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of Defence

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10TH December 2021

Your Ref: South Staffordshire Local Plan Review Preferred Options Consultation

Dear Sir/Madam

South Staffordshire Local Plan Review Preferred Options Consultation

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.

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.

It is understood that South Staffordshire Council has undertaken a Preferred Options Consultation on review of their Local Plan.

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 the 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 South Staffordshire Local Plan Review Preferred Options Consultation, the MOD can offer the following comments:

The authority area of South Staffordshire Council encompasses areas within the statutory Aerodrome Height safeguarding zone surrounding RAF Cosford, which lies approximately 10.5KM West of South Staffordshire Council authority area.

The Aerodrome Height safeguarding zones serve to protect the airspace above and around aerodromes to maintain an assured, obstacle free environment for aircraft manoeuvre. 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.

The proposed developments allocated for Brewood and the proposed Gypsy and Traveller allocated pitches at New Acre Stables, Penkridge fall within the statutory Aerodrome Height safeguarding zone surrounding RAF Cosford. Therefore, we would need to be consulted on any development exceeding 91.4M Above Ground Level (AGL) in these locations. To the west of the civil parish of Brewood and Coven we would need to be consulted on any development exceeding 45.7M AGL in accordance with safeguarding maps.

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 South Staffordshire Local Plan Review Preferred Options Consultation of any potential development within the Aerodrome Height safeguarding zones surrounding RAF Cosford which consist of structures or buildings exceeding statutory safeguarding height zones.

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

C Waldron

Chris Waldron
DIO Safeguarding Assistant Manager