



Ministry
of Defence

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25 February 2021

Dear [REDACTED]

Thank you for your correspondence of 15 February 2021 requesting the following information:

'I should be grateful if you would provide me with the following information under the terms of the Freedom of Information Act 2000. A copy of the Ministry of Defence's recent submission in relation to the nuclear emergency planning implications of constructing new homes in the Grazeley area close to the Atomic Weapons Establishment Burghfield'

We have treated your correspondence as a request for information under the Freedom of Information Act 2000 (the Act).

A search for the information has now been completed within the Ministry of Defence (MOD) and we can confirm that information in scope of your request is held. The information you have requested can be found in the attached documents:

- A. Letter from DNO to Wokingham Borough Council dated 12 November 2020 REF: DNO/Whd Dir/11-02-05
- B. Annex to DNO/Whd Dir/11-02-05 – AWE(B) Site Development Context Plan Illustrative Plan

Some of the information held in attachment A falls entirely within the scope of the absolute exemption provided for at section 40 (Personal Data) of the Act and has been redacted. Section 40(2) has been applied to some of the information in order to protect personal information as governed by the Data Protection Act 2018. Section 40 is an absolute exemption and there is therefore no requirement to consider the public interest in making a decision to withhold the information.

If you have any queries regarding the content of this letter, please contact this office in the first instance.

If you are not satisfied with this response or you wish to complain about any aspect of the handling of your request, then you should contact us in the first instance at the address above. If informal resolution is not possible and you are still dissatisfied, then you may request an independent internal review by contacting the Information Rights Compliance team, Ground Floor, MOD Main Building, Whitehall, SW1A 2HB (e-mail CIO-FOI-IR@mod.gov.uk). Please note that any request for an internal review should be made within 40 working days of the date of this response.

If you remain dissatisfied following an internal review, you may raise your complaint directly to the Information Commissioner under the provisions of Section 50 of the Freedom of Information Act. Please note that the Information Commissioner will not normally investigate your case until the

MOD internal review process has been completed. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Further details of the role and powers of the Information Commissioner can be found on the Commissioner's website at <https://ico.org.uk/>.

Yours sincerely,

Defence Nuclear Organisation Secretariat



Defence Nuclear
Organisation

Dr Paul Hollinshead OBE

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DNO/WHD Dir/11.02.05

12 November 2020

[REDACTED]
[REDACTED]
Place and Growth
Wokingham Borough Council
Environment
PO Box 157 Shute End
Wokingham
Berkshire
RG40 1WR

Dear [REDACTED]

**Wokingham Borough Council – Draft Local Plan
Land at AWE Burghfield, Reading, Berkshire, RG30 3RR**

1. I refer to the ongoing preparation of the draft Wokingham Borough Local Plan and write further to representations submitted by AWE plc on behalf of the Ministry of Defence in March 2020. The purpose of my letter is twofold:
 - a. to inform you of a material change in circumstances; and
 - b. formally to raise an in-principle **objection** to the proposed allocation of the Grazeley garden town (draft policy SS3).

Background

2. The Atomic Weapons Establishment (AWE) at Aldermaston, Burghfield and Blacknest are owned by the Secretary of State for Defence and deliver the warhead contribution to the nationally and internationally significant UK nuclear deterrent.
3. AWE has been at the forefront of the UK nuclear deterrence programme for more than 60 years through supporting the UK's Continuous At Sea Deterrence (CASD) programme. The AWE Burghfield site has unique national strategic importance as it is here that warheads are assembled and maintained while in service and decommissioned when out of service. It is the only site in the UK with this capability.

