

UPDATE REPORT

BY THE DIRECTOR OF ENVIRONMENT CULTURE & SPORT
READING BOROUGH COUNCIL
PLANNING APPLICATIONS COMMITTEE: 4th March 2009

ITEM NO.21

Ward: Out of Borough

App No.: 09/00163/ADJ

Address: AWE Burghfield

Proposal: Construction of main process facility and support building with 16 lightning protector towers, associated plant building, gates houses, vehicle inspection bays, sub-station buildings, security fence, access roads, hardstanding and sustainable drainage system infrastructure.

Applicant: Ministry of Defence

Date consultation received: 5th February 2009

AMENDED RECOMMENDATIONS

That West Berkshire District Council be informed that this Council

- raises no objection to the planning application
- welcomes confirmation that West Berkshire District Council's Eastern Area Planning Committee will be recommended, if permission is granted, to:
 - liaise with Reading BC regarding the discharge of Condition 18 intended to be imposed by West Berkshire relating to highway mitigation measures; and
 - include an informative requiring that the Highway Authority at Reading Borough Council should be notified of any timings and movements of abnormal loads and times of very large HGV movements during the construction phase, particularly those requiring escorts and route planning to ensure that the management of the highway can be maintained.

AND that

A copy of the Report to this Committee be sent to West Berkshire District Council for their information.

(1) INTRODUCTION

The purpose of this Update is to

1. notify Members of the response received from West Berkshire District Council to the Council's letter dated 20th February 2009 (pages 216-217 main Agenda)
2. provide further responses in relation to the application from internal consultees received since the main report in relation to this application was published
3. respond to a note received from the Nuclear Awareness Group (NAG) since the main report in relation to this application was published
4. advise in relation to a letter from the HSE sent to this Council by NAG since the main report in relation to this application was published, and
5. respond to representations received from Councillor Goodall

1. Response from West Berkshire District Council

The following was the reply from West Berkshire District Council to the officer letter appended to your main report:

Thank you for your letter, the contents of which have been noted. Unfortunately, this Local Planning Authority cannot agree to your Council's request to defer this application and you will be aware of the deadlines for determination of major planning applications as set by Central Government. It is considered that your Council has been given the statutory time period in

which to comment and Reading Borough Council's holding objection to the application will be reported to our Planning Committee.

Attached to this update is a copy of the West Berkshire District Council committee report (their committee starts this evening at 6.30pm), which includes reference to our holding objection letter.

Further liaison with West Berkshire District Council officers (Planning and Transport) has resulted in agreement to liaise with Reading Borough Council officers on the discharge of the relevant highways mitigation condition and to include an additional informative regarding notifying Reading as Highways Authority of construction traffic movements, should planning permission be granted.

2. Response from Internal consultees

The main report in your agenda was written prior to receipt of comments from transport officers and the Council's Emergency Planning Officer.

Transport comments

The site is located south of the M4 motorway, in close proximity to Burghfield village, approximately 2 miles south of the Reading boundary. The application has to be assessed, in transport terms, in the light of the effects the completed development will have on the adjacent highway network.

The proposed development will be a direct replacement for the existing facility, and will be occupied by the same number of operational workers. Accordingly, the application proposals will not generate any additional worker vehicle movements over and above the existing facility and the only additional movements will be generated by construction activity during the course of the development. Therefore the proposal, when completed, will not result in an increase in vehicle movements above the existing situation and a transport objection by this Council to the current application is not accordingly considered to be sustainable from this Council's perspective as neighbouring highway authority.

However, it is accepted that during the construction period there will be an increase in transport movements on the network, but movements of construction traffic during the course of a development is not a sustainable planning reason for refusing to grant planning permission where the control of construction can be effectively managed and controlled by the use of appropriate Conditions by the determining authority - in this case West Berkshire.

Transport Strategy have been involved in pre-planning discussions with the MoD, Highways Agency, West Berkshire Council and Wokingham Borough council regarding access routes for construction vehicles to and from the site, which fall basically in to 2 areas, HGV movements and non HGV movements. Non HGV movements can access the site from the north, south, east and west but for HGV's routes are restricted given weight and height limits on roads to the east towards J11 of M4 at Grazeley Green Road and Hartley Court Road and west towards J12 of the M4 at the Theale Swing Bridge.

