

Lesley Loane (LMM)

From: Dale, Louise Miss (DIO SEE-EPS SG1a1) <Louise.Dale192@mod.gov.uk>
Sent: 28 January 2019 10:23
To: Lesley Loane (LMM)
Subject: 20190128-Down Ampney - Further revision to no open water restoration.

Lesley

Thank you for the revised restoration plan and additional information in your email below.

I can confirm on reviewing the new proposed restoration plan dated the 8th January 2019 (drawing F 03 01 19), the MOD has no safeguarding concerns subject to:

- Detailed plans are submitted regarding the restoration proposals ;
- Confirmation that the site will be worked dry
- Confirmation that ground levels in the meadows will be high enough not to be regularly damp or wet

A robust results based bird hazard management plan being implemented for the establishment of each phase and commitment in perpetuity that the wet woodland and any other areas of the site found to hold water on regular basis will be managed to mitigate this attractant

I trust the above is clear.

Kind Regards

Louise Dale

Safeguarding Officer
Estates – Safeguarding

**Defence
Infrastructure
Organisation**

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 Defence Infrastructure Organisation

From: Lesley Loane (LMM) [mailto:ll@landandmineral.co.uk]
Sent: 08 January 2019 14:31
To: Dale, Louise Miss (DIO SEE-EPS SG1a1) <Louise.Dale192@mod.gov.uk>
Subject: RE: 20181217: Down Ampney - Further revision to no open water restoration.

Louise,

Thank you for the information provided in your email of 17th December in relation to the concept restoration plan D10_LAN_007 (July 18) for Down Ampney.

As I am sure you will be aware internal and external discussions on this proposal have been continuing to find a workable solution to all the various constraints which must be considered. Negotiation with the LPA have culminated in an understanding that they would support a greater degree of flexibility than normal in the restoration programme in relation to the mineral extraction timescales, which in turn has allowed us to incorporate more material in the design of the restoration. The decision has also been made by Farmcare and Hills Quarry Products to exclude the parcel of land to the north that you refer to in your email.

Extensive and detailed modelling of the site using information from the boreholes available as well as appropriate stand offs to features to be retained such as trees and hedges as well as boundaries, reducing the areas to be worked, incorporating additional restoration materials and consideration of all of the various comments received from DIO through this process, has given rise to a final restoration plan (attached Rev F 03 01 19) which shows the site will be restored at close to original levels, as lowland meadows and with a considerably reduced area of wet woodland. We believe this solution meets all of the requirements that have arisen from DIO comments and in particular the responses in your email of 17th December. The extensive additional re-working of the proposals have been also undertaken in light of the recent confirmation of USAF's proposals for RAF Fairford over the coming years that will no doubt increase the scrutiny applied to any local development.

It is now Farmcare's intention to press ahead with the Environmental Impact Assessment across the range of assessments including noise, air quality, hydrology, transport, ecology, landscape and visual, all of which will rely on this being the restoration proposal that will be adopted. If DIO have any comments on this revised proposal we would be grateful to receive them before the EIA work gathers speed in mid January.

If you have any queries, do please let me know.

Kind Regards

lesley

From: Dale, Louise Miss (DIO SEE-EPS SG1a1) <Louise.Dale192@mod.gov.uk>
Sent: 17 December 2018 11:48
To: Peter Andrew <Peter.Andrew@hills-group.co.uk>
Cc: Richard Quinn (Richard.Quinn@farmcareltd.co.uk) <Richard.Quinn@farmcareltd.co.uk>; 'Sean Hussain' (s.hussain@wellcome.ac.uk) <s.hussain@wellcome.ac.uk>; Lesley Loane <ll@landandmineral.co.uk>
Subject: 20181217: Down Ampney

Peter

DIO REF:10041910

DIO Safeguarding have reviewed the proposed restoration scheme again as promised in our meeting dated the 10th October.

The MOD remain concerned with creating large areas of open water within close proximity to RAF Fairford and our objection remains to the proposed restoration at present. However, in the meeting you requested guidance from the MOD to identify what design principles we would find acceptable if applied and managed correctly.

