



# Ministry of Defence

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# Defence Infrastructure Organisation

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17<sup>th</sup> January 2022

**Your Ref: South Cambridgeshire District Council - Fulbourn Neighbourhood Plan**  
**DIO Ref: 10053208**

Dear Sir/Madam,

It is understood that South Cambridgeshire District Council are undertaking a Consultation regarding the submission of the Fulbourn Neighbourhood Plan.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (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 97 of the National Planning Policy Framework 2021 requires that planning policies and decisions should take into account defence requirements by '*ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.*' To this end MOD may be involved in the planning system both as a statutory and non-statutory consultee. Statutory consultation 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 by Department for Levelling Up, Housing and Communities (DLUHC) in accordance with the provisions of that Direction.

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

Having reviewed the supporting documentation in respect of the Fulbourn Neighbourhood Plan, the MOD have an area of interest in Cambridge Airport

The authority area of the Fulbourn Neighbourhood Plan encompasses areas within the statutory Aerodrome Height, Birdstrike and Technical safeguarding zones surrounding the aerodrome. Cambridge Airport lies approximately 1.8km North of the Fulbourn Neighbourhood Plan authority area.

The statutory Aerodrome Height and Technical safeguarding zones serve to protect the airspace above and around aerodromes to maintain an assured, obstacle free environment for aircraft manoeuvre and ensure that line of sight navigational aids and transmitter/receivers are not impeded. This airspace needs to be kept free of obstruction from tall structures to ensure that aircraft transiting to and from or circuiting the aerodrome can do so safely.

Within the statutory consultation areas associated with aerodromes are zones that are designed to remove or mitigate birdstrike risk. 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.

Sustainable Urban Drainage Systems (SUDS) additionally provide an opportunity for habitats within and around a development. The incorporation of open water, both permanent and temporary, and associated reedbeds, wetlands ponds and ditches provide a range of habitats for wildlife, potentially increasing the creation of attractant environments for large and flocking bird species hazardous to aviation.

Within Policy FUL/03 - Green Infrastructure Network, the area's designated within Figure 11 of the Fulbourn Neighbourhood Plan fall within the statutory Aerodrome Height, Birdstrike and Technical safeguarding zones surrounding Cambridge Airport. Therefore, we would need to be consulted on any development which consists of structures or buildings exceeding statutory safeguarding height or technical zones, or any development which includes schemes that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation

In addition, where development falls outside designated safeguarding zones the MOD may also have an interest, particularly where the development is of a type likely to have an impact on operational capability. Examples of this type of development are the installation of renewable energy generation systems and their associated infrastructure. The MOD has, in principle, no issue or objection to renewable energy development though some methods of renewable energy generation, for example wind turbine generators or solar photo voltaic panels can, by virtue of their physical dimensions and properties, impact upon military aviation activities, cause obstruction to protected critical airspace encompassing military aerodromes, and impede the operation of safeguarded defence technical installations. In addition, where turbines are erected in line of sight to defence radars and other types of defence technical installations, the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations with associated impacts upon aviation safety and operational capability. Planning Practice Guidance published on the Gov.uk website acknowledges the potential effect of wind turbine generators and directs developers and Local Planning Authorities to consult the MOD where a proposed turbine has a tip height of or exceeding 11m or has a rotor diameter of 2m or more.

In summary, the MOD would wish to be consulted within the Fulbourn Neighbourhood Plan of any potential development within the Aerodrome Height, Technical and Birdstrike safeguarding zones surrounding Cambridge Airport which consists of structures or buildings exceeding statutory safeguarding height or technical zones. In addition, the MOD request that developers are made aware, through policy provisions, that development which might result in the creation of attractant environments for large and flocking bird species hazardous to aviation will be subject to scrutiny, and that those schemes where risk cannot be removed or mitigated will be refused.

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