



# Ministry of Defence

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# Defence Infrastructure Organisation

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13<sup>H</sup> December 2021

**Your Ref: Greater Cambridge Local Plan – Local Plan First Proposals Regulation 18: Preferred Options  
2021**

**DIO Ref: 10049272 Rev2**

Dear Sir/Madam

It is understood that Greater Cambridge Shared Planning are undertaking a Regulation 18 consultation on their Local Plan First Proposals. The shared Local Plan will inform the implementation of policies for future development within the shared Authority areas.

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 Greater Cambridge Shared Planning Local Plan First Proposals Regulation 18 Preferred Options 2021 there are two areas of interest for the MOD.

One of these areas of interest is Cambridge Airport for which Statutory Aerodrome Height and Birdstrike Safeguarding Zones have been designated.

The statutory Aerodrome Height safeguarding zone serves to protect the airspace above and around aerodromes to maintain an assured, obstacle free environment for aircraft manoeuvre. This airspace is 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 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. Sustainable 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, including potentially increasing the creation of attractant environments for large and flocking bird species hazardous to aviation.

The other specific interest MOD have in the plan area is a new technical asset known as the East 2 WAM Network which contributes to aviation safety by feeding into the air traffic management system in the Eastern areas of England. There is the potential for development to impact on the operation and/or capability of this new technical asset which consists of nodes and connecting pathways, each of which have their own consultation criteria. Elements of this asset are located within and/or pass through the Greater Cambridge Local Plan area of interest.

The Safeguarding map associated with the East 2 WAM Network has been submitted to DLUHC for issue. As is typical, the map provides both the geographic extent of consultation zones and the criteria associated with them. Within the statutory consultation areas identified on the map are zones where the key concerns are the presence and height of development, and where introduction of sources of electro-magnetic fields (such as power lines) are of particular concern. Wherever the criteria are triggered, the MOD should be consulted in order that appropriate assessments can be carried out and, where necessary, requests for required conditions or objections be communicated.

For your convenience, a copy of the safeguarding plan passed to DLUHC for formal issue has been attached to this email.

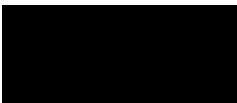
Should any Ministry of Defence operational site or asset cease to be operational and/or no longer require the benefit of a designated Statutory Safeguarding Zone, the MOD will notify DLUHC to initiate the withdrawal of those plans.

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. 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 should be consulted on any potential development within the Aerodrome Height and Birdstrike safeguarding zones surrounding Cambridge Airport, which consists of structures or buildings exceeding statutory safeguarding height 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. The MOD should also be consulted on any applications for development within the safeguarding zones designated to ensure the operation and capability of the East 2 WAM Network that trigger the criteria set out on the statutory safeguarding plan for that asset.

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

Yours sincerely



DIO Assistant Safeguarding Manager