



Examination of the Basingstoke and Deane Local Plan (2011 to 2029)

MF9 - Position Statement on SS7 – Nuclear Installations –
Aldermaston and Burghfield (prepared by Basingstoke and
Deane Borough Council and West Berkshire Council with
the assistance of the Office for Nuclear Regulation)

October 2015

1. Introduction

1.1. This position statement has been drafted to assist in the understanding of the current position in relation to nuclear safety for the purposes of examination of the Basingstoke and Deane Submission Local plan (plan period 2011-2029). It has been prepared by Basingstoke and Deane Borough Council, with the involvement of the Office for Nuclear Regulation (ONR) and the Civil Contingencies and Planning Departments of West Berkshire Council (WBC). Specific points which reflect the views of these organisations are highlighted for the benefit of the Inspector.

1.2. There are two licensed nuclear installations in close proximity to Basingstoke and Deane Borough Council, Atomic Weapons Establishment (AWE) Aldermaston (AWE (A)) and Burghfield (AWE (B)), both of which lie within the administrative area of West Berkshire Council. The site with the greatest impact on Basingstoke and Deane Borough Council is AWE (A) which is on the boundary of the two Council areas.

1.3 Around each site is a Detailed Emergency Planning Zones (DEPZ), which extends to 3km in relation to the Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPPIR) and a Hazard Identification Report and Evaluation undertaken by the site's operator and approved by the ONR.

1.4 The purpose of REPPPIR is to establish a framework of emergency preparedness measures to ensure that members of the public are:

- Properly informed and prepared, in advance, about what to do in the unlikely event of a radiation emergency occurring; and
- Provided with information if a radiation emergency actually occurs.

In so doing, the aim is to protect the health and wellbeing of the community in the area.

1.5 Beyond this 3km are two further zones at 5km (middle zone) and 8km (outer zone). The zones reflect the proximity of the AWE sites to a large resident population, and potential issues linked to any incidents within the sites, and the requirement to consult with ONR on planning applications, dependent on their scale and proposed use.

1.6 The role of the ONR in the process is to advise local authorities on the hazards arising from licensed sites and what factors should be taken into account when planning applications are being considered; this is ultimately in the interest of public safety. The following diagram illustrates the extent of the DEPZ and the middle and outer zones.

2.2 The following section details the process undertaken in respect of the determination of planning applications, which has been drafted in liaison with WBC.

2.3 When a relevant application is received, the council consults with the ONR, and Hampshire County Council (HCC) as to the appropriateness of the proposals. The process undertaken by HCC involves:

- Reviewing the application as to its potential impact on the Off-Site Emergency Plan – assessing against a number of criteria, e.g. proximity to the AWE (A) site, numbers involved, type of premises;
- Consulting with WBC as the owner of the plan as to the impact on the plan; and
- WBC Consulting as necessary with the other contributors to the Off-Site Emergency Plan, and seeking their views on the appropriateness of this in light of the Off Site Emergency Plan and on their individual organisation's plans/resources.

2.4 BDBC have identified that, to date, this has generally resulted in applications being refused planning permission, other than for small-scale development in a limited number of situations. There are, however, two notable exceptions, where planning permission for larger schemes has been granted on the basis of site specific considerations, as set out below:

- Boundary Hall (BDB/67609) – permission was granted for planning permission for 115 homes and 945sqm of commercial floorspace, in line with the allocation of the site in the Adopted Local Plan 1996-2011. This matter was considered by the Secretary of State in 2011 after advice from the ONR that the matter should be referred to him. In this instance, the Secretary of State concluded that *'he attaches significant weight to the risk that those on the application site could receive a materially harmful radiation dose but, having carefully considered all relevant considerations, he concludes that the support from development plan policy and factors which weigh in favour of the proposed development together outweigh the limited conflict with development plan policy and the extremely remote possibility of the type of incident occurring which could give rise to the factors weighing against the scheme. He does not therefore consider that there are material considerations of sufficient weight to justify refusing planning permission.'*
- Burnham Copse School (14/02200/OUT) –the council's Development Control Committee agreed, on 25 February 2015, to grant planning permission for the redevelopment of a former infant school for 36 homes. In approving this application, the following reason for approval was provided: *'Members considered that the harm in terms of increase in population within the (0-3km) Detailed Emergency Planning Zone (DEPZ) was outweighed by the benefits it represented in terms of housing supply, affordable housing provision in a highly sustainable location and re use of previously developed land'*.

