REGINA -v- MS JULIET M^CBRIDE

NEWBURY MAGISTRATES COURT FEBRUARY 2006

OUTLINE OF TOPICS OF EVIDENCE

CLIENT: BINDMAN & PARTNERS

REPORT REF N^O R3071-ALDERMASTON-1

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REGINA -V- MS JULIET MCBRIDE

1 QUALIFICATIONS AND EXPERIENCE

1.1 I am John H Large of the Gatehouse, 1 & 2 Repository Road, Ha Ha Road, Woolwich, London SEI8.

1.2 I am a Consulting Engineer, Chartered Engineer, Fellow of the Institution of Mechanical Engineers, Graduate Member of the Institution Civil Engineers, Member of the British Nuclear Society and a Fellow of the Royal Society of Arts.

1.3 From the mid 1960s I was engaged as a research fellow working on defence related work in the United States, thereafter from the early 1970s through to the late 1980s I was employed as a full-time member of the academic research staff at Brunel University on behalf of the United Kingdom Atomic Energy Authority (UKAEA) and other government agencies undertaking postgraduate research in the nuclear area.

1.4 In the early 1990s I established the firm of Consulting Engineers Large & Associates which provides specialist analysis and advice in nuclear related activities, including the development, deployment, transportation and storage of nuclear warheads and weapons systems.

1.5 During the course of my career I have been involved in aspects of fundamental research, with the development and analysis of a number of technically demanding nuclear projects, including aspects of nuclear fuel reprocessing, nuclear power generation and marine propulsion, and nuclear weapons. On these topics I have given evidence to several House of Commons Select Committees; I have advised a number of overseas governments on nuclear and nuclear weapons related matters; I have visited and inspected sites of nuclear weapons testing, in the United States, Australia, Russia and Kazakhstan; and I have given evidence at the Court of Human Rights, Strasbourg on the effects of nuclear weapons atmospheric testing on British armed services personnel stationed on the sites of nuclear weapons atmospheric testing (Grapple Thermonuclear Series - Christmas Island).

2 INSTRUCTIONS

2.1 I have been instructed by Mr M Schwarz of Bindman & Partners, a firm of solicitors acting on behalf of Ms J M^{c}Bride the Accused in this matter.

2.2 In August 2005 I was instructed to provide evidence on what I might best describe as i) the 'basics' of a nuclear weapon and ii) how the Atomic Weapons Establishment (AWE) at Aldermaston (and its associate plant at Burghfield) was involved in the design and production of the UK nuclear weapons system. In November 2005 these instructions were extended to include iii) consideration of the security measures adopted by the AWE to safeguard against intruders and iv) whether these, as adopted during the intrusions by the Accused of 15 March and 12 June 2005, were proportionate to the threat supposedly imposed by the Accused.

2.3 I consider myself adequately qualified and experienced to provide evidence and opinion on this matter of R -v- Ms Juliet M^{c}Bride, particularly in that:

2.4 In the mid-1990s I was a member of a then Soviet technical working party evaluating the degradation and potential instability of the nuclear warheads that had been lost with the sinking of the Northern Fleet nuclear powered and nuclear-armed submarine *Komsomolets* in 1989. I also completed a number of inspections of Soviet nuclear weapons facilities and military-industrial complexes (the equivalent of Aldermaston/Burghfield) for an international agency, reporting thereon in the strictest of confidence.

2.5 In 2001 I headed up the specialist team undertaking the risk and hazards assessments for both weaponry (including nuclear warheads) and the nuclear reactor systems during the preparation for and throughout the salvage of the Russian Federation nuclear powered and nuclear armed submarine *Kursk*.[1] For this project I was jointly engaged by the salvers (Smit-Mammoet) and the Russian Federation government, and I was awarded a commemorative medal by the Russian authorities for my contribution to this world-first successful salvage of a nuclear powered submarine.

2.6 More recently (2004), I submitted evidence[2] to the Nuclear Regulatory Commission (NRC – United States) with respect to the then transportation of nuclear warhead material (plutonium) from the United States to France and return, highlighting within my evidence the risk of terrorist attack and the United Kingdom's failure (as the shipper of the consignment via ships operated by the British Nuclear Group) to adopt the requisite US *'Stored Weapons Standard'* for the transportation.

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1 *Risks and Hazards in Recovering the Nuclear Powered Submarine Kursk*, Warships - Naval Submarines 8, Royal Institution of Naval Architects, Conf, London, 23-24 June 2005.