4. Government policy in respect of continuing to maintain a nuclear deterrent has most recently been confirmed by the Secretary of State for Defence in the announcement of the programme to replace the UK's nuclear warhead – 25 February 2020 and also in the Strategic Defence and Security Review 2015, (SDSR). The Government's commitment to investing in AWE has been consistently set out since 2005 and was similarly reiterated in the SDSR. The site is therefore required to fulfil its unique function for the foreseeable future – until at least 2040. In the event that this role was to cease there would be several decades of nuclear decommissioning tasks required on the AWE Burghfield site.
5. In order to continue its role, the AWE Burghfield site requires identification within the Local Plan and safeguarding for its unique development purposes and to sustain and deliver an associated investment programme. Currently proposed investment includes new builds along with refurbishment of existing key facilities.
6. AWE has prepared a Site Development Context Plan (SDCP) Illustrative Framework Plan for both the Aldermaston and Burghfield sites. These describe how the investment programme will be accommodated within the estate. These plans indicate potential land uses up to and beyond 2030. The plans will inform planning applications that will be submitted in the future to deliver the necessary infrastructure required to ensure the site operations are at the forefront of defence support. The plans have been subject to stakeholder involvement and were presented to the AWE Local Liaison Committee on 4 July 2018 and 13 March 2019. Wokingham Borough Council is a member of the LLC. A copy of the plan for AWE Burghfield is enclosed as an annex to this letter.
7. AWE plc holds a nuclear site licence for part of the AWE Burghfield site, issued by the Office for Nuclear Regulation (ONR) under the Nuclear Installation Act 1965 and an environmental permit issued by the Environment Agency under Schedule 23 (Radioactive substances activities) of the Environmental Permitting (England and Wales) Regulations 2016. Activities involving nuclear matter and radioactive substances are regulated by AWE plc's licence and the environmental permit and, amongst other matters, the site is subject to regular inspection by the ONR to ensure that adequate arrangements are in place for dealing with any radiation emergency arising from AWE and its operations. It is also therefore appropriate that all planning designations, and the Local Plan generally, are consistent with this extant and ongoing use and designation.
8. AWE plc must also meet the requirements of the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPiR). AWE plc, as the operator, is required, by REPPiR, to determine whether there is potential for a radiation emergency to arise due to operations being carried out on-site and advise the local authority in which AWE Burghfield is located, West Berkshire Council, of the consequences of such an emergency.
9. REPPiR places a legal duty on West Berkshire Council, to prepare and implement plans to deal with an off-site emergency and to determine the Detailed Emergency Planning Zone (DEPZ). The primary aim of the plan is to protect members of the public in the event of a radiation emergency. The purpose of a DEPZ is to set a zone around a site where it is proportionate to pre-define and implement arrangements for protective

actions which can then be implemented without delay in the event of a radiation emergency.

Material change in circumstances

10. On 22 May 2019 the government introduced the new Radiation (Emergency Preparedness and Public Information) Regulations 2019 which replaced the REPIR 2001 regulations.
11. This new legislation required AWE plc in 2019 to prepare a consequences report for Burghfield (and Aldermaston) which recommended to West Berkshire Council the minimum distance to which urgent protective actions may need to be taken and the minimum geographical extent from AWE Burghfield that requires detailed off-site emergency planning. The consequences report produced in accordance with REPIR recommended a 3,160m radial distance from the AWE Burghfield Site centre location. This is a greater distance than that which was previously calculated under REPIR 2001. The increase in the distance is due to changes in the evaluation and assessment required under REPIR 2019, not because of any changes in the inventory of materials or in the operations at AWE Burghfield.
12. West Berkshire Council was required under the new legislation to determine the DEPZ for AWE Burghfield in accordance with the recommendation as to the minimum distance identified by AWE, which it did on 12 March 2020. This DEPZ is a significant material consideration both for any development plan making process and in the determination of planning applications and accordingly has implications for any new residential developments that might be proposed within the DEPZ.

Development within DEPZ

13. West Berkshire Council, Basingstoke and Deane Borough Council and Wokingham Borough Councils have planning policies within their current local plans that address proposed developments within the DEPZ. Wokingham Borough Council is proposing a similar policy within their Draft Local Plan.
14. Policy CS8 (Nuclear installations – AWE Aldermaston and Burghfield) of the West Berkshire Core Strategy (2012) – states “*In the interests of public safety, residential development in the inner land use planning consultation zones of AWE Aldermaston and AWE Burghfield is likely to be refused planning permission by the Council where the Office for Nuclear Regulation (ONR) has advised against this development.*” The supporting text to policy CS8 explains that the Council would normally follow the ONR’s advice and that the ONR would advise against nearly all residential development within the inner land use planning zones defined on the Proposals Map, based on its model for testing the acceptability of residential development around the AWE sites.
15. Policy SS7 (Nuclear Installations – Aldermaston and Burghfield) of the Basingstoke and Deane Local Plan (May 2016) states “*Development will only be permitted where the Off Site Nuclear Emergency Plan can accommodate the needs of the population in the event of an emergency.*”
16. Policy TB04 (Development in vicinity of Atomic Weapons Establishment (AWE), Burghfield) of the Wokingham Borough Adopted Managing Development Delivery Local Plan (February 2014) states that “*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."

