



## Ministry of Defence

Jayson Grygiel  
The Planning Policy Team  
Planning and Regeneration Services  
Gosport Borough Council  
Town Hall  
High Street  
Gosport  
PO12 1EB.

## Defence Infrastructure Organisation

Safeguarding Department  
Statutory & Offshore  
Defence Infrastructure Organisation  
St Georges House  
DIO Head Office  
DMS Whittington  
Lichfield  
Staffordshire  
WS14 9PY  
Tel: [REDACTED]  
E-mail: [REDACTED]  
www.mod.uk/DIO

29<sup>th</sup> November 2021

**Your Ref: Gosport Borough Local Plan 2038 Regulation 18**  
**DIO Ref: 10052793**

Dear Jayson

### **Gosport Borough Council Local Plan 2038 Regulation 18 Consultation**

It is understood that Gosport Borough Council are undertaking a Regulation 18 consultation on their draft Local Plan 2038. The Draft Local Plan 2038 will inform the implementation of policies for future development within the Authority area

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 Ministry for Housing, Communities & Local Government (MHCLG) 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 Gosport Borough Council Draft Local Plan 2038 there are three areas of interest for the MOD.

DIO safeguarding have an area of interest in Fleetlands Heliport and the Statutory Aerodrome Height, Technical and Birdstrike Safeguarding Zones surrounding the aerodrome. We have additional interests in Defence Munitions (DM) Gosport and HMNB Portsmouth with Statutory Explosive Safeguarding Zones surrounding the Sites.

The 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.

Additionally, 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 and drainage systems.

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, including potentially increasing the creation of attractant environments for large and flocking bird species hazardous to aviation.

Explosive Safeguarding Zones serve to define areas in the vicinity of storage sites and armed aircraft stands in which land use and building types are regulated to maintain explosives storage licensing standards.

The Inhabited Building Distance (IBD) is defined as yellow line on the statutory safeguarding map, within this safeguarding zone the MOD monitors the management and use of development to maintain public safety and persons living, working, or congregating for long periods of time.

The second consultation zone is the Vulnerable Building Distance (VBD) defined as a purple line on the statutory safeguarding plan. Within this zone all buildings should be deemed as being 'non vulnerable' that is of robust design and construction so that should an explosion occur at the MOD storage facility, buildings nearby will not collapse or sustain damage that could cause critical injury to the occupants

DM Gosport and HMNB Portsmouth are surrounded by Explosive Safeguarding Zones. DM Gosport is surrounded by VBD and IBD, whilst HMNB Portsmouth is surrounded by the VBD

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.

Within the Policy area 5.38 Policy LE12 Safeguarding Zones 5.38.3 Further Information is a hyperlink to MOD Statutory Safeguarding Policy. We request that the link is updated to the following:

<https://www.gov.uk/government/publications/safeguarding-aerodromes-technical-sites-and-military-explosives-storage-areas>

In summary, the MOD would wish to be consulted within the Gosport Borough Council Draft Local Plan 2038 on any potential development within the Aerodrome Height, Technical and Birdstrike safeguarding zones surrounding Fleetlands Heliport, 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. Further to this, we request to be consulted on any development within the Explosive Safeguarding Zones; the Inhabited Building Distance (IBD) and the Vulnerable Building Distance (VBD) that surround DM Gosport and HMNB Portsmouth.

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



Chris Waldron  
DIO Assistant Safeguarding Manager