2 NRC Hearing Disposition of Surplus Weapons Plutonium Using Mixed Oxide Fuel, US Nuclear Regulatory Commission Hearing, 2004:

- *Comments on Opinion on the Applicability and Sufficiency of the Safety, Security and Environmental Requirements and Measures as these Apply to the Transatlantic Shipment, European Waters and France*
- *The Role of PNTL Ships in the Atlantic Transit Phases, United States of America Nuclear Regulatory Commission, 26 November 2003,*
- Summary of the Findings of the French-sourced Plutonium Dioxide Transportation, 23 March 2004

2.7 I have published and presented papers at international conferences on security and vulnerability aspects of nuclear facilities.[3]

3 NATURE OF MY EVIDENCE

3.1 Nuclear weaponry and security arrangements are complex with each of these subjects deserving much more detail than I have presented in this evidence.

3.2 That said, I will of course expand on any of the topics that I have touched upon, expending my best efforts to do so if requested.

4 TOPICS OF INDEPENDENT OPINION FOR CROSS EXAMINATION

4.1 UK Nuclear Weapons

4.1.1 The UK's present nuclear weapons system is Trident, comprising four nuclear powered *Vanguard* class (SSBN) submarines, each providing a launch platform for Trident D5 missiles that carry and deliver to target nuclear warheads. Each *Vanguard* class submarine is capable of launching up to sixteen Trident missiles, each of which has a maximum payload of 12 nuclear warheads, although other launch and MIRVs (multiple independently-targetable re-entry vehicles) packages may also be deployed in place of a number of the warheads carried. However, the UK Government 1998 Strategic Defence Review restricted the total nuclear warheads deployed on each submarine to 48 so, with one SSBN submarine guaranteed to be fully operational at any time, the UK has a capability to attack 48 targets within a range of about 7,500km from the location of the submarine. The submarine itself can be positioned anywhere in the deep seas of the World.

4.2 UK Nuclear Weapons System Design, Development & Manufacture

4.2.1 The UK Trident nuclear weapons system is complex: The submarines are designed and manufactured in the United Kingdom but the key aspects of the nuclear propulsion reactor are licensed from the United States and the UK is dependent upon the United States for the final stages of enrichment of the highly enriched uranium fuel used in the reactor cores. The Trident missiles are effectively 'leased' from the United States, with

3 A) Submission to the International Atomic Energy Agency - Convention on the Physical Protection of Nuclear Material (CPPNM) – IAEA InfCirc/274 & InfCirc/225/Rev.4 - *IAEA Requirements on Design Basis Threat Assessment - Non Compliance of Eurofab LTA shipment from US to France on UK Vessel: Security and Physical Protection Issues*, IAEA 20 September 2004 – B) IPPNW Global Health Watch, Rethinking Nuclear Energy and Democracy after September 11, 2001, '*The Aftermath of September 11: Vulnerability of Nuclear Plants to Terrorist Attack*', International Physicians for the Prevention of Nuclear War and Physicians for Social Responsibility, September 2004 – C) *The Implications of September 11th for the Nuclear Industry*, Monitor, Royal United Services Institute, London, February 2003, V2 No 1

the missiles being serviced in the United States, the missiles depend upon target acquisition, guidance data and flight control parameters that derive from systems under the control of the United States, and the launch control equipment, targeting electronics and software installed on each submarine are of US design and manufacture.

4.2.2 In the earlier years of the UK's nuclear warhead design and development programme, there were a number of facilities nationwide that contributed elements of the weapons development programme although with rationalization, today, the nuclear warheads deployed in the Trident system are mostly designed and manufactured, and periodically refurbished at Aldermaston and Burghfield. Other facilities, such as Fort Halstead at Orpington Kent, are also involved in the research, development and procurement of nuclear warhead components.

4.2.3 The fissile and nuclear materials used in the UK nuclear warheads are prepared and/or drawn from UK stockpiles of unsafeguarded materials which are held at locations such as Sellafield in Cumbria. These stockpiles include 'weapons grade' plutonium, highly enriched uranium, depleted uranium, tritium and other nuclear substances used in the fissile pit or heart of a nuclear warhead and, particularly, in the initiator component that boosts the nuclear detonation sequence.

4.2.4 During the early years of the UK development programme there was considerable exchange of technology and know-how with the United States that speeded the UK's move from atomic warheads (A-Bomb) to the much more powerful thermonuclear warhead (H-Bomb). I understand that there are, to this day, continuing exchanges of nuclear warhead technology and design, and quite possibly nuclear materials, between the UK and the United States.

