

Ms Mary Hudson County Hall New Road

Oxfordshire County Council OX1 1TH

Jill Roberts

Defence

Infrastructure

Organisation

Ministry of Defence Safeguarding Department **DIO Headquarters DMS** Whittington Lichfield Staffordshire **WS14 9PY**

Mobile: 0792905 6607

E-mail: Jillian.roberts156@mod.gov.uk

08 December 2021

Your reference: MW.01115/21 Our reference: DIO10043458

Dear Mary

MOD Safeguarding - RAF Benson

Proposal: Re-submission of Planning Proposals to allow the extraction and processing

> of sand & gravel including the construction of new site access roads, landscaping and screening bunds, minerals washing plant and other associated infrastructure with restoration to agriculture and nature conservation area restoration back to original site levels, using imported inert

fill. REF: MW.0033/18

Location: White Cross Farm, reading Road, Cholsey, Oxfordshire

Grid Ref: 460459,187611

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development which was received by this office on 09 September 2021.

This relates to a re submission to allow the extraction and processing of sand & gravel including the construction of new site access roads, landscaping and screening bunds, minerals washing plant and other associated infrastructure with restoration to agriculture and nature conservation area restoration back to original site levels, using imported inert.

The proposed development site occupies the statutory birdstrike safeguarding zone surrounding RAF Benson and is located approximately 4.2km from the airfield.

The applicant has submitted a bird hazard management plan (BHMP) with the proposal.

Birdstrike statutory safeguarding zone

Within this zone, the principal concern of the MOD is the creation of new habitats may attract and support populations of large and or, flocking birds close to the aerodrome.

This reapplication is for extraction and processing of sand and gravel including the construction of new site access roads, landscaping and screening bunds, minerals washing plant and other associated infrastructure with restoration to agriculture and nature conservation areas, using inert fill. The restoration proposals reflect, replicate and strengthen the original/ current land use the re-creation will include of low-level floodplain land within the eastern extraction area for a range of diverse habitats such as reedbeds, marshland and floodplain grazing marsh. The larger western extraction area and plant site will be restored to mainly agricultural land with hedgerows, using soils stored in landscaping bunds, following backfilling with imported inert materials to raise the levels of the land back to original levels.

- The site is on the floodplain for the River Thames. The proposed restoration of the eastern
 part of the development is back to flood meadow but incorporating a series of shallow
 scrapes and pools has the potential to result in increased muddy margins and shallow
 waters attractive to hazardous birds including Lapwing, Golden Plover, wildfowl and gulls.
- Therefore, the use of scrapes and shallow ponds should be avoided or at least minimised to what is necessary for water flows in order to minimise the attraction posed by this habitat.
- Target bird species and trigger levels to monitor are set out as follows: Geese 50 Swans 20 Gulls 100 Lapwings 100. MOD have previously recommended for this site that target levels for feral geese are set at no more than 20 birds, and it is recommended that this is followed on this instance. The other proposed target levels are appropriate.
- Should the numbers of bird species rise above the agreed levels, the relevant stakeholders will be notified and appropriate mitigation measures along with increased frequency of monitoring shall be agreed upon to minimise the risk will be implemented. The relevant stakeholders should be informed at this point, but the appropriate mitigation measures and increased monitoring frequency should be agreed beforehand, not when the trigger level is met. The mitigation measures set out are appropriate in the first instance to reduce hazardous bird numbers frequenting the site and should be implemented as soon as the trigger levels are met.
- Dispersal of some species such as Lapwing or swans, it is better to manage the habitat so
 that these species are not attracted to the site in the first place, rather than to try to
 disperse them retrospectively.
- The BHMP should also include a commitment to disperse hazardous birds at the reasonable request of RAF Benson.
- The BHMP should be in perpetuity, not just for the five-year aftercare period. Monitoring is
 proposed, but it is not clear how regularly it will be carried out, and for how long after
 restoration.

Summary: subject to the above requirement being implemented as part of any planning permission granted and an updated BHMP is submitted to meet our concerns I can confirm the MOD has no safeguarding objection to this proposal provided our recommendations and assurances are adhered to.

I would be grateful if you could confirm receipt of this letter and confirm that a relevant condition covering the MOD's requirements is included in any consent granted.

It is important that the conditions requested in this response are included in any planning permission granted. As per Planning Circular 01/03: Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas, if Oxfordshire County Council decides to grant planning permission contrary to our advice then we must be notified 28 days prior to a decision being made.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely

Jill Roberts

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