



Defence  
Infrastructure  
Organisation

Christopher Waldron

Ministry of Defence

[Redacted]

Your reference:  
Draft Local Plan Consultation Regulation 18  
Our reference:  
10061870

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Planning Policy Team  
South Kesteven District Council  
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The Picture House  
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25<sup>th</sup> April 2024

Dear Sir/Madam

I write to confirm the statutory safeguarding position of the Ministry of Defence (MOD) in relation to South Kesteven District Council Draft Local Plan Consultation Regulation 18 document.

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.

The area covered by any South Kesteven District Council Draft Local Plan 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 Barkston Heath, RAF Cranwell, RAF Waddington, RAF Wittering, RAF Syerston, RAF Cottesmore and the Eastern WAM Network).

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

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.

Should any Ministry of Defence operational site or asset cease to be operational and/or no longer require the benefit of a designated Statutory Safeguarding Zone, the MOD will notify DLUHC to initiate the withdrawal of those plans.

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 the main safeguarding areas of concern 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. Colour coded zones are marked on safeguarding maps that provide heights which, if proposed development would reach or exceed them, would trigger MOD consultation. 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 change of use of land to allow/facilitate flying activities; and 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 and marked on safeguarding maps with a heavy dotted line. Aircraft within these zones are most likely to be approaching or departing aerodromes and would be at critical stages of flight. Within these statutory consultation zones the creation or enhancement 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:

- the landscaping schemes associated with developments including the provision of green/brown roofs, or roof gardens. This would also include both on and off-site provision of Biodiversity Net Gain (BNG). 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 MOD consulted where any element falls within the marked statutory safeguarding zone; and/or

- the creation of new waterbodies such as reservoirs, wetlands, ponds and/or attenuation basins, balancing ponds and other elements associated with sustainable drainage systems.

Technical assets that facilitate air traffic management, primarily radar, navigation, and communications systems are safeguarded to limit the impact of development on their capability and operation. The height, massing, and materials used to finish a development may all be factors in assessing the impact of a given scheme. Developments that incorporate renewable energy systems may be of particular concern given their potential to provide large expanses of metal at height, for example where proposals include a wind turbine or roof mounted solar PV system.

Statutory safeguarding zones are designated around Military explosives storage sites, to ensure that development and land uses will be compatible with MOD capability. Within these zones, where applicable, requirements relating to the siting, design, and construction of buildings, or changes to land use may apply. In principle, the MOD does not object to land in the outer explosives safeguarding zone being developed for residential, commercial, and industrial land use purposes. Any buildings within this zone must be 'non-vulnerable' to blast effects, that is of robust construction, so should an explosive event occur, the structure would not collapse or sustain damage that could cause critical injury to the occupants. Of particular concern within this zone are tall buildings (in excess of 3 storeys), light weight construction and large areas of glazing. The MOD will object to development proposals which support people living, working and congregating within the inner explosives safeguarding zone,

Where development falls outside designated safeguarding zones the MOD may 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, or exceeding 2m;
- 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; and
- Any development, including changes of use and regardless of height, outside MOD safeguarding zones but in the vicinity of military training estate or property.

The proposed draft new Policy 4: Biodiversity Opportunity and Delivering Measurable Net Gains identifies that “All qualifying development proposals (as defined by the Environment Act 2021, Schedule 7A, Part 2, Paragraph 17) must deliver at least 10% measurable biodiversity net gain attributable to the development”.

The MOD request that; when drafting policy and guidance which addresses green infrastructure, biodiversity, ecology, and Biodiversity Net Gain; South Kesteven 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.

Within any new Local Plan, policies and the reasoned justification supporting them should, ideally, refer to the presence of safeguarding zones and/or provide a developer with an indication as to potential limitations that might apply to certain development types. In order to provide a broader representation of MOD interests, and to ensure prospective developers are aware of the implications of developing within an area containing MOD safeguarded zones.

A number of the sites allocated in the South Kesteven District Council Draft Local Plan Consultation Regulation 18 fall within statutory safeguarding zones. For your convenience, please find a table at Appendix A which provides a summary of the safeguarding criteria that would apply to those potential development sites identified. The table below provides a summary of those sites and the triggers for statutory safeguarding consultation that would apply.

The MOD Safeguarding team would welcome being listed as a consultation body of the South Kesteven District Council Local Plan and will provide representations as and when appropriate in the drafting and consultation stages.