4.2.5 Bilateral arrangements for the sharing and provision of nuclear weapons (ie the nuclear warhead and its delivery systems) technology and information materials between the United Kingdom and the United States are enabled by the 1958 US-UK Defence Agreement.[4]

4.2.6 The nuclear warheads are stored at the RNAD[5] Coulport in the Clyde area and loaded, complete with the Trident missiles, onto the submarines at the Coulport loading jetty.

4 Agreement between the Government of the United States of America and the Government of the United Kingdom of Great Britain and Northern Ireland for Cooperation on the uses of Atomic Energy for Mutual Defense Purposes, as amended, 23 May, 1994

5 RNAD - Royal Naval Armament Depot

Consignments of nuclear warheads are routinely transported to and from Coulport to Aldermaston/Burghfield by road in convoys of vehicles under escort of armed troops. There are other road-borne consignments of nuclear warhead materials and components to Aldermaston and Burghfield.

4.2.7 I have provided this briefest of outline of where the UK's nuclear weapons system design, manufacturing and deployment activities take place to illustrate where a person of mind to protest about nuclear weapons might do so.

4.2.8 Obviously, being the location of the design, development, manufacture and refurbishment of the UK's nuclear warheads, the AWE plant at Aldermaston might be considered by such a person to be the most appropriate place to protest.

4.3 Ongoing Development of the UK's Nuclear Weapons Arsenal

4.3.1 As I have previously touched on, the current Trident nuclear weapons system comprises a number of independently-targetable warheads that are each programmed to home in on preselected targets within an accuracy of about 100m. It follows that with such delivery accuracy and knowledge of the type of target and the required damage severity, each homing nuclear warhead could be optimised or matched to the specific type of target, and the delivery and damage severity objectives.

4.3.2 In other words, the basic framework design of the warhead includes for varying the weapon's operational parameters, for example the magnitude of explosive yield; whether the detonation is to occur at altitude (air burst), at ground level or undersea; if it is to maximise emf[6] generation to disrupt electronic communications, etc.; if there is to be a greater emission of neutron irradiation (a radiation enhanced or the neutron bomb); and if individual warheads are to be deployed in clusters to maximise blast and the ensuing firestorm damage.[7]

4.3.3 In effect, the requirement to match the weapon to any target places an ongoing requirement to modify and adapt the weapon system with this particularly applying to the nuclear warhead design. Obviously, as potential areas of geo-political conflict emerge there is likely to arise a changing targeting strategy, and thus a requirement for

6 emf – electro magnetic force or pulse which is capable of generating very high voltage potentials across conductors sufficient to burn-out unprotected electronic circuits, etc..

7 Target types will vary from deep bunkers acting as troop barracks, arsenals and/or military command centres for which ground detonating bunker-busting configuration is used; a mid-altitude air-burst against troop and equipment emplacements; relatively low yield a high neutron emission bursts against large troop deployment on open ground, multiple clustering over or nearby large urban areas to maximise radioactive fall-out downwind and firestorm damage; and so on. Different target matches will also require a

optimisation and target matching of nuclear warheads in the UK nuclear arsenal. Similarly, there will be a requirement to review the nuclear weapon system functions and performance to match the development of counter-attack systems, and/or as the delivery systems develop and their accuracy improves.[8]

4.3.4 My understanding is that virtually all of the design and development work necessary to maintain flexibility and target matching of the UK's nuclear warhead is undertaken at AWE Aldermaston.

4.3.5 Once again I note that AWE Aldermaston, being the centre of ongoing modification and adaptation of the UK nuclear warhead arsenal, might be the place chosen by a person so minded to protest over the UK's possession of a nuclear arsenal.

4.4 Future Development of UK Nuclear Warheads and Weapons Systems

4.4.1 In addition to the Trident submarine launch platform, the United Kingdom armed services have in place arrangements for, and are capable of deploying and firing artillery-sized (gun barrel) warheads procured by prior agreement from the United States nuclear warhead arsenal. This unpublicised arrangement is endorsed by the fact that several classes of British Army artillery pieces are nuclear capable.

4.4.2 United Kingdom armed forces also deploy other weapons delivery systems that are nuclear capable. For example, Royal Navy attack (SSN) submarines (7 in total presently *Swiftsure* and *Trafalgar* class increasing to 10 with the delivery of the 3 Astute class SSN submarines) are armed with Tomahawk TLAMs (Tactical Land Attack Missile) which are potentially nuclear-capable.[9]

4.4.3 Should the UK government choose not to renew the ageing Trident weapons system (SSBN submarines, Trident missiles and nuclear warheads) but retain a nuclear capability (a decision that has to be made in the next parliament) then a need will arise to develop new nuclear warheads suited to the weapons delivery systems then in place and, of course, the expected types of strategic and tactical roles politically foreseen in advance.

