

Wokingham Borough Council
Shute End
Wokingham,
Berkshire
RG40 1BN

Date : 17 March 2026
Ref : AWE_W_0021 – 250517 (no.3)

Sent via email: development.control@wokingham.gov.uk

Dear Sir/ Madam,

250517 - Hybrid planning application (part outline/ part detailed) comprising: Outline planning permission is sought with all matters reserved for future determination, save for the means of access via Basingstoke Road, for: up to 420 dwellings (Use Class C3), an 80 bed care home (Use Class C2), 1ha of employment land (Use Class E(g), primary school (Use Class F1), local centre (Use Classes E(a), (b), (c), (f)), sports pitch and changing facility, public open space and a full application for the proposed Suitable Alternative Natural Greenspace (SANG), associated landscaping/car park at Land Off Basingstoke Road To the south and west of Spencers Wood (the Proposed Development).

I write in respect of the above planning application further to the Applicant's Covering Letter dated 24th February 2026. I have reviewed the revised documents submitted as part of the planning application and I wish to formally reiterate our stance on behalf of AWE plc (AWE) and the Ministry of Defence (MOD) and strongly object to the Proposed Development for the reasons highlighted previously in our objections dated 13th May 2025 and 8th July 2025. AWE and the MOD stand by their previous submissions that the Proposed Development should be refused planning permission.

Background to AWE

AWE is a Non-Departmental Public Body wholly owned by the MOD and operator of two licensed nuclear sites at Aldermaston (AWE A) and Burghfield (AWE B). These sites are critical to UK defence and the delivery of the Continuous At Sea Deterrent (CASD). They are the only sites in the UK which design, manufacture, maintain, and when required, disassemble our nuclear warheads. They are unique and irreplaceable sites, and their long-term operability must be ensured.

MOD has consistently sought to ensure that constraints on delivering this nationally and internationally important capability are minimised. The success of the UK's defence nuclear enterprise remains a critical national endeavour, requiring significant and sustained investment and support from HM Government.

The significance of CASD, and the irreplaceable nature of AWE A and AWE B in delivering it, inform the precautionary approach that must be applied in the case of all planning applications and appeals for development which would impact or potentially impact AWE's operations.

AWE reiterates that while West Berkshire Council (WBDC) currently has an adequate off-site emergency plan (OSEP) in place, the Office for Nuclear Regulation (ONR), as the statutory regulator responsible for the enforcement of the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPIR) as it applies to UK nuclear sites, is concerned the AWE OSEP is under strain. The Proposed Development of a care home, and school in addition to the 420 dwellings in the Detailed Emergency Planning Zone (DEPZ), represents a fundamental and substantial risk to the OSEP and as such the operations of AWE.

Before turning to the relevant policies applicable to any decision on the Application, it is necessary to highlight inaccurate terminology within the Application documents. The Applicant acknowledges that the Proposed Development is inside the DEPZ but states that the Proposed Development is located outside the Urgent Protection Action Zone (UPAZ). There is no such Zone referred to in REPPIR. The only zone which is of relevance to the Proposed Development is the DEPZ. If this development was to go ahead, then the Site would be subject to emergency planning requirements set out in the OSEP, including the application of urgent protective actions at the commencement of a radiation emergency. This is the factual situation which needs to be considered in the decision-making process.

It should also be noted that the calculations presented within the Applicant's Development Specific Emergency Plan (version 4), as submitted as part of a suite of updated documents, are not relevant to decisions which are required to be taken under REPPIR for protecting the public, establishing the DEPZ and the need to have and maintain an OSEP.

Conflict with the Adopted Development Plan

Policy TB04 of the Wokingham Local Plan is a restrictive policy which puts the burden on the Applicant to demonstrate that a proposal in the AWE B DEPZ can safely be accommodated. In order to do so, TB04 requires the applicant (and decision-maker) to have regard to both (a) the needs of 'blue light' services, and (b) the needs of the AWE OSEP. The purpose of the policy is clearly to secure public safety and the integrity of AWE B and the OSEP. It is consistent with national policy principles on protecting public safety in the National Planning and Policy Framework (NPPF) and reflective of the PPG's express consideration of the risks around population increases in safety consultation zones such as the DEPZ.

Further residential development in the DEPZ puts more people at risk of being involved in a radiation emergency. As explicitly recognised in national planning guidance: *"such cumulative development, by whatever means, leads to a rise in population within the consultation zone and a proportionate increase in the consequences should a major accident occur."*¹ Increasing population increases the societal risk: that is not just putting more people at risk of receiving a dose above background levels, it also exposes new populations to all the consequences that would flow from activation of the OSEP and being caught up in a radiation emergency and gives rise to additional risks of harm to the existing population from an increased strain on emergency resources.

While AWE and MOD acknowledge the need for housing delivery, the continuing operation of AWE B is of the upmost importance for national security and defence commitments as a site responsible for the UK's nuclear deterrent. In line with the NPPF (para 102 (b)), it is essential that AWE B should not have unreasonable restrictions placed on it as a consequence of additional residential and other development in the DEPZ. In the worst-case scenario of ONR concluding that the OSEP is inadequate and cannot be made adequate, AWE B would have to cease its nuclear activities (see regulation 10(4) REPPIR). This risk should be given considerable and substantial weight.