17. Policy HC10 (Development in the vicinity of Atomic Weapons Establishment (AWE), Burghfield) of the Wokingham Borough Council Draft Local Plan (Feb 2020) states that *"Development will only be permitted where it is demonstrated 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 the responding agencies detailed in the West Berkshire Council's AWE Off-Site Emergency Plan for the Atomic Weapons Establishment"*.

National Planning Policy Framework

18. In addition to these adopted and emerging development plan policies, the ongoing needs of operational defence sites are supported within the National Planning Policy Framework ("the Framework").
19. Paragraph 95 states that 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."*
20. Paragraph 127 says that decisions should ensure that developments will "function well... not just for the short term but over the lifetime of the development".
21. Paragraph 182 explains that decisions should ensure that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.
22. The proper application of policies limits the radiological risks and consequences to the public in the unlikely event of any radiation emergency involving the spread of radioactive materials beyond the boundary of the site. AWE Burghfield operates on a day-to-day basis in the knowledge and expectation that these policies should properly protect and soundly plan for public safety and enable activities to continue on site that assist in protecting the nation's security. These policies also safeguard and protect the future of the site in the national interest by enabling new technologies to be incorporated as necessary to ensure the nation's defence is best prepared for threats to peacetime.

Proposed Grazeley Garden Town

23. Despite these policies and principles, Wokingham's current Draft Local Plan Policy SS3 proposes the provision of 15,000 new dwellings at Grazeley. The draft policy as currently written acknowledges the existence of the former DEPZ (i.e. as it existed before 12 March 2020) and explains that the proposed new dwellings are not located within the DEPZ, but should this change the Council will work with West Berkshire District Council (as the lead local authority for emergency planning for AWE Burghfield) and partners to mitigate risk and ensure that an adequate off-site emergency plan is in place. The MOD understands that early master planning for the Grazeley proposal

sought to avoid any sensitive development uses (such as residential uses) being proposed within the then DEPZ. The supporting text to policy SS3 also acknowledges the update to REPPiR and that, if this amends the DEPZ, the Council will work with its partners to ensure that emergency planning is kept up-to-date and that an adequate off-site emergency plan is in place.

24. The requirements imposed by REPPiR 2019 have now resulted in such amendments, with the determination of a new DEPZ that now includes the entire area that was previously being suggested as an emerging proposal for Grazeley Garden Town.
25. The MOD acknowledges that significant work is likely to have been undertaken by the Council and its partners in preparing and promoting Grazeley Garden Town for residential development. However, it has always been properly recognised (as summarised above) that this was subject to the DEPZ. The location of the Grazeley Garden Town proposal is inappropriate. The MOD is concerned that any continued reliance on new residential development here is unrealistic.
26. The proximity of Grazeley to AWE Burghfield was always known to be of relevance to emergency planning whether inside or adjacent to the DEPZ. Under the previous legislation, REPPiR 2001, there was a concept of extendibility where, as a matter of good practice, an emergency planning area could be expanded rapidly to provide effective mitigation for radiation emergencies across a wider area if needed. West Berkshire Council had recognised this in their AWE Off-Site Emergency Response Plan. This included the ability to extend out the off-site emergency plan arrangements around Burghfield up to 12km (including Grazeley in its entirety). The concept of extendibility no longer exists under REPPiR 2019 but there is now provision for an outline planning zone (OPZ). For AWE Burghfield, this is a 12km area which is determined by the Secretary of State for Defence. The outline planning zone builds on the arrangements and capabilities in existing emergency plans to provide commensurate planning for low probability events.
27. In accordance with paragraphs 95, 127 and 182 of the National Planning Policy Framework, policy CS8 of the West Berkshire Local Plan, policy SS7 of the Basingstoke and Dean Local Plan and policy TB04 of the Wokingham Local Plan, AWE plc and the MOD have been consistent in applying the required regulations and requirements, whilst protecting these sites of national and international importance for defence from development that would affect adversely operational defence sites (including the sites at AWE Burghfield and Aldermaston).
28. On this basis, the MOD has no option but to raise an in-principle objection to the soundness of the proposed allocation and consequential policy. MOD urges the Council to remove the allocation and policy as a matter of urgency and focus its attention on an alternative approach that does not give rise to this unacceptable increase in risk, and the consequential policy failure that will result with what would be an unsound and unsustainable plan.