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specifically allocated warhead yield from the present maximum strategic 100 to 120kTon rating of the thermonuclear version of the UK warhead, reducing this yield to the so-termed 'sub-strategic' yield which is probably around 1 to 5kTon, 10 to 18 kTon and above depending on the particular warhead configuration.

8 This is because a nuclear warhead forms an integrated element of a weapons systems overall – the physical package of the warhead has to be capable of withstanding the rigours placed upon it by the delivery system, such as high rates of acceleration, vibration, shock loading etc., so even a small change in the way in which the delivery system functions and/or performs will require the nuclear warhead to be proved against that environment.

9 The United States navy nuclear powered attack submarines deploy the nuclear capable version of the Tomahawk TLAM carrying the US W80 nuclear warhead of 1 to 300kton nuclear yield. To carry nuclear warheads some further modification would be required of the SSN submarine bow compartments and arming and fire control systems.

4.4.4 In my assessment, developing a new warhead to suit some future role, perhaps a tactical warhead suited for delivery by a TLAM, would occupy AWE some 10 or more years whilst maintaining the existing Trident warheads fit for service until the Trident capability was withdrawn. The phase-out of Trident, essentially set by the service life of the *Vanguard* class of SSBN delivery platform submarine, commences about 2020 and becomes ineffective by about 2027,[10] although the withdrawal and replacement of Trident might be accelerated by other tactical and political considerations.

4.4.5 Recent technological and human resources investment at Aldermaston suggest to me that AWE is pursuing a development programme that will serve not just to improve the safety of the existing nuclear arsenal of nuclear warheads[11] but that these facilities[12] are dual-capable and provide design and research capability for the development of new, generally (physically) smaller, nuclear warheads.

4.4.6 The introduction of this new capability at Aldermaston is very similar to the combined *Reliable Replacement Warhead* (RRW) and *Life Extension Program* (LEP) now underway in the United States. When reviewing the role of RRW the *House Armed Services Committee*[13] claimed that its value was that it *'reduces or eliminates the need for nuclear testing'* which is certainly not at all related to safety and reliability of an existing nuclear arsenal stockpile.

4.4.5 Once again I note that AWE Aldermaston, now being resourced in such a way to enable the design and development of a new generation of nuclear warheads to be developed there, might be the place chosen by a person so minded to protest over the UK's possession of a nuclear arsenal.

4.5 Indiscriminate Nature of Nuclear Warheads and Weapons of Mass Destruction

4.5.1 Even if it is accepted that a modern weapons delivery system is capable of reliably placing a nuclear warhead within a small and well defined target zone, the immediate blast and irradiation affects and, over the interim and longer terms, the radioactive contamination and consequences from the nuclear detonation cannot be arranged to

10 This is because to keep one submarine at sea at any time requires a flotilla of at least 3 and ideally 4 operational submarines.

11 This is the claim of proponents of the expansion at Aldermaston although there is no logical rational how ORION will contribute to this, since much of the function of this facility is to be used to seed the advanced computer simulations of the nuclear detonation sequences required as a design tool in the absence of nuclear testing.

12 The AWE Aldermaston development programme includes the installation of a super-computer, intensive recruitment in the science and engineering fields increasing the workforce by around 1,000 personnel and, particularly, the ORION laser high energy system which will enable conditions of nuclear fission and fusion to be replicated at miniature scale.

13 *U.S. Congress. Senate. Committee on Armed Services*. National Defense Authorization Act for Fiscal Year 2006. Report to accompany S. 1042. May 17, 2005.

discriminate against and be isolated from members of the public and other non-combatants in the near- and far-field localities of a targeted nuclear weapons strike.

4.5.2 Thus, I am able to conclude that all nuclear weapons systems, irrespective of the size and type of nuclear warhead deployed, violate the principle of discrimination and are weapons of mass destruction.

