

**From:** [Dale, Louise Miss \(DIO Estates-SafegdgMgr2\)](#)  
**To:** [A303 Sparkford to Ilchester](#)  
**Subject:** 20190503: A303 Sparkford to Ilchester Dualling (TR010036) MOD Response  
**Date:** 03 May 2019 13:45:55  
**Attachments:** [20190503\\_10044194\\_RNAS\\_Yeovilton\\_PINS\\_Questions.pdf](#)

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A303 Sparkford to Ilchester Dualling Project Team

Your Ref: 20015267

Please find attached the DIO response to the PINS questions.

**Kind Regards**

**Louise Dale**

Safeguarding Officer  
Estates – Safeguarding

**Defence  
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 **Defence Infrastructure Organisation**

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**From:** A303 Sparkford to Ilchester <A303SparkfordtoIlchester@planninginspectorate.gov.uk>  
**Sent:** 16 April 2019 13:22  
**To:** Baker, Deborah D (DIO SEE-EPS SG1a2) <Deborah.Baker134@mod.gov.uk>  
**Subject:** A303 Sparkford to Ilchester Dualling (TR010036)

Dear Sir/Madam

**A303 Sparkford to Ilchester Dualling (TR010036)**

Your reference: 20015267

Please follow the link below to view the letter giving information about hearings for the above project, and details of how to register. If you wish to attend, please let us know by 1 May 2019.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010036/TR010036-000790-Notification%20of%20Hearings2.pdf>

You can also view the letter on the project page of the National Infrastructure Planning website:

<https://infrastructure.planninginspectorate.gov.uk/projects/south-west/a303-sparkford-to-ilchester-dualling/?ipcsection=overview>

Yours faithfully

A303 Sparkford to Ilchester Dualling Project Team  
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Temple Quay House  
Temple Quay  
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BS1 6PN

Email: [A303SparkfordtoIlchester@pins.gsi.gov.uk](mailto:A303SparkfordtoIlchester@pins.gsi.gov.uk)

National Infrastructure Planning  
The Planning Inspectorate, Temple Quay House, Temple Quay, Bristol BS1 6PN  
Direct Line: 0303 444 5036  
Helpline: 0303 444 5000

Web: <https://infrastructure.planninginspectorate.gov.uk/> (National Infrastructure Planning)

Web: [www.gov.uk/government/organisations/planning-inspectorate](http://www.gov.uk/government/organisations/planning-inspectorate) (The Planning Inspectorate)

Twitter: [@PINSgov](https://twitter.com/PINSgov)

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The Planning Inspectorate  
National Infrastructure Planning  
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**Safeguarding  
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Defence Infrastructure Organisation  
Kingston Road  
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[www.mod.uk/DIO](http://www.mod.uk/DIO)  
02 May 2019

Dear Sir/Madam,

**Your Reference:** TR010036  
**Our Reference:** 10044194

**Application by Highways England for an Order granting Development Consent**

This letter is written in response to the Examining Authority's written questions and requests for information issued on the 16<sup>th</sup> April 2019 in which the Ministry of Defence /DIO was asked two specific questions at 3.0.6 and 3.10.20. These two questions are set out in full below with the relevant response provided in each case.

3.0.6 RNAS Yeovilton

**A) What evidence is there to demonstrate that the proposal has been designed to minimise the adverse impacts on the operation and safety of RNAS Yeovilton and that reasonable mitigation is carried out?**

The applicant has carried out an assessment on the construction compound between Podimore and Camel Hill to identify any infringements by the construction equipment and infrastructure of the protected airspace surrounding RNAS Yeovilton known as the Obstacle Limitation Surface (OLS). The MOD does not agree with the results of this assessment. The applicant's assessment was based on the standards outlined by the International Civil Aviation Organization (ICAO) however the MOD uses military standards known as RA3500.

Regarding birdstrike safeguarding the applicant has identified available registers of bird counts in the area which are completed on a voluntary basis. These registers show limited records of bird counts in the area however this does not mean that species of concern to the MOD are not present in the local area. It is known that gulls will travel large distances and if not already in the area the MOD wants to ensure that suitable habitat is not provided to attract them to an area where not previously present.

