



Defence
Infrastructure
Organisation

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Safeguarding Department

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Your reference: Draft Biodiversity and
Trees SPD Consultation

Our reference: [REDACTED]

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Strategic Planning Policy Team
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

19th June 2024

Dear Strategic Planning Policy Team,

It is understood that Babergh and Mid Suffolk District Councils are undertaking a consultation regarding their Draft Biodiversity and Trees SPD Consultation. This document provides supplementary information to further explain the policies on biodiversity, protected species and habitats, and trees to inform the preparation, consideration and determination of planning applications, to ensure biodiversity enhancement is provided through the planning process.

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 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 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.

Designated statutory safeguarded zones associated with Wattisham Station, and the Eastern Wide Area Multilateration (WAM) Network are within and/or extend over the Babergh and Mid Suffolk District Councils area. These safeguarding zones are designed to preserve operational capability by ensuring that development that might penetrate obstacle limitation surfaces, that might compromise or constrain the operation of technical equipment fundamental to air traffic services, or that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation are subject to consultation.

The Draft Biodiversity and Trees SPD Consultation identifies what that the Joint Council will expect development to include following the biodiversity mitigation hierarchy in the first instance and where BNG is necessary, securing a minimum requirement of 10%, and the Councils would encourage delivery of 20% where possible.

The MOD request that; when drafting policy and guidance which addresses biodiversity, ecology, and Biodiversity Net Gain; the Council bear in mind that some forms of environmental improvement or enhancement may not be compatible with aviation safety.

The proximity of a site that is to be enhanced to a statutorily safeguarded site and asset should be considered. Enhancements that require or result in the introduction of tall structures (whether temporarily or permanently), or where plants or trees are planted may degrade aviation safety, either by introducing physical obstacles to aircraft, or by degrading or compromising the operation and capability of safeguarded technical assets. Where enhancements include ground works that might result in open water (whether temporarily or permanently), the introduction or plant/tree species that bear berries or fruit, or the introduction of tree species that provide dense canopy, and the enhanced site is within 12.87km of an MOD aerodrome, it is possible that bird strike risk can be introduced or exacerbated to the detriment of aviation safety.

In summary, 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.

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