5 MS M[C]BRIDE'S INTRUSION AND THE SECURITY RESPONSE INVOKED

5.1 My attention has been drawn to a number of Witness Statements and other documents produced by the Crown Prosecution Service, these are (with my emphasis) relating to the incident of 12 June 2005:

i) **Shift Manager/Health Physics Site Daily Report – Monday 13 June 2005**

I believe this to be *'control'* as referred to be PC Chalinor, here I refer to the item under Friday refers to *'MDP report **well known** protester arrived at camp'*

Under Sunday, 09.50 *'site tannoy message security alert at zone 98 staff to stay indoors, stood down at 10.18. **Well known protestor** trespassed on MoD Land at zone 98 next to Burnham gate. At 09:53 she was apprehended and arrested at 09:55. . '*

ii) **MoD Police Incident report 09:50 Hours 12/06/05**

Under Summary states that *'Juliet MCBRIDE climbed both the outer and inner fence at AWE Aldermaston and entered site at Zone 98'*. Then refers to tannoy address going out at 09:52, detained at 09:53 and arrested at 09:55.

iii) **MoD 'A Practioners** [sic] **Guide to Policing the Activity of Trespassers on Ministry of Defence Property', Western Division, February 2005**

Particularly, par 21 p7 which states *'On units where a degree of disruption is caused to the general workforce or other persons present at any given time there should be no problem in proving this offence'* and para 3, p 13 *'What will be required for evidential purposes is a statement from a responsible person who was present on the site AT THAT TIME, to prove that disruption to site was, or was likely to have been caused by the protestors [sic] activities'*.

and

relating to the earlier incident of 15 March 2005:

iv) **Witness Statement of S P Matthews of 15 March 2005**

Particularly the description relating to making the work department 'safe' in '*that ongoing work has to be shut down and all work areas secured. All employees then have to go undercover . . '* and where he states *'This department works with "high hazard materials" and is situated in the* ***South East corner*** *of the establishment. . '*

v) **Witness Statement of M Firth of 7 April 2005**

Particularly where he sets out the need for action, being *'If local arrangements require it then work will cease within certain buildings to ensure the safety of staff and investigating officers'.*

vi) **Witness Statement of G L Chalinor PC 1944 of 15 March 2005**

Particularly the description relating to his immediate recognition of Ms M^{c}Bride *'Whilst on AL31 duties I was tasked by control to attend a fence down at Zone 6. At 11.31 I arrived at the scene and saw a woman who I know to be Juliet McBride climbing over the inner fence. It was broad daylight on a bright day and the visibility was good'*, thereafter he refers to Ms M^{c}Bride in the familiar style as *'Juliet'.*

5.1.1 Finally, I have attached a satellite photograph of the AWE Aldermaston site[14] overall (FIGURE 1) and details of the site showing the locations of Ms M^{c}Bride's intrusions and points of arrest on 15 March and 12 June as FIGURES 2 and 3 respectively.

5.1.2 **Ms M^{c}Bride's 15 March Location and Threat to AWE – Her Whereabouts**

5.1.3 Mr Matthews states that on 15 March there was a security alert broadcast on the establishment tannoy system from which I assume he means that every part and building occupants in the entire AWE compound marked on FIGURE 1 was made aware of the alert. The e-mail memorandum from Martin Firth of 8 March notes that '*staff in specified areas are to stay within buildings while the investigation takes place'* but it does not specify which buildings are included within the *'specified areas'*.

5.1.4 My understanding is that it is only Mr Matthews that has given a statement that his department was closed down (*'made safe'*) so, in the absence of any other statements, I

14 This is a 2005 GeoSat image located at 51.21.57.37N-1.08.11.41W which is freely accessible on Google Earth.

shall assume no other buildings and activities on the AWE Aldermaston site were so required to cease work because of Ms M^{c}Bride's presence.

5.1.5 The point here is that Mr Matthews gives the location of his building to be at the South-East corner of the site, that is where Ms M^{c}Bride climbed over the outer fence but she stayed within the sterile security strip between inner and outer fences – see FIGURE 2.

5.1.6 Again referring to FIGURE 2, Ms M^{c}Bride was arrested at the mid-point of the southern boundary of the site according to PC Chalinor immediately who recognised that it was Ms M^{c}Bride climbing over the inner fence at 11.31 hours and who apprehended her minutes later within a short distance of her entry into the site.

5.1.7 There are two points of interest here:

5.1.8 First, Ms M^{c}Bride was not within the vicinity of Mr Matthews's buildings (about a 15 minute walk distant to the East) so it not possible that she, alone, could have represented any threat to that particular group of buildings.

5.1.9 She could only have represented a threat to the buildings that Mr Matthews refers by having in her possession a device capable of striking over such a distance (about two-thirds of a mile). However, she is a slightly-built woman who would have difficulty concealing any type of munitions (ie an RPG)[15] that had the capability and range to threaten Mr Matthews's buildings.