I can confirm the MOD would need the northern parcel of land to be dry restoration and phased working due to it being in close proximity to the aerodrome and within the approach surface of the main runway. To the south of the site we could accept wet woodland with no channels, islands or open pools and with a dense continuous canopy. A robust Bird Hazard Management Plan would be required to cover the area whilst the tree cover became established as would a condition to prevent the successful breeding of geese and the requirement to prevent the formation of a corvid or pigeon roost in perpetuity of the airfield or until it was no longer operational.

In summary, in order to mitigate our concern the MOD would have no safeguarding concerns if the Northern parcel of land was dry working and dry restoration and the southern half restored to wet woodland with a robust BHMP.

Kind Regards

Louise Dale

Safeguarding Officer
Estates – Safeguarding

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From: Peter Andrew [<mailto:Peter.Andrew@hills-group.co.uk>]

Sent: 12 November 2018 16:24

To: Dale, Louise Miss (DIO SEE-EPS SG1a1) <Louise.Dale192@mod.gov.uk>

Cc: Richard Quinn (Richard.Quinn@farmcareltd.co.uk) <Richard.Quinn@farmcareltd.co.uk>; 'Sean Hussain' (s.hussain@wellcome.ac.uk) <s.hussain@wellcome.ac.uk>; Lesley Loane <ll@landandmineral.co.uk>

Subject: Down Ampney

Good afternoon Louise,

Following our meeting on 10th October and subsequent e-mails you were due to meet with your clients and colleagues to discuss the July 2018 Down Ampney Restoration proposal. I am hoping that you are now in a position to provide some feedback and suggestions on changes or improvements that you consider would reduce risk of bird strike from the final landform. I look forward to hearing from you.



Defence Infrastructure Organisation

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Your Reference: 21/0032/CWMAJM

Tel: 07967 750 890

Our Reference: 10052539

Email: james.houghton109@mod.gov.uk

Mr Jason Betty
Strategic Infrastructure
Gloucestershire County Council
Shire Hall
Gloucester
GL1 2TH

27 September 2021

By email only

Dear Mr Betty,

Thank you for consulting the Ministry of Defence (MOD) on the application for the extraction of minerals (sand and gravel), erection/siting of associated infrastructure to include access and processing facilities, associated ancillary buildings, structures and operations, and for the restoration of the site, using imported materials, to agriculture and enhanced ecological interest and bio-diversity at the former RAF airfield at Down Ampney. Your consultation email and letter were received by this office on 18 March.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represent 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. DIO Safeguarding should be consulted on any planning applications which occupy MOD statutory safeguarding zones.

The application site is located approximately 1.5km to the south west of RAF Fairford, a military aerodrome operated by the United States Air Force (USAF). The airfield benefits from a single runway (09/27) and provides USAF's only European airfield for heavy bombers.

The application site falls within statutory safeguarding zones designed to preserve aviation safety and the operation of both the airfield and those technical assets sited there. Specifically, the application site falls within zones where the height and materials used in the construction of development, or where that development may create an environment that might be attractive to those large and/or flocking bird species hazardous to aviation safety are of particular concern.

Aerodrome and technical safeguarding.

The site falls within an aerodrome safeguarding zone where structures, either temporary or permanent, that exceed a height of 15.2m above ground level may form a physical obstacle to aircraft which, due to their proximity to the airfield, are likely to be at a critical stage of flight. In addition, the height and construction of development or the siting of plant and machinery has the capacity to degrade or compromise the operation of technical assets which might include radar and navigational aids.

The structures and plant proposed to facilitate the extraction of sand and gravel as well as those structures that will provide administrative and welfare facilities have been assessed, the MOD has no concerns or objections relating to this element of the development.

Bird hazard safeguarding.

