



# Defence Infrastructure Organisation

Your reference:  
Local Plan for the Broads – review Regulation 19 version  
second consultation  
Our reference:  
10062390

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8<sup>th</sup> January 2026

Dear Sir/Madam

It is understood that Broads Authority are undertaking a Local Plan regulation 19 second consultation.

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 MOD sites or departments.

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.

The area covered by any Broads Authority Local Plan Review Plan period 2021 to 2041 consultation will both contain and be washed over by safeguarding zones that are designated to preserve the operation and capability of RRH Neatished and the East Wide Area Multilateration (WAM) Network.

Eastern WAM Network is a new technical asset, which contributes to aviation safety by feeding into the air traffic management system in the Eastern areas of England. There is the potential for development to impact on the operation and/or capability of this new technical asset which consists of nodes and connecting pathways, each of which have their own consultation criteria. Elements of this asset pass through Broads Authority Local Plan review preferred options area of interest.

**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 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 main safeguarding area of concern 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 and welcomes the provision within Policy PUBDM21: Renewable and low carbon energy General principles– “6. Proposals shall not compromise, restrict or otherwise degrade the operational capability of safeguarded MOD sites and assets. 7. The authority shall also consider the impact of proposals on air traffic safety, radar, reflected light and telecommunication, water quality and water resources.”

In addition the MOD recommend, in order to provide a broader representation of MOD interests, and to ensure prospective developers are aware of the implications of developing within an area containing MOD safeguarded zones, Broads Authority should include at future stages of the Local Plan, policy wording that makes clear that only those applications for development which would not compromise, restrict or otherwise degrade the operational capability of safeguarded MOD sites and/or assets will be supported.

A number of the policies within the site-specific area in the Broads Authority Local Plan fall within statutory safeguarding zones, with areas of land that have been identified as having potential for mixed development but offers no specifics. As such the MOD is unable to provide any detailed advice in relation to specific safeguarding criteria that would apply to any potential development sites. At such time as more detail on the location and extent of potential development sites becomes available the MOD would be able to provide more detailed responses. The MOD should be consulted on any development that triggers statutory consultation 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.

Yours sincerely



Chris Waldron  
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