5.1.10 Secondly, Ms M^{c}Bride is clear in her recollection of where she climbed the outer fence into the sterile strip and then, keeping in the strip, walked along to the mid-point of the southern boundary, in all occupying her about 15 or so minutes. In other words, she breached the security system 15 or so minutes before she was detected by 'control' and apprehended by PC Chalinor.

5.1.11 I find it difficult to comprehend that she was able to proceed for 15 or so minutes apparently completely undetected. The purpose of the sterile strip between the inner and outer fences is to provide an environment free of fauna and flora (ie sterile) giving unrestricted sight and thermal imaging lines to enable reliable detection of intruders.[16]

15 RPG – Rocket Propelled Grenade.

16 Perhaps it is not appropriate here to discuss the other means of detection employed on high security sites such as AWE Aldermaston – I myself live immediately adjacent to a high security military site (the Royal Artillery) and I am well aware of the security system active along my site boundary

5.1.12 I have to conclude that either the security system at Aldermaston is deficient in this important respect or that, if it is functioning fully as I would expect it to be, that for some reason the *'control'* referred to by PC Chalinor knew of Ms McBride's presence and decided not to broadcast the tannoy alert until she had climbed the inner security fence.

5.1.13 In this respect, I note that PC Chalinor was directed by *'control'* to the exact location where he witnessed Ms M[c]Bride in the act of *'climbing over the inner fence'* so, it follows, *'control'* must have been tracking her progress along the sterile strip.

5.1.14 To me, the procedures adopted to establish and secure the threat apparently represented by Ms M[c]Bride seem very odd. Even if she was undetected climbing the outer fence, she remained in and moved about the sterile area for at least 15 minutes during which, surely, her presence would have been detected in an area bristling with transducers. Then once she had been apprehended and recognised to be that *'well known protestor'* (who had a consistent and harmless modus operandi of protesting alone over many years) and was in the custody of a police officer (PC Chalinor), it was then decided to raise a security alert over the entire Aldermaston site and, in particular, close down activities in a group of buildings about two-thirds mile distance even though any possible threat from Ms M[c]Bride had been contained.

5.1.15 I might reluctantly conclude that, on that day at least, security procedures at AWE Aldermaston were bungled and incompetently managed and certainly an overreaction to the actual threat posed by Ms M[c]Bride or, if I allow some benefit of doubt, could it be that Ms M[c]Bride's seemingly harmless and non-threatening incursion into Aldermaston was used to trigger a security exercise to test recently introduced security procedures?[17]

5.2 **Incident and Arrest of 12 June 2005**

5.2.1 A similar confused situation seems to have arisen during the second incident when Ms M[c]Bride entered the North-West section of the site – see FIGURE 3.

5.2.2 In this incident she climbed both outer and inner fences into the site at 09:50 hours and she was apprehended at 09:53 hours with a tannoy announcement being made at 09:52

17 Interestingly, Ms McBride's 'challenge' to the security systems at Aldermaston occurred just a week following the introduction of new security measures by Mr Firth, as outlined by his memorandum e-mail of 8 March 2005, thus inviting the question was this the first opportunity to safely test the new arrangements.

hours.[18] In fact, Ms M[c]Bride had been recognised by 'control' as she climbed the outer and inner fences and entered the site at 09:50 - see para 5.1i).

5.2.3 My point here is that the detection, recognition of Ms M[c]Bride, and her arrest into custody occurred within a very few minutes under what seems to have been a well controlled operation so why was it necessary, in this instance, to close down a section of the site when, in fact, the security threat could only have been assessed to be minimal and incident was entirely under control?

5.2.4 Again, I conclude that the reaction of the security personnel at AWE Aldermaston on this occasion was an overreaction and not at all proportionate to the minimal (ie nuisance value) threat that the presence of Ms M[c]Bride posed.

5.3 **Relating Ms M[c]Bride's Activities to the Broader Security Context**

5.3.1 It might be alleged that even though, in immediate security terms, Ms M[c]Bride's activities are of nuisance value, the preoccupation of the police at AWE with Ms M[c]Bride might enable a person or persons with actual malevolent intent to gain access to the site.

5.3.2 This is flawed reasoning because Ms M[c]Bride is uniquely the *'well known protestor'* who has an established and consistent modus operandi over many years. Her presence and activities are readily detected, her containment and arrest requires the minimum of security personnel attendance and, I understand, that once in custody she is co-operative and not obstructive.