The development proposed entails the stripping of topsoil, the extraction, working and storage of minerals, and the phased restoration of the site. Each of these activities have the potential to create an environment that would be attractive to those large and/or flocking bird species hazardous to aviation safety. The potential hazard is exacerbated by the proximity of the application site to several lakes within the area, and to RAF Fairford. The applicant has acknowledged that aircraft passing close to the application site, approaching or departing RAF Fairford, are likely to be at altitudes of less than 1000ft (304.8m) above ground level and would be within the range of altitudes where 90% of birdstrike events take place.

The applicant and the MOD have conducted pre-application discussions. Through these discussions the MOD has made clear that restoration of the site which results in the creation of open water would be unacceptable as those waterbodies would likely provide an environment attractive to those large and/or flocking bird species hazardous to aviation. The applicant's proposal takes MOD advice into account, making clear that the site is to be restored to provide agricultural land, lowland meadow and permanent pasture, wet woodland, woodland, grassland, and reed marsh as well as retained sections of the former runways. In seeking to minimise the potential for the development at any stage to contribute to birdstrike hazard, the applicant supports their application with a clear Restoration Proposals Plan (Drawing no. D10_LAN_215 Rev. v1.0), a detailed Supporting Statement (dated 4 March 2021), an Outline Landscape and Ecological Management Plan (7 November 2020), an Operational Wildlife Hazard Management Plan (Pre-Consent V1a 1 November 2020), a Post Operational Wildlife Hazard Management Plan (Pre-Consent V1a 1 November 2020), and a draft Section 106 agreement (Knights plc).

The submitted wildlife hazard management plans (WHMP) are robust and comprehensive, identifying the various elements of the development which may attract problematic species and what those problematic species are likely to be, along with a risk assessment of each of those species. Passive wildlife control measures that will reduce the attractiveness of the site and accessibility, as well as active measures to respond to observed hazardous species are also set out. The submitted WHMPs set out clear communication protocols to ensure that RAF Fairford is made aware of bird control activity that might temporarily displace birds into critical airspace allowing coordination by both parties. Finally, both WHMPs contain monitoring/recording procedures and means to review the efficacy of the wildlife control measures undertaken and to update and amend what actions are taken in response to observed results.

Given the potential for a development of the type proposed to have a significant impact on aviation safety it is considered appropriate to request conditions that require the development is carried out strictly in accordance with the restoration plan provided and the WHMPs submitted for both the operational/extraction and restoration phases. In addition,

wildlife hazard management should be secured for the site in perpetuity through legal means such as a Section 106 agreement as suggested by the applicant.

In order to ensure that dry restoration can be secured at each stage of the development, it is requested that a condition is applied to any consent issued requiring evidence that sufficient inert material has been secured to infill each stage of the development prior to the commencement of that phase of the extraction process.

Summary.

Subject to the addition of conditions requiring:

- that the development is carried out strictly in accordance with the submitted restoration plan (Drawing no. D10_LAN_215 Rev. v1.0),
- that the site is managed strictly in accordance with the details set out in the submitted Wildlife Hazard Management Plans during the operational, restoration and post restoration phases,
- that provide certainty prior to the commencement of each extraction phase that sufficient inert material has been secured to implement the dry restoration of that phase,

and that a Wildlife Hazard Management Plan is secured in perpetuity by means of a legal agreement or similar mechanism, the MOD has no objection to the development proposed.

The MOD would request to both be involved in the drafting of, and be a signatory to, any planning obligations or section 106 agreements that might be produced to ensure that appropriate wording is in place to preserve the operation and capability of RAF Fairford.

I would be grateful if you could confirm receipt of this letter and confirm that a relevant condition covering the MOD's requirements are included in any consent granted. It is important to note that the conditions requested in this response are included in any planning permission granted. As per Planning Circular 01/03: Safeguarding Aerodromes, Technical and Military Explosive Storage Areas, should Gloucestershire County Council resolve to grant planning permission contrary to, or omitting provisions within the above advice, the MOD must be notified 28 days prior to that decision being formalised.

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

Yours sincerely

James Houghton
Senior Safeguarding Manager