the town's status as a district retail centre and support local shops and support for key services
- A shrinking population and pool of labour to support local businesses and employers. Further housing provision within Tadley would help to provide local homes for workers at the AWE, helping to reduce unsustainable commuting patterns associated with employees travelling into the town.

18.1.6 Whilst Gladman note the provisions of Policy SS7, we submit that this policy is excessive and fails to recognise that there is capacity for a more substantial level of development within Tadley. Although the supporting text to Policy SS7 indicates that the consultation zones around the AWE and the Office for Nuclear Regulation's (ONR) advice in respect of proposals may change over time, the Council fail to describe how this may lead to a review of the Local Plan's approach. Gladman note that a recent review recommended that the Aldermaston DEPZ should be set at a revised radius of 2.125 km from the centre of the AWE site.

18.1.7 Gladman submit that the Local Plan's approach to Tadley must now be revised to make specific provision for further housing to be delivered in the town. It must now be acknowledged that there is further scope for housing development to come forward to meet Tadley's needs, without leading to an unacceptable risk to human health and affecting the AWE Off-Site Emergency Plan arrangements. Gladman reiterate that there is no reference to restricting development due to the presence of AWE installations in footnote 9 of the Framework.

## **APPENDIX A**

**Evaluation of the Degree to which Potential Accidents with Off-site Radiological Consequences occurring at AWE Aldermaston are a Material Consideration in Defining the Overall Future Pattern of Development of Tadley**

**Mike Thorne Associates**

## **APPENDIX B**

### **A Review of the Policy Approach to Tadley and the Rural Area**

#### **Rural Solutions**