¹ Paragraph: 069 Reference ID: 39-069-20161209 of the National Planning Practice Guidance

As part of its site mitigation measures, the Applicant has proposed the installation and use of Air Monitoring Systems within the Development Specific Emergency Plan (2.2.4. Air Monitors) building upon previous information within the Applicant's Environmental Statement. As previously set out in our original representation, this is not acceptable to AWE. Similar mitigation measures were presented by the appellant at the Land at Hayes Drive planning appeal Public Inquiry.² AWE's and MOD's position on the inadequacy of the proposed measures (and as presented at the Public Inquiry) equally apply to the Application:

- 1) The monitoring stations will simply provide an additional datapoint with which STAC and SCG can make those decisions, which will remain reliant upon AWE and UKHSA data;
- 2) The monitoring takes place once the emergency alert has been triggered. It is not there to protect the residents from radiation;
- 3) The proposed mitigation scheme is untested. It is wholly unclear if it is even workable;
- 4) A potential condition that would require the installation of an air monitoring system that is installed and operated in accordance with a strategy approved by the local planning authority, and the maintenance of that strategy in perpetuity. Such a strategy will be dependent on third parties for its effective operation, notably the emergency planners that will be responding to an emergency at AWE B and could therefore put the monitoring data to effective use. It is unclear how the condition could be enforced against these third parties so as to ensure that the monitoring system remains effective for its stated purpose in the event of an emergency.

For each of the reasons set out above any proposed condition securing the monitoring measures would not comply with the relevant tests at paragraph 57 of the NPPF. The Secretary of State also reached this conclusion in the Hayes Drive decision² where at paragraph 21 of the Decision it states:

"[The Secretary of State] has also taken into account the appellant's offer to provide monitoring stations on the appeal site but agrees with the Inspector that the proposed condition would not meet the relevant tests"

The Emerging Local Plan

The Wokingham Borough Local Plan Update, proposed submission plan includes proposed policy SS7: Development in the vicinity of AWE. In line with National Planning Policy Framework paragraph 49, local planning authorities may give weight to relevant policies in emerging plans according to the stage of preparation. Increased weight can therefore be given to the policy which is replicated below:

1. *Development proposals within consultation zones surrounding AWE Burghfield and AWE Aldermaston as set by the Office for Nuclear Regulation or other relevant national and local agencies, and exceptionally beyond, will be managed in the interests of public safety, emergency response, and national security and defence requirements.*
2. *Development proposals will be refused unless all the following criteria are met:*
 - a) *The development, individually or cumulatively:*
 - i. *Will not pose an external hazard to the current and future operation of AWE Burghfield and/or AWE Aldermaston; and*
 - ii. *Will not adversely affect the current or future operation and security of AWE Burghfield and/or AWE Aldermaston.*
 - b) *The increase in the number of people living, working, shopping and/or visiting the proposal (including at different times of the day), individually and cumulatively:*
 - i. *Will not have an unacceptable risk to human health; and*

² [Recovered appeal: land east of Hayes Drive and north of Church Lane, Three Mile Cross, Reading, Berkshire \(ref. 3354607 - 22 September 2025\)](#)

- ii. *Will not have an adverse impact on the AWE Off-Site Emergency Plan.*
- 3. *The assessment of development proposals will in particular have regard to the following:*
 - a) *The nature, character and vulnerability of the proposed use;*
 - b) *The potential increase in population;*
 - c) *The scale of proposed development;*
 - d) *The location of the proposed development; and*
 - e) *Any specific advice from the emergency planners, AWE plc, and the Office for Nuclear Regulation.*

As explained in further detail below the position of AWE and MOD remains that the applicant has not demonstrated the Proposed Development can be safely accommodated within the DEPZ having regard to the AWE OSEP. The application is therefore contrary to Policy TB04, and emerging policy SS7 and this fact should be a material consideration in determining the current application.

National Planning Policy Framework

Whilst it is acknowledged that paragraph 3 of the NPPF requires the framework to be read as a whole, we draw attention below to specific areas of relevance to AWE and MOD.

Section 8 of the NPPF sets out policy on promoting healthy and safe communities. Paragraph 102 of the NPPF 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**” (emphasis added)*

This paragraph does not include any qualifications (for example, a reference to “materially affect” or “unduly affect”) and therefore *any* adverse effect on a defence site should be treated as being contrary to the NPPF. In this case, whilst chances of a radiation emergency at AWE B are very low, the potential impact on the local population would be high and an appropriate and proportionate step is, to where possible, avoid new development being located within the DEPZ.

It is notable the risks not only apply to any new population but also to existing populations, where the burden of managing existing residents and workers would come under more pressure if new housing increased populations and therefore the complexity of any emergency response. It is therefore important that the Application is considered within this wider context and the cumulative impact of population increase within the DEPZ.

