

	Ministry of Defence
	Safeguarding Department
Defence	DIO Head Office
	St George's House
Infrastructure	DMS Whittington
Organisation	Lichfield
	Staffordshire WS14 9PY

Your reference: Weymouth Neighbourhood Plan consultation	Mobile:	
Our reference:	E-mail:	

Christopher Waldron

Planning Policy **Dorset Council** County Hall Colliton Park Dorchester DT1 1XJ

8<sup>th</sup> April 2025

## Dear Sir/Madam

I write to confirm the statutory safeguarding position of the Ministry of Defence (MOD) in relation to Dorset Council's Weymouth Neighbourhood Plan (Regulation 16) 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 parts of the MOD.

Paragraph 102 of the National Planning Policy Framework (December 2024) 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 Ministry of Housing, Communities & Local Government (MHCLG) in accordance with the provisions of that Direction.

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 Weymouth Neighbourhood Plan authority area both contains and is washed over by safeguarding zones that are designated to preserve the operation and capability of defence assets and sites including Portland and Wyke Regis Training Area.

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 relevant safeguarding zone is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.

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 in the case of a wind turbine or a solar PV system mounted on a
roof.

In addition to the safeguarding zones identified, the MOD may also 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:

- 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.
- Development, regardless of height, outside MOD safeguarding zones but in the vicinity of military training estate or property.

The MOD notes the provision for development proposals within Policy W43: Community Energy Schemes including "Community energy initiatives which contribute to the promotion, development, and delivery of sustainable energy sources for the neighbourhood area will be supported"

The MOD has, in principle, no objection to any renewable energy development, though some infrastructure enabling renewable energy production, for example wind turbine generators can, by virtue of their physical dimensions and properties, impact upon military aviation activities, cause obstruction to protected critical airspace surrounding military aerodromes, or impede the operation of safeguarded defence technical installations.

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 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.

Solar PV development can compromise the operation of communications and other technical assets by introducing substantial areas of metal that degrade signals and, depending on the location of development, may produce glint and glare to the detriment of aviation safety.

Additionally, it may be necessary in certain circumstances for MOD to require the removal of permitted development rights, where the use of these rights introduces elements that would not be compatible with MOD safeguarding requirements.

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.

Chris Waldron
DIO Assistant Safeguarding Manager