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Your reference: West Berkshire Local Plan Review Regulation 19 Consultation Mobile:

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Planning Policy Team Development and Regulation West Berkshire District Council Market Street Newbury RG14 5LD

2<sup>nd</sup> March 2023

Dear Sir/Madam,

I write to confirm the statutory safeguarding position of the Ministry of Defence (MOD) in relation to the West Berkshire Local Plan Review Consultation. The Local Plan Review sets out the Council's vision, objectives and spatial planning strategy for West Berkshire up to 2039. Public engagement will form part of the consultation process required under Regulation 19 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012, and the responses received will help the West Berkshire Authorities prepare the Proposed Submission 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 parts of the MOD.

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.

The area covered by any West Berkshire Local Plan will both contain and be washed over by statutory safeguarding zones that are designated to preserve the operation and capability of defence assets and sites including RAF Benson, RAF Odiham, RAF Welford, Atomic Weapons Establishments (AWE) at Aldermaston and Burghfield and the Central Wide Area Multilateration (WAM) Network.

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.
- Within the West Berkshire plan area is a new technical asset known as the Central Wide Area Multilateration (WAM) Network which contributes to aviation safety by feeding into the air traffic management system in the Central 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 pass through the West Berkshire Local Plan area. The key concerns are the presence and height of development, and where introduction of sources of electro-magnetic fields (such as power lines or solar photo voltaic panels and their associated infrastructure) are of particular 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 this zone, the principal concern of the MOD is that the creation of new habitats may attract and support populations of large and, or flocking birds close to the aerodrome.
- 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.

## Copies of these safeguarding maps, in both GIS shapefile and .pdf format, can be provided on request through the email address at the start of this letter.

It should be recognised that 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 by virtue of scale, height, or physical properties. Examples of these types of development include any development that would exceed a height of 50m above ground level. Tall (of or exceeding a height of 50m above ground level) structures introduce physical obstacles to low flying

aircraft. The MOD should be consulted, through DIO Safeguarding, where development exceeds a height of 50m above ground level to ensure that the potential for these structures to form a physical obstacle to low flying aircraft can be addressed through appropriate lighting and charting. In addition, the MOD requests to be consulted on any proposals, regardless of height, which fall outside of an MOD safeguarding zone but are in the vicinity of military training estate or property.

On reviewing the potential allocation site and policies for the area, I can confirm the MOD has no statutory safeguarding concerns or suggested amendments to the West Berkshire Local Plan Review.

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

I trust this clearly explains our position in relation to this consultation. However, should you have any questions please do not hesitate to contact me.

Yours sincerely

Debbie Baker Safeguarding Manager DIO Safeguarding