It is clear from part b) of Paragraph 102 of the NPPF that planning decisions need to ensure that operational defence sites like AWE B are not adversely affected. This is particularly important when there are no alternative sites in the UK which can undertake the activities carried out at AWE B.

Section 15 of the NPPF sets out the policy on conserving and enhancing the natural environment and introduces the agent of change principle which seeks to prevent existing businesses having unreasonable restrictions placed on them. Paragraph 200 states: *“Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the*

applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."

Appeal Decisions

The cumulative adverse impact of large-scale development inside the DEPZs for AWE A and AWE B has been recognised by a number of planning inspectors in recent planning appeals relating to residential development. In this instance, AWE and MOD consider that the previous decisions are highly relevant in the consideration of this Proposed Development.

The appeal decisions that AWE and MOD believe to be of significant relevance in the context of the Proposed Development and, the AWE A and AWE B sites are provided within our original representation. Additionally, since the original representation, as mentioned above the Secretary of State has issued a decision on Land at Hayes Drive appeal, highlighting the importance of considering cumulative impacts of each development within the DEPZ in the context of existing and proposed development, including but not limited to commercial, industrial and residential developments. Further information is provided in the section below.

Land at east of Hayes Drive and North of Church Lane, Three Mile Cross (Appeal Ref: APP/X0360/W/24/3354607

This appeal related to the refusal by Wokingham Borough Council of a planning application for outline permission for the erection of up to 148 dwellings together with associated infrastructure including public open space. The Secretary of State agreed with the Inspectors recommendation and dismissed the appeal on 22nd September 2025.

Two of the main issues in the appeal (which AWE and MOD participated in) were the safety and wellbeing of future residents of the proposed development, and the wider public, with regard to the proximity of the Atomic Weapons Establishment (AWE) site at Burghfield (AWE(B)) and the future capability and capacity of AWE(B) to operate effectively.

We highlight the following paragraphs from the Secretary of State's decision, in particular, alongside the Inspectors report paragraphs 9.14 to 9.53:

"40. Weighing against the proposal is the unacceptable risk to the future capability and capacity of AWE(B) to operate effectively, which carries very substantial weight; the unacceptable risk of harm to the safety and wellbeing of future residents of the proposed development and the wider public, which carries substantial weight.

[....]

42....He considers that the adverse impacts of granting permission, including the unacceptable risk to the future capability and capacity of AWE(B) to operate effectively and the implications for national security, would significantly and demonstrably outweigh the benefits when assessed against policies in the Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well designed places and providing affordable homes, individually or in combination. The presumption in favour of sustainable development therefore does not apply."

It is AWE and MOD's contention that the reasons provided by the Secretary of State for dismissing the appeal and refusing planning permission for the Hayes Drive proposed development which related to (1) the safety and wellbeing of future residents of the proposed development and the wider public, with regard to the proximity of the AWE B and (2) the future capability and capacity of AWE B to operate effectively, are directly relevant to this Proposed

Development. Arguably the reasons are even more relevant here given this Proposed Development is much larger compared to the proposed development considered in the Hayes Drive decision.

Conclusion

The Proposed Development lies within the AWE B DEPZ. The Application fails to comply with Policy TB04 because the applicant has not demonstrated that the Proposed Development can be safely accommodated within the existing OSEP for AWE B, as required by policy. Any policy non-compliance should be afforded substantial weight in the decision-making process. The DEPZ for AWE B is just 7% of the area of Wokingham Borough and adherence to policy TB04 does not prevent Wokingham delivering its local housing provision.

While it is acknowledged that the Applicant has provided a Development Specific Emergency Plan, the monitoring measures proposed do not meet the relevant tests at paragraph 57 of the NPPF.

Cumulative impacts of other developments within the DEPZ on the OSEP must be considered and not just the impact of one development. The impacts of cumulative development may not always be immediately apparent, and it is not possible to evidence a tipping point where an OSEP which is adequate becomes inadequate. Cumulative development, by whatever means (except for the purposes of development of the AWE sites and facilities themselves), within a DEPZ leads to a rise in population within the DEPZ and a proportionate increase in the consequence should a radiation emergency occur.

While AWE and MOD acknowledge the need for housing delivery, the continuing operation of AWE B is of the upmost importance for national security and defence commitments. In line with the NPPF, it is essential that AWE B should not have restrictions placed on it as a consequence of additional residential and other development in the DEPZ and this is a material risk if additional pressure continues to be placed on the OSEP. AWE B is of critical national importance in ensuring national security; it is a unique site and a key component in the delivery of CASD. This importance cannot be overstated and the ability for AWE B to operate now and in the future must be protected and the impact on AWE B given substantial weight.

Furthermore, since the original representation the Secretary of State has issued a decision on the Land at Hayes Drive appeal and dismissed the appeal in-line with the inspector's recommendation. The Secretary of State's decision should be given substantial weight in the determination process.

AWE and MOD conclude that any potential benefits associated with the Proposed Development are significantly outweighed by the matters outlined above. Weighing all of the relevant factors, the Application should be refused. Development Plan policy does not support it, national policy does not support it, and the clear weight of material considerations does not support it.

Yours sincerely,

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