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Q19c

AWE, on behalf of the Ministry of Defence, has been working with three local planning authorities [Reading, Wokingham and West Berkshire] to ensure that MOD concerns about future development close to AWE sites are both understood and addressed during the LPU process.

This response is specific to the proposal for establishing a garden settlement at Grazeley as described in this document and with the current DEPZ. Should any of the key information change within the document such as the extent of the DEPZ the MOD reserves the right to make further representations and / or objections to the Local Plan.

In any event the MOD is also undertaking assessments of the possible impact of the proposals upon AWE capabilities, which will provide more detailed evidence to underpin their concerns. This evidence will be presented, as far as possible given security constraints, at the appropriate future stages of the consultation process.

MOD has two fundamental, in-principle concerns in respect of the proposal:

1. It is contrary to National Planning Policy Framework 2018 paragraph 95 which states that “planning policies and decisions should promote public safety and take into account wider defence and security requirements” and, in particular, ensure that “operational [defence] sites are not affected adversely by the impact of other development proposed in the area”; and
2. It is contrary to National Planning Policy Framework 2018 paragraph 45 which seeks to mitigate the effect on public safety of major accidents.

Role of AWE Burghfield

The AWE Burghfield site has strategic importance, providing the capabilities for assembly, maintenance and disassembly of the nuclear warhead, together with component manufacturing facilities. The site will be required to fulfil its function for the foreseeable future. Even if this role ceases, there will be several decades of decommissioning tasks.

The AWE sites at Aldermaston and Burghfield are the only location in the UK that can provide these capabilities, so MOD wishes to ensure any possible constraints on delivering that capability and function are minimised accordingly.

Operational and Development Context

An update of the AWE Site Development Context Plan will be published this year. This considers the constraints and opportunities both within and around the sites, including the demographics as well as the specific functional requirements necessary to support the UK's Nuclear Weapon Programme.

The SDCP20 identifies the next phase of investments to 2031 and beyond. Three projects of about 9,500m² are programmed for the next 10 years.

Regulation of the AWE sites requires the delineation of public safety zones to reduce the potential impact on the public of any accident arising from site operations. The legal duties of the Office for Nuclear Regulation, WBC and AWE to protect the public from a radiation, explosive or hazardous emergency take into account both the current local population, which does not include any significant residential properties within 2km of the eastern boundary of AWE Burghfield, as well as the on-site location of current and future capabilities at AWE.

Potential Implications for AWE Burghfield Current and Future Capabilities

In general terms, if housing is introduced within these “protected” areas contrary to planning policy, it could constrain both the current and the future utility of the AWE Burghfield site and therefore threaten the support to the UK's Nuclear Warhead Programme by restricting operations.

The current licensing arrangements assume a given population density in the locality. A significant increase in population would therefore jeopardise the licensing permission. The Regulator may then be obliged to impose limitations or constraints on site operations. Any resulting time delay or material constraints on operations would inevitably have an impact on the programme. The specific impacts upon the warhead programme can be considered under two capability headings: warhead assembly / disassembly operations, and current and future component manufacturing and associated storage.

Assembly / Disassembly:

AWE Burghfield is the only location in the UK where the warhead is assembled, maintained and disassembled. For technical reasons and lack of space the facility cannot be located at AWE Aldermaston. The site also supports Nuclear Threat Reduction activities for the government.

The operations at Burghfield involve fissile material and are therefore covered by the Nuclear Installations Act 1965 and the Explosive Regulations 2014, together with the corresponding requirements of off-site emergency planning and safeguarding areas.

Introducing additional dwellings close to Burghfield may be perceived by the ONR as affecting their ability to license operations. This would disrupt the assembly / disassembly programme and therefore support to the UK's Nuclear Warhead Programme.

Component Manufacturing Facilities and Storage: component manufacture using hazardous (non-fissile) materials is undertaken in ageing facilities at both AWE sites.

A key element of the investment programme is the consolidation and rationalisation of that component manufacturing at Burghfield early in the 2020s. This may bring Burghfield within the scope of COMAH regulations, which seek to limit potential impacts on the public of an emergency.

Additional housing within the area may make it difficult for regulatory approval for operations, which could impact the warhead programme.

Conclusion

AWE Burghfield provides a unique capability in support of the UK's deterrent programme. That capability could be significantly affected by the current proposed housing development.

The extent of that impact is related to the proximity both within and adjacent to any existing and future AWE associated public safety zones.

It is, therefore, essential for the local planning authorities to continue to work with the MOD to identify an acceptable solution that also seeks to maximise the opportunity to deliver significant housing at Grazeley.

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See comments to section 4. In addition should the extent of the DEPZ change subsequent to the closure of this consultation period the AWE on behalf of the MOD reserves the right to provide further representation and / or objection in respect of the application of this policy upon the proposed Grazeley Garden settlement and it's potential impact upon national security.

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MOD reserves the right to make further representation and / or objection to the Local Plan should any significant changes takes place such an extension to the DEPZ.