



Defence
Infrastructure
Organisation

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Your reference:
Odiham and North Warnborough Neighbourhood
Plan 2014-2032 Submission Consultation
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Planning Policy Team
Neighbourhood Planning
Planning Policy Team
Hart District Council
Harlington Way
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16th September 2024

Dear Sir/Madam

I write to confirm the statutory safeguarding position of the Ministry of Defence (MOD) in relation to Hart District Council's Odiham and North Warnborough Neighbourhood Plan 2014-2032 submission consultation document.

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 101 of the National Planning Policy Framework (December 2023) 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 Department for Levelling Up.

The area covered by any Hart District Council's Odiham and North Warnborough Neighbourhood 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 Odiham and the Central WAM Network).

Central WAM Network is a new technical asset, 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 Hart District Council's Odiham and North Warnborough Neighbourhood Plan authority area.

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.

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 the main safeguarding areas of concern 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. Colour coded zones are marked on safeguarding maps that provide heights which, if proposed development would reach or exceed them, would trigger MOD consultation. 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 change of use of land to allow/facilitate flying activities; and 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 and marked on safeguarding maps with a heavy dotted line. Aircraft within these zones are most likely to be approaching or departing aerodromes and would be at critical stages of flight. Within these statutory consultation zones the creation or enhancement 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:

The landscaping schemes associated with developments including the provision of green/brown roofs, or roof gardens. This would also include both on and off-site provision of Biodiversity Net Gain (BNG). Where off-site provision is to provide BNG, the locations of both the host development and any other site should both/all be assessed against statutory safeguarding zones and MOD consulted where any element falls within the marked statutory safeguarding zone; and/or

The creation of new waterbodies such as reservoirs, wetlands, ponds and/or attenuation basins and other elements associated with sustainable drainage systems.

- 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.
- 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 where proposals include a wind turbine or roof mounted solar PV system.

Where development falls outside designated safeguarding zones the MOD may 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, or exceeding 2m;

- 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; and
- Any development, including changes of use and regardless of height, outside MOD safeguarding zones but in the vicinity of military training estate or property.

The proposed Policy 12: The Natural Environment supporting text context at 3.113: identifies that “Under the statutory framework for biodiversity net gain, every grant of planning permission is deemed to have been granted subject to a general biodiversity gain condition to secure the biodiversity gain objective. This objective is to deliver at least a 10% increase in relation to the pre-development biodiversity value of the development granted permission. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits.”

The MOD request that; when drafting policy and guidance which addresses biodiversity, ecology, and Biodiversity Net Gain; Hook District Council bear in mind that some forms of environmental improvement or enhancement may not be compatible with aviation safety. Where off-site provision is to provide BNG, the locations of both the host development and any other site should both/all be assessed against statutory safeguarding zones and the MOD should be consulted where any element falls within the marked statutory safeguarding zone.

A number of the sites allocated in the Hart District Council’s Odiham and North Warnborough Neighbourhood Plan 2014-2032 submission consultation document; Policy 2: Housing Development Sites 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.

MOD recommend that any more detailed policies for these sites include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets. 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



Chris Waldron
DIO Assistant Safeguarding Manager

Appendix A

For your convenience, please find below a table which provides a summary of the safeguarding zones that would apply to each of the potential development sites identified and the forms of development that would trigger MOD consultation.

POTENTIAL ALLOCATIONS	SAFEGUARDING ZONE(S) AFFECTED	POTENTIAL MOD SAFEGUARDING ASSESSMENT REQUIREMENTS
Land at Longwood, Odiham	<p>RAF Odiham (height, birdstrike and technical safeguarding zones)</p> <p>Central WAM Network (technical safeguarding zone)</p>	<p>Development of or exceeding 45.7m in height above ground level will trigger statutory consultation requirement.</p> <p>Development incorporating any overhead power lines above 100kv</p> <p>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.</p> <p>Central WAM Network safeguarding criteria trigger - Development of or exceeding 45.7m in height above ground level will trigger statutory consultation requirement</p>
Land at 4 Western Lane, Odiham	<p>RAF Odiham (height, birdstrike and technical safeguarding zones)</p> <p>Central WAM Network (technical safeguarding zone)</p>	<p>Development of or exceeding 45.7m in height above ground level will trigger statutory consultation requirement.</p> <p>Development incorporating any overhead power lines above 100kv</p> <p>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.</p> <p>Central WAM Network safeguarding criteria trigger - Development of or exceeding 45.7m in height above ground level will trigger statutory consultation requirement</p>

<p>Land at Crumplins Yard</p>	<p>RAF Odiham (height, birdstrike and technical safeguarding zones)</p> <p>Central WAM Network (technical safeguarding zone))</p>	<p>Development of or exceeding 45.7m in height above ground level will trigger statutory consultation requirement.</p> <p>Development incorporating any overhead power lines above 100kv</p> <p>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.</p> <p>Central WAM Network safeguarding criteria trigger - Development of or exceeding 91.4m in height above ground level will trigger statutory consultation requirement</p>
<p>Land at Albion Yard, North Warnborough</p>	<p>RAF Odiham (height, birdstrike and technical safeguarding zones)</p> <p>Central WAM Network (technical safeguarding zone</p>	<p>Development of or exceeding 45.7m in height above ground level will trigger statutory consultation requirement.</p> <p>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.</p> <p>Central WAM Network safeguarding criteria trigger - Development of or exceeding 91.4m in height above ground level will trigger statutory consultation requirement</p>
<p>Land at Dunleys Hill, Odiham</p>	<p>RAF Odiham (height, birdstrike and technical safeguarding zones)</p> <p>Central WAM Network (technical safeguarding zone</p>	<p>Development of or exceeding 45.7m in height above ground level will trigger statutory consultation requirement.</p> <p>Development incorporating any overhead power lines above 100kv</p> <p>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.</p>

		<p>Central WAM Network safeguarding criteria trigger - Development of or exceeding 91.4m in height above ground level will trigger statutory consultation requirement</p>
<p>Land at Hook Road, North Warnborough</p>	<p>RAF Odiham (height, birdstrike and technical safeguarding zones)</p> <p>Central WAM Network (technical safeguarding zone)</p>	<p>Development of or exceeding 45.7m in height above ground level will trigger statutory consultation requirement.</p> <p>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.</p> <p>Central WAM Network safeguarding criteria trigger - Development of or exceeding 91.4m in height above ground level will trigger statutory consultation requirement</p>
<p>Land next to Crownfields, Odiham</p>	<p>RAF Odiham (height, birdstrike and technical safeguarding zones)</p> <p>Central WAM Network (technical safeguarding zone)</p>	<p>Any development or change of use will trigger statutory consultation requirement.</p> <p>Development incorporating any overhead power lines above 100kv</p> <p>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.</p> <p>Central WAM Network safeguarding criteria trigger - Any development or change of use will trigger statutory consultation requirement</p>