The main route for HGV's delivering to the site, therefore, will be from the M4, A4 and A33, the only feasible route in will be via the A4 Bath Road and Burghfield Road, through Reading Borough. During pre planning it was asked if it was possible to provide access through the Reading West Motorway Service area to the Burghfield Road, but the Highways Agency objected to this on grounds that such a proposal was contrary to policy grounds, third party land constraints and would create an unacceptable precedent. Given the Highways Agency have the power of direction; this objection cannot be overruled.

A detailed analysis of the number of HGV's expected to use Burghfield Road has been undertaken. This has shown that the average daily increase in HGV's along Burghfield Road during the construction period will be 56 vehicles per day an increase of 15% on the existing HGV flow of 359 HGV vehicles per day, however during a section of the construction programme, for

a 5-6 week period in the winter of 2010/11 this will rise to 182 HGV movements. No details have been provided of what this peak construction involves, as the detailed programme is classified information.

Non HGV vehicles will still be able to access the site via a variety of routes so the anticipated increase in all vehicles associated with the construction of the scheme along the Burghfield Road, will be 310 vehicles, a 3% increase, in 2010, and 296 vehicles, 2.8% increase in 2012.

Therefore apart from a short peak in HGV movements in 2010/11, the increase in vehicle movements along Burghfield Road is not considered in highway terms to be material as the increase will be only temporary during construction (which as stated above are not grounds for refusal) and the final scheme will not generate any additional movements.

By way of conclusion the confirmation that RBC will be involved in the discharge of the relevant highways mitigation condition and that the applicant will be advised to liaise with RBC highways authority on construction vehicle routes meets Transport Strategy's initial concerns in this regard.

Emergency Planning Officer comments

The AWE Burghfield site is regulated by a number of bodies, including the Nuclear Installations Inspectorate and the Explosives Inspectorate and there have been no objections raised on nuclear safety grounds. It is concluded that the proposed development, which will replace old buildings with modern and improved replacement facilities for existing operations, will not result in an increase in risk from the site to the population of Reading Borough Council.

3. NAG note

An additional response to the consultation on this application has been received from Nuclear Awareness Group (NAG). Their consultation response (they have also written to West Berkshire District Council) states that this local group was set up in 1993 following the Community Inquiry which had previously been undertaken by Helena Kennedy QC in relation to AWE Aldermaston.

Council records indicate that NAG's predecessor was set up in 1994 following a report to Health & Environment Services Committee. The Group was first called the AWE Forum, then the Nuclear Sites Community Forum (Berkshire), and thereafter the Nuclear Action Group. In Planning application consultation terms this group is considered to be an "outside body" to the Council.

The NAG submission refers to whether the application site, with its proximity to the urban area of Reading, is appropriate for the development of a new nuclear facility. It also raises concerns regarding the history of flooding on the site (notably July 2007 when there was much localised flooding in the Reading area) and construction traffic impacts. Finally they raise concerns for the implications of the future planning of the urban areas around AWE (Burghfield and Aldermaston) in the light of HSE Nuclear Directorate's position on residential developments in Nuclear Safeguarding Zones around AWE sites in the area.

In response to concerns about the principle of the continuing presence of the nuclear warhead processing facility so close to populated areas it must be remembered that (a) this Council is not the determining authority in relation to the planning application submitted to West Berkshire, and that (b) West Berkshire as determining authority in relation to the application will themselves be assessing the proposal against their own adopted development plan policies and in the light of government guidance. This Council's Planning Application's Committee is not the appropriate forum for a debate on the Central Government policy for the development of nuclear arms as a defence strategy or its decision in 2005, as announced by the Secretary of State for Defence, to undertake an investment programme for AWE Burghfield and Aldermaston.

