



Defence Infrastructure Organisation

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Your reference:
Soham and Barway Submission Version
Neighbourhood Plan
Our reference:
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Strategic Planning Team
East Cambridgeshire District Council
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Dear Sir/Madam

It is understood that East Cambridgeshire District Council are consulting on the submission version of the Soham and Barway Neighbourhood Plan.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.

Paragraph 101 of the National Planning Policy Framework (December 2023) requires that planning policies and decisions take into account defence requirements by '*ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.*' Statutory consultation of the MOD occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued to Local Planning Authorities by the Department for Levelling Up.

Copies of these relevant plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.

The Soham and Barway Submission Version Neighbourhood Plan consultation authority area will both contain and be washed over by safeguarding zones that are designated to preserve the operation and capability of defence assets and sites including RAF Mildenhall and RAF Lakenheath.

The review or drafting of planning policy provides an opportunity to better inform developers of the statutory requirement that MOD is consulted on development that triggers the criteria set out on Safeguarding Plans, and the constraints that might be applied to development as a result of the requirement to ensure defence capability and operations are not adversely affected.

To provide an illustration of the various issues that might be fundamental to MOD assessment carried out in response to statutory consultation, a brief summary of each of the safeguarding zone types is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.

- The airspace above and surrounding aerodromes is safeguarded to ensure that development does not form a physical obstruction to the safe operation of aircraft using that aerodrome. Zones are drawn that trigger consultation on development of various heights to ensure that their effect on the protected airspace above and surrounding an aerodrome is assessed and, if necessary, mitigated. These zones also indicate areas where development might reduce the capability or otherwise compromise the operation of technical assets such as communications, navigation, or surveillance systems including radar. In addition to permanent physical development within these zones, the use of cranes, piling rigs or other tall plant or equipment to implement development may also be of concern.
- Birdstrike safeguarding zones with a radius of 12.87km are designated around certain military aerodromes. Aircraft within these zones are most likely to be approaching or departing aerodromes and therefore being at critical stages of flight. Within the statutory consultation areas associated with aerodromes are zones that are designed to allow birdstrike risk to be identified and mitigated. The creation of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect. This can include landscaping schemes associated with large developments, as well as the creation of new waterbodies such as ponds, wetlands and/or attenuation basins. This would also include both on and off-site provision of Biodiversity Net Gain (BNG). Sustainable Drainage Systems (SUDS) additionally provide an opportunity for habitats within and around a development. The incorporation of open water, both permanent and temporary, provide a range of habitats for wildlife, including potentially increasing the creation of attractant environments for large and flocking bird species hazardous to aviation and therefore may be subject to design requirements or for management plans to be applied.

In addition to the safeguarding zones identified, the MOD may also have an interest where development is of a type likely to have any impact on operational capability. Usually this will be by virtue of the scale, height, or other physical property of a development. Examples these types of development include, but are not limited to:

- Solar PV development which can impact on the operation and capability of communications and other technical assets by introducing substantial areas of metal or sources of electromagnetic interference. Depending on the location of development, solar panels may also produce glint and glare which can affect aircrew or air traffic controllers.
- Wind turbines may impact on the operation of surveillance systems such as radar where the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations, potentially resulting in detriment to aviation safety and operational capability. This potential is recognised in the Government's online Planning Practice Guidance which contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of 2m or more; and,
- Any development that would exceed a height of 50m above ground level. Both tall (of or exceeding a height of 50m above ground level) structures and wind turbine development introduce physical obstacles to low flying aircraft
- Development, regardless of height, outside MOD safeguarding zones but in the vicinity of military training estate or property.

The proposed new Policy SBNP12 - BIODIVERSITY AND WILDLIFE HABITATS identifies that "In addition to the mandatory Biodiversity Net Gain requirements as established by the Environment Act 2021, the following additional requirements should be met:

bi. The minimum biodiversity net gain for all qualifying developments shall be 20%, rather than the national mandatory minimum of 10%, unless demonstrated through an independent assessment that it would make the development unviable."

The MOD request that; when drafting policy and guidance which addresses biodiversity, ecology, and Biodiversity Net Gain; East Cambridgeshire District Council bear in mind that some forms of environmental improvement or enhancement may not be compatible with aviation safety. Where off-site provision is to provide BNG, the locations of both the host development and any other site should both/all be assessed against statutory safeguarding zones and the MOD should be consulted where any element falls within the marked statutory safeguarding zone.

In order to provide a broader representation of MOD interests, and to ensure prospective developers are aware of the potential implications of these forms of development, it is requested that provision is made in 'POLICY SBNP19 - RENEWABLE ENERGY" to communicate that applications for renewable energy development which would not compromise, restrict or otherwise degrade the operational capability of safeguarded MOD sites and assets will be supported

I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.

Yours sincerely



Chris Waldron
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