5.3.3 Indeed, Ms M[c]Bride's activities should have been categorised by the AWE security personnel in its demonstration that its security systems are capable of responding to a range of threats. Because she and her modus operandi are well established, Ms M[c]Bride would be seen as a *reasonably foreseeable* threat for which there would be a rehearsed proportionate response and containment. In my opinion, Mr Firth's arrangements to shut down parts of the plant is entirely disproportionate to the nuisance value that Ms M[c]Bride is known to represent and, when applied at this trivial level of threat, could undermine the response to a greater threat should such arise – in other words, an over response could be accompanied by the risk of *'crying wolf*'.

18 There are 2 minutes discrepancy of the reporting etc between the police officer report and the shift manager's log – all within a normal interpretation of reading a wrist watch.

6 SUMMARY OF MY OPINION AND CONCLUSIONS

6.1 I consider that:

i) all nuclear weapons systems, irrespective of the size and type of nuclear warhead deployed, violate the principle of discrimination and are weapons of mass destruction;

ii) the Atomic Weapons Establishment (AWE) at Aldermaston (and its associate plant at Burghfield) are involved in the design and production of the UK nuclear weapons system and that this includes a continuing design and development function related to the changing target and military requirements of the Trident warheads currently in active deployment, and a capability (if not underway now) for the design and development of new nuclear warheads; and

iii) that the measures implemented by AWE in closing down parts of the AWE activity because to the presence of Ms M^{c}Bride on site to have been entirely disproportionate to the actual nuisance nature of the threat that she presented.