The applicant has identified a risk table regarding pond design etc. The MOD has reviewed the risk table and based on guidance from our ornithological advisors maintain concerns with the proposed ponds due to their design, proximity to airfield and the use of berry bearing plant species in their Environmental Masterplan.

There are on-going discussions between DIO Safeguarding, Navy and the applicant regarding the MOD's concerns. A meeting has been arranged for 09/05/19 to discuss the proposed scheme and if there is any scope to mitigate our concerns.

**B) Is there any evidence to indicate whether the development would significantly impede or compromise the safe and effective use of defence assets or significantly limit military training?**

At present the MOD has raised concerns with the number of open water bodies proposed which will act as attenuation basins. These water bodies will occupy the statutory birdstrike safeguarding zone surrounding RNAS Yeovilton. This zone extends out to 13km radius from the centre of the runway. The MODs main birdstrike safeguarding concern relates to the potential for new water bodies to attract and support bird species such as gulls that are hazardous to aircraft safety. As proposed, the water bodies have the potential to attract birds hazardous to air traffic. The MOD raised concerns due to the design and proximity of the ponds to RNAS Yeovilton and the planting species to be installed as part of the environmental masterplan.

The MOD are currently engaged with Highways England to identify mitigation to reduce the attractiveness of the water bodies to birds hazardous to air traffic.

The MOD is also engaged with Highways England regarding the proposed works compound on land adjacent to the end of RNAS Yeovilton's main runway. The MOD raised concerns due to the height of the proposed equipment and infrastructure to be stored there, some of which will be approx. 21m high and will occupy the statutory aerodrome height and technical safeguarding zones surrounding RNAS Yeovilton. These zones ensure air traffic approaches and the line of sight of navigational aids and transmitters/receivers are not impeded.

The airspace above and around aerodromes is safeguarded to maintain an assured, obstacle free environment for aircraft manoeuvre and is known as the Obstacle Limitation Surface (OLS). This development site sits beneath the approach and take off climb OLS surfaces for RNAS Yeovilton. The approach and take off climb surfaces need to be kept free from obstruction from tall structures to ensure that aircraft transiting to and from or circuiting the aerodrome can do so safely.

The MOD carried out an assessment and identified the height of the proposed construction equipment and infrastructure will infringe the approach OLS surface. The MOD raised concerns with the site identified to store construction equipment and infrastructure as there cannot be any infringements of the OLS.

The proposed-compound is also within the area protecting the operation of the Instrument Landing System (ILS) and the Precision Approach Radar (PAR) that surveys the approach to runway 22 at RNAS Yeovilton.

Based on information submitted, the height of the compound equipment and infrastructure would create an infringement of the radars safeguarded arcs; affecting the performance of the PAR and ILS radars. An infringement would affect the stations ability to operate runway 22 causing detrimental impacts to military operations.

The MOD are engaged with Highways England to discuss and identify-any mitigation options which could alleviate our concerns.

**3.10.20 Schedule 2- Potential New Requirement-Construction Equipment Height**

**The ExA notes that the DIO and the Applicant have agreed that the height of the construction equipment should be limited. This matter is not included within the dDCO. Could the parties please submit appropriate wording in accordance with Appendix B of the (draft) Statement of Common Ground?**

Highways England provided a maximum height of 21m for construction equipment and infrastructure within the compound. This maximum height was calculated using ICAO standards.

The standards military aerodromes are safeguarded to are outlined within the RA3500 series published by the Military Aviation Authority (MAA). These standards are derived from International Civil Aviation Organization (ICAO) but are applied to military aerodrome requirements. We appreciate the applicant may not be aware of this. The model in appendix B of the Statement of Common Ground is not recognised by the MOD.

**The ExA has asked for wording for the SoCG...**

To prevent an infringement of the Obstacle Limitation Surface and the safeguarded arcs protecting the Precision Approach Radar (PAR) and Instrument Landing System (ILS) no structure or equipment should exceed ..... m Above Ground Level (AGL).

I trust the above information provides an adequate response to the questions raised.

Yours Sincerely

Louise Dale  
Safeguarding Officer  
DIO Estates