Adverse impact on this operational site

29. The MOD has consistently sought to ensure that any constraints on delivering the capabilities at Burghfield (and Aldermaston) now and in the future are minimised. The proposed introduction of 15,000 dwellings within about 1600m of Burghfield (at its nearest point) is directly contrary to safety and emergency planning advice and practice

in light of the DEPZ and OPZ required. In addition, it could have an adverse impact on the nation's security by constraining both the current and future operation of AWE Burghfield, in particular:

- a. Constraining best use and continuing consolidation, development and modernisation of the established site, placing unreasonable restrictions on the use of such a unique defence site and resource;
 - b. Restricting operations in certain facilities due to potential conflicts with current and future nuclear licensing arrangements;
 - c. Requiring the implementation of additional engineered safeguards to facilities and/or possible relocation of facilities with consequential disruption, delay and additional cost to Defence and the public purse as well as significant uncertainty;
 - d. Constraining the ability to manage any future changes in health and safety legislation; and
 - e. Setting a precedent for future housing applications and approvals in hazardous areas adjacent to AWE Aldermaston and AWE Burghfield, leading to further erosion of their utility and increasing potential adverse impacts upon the UK's nuclear deterrent.
30. Introducing substantial additional residential occupiers within 1600m of the site (at its nearest point) may also affect the ability of ONR to licence activities without changes to the nature and amount of materials held on-site which would directly impact the ability to assemble, maintain and decommission the necessary amounts of warheads for defence resilience.
31. We are aware that the ONR has made further representations about the draft local plan. The ONR confirmed they are likely to object to residential developments such as Grazeley.

Impact on emergency planning

32. Considering whether there can be an adequate off-site emergency plan for AWE Burghfield if the Grazeley development was to go ahead, in light of the relevant risks, does not result in adequate management of those risks and thus is not an appropriate basis for permitting the increase in risk.
33. In addition to the in-principle objection of proposing residential development of such a scale so close to AWE Burghfield, there is no proper evidence produced to demonstrate how, in practice, an emergency plan would be brought forward in proximity to such a site. A plan needs to demonstrate available short and medium term adequate shelter opportunities for up to 15,000 new dwellings, which is deliverable, responsive, timely and effective on that scale. A development of 15,000 dwellings involves, of course, many more individuals and their associated household needs and employment options. Development at this scale will substantially increase risk, as any individual who does not shelter in time is at increased risk. On such a sizeable increase in dwellings, the number of people potentially at risk thus also increases.

34. The issues created by such development involve not only the serious challenges of ensuring new residents are fully informed each time a new resident moves into the area, but also the difficulty of ensuring that household guests and workers within or visiting householders are similarly informed. The logistics of assisting with the shelter or evacuation of the inhabitants of 15,000 new dwellings are challenging. This is likely to lead to: increased pressure on the road networks, at precisely the time when emergency vehicles are trying to access the area; the risks associated with a "scattered" approach to residential evacuation; and an increased pressure on the resources required each financial year resulting from this development. Resource pressure is not limited to the emergency services, but also extends to healthcare services, advertising, training, and facility inspection, caused by this increase in risk, for such a scheme or schemes, across the lifetime of AWE Burghfield. The question of funding has, therefore, to be considered in perpetuity.
35. All of this creates real risks for individual households. It also contradicts the fundamental purpose of having the DEPZ and OPZ; the purpose which international learning and practice sets out for such zones. In itself this situation creates a dangerous precedent. The MOD does not consider that such fundamental problems are solvable or that appropriate, proportionate, effective and deliverable steps can be proposed for such new residential development during an emergency event to reduce vulnerability, increase resilience and ensure public safety and security (as per the requirements of paragraph 95 of the NPPF). In such circumstances the plan can and should look for alternative locations for such development.

