



## Ministry of Defence

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## Defence Infrastructure Organisation

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27 June 2022

Your reference: MW.0115/21  
Our reference: DIO/10043458\_Rev6/2022

Dear Mary

### **MOD Safeguarding –RAF Benson**

Proposal: Notice of Submission of Further Information in relation to Application for Planning Permission Accompanied by an Environmental Statement (Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 as Amended). 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.

Location: Land at White Cross Farm, Wallingford, Oxfordshire

Grid Ref's: E 460459 N 187611-Central Response point

E 460406 N 187985

E 460787 N 188059

E 460787 N 187421

E 460592 N 187480

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development which was received by this office on the 06/04/2022

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System

The applicant is seeking approval for a proposed sand and gravel extraction and processing with restoration to farmland and nature conservation. The application area comprises mainly agricultural land that has been used for arable and livestock grazing. Further information has been submitted relating to the above application. The following new documents have been submitted: Revised application, phasing plans and updated information on need, landscape, transport, ecology, flooding, water supplies, drainage and climate change.

The application site is approximately 3.8 km from the centre of the runway at RAF Benson and occupies the statutory Aerodrome Height and Birdstrike statutory safeguarding consultation zones surrounding the aerodrome.

### **Aerodrome Height Safeguarding Zone**

The Aerodrome Height Safeguarding Zone defines zones around aerodromes to regulate the height of structures to prevent the obstruction of the critical air space encompassing the aerodrome in which the principal take-off, landing and circuiting procedures are contained.

Having reviewed the proposals, I can confirm the MOD has no concerns with regards to the height of the proposed development.

### **Birdstrike Safeguarding Zone**

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

On review of the plans, the restoration proposals appear to include additional habitats including damp meadow with shallow scrapes. Shallow scrapes are a habitat type that can result in a seasonal attractant for very large flocks of hazardous bird species, including waders, gulls and waterfowl. This site is alongside the river Thames and as such any increase in local wildfowl populations resulting from this development that follow the river will be coming very close to RAF Benson. There are also a number of large waterbodies upstream along the Thames, around Dorchester, and movements of birds between the proposed site and this existing habitat would be past RAF Benson.

The conceptual restoration V2 continues to include extensive scrapes within the damp meadow. If it is not possible for the area to be restored to a dry level then other more vegetated wetland habitats, which would be less attractive to large, flocking, hazardous bird species but which can still withstand a high level of flooding, if necessary, should be developed. These might include closed wet woodland, or densely vegetated wetland habitats, without open water or with only small areas of open water within predominantly tall, dense vegetation such as reedbed or wet woodland. The small lagoon/pond on the site of the silt lagoon would ideally be returned to dry levels but should be acceptable as long as it is designed to be unattractive to hazardous birds and fully enclosed by dense vegetation such as wet woodland or reedbed.

The MOD issued a response to an Updated Bird Hazardous Management Plan (BHMP) on 10/06/22. After reviewing the updated BHMP and the restoration plan, I can confirm whilst some of our previously suggested amendments have been made to the BHMP there are amendments outstanding, which are listed below.

- Shallow scrapes are to be removed from the restoration plan
- The trigger level for geese should be reduced to 20 birds, and the BHMP should set out the frequency and extent of monitoring and include a commitment to disperse hazardous birds at the reasonable request of RAF Benson. This should be agreed at the conditions stage, and prior to excavation starting. Monitoring should also be more frequent during flood events, although a higher threshold may be agreed during these times.
- Should the numbers of bird species rise above agreed levels, then action should be taken to reduce the risk without having to first agree what that action should be, and this should be set out in the BHMP.
- The BHMP should also include failure criteria which will trigger a review of the management plan and further action to reduce any risk from hazardous birds attracted to this site.

**In summary, the MOD does not object to this application, subject to a conditional requirement being included as part of any planning permission granted for the above design requirements and the outstanding amendments to the BHMP being implemented. The BHMP is to be approved via consultation with Oxfordshire County Council and the MOD, prior to any development taking place.**

The MOD must emphasise that the advice provided within this letter is in response to the information detailed above in the email titled Oxfordshire County Council Planning Reference MW.0115/21 sourced from Oxfordshire County Council dated 4<sup>th</sup> April 2022. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

I would be grateful if you could confirm receipt of this letter.

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

*C Waldron*

Mr Chris Waldron  
DIO Assistant Safeguarding Manager