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  
DIO Assistant Safeguarding Manager

**Appendix A**

POLICY REFERENCE	SAFEGUARDING ZONE(S) AFFECTED	DEVELOPMENT TRIGGERING STATUTORY SAFEGUARDING CRITERIA
SKPR-278 (GR3-H1):	<p>Eastern WAM Network (Technical Safeguarding zone)</p> <p>RAF Barkston Heath (height and birdstrike safeguarding zones)</p>	<ul style="list-style-type: none"> <li>• Eastern WAM Network safeguarding criteria trigger -Any development or change of use will trigger statutory consultation requirement</li> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement,</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</li> </ul>
SKPR-279 (GR3-H2)	RAF Barkston Heath (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</li> </ul>
SKPR-280 (GR3-H3)	RAF Barkston Heath (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</li> </ul>
SKPR-65 (GR3-H4)	<p>Eastern WAM Network (Technical Safeguarding zone)</p> <p>RAF Barkston Heath (height and birdstrike safeguarding zones)</p>	<ul style="list-style-type: none"> <li>• Eastern WAM Network safeguarding criteria trigger -Any development or change of use will trigger statutory consultation requirement</li> <li>• Development of, or exceeding, 45.7m in height above ground level will trigger statutory consultation requirement,</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</li> </ul>
SKPR-117	RAF Barkston Heath (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 45.7m in height above ground level will trigger statutory consultation requirement,</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including</li> </ul>

		the potential for an environment attractive to hazardous bird species to be formed temporarily
SKPR-268	RAF Barkston Heath (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement,</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.</li> </ul>
SKPR-57	RAF Barkston Heath (height and birdstrike safeguarding zones)  RAF Cranwell (height safeguarding zone)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.</li> </ul>
SKPR-62	RAF Barkston Heath (height and birdstrike safeguarding zones)  RAF Cranwell (height safeguarding zone)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</li> </ul>
SKPR-281	Eastern WAM Network (Technical Safeguarding zone)  RAF Wittering (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> <li>• Eastern WAM Network safeguarding criteria trigger -Any development or change of use will trigger statutory consultation requirement</li> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement, Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</li> </ul>
SKPR-282	RAF Wittering (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement,</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</li> </ul>
SKPR-266	RAF Wittering (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement,</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</li> </ul>
SKPR-36	RAF Wittering (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement,</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</li> </ul>

SKPR-37	RAF Wittering (height safeguarding zone)	<ul style="list-style-type: none"> <li>Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement,</li> </ul>
SKPR-144	RAF Wittering (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> <li>Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement,</li> <li>Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</li> </ul>
SKPR-26	RAF Wittering (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> <li>Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement,</li> <li>Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</li> </ul>
SKPR-55	RAF Wittering (height safeguarding zone)	<ul style="list-style-type: none"> <li>Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement,</li> </ul>
SKPR-284	RAF Wittering (height safeguarding zone)	<ul style="list-style-type: none"> <li>Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement</li> </ul>
SKPR-37	RAF Wittering (height safeguarding zone)	<ul style="list-style-type: none"> <li>Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement</li> </ul>
SKPR-271	RAF Barkston Heath (height and birdstrike safeguarding zones)  RAF Cranwell (height, technical and birdstrike safeguarding zones)  Eastern WAM Network (Technical Safeguarding zone)	<ul style="list-style-type: none"> <li>Development of, or exceeding, 45.7m in height above ground level will trigger statutory consultation requirement</li> <li>Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.</li> </ul>
SKPR-58	RAF Barkston Heath (height and birdstrike safeguarding zones)  RAF Cranwell (height, technical and birdstrike safeguarding zones)	<ul style="list-style-type: none"> <li>Development of, or exceeding, 45.7m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</li> </ul>
SKPR-283	RAF Barkston Heath (height and birdstrike safeguarding zones)  RAF Cranwell (height, technical and birdstrike safeguarding zones)  Eastern WAM Network	<ul style="list-style-type: none"> <li>Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement.</li> <li>Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</li> <li>Eastern WAM Network safeguarding criteria trigger - Development of, or exceeding, 45.7m in</li> </ul>

	(Technical Safeguarding zone	height above ground level will trigger statutory consultation requirement. • •
SKPR-242	RAF Barkston Heath (height and birdstrike safeguarding zones)  RAF Cranwell (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</li> </ul>
SKPR-272	RAF Barkston Heath (height and birdstrike safeguarding zones	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</li> </ul>
SKPR-109	Eastern WAM Network (Technical Safeguarding zone  RAF Wittering (height safeguarding zone)	<ul style="list-style-type: none"> <li>• Eastern WAM Network safeguarding criteria trigger -Any development or change of use will trigger statutory consultation requirement</li> </ul> <p>Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</p>

SKPR-241	RAF Barkston Heath (height and birdstrike safeguarding zones	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</li> </ul>
SKPR-71	RAF Wittering (height and birdstrike safeguarding zones	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</li> <li>• Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</li> </ul>
SKPR-262	RAF Wittering (height safeguarding zone)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</li> </ul>
SKPR-273	RAF Wittering (height safeguarding zone)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement</li> </ul>
SKPR-192 and SKPR-276	Eastern WAM Network (Technical Safeguarding zone)	<ul style="list-style-type: none"> <li>• Eastern WAM Network safeguarding criteria trigger -Any development or change of use will trigger statutory consultation requirement</li> <li>• the potential for an environment attractive to hazardous bird species to be formed temporarily</li> </ul>
SKPR-56	RAF Wittering (height safeguarding zone)	<ul style="list-style-type: none"> <li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</li> </ul>



SKPR-277	RAF Wittering (height safeguarding zone)	<ul style="list-style-type: none"><li>• Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.</li></ul>
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