Ministry of Defence

Defence Infrastructure Organisation

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Our reference: DIO10049197

22 February 2024

Dear Julie,

MOD Safeguarding – MOD Boscombe Down

Proposal:	**Change of use of land to clay pigeon shooting school, stationing of portable office and toilet blocks, use of farmyard as car parking.**
Location:	**Beacon Hill Farm, Allington Track, Allington, Amesbury, SP4 0EL.**
Grid Ref:	**419459 142022**

Thank you for consulting the Ministry of Defence (MOD) on the above change of use application for the proposed development which was received by this office on 16 January 2024.

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 seeks planning permission for the change of land use of land to provide a clay pigeon shooting school and associated parking area. Application documents detail the siting of a portacabin to be used as an office, a toilet block, and moveable structures that would accommodate clay traps and shooting stands. The proposed use is to operate 6 days per week from 9am to dusk or 6pm. Competitions would be run approximately 24 times per year.

The application site is approximately one kilometre from MOD Boscombe Down and falls within statutory safeguarding zones drawn around that aerodrome specifically, zones which are triggered by any development where key concerns would be the height of structures, their massing, the materials used in their construction, and the potential for development to result in environments that might attract or support populations of those large and/or flocking bird species hazardous to aviation safety. In addition, the site is within statutory safeguarding zones drawn around Middle Wallop and Netheravon

within which the potential for development to result in environments that might attract or support populations of those large and/or flocking bird species hazardous to aviation safety is the key concern.

Aerodrome and technical safeguarding

The proposed development site occupies statutory height and technical safeguarding zones designed to ensure the airspace above and surrounding an aerodrome is maintained as an assured obstacle free environment for aircraft manoeuvre. In addition, these zones are designed to ensure that the operation and capability of technical assets such as radar, communication, and navigational systems are not degraded by new development.

After reviewing the documents provided, I can confirm that the MOD has no concerns with regard to the heights or massing of any of the proposed structures.

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 those large and/or flocking bird species hazardous to aviation safety close to an aerodrome.

After reviewing application documents, I can confirm that MOD has no concerns with regard to the development proposed.

Aviation Safety

The activity proposed has the capacity to be incompatible with the existing aviation use of the area. MOD Boscombe Down is the tri-service home of military aircraft Test and Evaluation, the Empire Test Pilots' School, and two University Air Squadrons. MOD Boscombe Down is also a regular host to many UK and Foreign military and civilian aircraft. As such a wide range of aircraft operate at the aerodrome 7 days of the week, flying close to and overhead this area. Some aircraft may operate below 500 feet above ground level and flown by pilots with vastly differing levels of experience.

The potential for aircraft operating in the established circuit, a series of procedures that ensure air traffic can be managed safely in the airspace immediately around the aerodrome and that allows aircraft to safely manoeuvre to a position from which a landing can be executed, to be proximate to the application site is very high. The shooting activity proposed could result in shot being in the air whilst aircraft are close by or overhead the site.

Whilst it is acknowledged that a certain level of shooting may already take place on this site, the proposed intensification of this use increases the potential for aircraft to be operating close to or overhead the application site at times when shooting is taking place. As such a condition designed to deconflict the proposed and existing use is requested. Such a condition should ensure that liaison between MOD Boscombe Down and the proposed use is established, that MOD Boscombe Down is aware of when shooting activity will be taking place and provide a means to communicate/agree in what directions shooting will taking place and when. A suggested condition wording is set out below:

> **The use hereby permitted shall not be first brought into use unless and until such time as a Management Schedule Agreement has been submitted to and approved in writing by the LPA following consultation with, and the written agreement of, the Ministry of Defence (MOD). The Management Schedule Agreement shall contain as a minimum:**
>
> - **An operating schedule setting out the times and days on which the clay pigeon shooting use is proposed to operate;**

- **Primary and back up points of contact (telephone numbers and named persons/job roles) for both the clay pigeon shooting use and Air Traffic Control at MOD Boscombe Down;**
- **A procedure for reporting/communicating any departures from the operating schedule and requests for deconfliction; and**
- **Details of measures for limiting the potential for clay shooting to conflict with aircraft movements, this might include:**
    - **confirmation of limitations on the ammunition that may be used on the site:**
    - **confirmation of standard operating procedures that will apply to all guns/shooters and those operating clay traps when using the site, such as stop and unload procedures, and the circumstances triggering those procedures (e.g. when aircraft are overhead or approaching the site):**
    - **restrictions on the use of any shooting positions out of the north side of the site or the west side of the site, depending on the runway in use at that time;**
    - **limitations on the height of clays that might be projected in these directions depending on the runway in use at the time; or**
    - **means to limit the range of movement of shooters in terms of windage and elevation when shooting toward the west, south, or east.**

The use shall be operated strictly in accordance with the details approved unless and until formally approved in writing by the LPA following consultation with, and the written agreement of, the MOD.

Reason.
To preserve aviation safety.

In addition, an informative should be attached to any consent issued which states:

The application site is located close to an operational military aerodrome. You are reminded that it is a criminal offence, under the provisions of article 240 of the Air Navigation Order 2016 (as amended), for any person to recklessly or negligently act in a manner likely to endanger an aircraft, or any person in an aircraft.

In summary, subject to a condition requiring the submission, approval, and implementation of a Management Schedule Agreement and the above informative being attached to any consent that might be issued, the MOD maintains no objection to this proposal.

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.

The MOD must emphasise that the advice provided within this letter is in response to information detailed in the developer's documents titled 'Supporting Statement' dated December 2023. 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.

As per Planning Circular 01/03: Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas, if Wiltshire 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

[redacted]

Teena Oulaghan
Safeguarding Manager
DIO safeguarding