Conclusion

36. The AWE Burghfield site is of national strategic importance for the UK's defence and delivery of the UK international defence commitments. If the site activities were to stop or be impeded, or the site had to reduce its operations or was not able to evolve and develop alongside the required technological advances, this would threaten the support to the UK's CASD programme and national nuclear security.
37. While recognising the benefits of the principle of garden town development to the wider housing needs agenda for the local authorities, the purpose of emergency planning is to limit the radiological consequences to the public in the unlikely event of an incident involving the spread of radioactive materials beyond the nuclear site boundary. AWE Burghfield operates on a day-to-day basis safely in the knowledge that the consequential policies protect public safety and enable activities to be undertaken on site that assist in protecting the nation's security and in delivering the UK's international defence commitments. Those policies also safeguard and protect the future of the site by enabling new technologies to be continually incorporated to ensure the nation's defence is best prepared for threats to peacetime.
38. The MOD considers that a policy allocating substantial new residential development within 1600m of Burghfield (at its nearest point) would set an unacceptable and dangerous precedent. It would be unsound as it would fail to be justified, effective or protect the wider security and defence requirements for the nation by restricting current and future use of the operational defence site AWE Burghfield which could compromise the UK's warhead capability wholly contrary to and inconsistent with paragraphs 95, 127 and 182 of the NPPF.

39. In addition, the proposed allocation would unacceptably increase exposure to the risks that REPPiR 2019 seeks to address. There is no justification for proposing a substantial increase in the number of residential occupiers to be located in close proximity to AWE Burghfield, contrary to policy CS8 of the West Berkshire Core Strategy, policy SS7 of the Basingstoke and Deane Local Plan, policy TB04 of the Wokingham Borough Adopted Managing Development Delivery Local Plan and again paragraphs 95 and 180 of the NPPF. It has not been demonstrated or evidenced that there is no alternative allocation that does not give rise to this dangerous precedent, policy failure and substantial increased risk to individual householders and national defence resilience, but even if it were so demonstrated within Wokingham's area, the risk is still unacceptable.
40. Finally, permitting substantial new sensitive development so close to a nuclear licensed site would set a dangerous precedent for similar developments within proximity of other nuclear licensed sites.

Yours sincerely,



Dr Paul Hollinshead OBE
Director Warhead



- Notes:**
1. Do not scale from this drawing.
 2. All dimensions must be checked on site and any discrepancies verified with landscape architect.
 3. All dimensions are drawn in mm.
 4. Landscape drawing only.
 5. All materials/items used to be as specified or alternatives to be approved by landscape architect.

- EXISTING BUILDING
- EXISTING WATERBODY/WATERCOURSE
- EXISTING TREES/VEGETATION WORTHY OF RETENTION
- EXISTING CAR PARKING
- EXISTING SPORT/RECREATION FACILITIES
- RECENTLY IMPLEMENTED STRUCTURE PLANTING

- ACCESS POINTS**
- STAFF, VISITOR + CONSTRUCTION ACCESS
 - POSSIBLE INDEPENDENT ACCESS

- INDICATIVE MAIN DEVELOPMENT PARCELS:**
- CORE BUSINESS - NEW
 - CORE BUSINESS - MAINTAIN
 - OPPORTUNITY AREA (NON CORE)
 - PARKING HUB
 - LONG TERM CLEARANCE PARCELS
 - HERITAGE ASSET

- ENVIRONMENTAL PROPOSALS:**
- PROPOSED POTENTIAL AVENUE PLANTING
 - PROPOSED POTENTIAL STRUCTURE PLANTING
 - FLOOD ALLEVIATION WITH ENHANCED BIODIVERSITY AND STRUCTURE PLANTING
 - PRIMARY STREET
 - PEDESTRIAN PRIORITY AREA
 - OPPORTUNITY FOR TEMPORARY LANDSCAPE TREATMENT ON DEVELOPMENT PARCELS, FOLLOWING INITIAL SITE CLEARANCE. TREATMENT TO INCLUDE WILDFLOWER MEADOW/GRASSLAND FOR BIODIVERSITY, AMENITY AND SUDS BENEFIT

04	03.04.19	Minor amendments following client comments	TP	AJ
03	22.03.19	Minor amendments following client comments	TP	AJ
02	18.03.19	Minor amendments following client comments	LC	AJ
01	31.10.17	First Issue	MR	AJ
Rev	Date	Description	By	CHK

Project
**AWE SDCP
BURGHFIELD**

Client
AWE

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Status
FOR PLANNING

Drawing Title
**ILLUSTRATIVE FRAMEWORK PLAN
2018 - 2031**

Job Nr 10051	Drawing Nr 10051_LD_PLN_100	Issue 04
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