2.5 In both cases West Berkshire Council (and the AWE Off-Site Emergency Planning Group) advised against the proposed developments. The outcome of the first case was the decision of the Planning Inspector / Secretary of State and reflected an on balance judgment of benefit against risk in light of the specifics of the site and its status rather than being directly related to the AWE Off-Site Emergency Plan implications. The outcome of the second case has caused concerns which have, to date, not been fully resolved.

3. Policy SS3.7 – Nuclear Installations – Aldermaston and Burghfield

3.1 Policy SS3.7 has been developed by the council through liaison with WBC and ONR as described in the council's Duty to Co-operate Statement (CD08), in order to respond to the issues associated with development in proximity to AWE Aldermaston.

3.2 ONR consider that the policy, as outlined in the Submission Local Plan (with mid examination proposed modifications), provides an appropriate mechanism for considering proposals in proximity to the AWE Aldermaston and AWE Burghfield nuclear licensed sites.

3.3 In terms of specific residential allocations at Tadley, the ONR is of the view that the policy does not exclude the potential for development within the DEPZ and also does not, in principle, exclude the possibility of allocating sites for residential development inside the DEPZ within the local plan. However, the ONR have clarified that, in light of current guidance, they would expect any site allocation for residential development within the DEPZ to pass all of the following tests:

- 1) It is not reasonably practicable to achieve the same planning objective by allocating a site or sites outside the DEPZ;
- 2) It is not reasonably practicable to achieve the same planning objective by allocating a site or sites further from the nuclear site boundary;
- 3) The development does not represent an external hazard to the site; and
- 4) The development can be accommodated within the Off-site Emergency Plan.

3.4 It is considered by the council and WBC that the tests set out by ONR represent a change in approach to that which was previously discussed and agreed in the formulation of policy SS7 and the preparation of the strategy of the Local Plan, including no specific allocations in Tadley.

3.5 It is the view of WBC who co-ordinate the AWE Off-site Emergency Plan referred to in criterion 4), that the policy approach set out in the Submission Local Plan provides for some flexibility to bring forward development in proximity to the named nuclear sites. However, in the case of the AWE (A) nuclear site, and in relation to development at Tadley, WBC consider that due to the size of the community already in situ (plus approved development) the area is 'full' with an already significant impact on the responders to any incident but particularly a radiation emergency. In particular, the impact on HCC and Basingstoke and Deane Borough Council in relation to longer term

recovery by way of rehousing those affected, etc. would be prohibitive. WBC therefore considers that it would be inappropriate to allocate a specific strategic allocation in the Local Plan.

3.6 In light of the specific tests now set out by the ONR, it is the view of the council and WBC that each planning application will need to be considered on its merits, taking into account the ability to accommodate the population arising from that development in the Emergency Off-Site Plan.

Glossary

AWE	Atomic Weapons Establishment
BDBC	Basingstoke and Deane Borough Council
DEPZ	Detailed Emergency Planning Zone
ONR	Office for Nuclear Regulation
REPPIR	Radiation Emergency Preparedness and Public Information Regulations
WBC	West Berks Council

Appendix One

Organisations involved in the preparation and implementation of the Off Site Nuclear Emergency Plan:

- AWE
- Basingstoke and Deane Borough Council
- Department of the Environment and Rural Affairs
- Environment Agency
- Food Standards Agency
- Government Decontamination Service
- Hampshire County Council
- Hampshire Constabulary
- Public Health England Public Health England (CRCE) Office for Nuclear Regulation
- Met Office
- Ministry of Defence
- Reading Borough Council
- Royal Berkshire Fire and Rescue Service
- Royal Berks Hospital
- South Central Ambulance Service
- Thames Valley Police
- Thames Water
- West Berkshire Council
- Wokingham Borough Council

Appendix Two

The National Policy Statement (NPS) for Nuclear Power Generation (EN-6 Vol II page 266, July 2011) states:

“The Government has a longstanding policy regarding local demographics which would limit the radiological consequences to the public in the unlikely event of an accident involving the spread of radioactive materials beyond the site boundary. This policy is a measure of prudence over and above the stringent regulatory requirements imposed on nuclear operators in order to prevent such accidents.

The Office for Nuclear Regulation administers the Government’s policy on the control of population around licensed nuclear sites. The Office for Nuclear Regulation fulfils this function throughout the entire life cycle of the installation through consultation with local authorities. This ensures that until the installation is delicensed, the basis for site licensing is preserved through constraints placed on the surrounding population by controls on future development.”