Concerns about flooding are discussed in the appended committee report to West Berkshire's Eastern Area Planning Committee at page 12. In summary the application complies with PPS25 in respect of the sequential test and exception test requirements and the Environment Agency

have confirmed that the submitted amended Flood Risk Assessment demonstrates that the development will remain safe during the 1 in 100 years plus climate change flood event and will increase the flood storage capacity on the site and therefore will not increase risk elsewhere. Several conditions related to compliance with the proposed flood risk management scheme, surface and ground water management and dealing with contamination are recommended.

The commentary from this Council's transport (Development Control) manager above and West Berkshire District Council's agreement to liaise with RBC this matter when discharging the relevant condition addresses the concern regarding construction traffic.

4. HSE letter sent in by NAG

As part of their submission to this Council, NAG have submitted a copy of a letter sent by HSE to Basingstoke and Deane Borough Council (date 12th December 2008) and copied to neighbouring planning authorities, including (amongst others) West Berkshire and this Council. A copy of that letter is annexed to this Update.

For information, HSE is a non-statutory consultee in relation to development proposals within a defined radius (referred to as a "safeguarding zone") around nuclear sites. HSE's role is the same as other non-statutory consultees i.e. advisory but in circumstances where a local authority is minded to grant planning permission against HSE's advice HSE can request the Secretary of State to call in the particular application for determination. In circumstances where HSE have health and safety concerns they will 'advise against' such planning applications.

The HSE letter expresses the HSE's general approach in relation to the planning application (for housing) submitted to Basingstoke & Deane and HSE have commented that 'the demographic margins within DEPZ's (Nuclear Safeguarding Zones) for the AWE Aldermaston and Burghfield nuclear licensed sites are...approaching unacceptable limits when judged against semi-urban population density criteria'. It is understood that the Basingstoke and Deane planning application site lies immediately adjacent to the boundary of AWE Aldermaston within its 3km DEPZ (inner zone) and where the HSE would ideally like to see low population levels. By contrast the DEPZ (inner zone) for AWE Burghfield extends to just 1.5 km.

Under consultation advice (known as PADHI) from HSE on consulting them on planning application sites around nuclear installations the request is that they should be consulted on any development likely to increase residential accommodation or an influx of non-residential population within the inner zone. For the middle zone (3km) they wish to be consulted on residential accommodation for 50+ people or influx of non-residential population of 50+ people and for the outer zone (5km) they wish to be consulted on development likely to lead to an increase of 500 people.

On this basis this Council has been consulting with HSE on developments within the Burghfield consultation zones for some time. In all cases there have been no objections raised to any of the proposals (ie Madejski stadium expansion, Green Park developments including Green Park Village and Kennet Island schemes).

The Head of Legal Services advises that the HSE letter expresses the HSE's general approach in relation to proposals for development within the "safeguarding zone". As is always the case, every planning application for development has to be considered on its own individual merits and circumstances, and "just because" HSE may have expressed a view in relation to a proposal for residential development submitted to Basingstoke and Deane, that is not considered to be relevant or material to the circumstances of this particular planning application to West Berkshire, or to this Committee's response to the consultation by West Berkshire in relation to the current application.

5. Councillor Glen Goodall comments

Councillor Glen Goodall sought clarification on a number of points and the officer response is shown in bold type:

- Does the proposed facility have to be located at AWE Burghfield? The proposed development is a “rehousing” of the existing operation, not a “new use” of the site
- Given HSE’s advice (he is referring to the Basingstoke and Deane BC application letter) what affect will this have on Reading planning applications? See comments above in response to NAG.
- What assurances do we have for the security of warheads? Warheads have been manufactured, decommissioned and transported to and from this site for many years and this activity is regulated by the relevant bodies.
- What will be the affect on the ambient radiation levels for s/w Reading? This question is outside our scope to answer but one must assume none at all from the new development.
- Will the proposal generate skilled jobs? No additional jobs will be created in the long term.
- Should the application be called in by GOSE? There has been no indication from GOSE to West Berkshire District Council that they wish to call in the application. From Reading Borough Council Officers’ view the application does not depart from adopted Reading Borough Council policies and there would appear to be no justification for this Council (Reading) to request that the Secretary of State for the Environment should intervene in this case.

Case Officer: Julie Williams