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Your Ref: Ipswich Local Plan Review 2018-2036
DIO Ref: 10048530 Rev1

Dear

Ipswich Local Plan Review 2018-2036

Proposed Main Modifications - Core Strategy and Policies Development Plan Document Main Modifications, Site Allocations and Policies, Development Plan Document Main Modifications

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 Ipswich Borough Council are undertaking a consultation on the Core Strategy and Policies Development Plan Document Main Modifications, Site Allocations and Policies, Development Plan Document Main Modifications, which are the modifications considered necessary to make the Ipswich Local Plan review sound / and or legally compliant.. The consultation relates to a submission of the Core Strategy and Policies Development Plan Document Main Modifications, Site Allocations and Policies, Development Plan Document Main Modifications

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 Ipswich Borough Council Local Plan Review 2018-2036 Core Strategy and Policies Development Plan Document Main Modifications, Site Allocations and Policies, Development Plan Document Main Modifications there are two areas of interest for the MOD, these being RAF Wattisham and the East 2 WAM network (a new technical asset consisting of a network of linked sites, whereby statutory safeguarding zones have been designed to ensure development which might impact on the operation and capability of both the linked sites, and the links between them, will result in consultation).

DIO Safeguarding has previously responded to Ipswich Borough Council Local Plan Review (IBCLPR)2018-2036 on 19/10/2017. The MOD highlighted principle concerns regarding the IBCLPR, these concerns being to ensuring that tall structures especially tall buildings do not cause an obstruction to air traffic movements at MOD aerodromes or compromise the operation of air navigational transmitter/receiver facilities located in the area. Additionally, the creation of open water bodies which potentially become an attractant to hazardous birds, posing an increased risk to aircraft using military aerodromes in this vicinity. Our original comments remain relevant.

The MOD's second area of interest, as mentioned above, is a new technical asset known as the East 2 WAM Network which contributes to aviation safety by feeding into the air traffic management system in the east of England. There is the potential for development to impact on the operation and/or capability of this new technical asset located within and passing through the IBCLPR area of interest.

The Safeguarding map associated with the East 2 WAM network has been submitted to MHCLG for issue. As is typical, the map provides both the geographic extent of consultation zones and the criteria associated with them. Within the statutory consultation areas identified on the map are zones where the key concerns are the presence and height of development, and where introduction of sources of electro-magnetic fields (such as power lines) are of particular concern. Wherever the criteria is triggered, the MOD should be consulted in order that appropriate assessments can be carried out and, where necessary, requests for required conditions or objections be communicated.

For your convenience, a copy of the safeguarding plan passed to MHCLG for formal issue has been attached to this email.

In addition, where development falls inside or 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.

With regard to the current proposal of the Ipswich Borough Council Local Plan Review 2018-2036, the MOD have no concerns to the Core Strategy and Policies Development Plan Document Main Modifications, Site Allocations and Policies, Development Plan Document Main Modifications.

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

DIO safeguarding