

NAG Ltd

nuclear awareness

16 Back Street St. Cross Winchester SO23 9SB

Planning Department (Attn Mr C. Inwards)
West Berkshire Council
Council Offices
Market Street
Newbury
RG14 5LD

8 September 2010

Dear Madam / Sir,

**Planning Application 10/01695/COMIND
Hydrodynamics Research facility, AWE Aldermaston
Comments objecting to the development from Nuclear Awareness Group**

I am writing on behalf of the Nuclear Awareness Group (NAG Ltd) to object to the planning application for a new Hydrodynamics Research Facility at the Atomic Weapons Establishment Aldermaston.

Our objection is based on the following grounds:

Lack of information about impacts

Information about the risks to public safety and the environment posed by the new facility has not been disclosed to the public or the Council. The planning application for Project Hydrus is accompanied by a 'Defence Exempt Environmental Appraisal' report, rather than a full environmental impact assessment study. The Defence Exempt Environmental Appraisal report does not include key information about processes, risks, and wastes associated with a proposed facility, and thus it is not possible to assess the scale of these impacts.

The limited information which is available about the risks associated with Project Hydrus indicates that it has the potential to pose threats to the public and the environment.

- Explosives will also be handled and detonated as an integral part of the experimental programme.
- X-ray radiation from the high powered x-ray machines used to record images during experiments poses a potential hazard to human health.
- Hydrodynamic experiments generate noise and vibration.
- Radioactive plutonium will be used in some of the tests conducted in the facility, and so radioactively contaminated wastes will be generated, which will be stored on site pending development of a National Repository for the UK's radioactive waste. Generation of waste for which there is no known disposal route is inherently unsustainable. Planning permission should be withheld until the Ministry of Defence is able to give a satisfactory explanation of how radioactive wastes arising from the facility will be dealt with.

Planning permission would not be granted to a commercial developer who submitted an application for a similar facility without demonstrating how these risks would be mitigated. The Council should not therefore grant planning permission until the Ministry of Defence has provided information about the risks posed by operations at the new facility and countermeasures to address these risks.

Construction impacts

Construction of this major development will lead to noise, disturbance, and increased traffic volumes in the vicinity. Planning permission should only be granted on condition that construction activities are limited to the period of 9 am to 5 pm (ie normal working hours) on Mondays to Fridays.

Lack of consultation

No consultation with the general public took place before the planning application for Project Hydrus was submitted. There appears to have been no effort to engage in dialogue on the application with AWE's neighbours, local communities, or the wider public. This represents poor practice – especially from a corporation of the scale of AWE – and the Council should seek evidence of public opinion on the development before coming to a decision on the planning application.

New facility, not a replacement

The proposed facility is a new development at the AWE Aldermaston site, and despite the claim in the planning application, is not a replacement for an existing facility. Project Hydrus will represent a big step upwards in AWE's capability to undertake hydrodynamics research. It will take the place of a number of existing facilities and will be equipped with more powerful equipment with the aim of surpassing current facilities.

Breach of international treaty obligations

Experiments undertaken in the proposed new facility will be used in the design of new nuclear weapons and are intended to allow the UK to cheat the Comprehensive Test Ban Treaty by acting as a substitute for nuclear weapons testing.

We consider that the planning committee should ask the Ministry of Defence to provide further information about the potential impacts of the proposed development, and if this information is not forthcoming, invite the Secretary of State to call in the application for determination at a public inquiry.

Yours faithfully,

Evelyn Parker
Secretary
Nuclear Awareness Group