



Defence Infrastructure Organisation

Christopher Waldron
Ministry of Defence
Safeguarding Department
DIO Head Office
St George's House
DMS Whittington
Lichfield
Staffordshire WS14 9PY

Your reference:
Local Plan Review – Regulation 18 Proposed
Housing and Mixed-Use Site Allocations
Consultation

Mobile: [REDACTED]

E-mail: [REDACTED]
[REDACTED]

Our reference:
DIO 10061870

Planning Policy Team
South Kesteven District Council
Council Offices
The Picture House
St Catherine's Road
Grantham
NG31 6TT

28th August 2025

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 regulation 18 proposed housing and mixed-use site allocations consultation document.

The MOD responded to the original draft Local Plan regulation 18 on 25th April 2024 and provided potential MOD Safeguarding concerns and requirements on the draft policies within the local plan, which remains extant. The National Planning Policy Framework changes made by national government has substantially increased South Kesteven District's annual housing need from 701 (as published through 2024 Draft Local Plan) to 886 dwellings per year, an uplift of 185 dwellings per year. To meet this higher housing requirement and ensure a sufficient land supply for the entire plan period, the Council must identify additional housing sites beyond those previously consulted on.

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 102 of the National Planning Policy Framework (December 2024) 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 Ministry of Housing, Communities & Local Government (MHCLG) in accordance with the provisions of that Direction.

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 are issued to Local Planning Authorities by MHCLG. An assurance review was conducted by the MOD in 2023 which confirmed that, at that time, Local Planning Authorities held the most recent relevant safeguarding data. Any subsequent updates to those plans were then issued by MHCLG. If there is a requirement for replacement data, a request can be made through the above email address

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 illustrate the various issues that might be fundamental to MOD assessments, a brief summary of 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. Within designated zones proposed development that exceeds given trigger heights necessitates that statutory consultation of the MOD takes place. This consultation allows the MOD to carry out assessment of development and to understand how the height of development would impact on the protected airspace above and surrounding an aerodrome and whether any form of mitigation is necessary or viable. These zones also indicate areas where development, by virtue of its height, scale, massing, or external materials 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. These statutory consultation zones are designed to allow birdstrike risk created by or increased by proposed development 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). The creation of open water, whether permanent and temporary, may 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.

- 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.
- Finally, those 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 in the case of a wind turbine or a solar PV system mounted on a roof.

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.
- 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.

Additionally, it may be necessary in certain circumstances for MOD to require the removal of permitted development rights, where the use of these rights may introduce development/features that would not be compatible with MOD safeguarding requirements

A number of the sites allocated in the South Kesteven District Council draft Local Plan regulation 18 proposed housing and mixed-use site allocation 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.

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
C Waldron

Chris Waldron
DIO Assistant Safeguarding Manager

Appendix A

POLICY REFERENCE	SAFEGUARDING ZONE(S) AFFECTED	DEVELOPMENT TRIGGERING STATUTORY SAFEGUARDING CRITERIA
SKPR-330	RAF Wittering (height safeguarding zone)	<ul style="list-style-type: none"> Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement
SKPR-55	RAF Wittering (height safeguarding zone)	<ul style="list-style-type: none"> Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement
SKPR-323	RAF Barkston Heath (height safeguarding zone) RAF Syerston (birdstrike safeguarding zone)	<ul style="list-style-type: none"> 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
SKPR-334	Eastern WAM Network (Technical Safeguarding zone) RAF Barkston Heath (height safeguarding zone) RAF Syerston (birdstrike safeguarding zone)	<ul style="list-style-type: none"> Eastern WAM Network safeguarding criteria trigger -Any development or change of use will trigger statutory consultation requirement 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
SKPR-168	Eastern WAM Network (Technical Safeguarding zone) RAF Barkston Heath (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> Eastern WAM Network safeguarding criteria trigger -Any development or change of use will trigger statutory consultation requirement Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement

	RAF Cranwell (height, technical and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • 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
SKPR-327	RAF Barkston Heath (height safeguarding zone) RAF Syerston (birdstrike safeguarding zone)	<ul style="list-style-type: none"> • 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.
SKPR-322	RAF Cranwell (height safeguarding zone) RAF Syerston (birdstrike safeguarding zone)	<ul style="list-style-type: none"> • 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.
SKPR-233	RAF Cottesmore (height safeguarding zone)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.