JOHN H LARGE

LARGE & ASSOCIATES
CONSULTING ENGINEERS

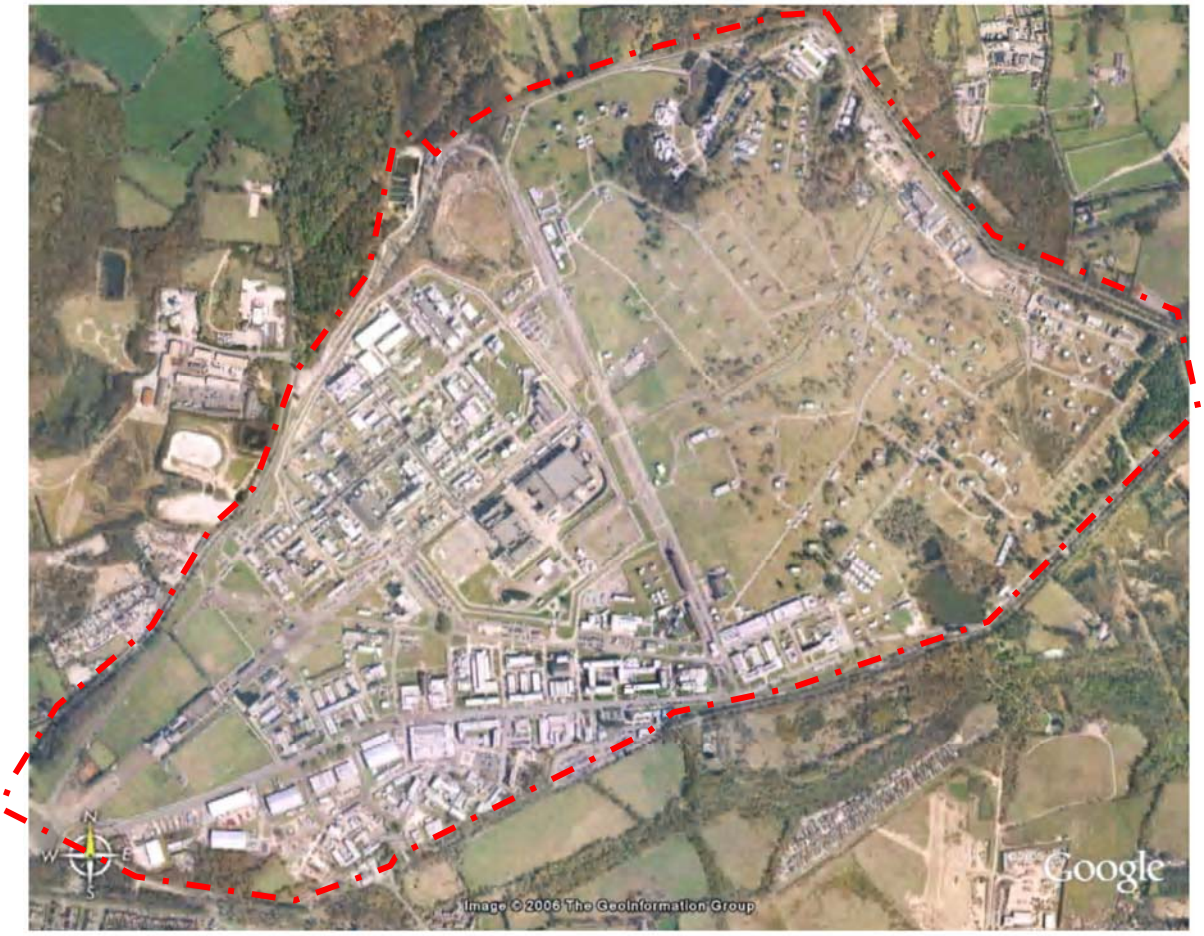

FIGURE 1 AWE ALDERMASTON

FIGURE 2 INCIDENT OF 15 MARCH 2005

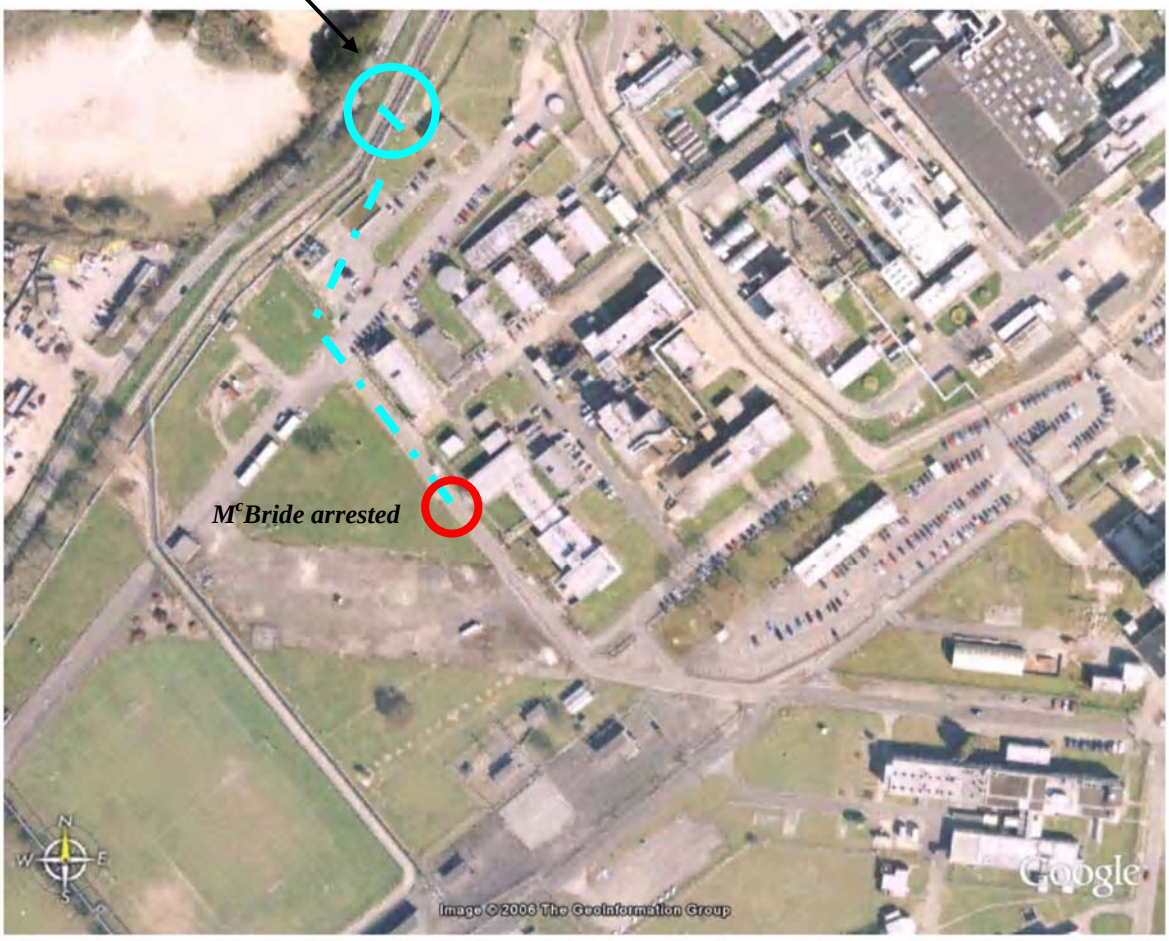

FIGURE 3 INCIDENT OF 12 JUNE 2005