



Defence  
Infrastructure  
Organisation

Christopher Waldron

Ministry of Defence

[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

Your reference: 2nd Deposit Revised  
Carmarthenshire Local Development Plan  
2018 – 2033

Mobile: [Redacted]

E-mail: [Redacted]  
[Redacted]

Our reference: 10049418-Rev2

[Redacted]

Forward Planning Section  
3 Spilman Street  
Carmarthen  
Carmarthenshire  
SA31 1LE

14<sup>th</sup> April 2023

Dear Sir/Madam,

I write to confirm the statutory safeguarding position of the Ministry of Defence (MOD) in relation to the 2nd Deposit Revised Carmarthenshire Local Development Plan (LDP) 2018 – 2033. The 2nd Deposit Revised LDP sets out the land use policies and proposals including the allocation and use of land through to 2033.

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.

Future Wales, the National Plan 2040 makes clear that military sites and assets in Wales are important to the UK strategic defence systems and emphasises that these sites and assets should be protected from the impacts of development. 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 Department for Levelling Up, Housing and Communities (DLUHC) in accordance with the provisions of that Direction.

The area covered by any 2nd Deposit Revised Carmarthenshire Local Development Plan (LDP) 2018 – 2033 will both contain and be washed over by statutory safeguarding zones that are designated to preserve the operation and capability of defence assets and sites including RAF Pembrey Sands, MOD Pendine, and the Mid Wales Tactical Training Area

**Copies of these plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.**

On reviewing the potential allocation sites, the following site references fall within statutory safeguarding zones designated to protect the operational capabilities of defence sites and assets:

Housing Allocations	SAFEGUARDING ZONE(S) AFFECTED
Kidwelly	RAF Pembrey Sands (Range safeguarding zone)
Pembrey	RAF Pembrey Sands (Range safeguarding zone)
Trimsaran Ffos Las	RAF Pembrey Sands (Range safeguarding zone)
Llangadog	RAF Pembrey Sands (Range safeguarding zone)

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

- Air Weapon Range Safeguarding Zones serve to regulate developments that could introduce or support populations of large and, or, flocking birds hazardous to aircraft. This can include landscaping schemes associated with large developments as well as the creation of new waterbodies, wetlands and Sustainable Drainage Systems (SUDS). The incorporation of open water, both permanent and temporary, wetlands ponds and ditches provide a range of habitats for wildlife, including potentially increasing the creation of attractant environments for large and flocking bird species hazardous to aviation. In addition, these zones serve to monitor the development of new micro-light/leisure flying sites in the vicinity of air weapon ranges.

- Technical safeguarding zones serve to ensure that 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
- Statutory safeguarding zones are designated around Military explosives storage sites, to ensure that development and land uses will be compatible with MOD capability. Within these zones, where applicable, requirements relating to the siting, design, and construction of buildings, or changes to land use may apply. In principle, the MOD does not object to land in the outer explosives safeguarding zone being developed for residential, commercial, and industrial land use purposes. Any buildings within this zone must be 'non-vulnerable' to blast effects, that is of robust construction, so should an explosive event occur, the structure would not collapse or sustain damage that could cause critical injury to the occupants. Of particular concern within this zone are tall buildings (in excess of 3 storeys), light weight construction and large areas of glazing. The MOD will object to development proposals which support people living, working and congregating within the inner explosives safeguarding zone.
- A significant portion of the 2nd Deposit Revised Carmarthenshire LDP 2018 – 2033 area is within a part of the UK Military Low Flying System, designated as Training Area 7T (Mid-Wales). Within the Tactical Training Area (TTA), fixed wing aircraft may operate as low as 100 feet or 30.5 metres Above Ground Level (AGL) to conduct low level flight training. The introduction of development within the TTA has the potential to introduce a physical obstruction to low flying aircraft operating in the area. As such the MOD would wish to be consulted on any development within the TTA which has a height of/or exceeding 15.2M AGL.

Mineral extraction has the potential to have a significant impact on defence capability and operations, through all stages of the extraction, restoration, and aftercare process. These types of developments have the potential to provide attractive environments to certain large and/or flocking bird species hazardous to aviation safety and therefore may be subject to design requirements or for management plans to be applied. Development types that might require the application of planning condition(s) and/or the use of Planning Obligations to secure legal frameworks for the way development is carried out or managed can include mineral extraction schemes, waste development schemes or proposals associated with waste facilities including any restoration of sites. The MOD requests that the plan highlights that the MOD must be consulted on any mineral extraction, waste or landfill scheme which occupies a statutory range safeguarding zone.

The MOD welcomes the provisions of policies CCC1 and CCH2 regarding renewable energy, which makes clear that renewable and low carbon projects will not be acceptable where they would have an unacceptable impact on the operations of defence facilities and operations (including aviation and radar) or the Mid Wales Low Flying Tactical Training Area (TTA-7T).

In addition, and where development falls 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 by virtue of scale, height, or physical properties. The MOD should be consulted, through DIO Safeguarding, where development exceeds a height of 50m above ground level to ensure that the potential for these structures to form a physical obstacle to low flying aircraft can be addressed through appropriate lighting and charting. In addition, the MOD requests to be consulted on any proposals, regardless of height, which fall outside of an MOD safeguarding zone but are in the vicinity of military training estate or property.

The MOD Safeguarding team note that the council will prepare Supplementary Planning Guidance for the Pembrey Peninsula and would ask that we are consulted during the preparation of any SPG.

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

A black rectangular redaction box covering the signature of Chris Waldron.

Chris Waldron  
DIO Assistant Safeguarding Manager