Central Lincolnshire Policy S84 Ministry of Defence Establishments Evidence Report

Formerly Policy S83

March 2022



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1. Introduction

- 1.1. The Central Lincolnshire Local Plan is being updated since the first Local Plan for Central Lincolnshire, an area covering the districts of City of Lincoln, North Kesteven and West Lindsey, was adopted in April 2017.
- 1.2. This Evidence Report (which is one of a collection) provides background information and justification for Policy S84, which relates to Ministry of Defence Establishments in Central Lincolnshire.

2. Policy Context

National Policy and Guidance

- 2.1. Since the Central Lincolnshire Plan was adopted the National Planning Policy Framework (NPPF) was updated in July 2018 with subsequent additional changes being published in February 2019 and a further update in July 2021.
- 2.2. Paragraph 97 of the NPPF (2021) is particularly relevant to Policy S84, as it states:
 - "Planning policies and decisions should promote public safety and take into account wider security and defence requirements by: ... b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area."
- 2.3. The Planning Practice Guidance (PPG) was first introduced in 2014 which offers 'live' government guidance. The PPG provides guidance to help in the implementation of policy in the NPPF.
- 2.4. There is little of relevance to development affecting Ministry of Defence (MOD) establishments but there is some guidance about how to deal with them in certain scenarios at application stage.

Local Policy

2.5. The adopted Local Plan contains a specific policy in relation to Ministry of Defence establishments. The policy seeks to support any defence related development required for operational purposes, while also providing a framework against which proposals for re-use of assets surplus to defence requirements can be assessed.

Context and Evidence

- 3.1. Large areas of Central Lincolnshire have been used for national defence purposes throughout the last century and the military presence has brought, and continues to bring, many benefits, particularly to the economy.
- 3.2. There are still a number of areas currently in Ministry of Defence (MOD) operational use. It is important that the role and the ongoing use of these establishments is protected and able to adapt in accordance with MOD operational plans.

- 3.3. Discussions with representatives of the MOD has shown that additional policy would be beneficial to ensure that no development coming forward would undermine defence and to ensure adequate consultation with the MOD takes place.
- 3.4. The MOD is committed to making the most efficient use of its existing estate by maximising the utilisation of sites, identifying sites which can be released and consolidating on fewer, larger sites where resources can be better deployed. One site identified to be released within the plan period is RAF Scampton with its functions being relocated elsewhere, including to RAF Waddington. RAF Scampton is covered separately under Policy S75.
- 3.5. The re-use of suitably located MOD sites which are surplus to MOD operational purposes presents a significant opportunity for new housing, economic development and/or regeneration when such opportunities arise, but these opportunities can also present challenges in ensuring that the community that remains is truly sustainable.

4. Issues and Options Consultation

- 4.1. The Issues and Options consultation sought respondents' views on a number of questions in relation to Ministry of Defence establishments within Central Lincolnshire.
- 4.2. Question 22s asked "Do you think the operational Ministry of Defence sites should be listed in the new Local Plan?" There were 84 responses to this question, 68 supported the proposal, and 16 disagreed. There were a number of additional comments made to this question, as set out below:
 - MoD sites often have housing needs that should be in line with the local plan;
 - Service people should be able to expect a decent living environment;
 - There's significant scope for existing MOD sites to change purpose, & consideration should be given to being able to develop them into flourishing communities with housing & space for industry etc.as and when required;
 - National security and operational imperatives should preclude their inclusion. But MOD should liaise with council officials to ensure we can dovetail in;
 - Would not make public any active military bases as there is a risk that such
 information could be used by those who seek to do harm to those who serve and
 their families unless the MOD is of the view that the risk of publishing such
 information publicly is minimal. Officers and Cllrs should be aware of all active
 MOD bases in a plan area by a list that is held privately or other means;
 - Operations land will never be available for private development. Adjust the plan as necessary, but don't be unrealistic;
 - When they are formerly decommissioned, development should be considered;
 - Listed as showing the "air-field" sign only;
 - Currently, the area of Cranwell adjacent to RAF Cranwell is silent with regard to
 the CLLP. This has meant that planning decisions do not have to take the CLLP
 into account, relying instead principally on the NPPF. The planned expansion of
 RAF Cranwell, potentially including extra homes for Service Personnel, will have
 an impact on neighbouring civilian residents as well as those living in the village
 itself. Believe it is important to include the area of the base (and adjoining civilian
 properties) in the CLLP to ensure planners are able to take anticipated expansion
 into account in determining schemes that may come forward throughout Cranwell;

- The military are no different when it comes to use of land same rules should apply.
- Waste of land facilities and disregard for the local infrastructure has been observed;
- RAF Scampton site is due to close and will make an ideal large village, potentially taking the pressure off development elsewhere;
- Not clear what this offers;
- Only if the accommodation attracts rates but have no knowledge of the customary arrangements in such cases;
- If there is to be warfare it will not be ground based but remote drones from Waddington to Syria. What about nuclear sites? They are here still;
- The MoD welcome proposal to carry policy LP 57 forward into the new Local Plan. Whilst the policy pre-dates para 95 in the NPPF 2018 and which is retained in NPPF 2019, the wording of policy LP 57 policy is supportive of development required for operational defence purposes as advocated by paragraph 95. It should be noted that paragraph 95 also requires planning policies and decisions to ensure that operational sites are not affected adversely by the impact of other development proposed in the area and MOD would ask that wording to this effect be added to any revision to policy LP 57. As announced in July 2018, RAF Scampton is due to close in 2022. MOD are still planning for the vacation and disposal of Scampton and the future location of the Red Arrows is still being determined, with RAF Waddington, RAF Leeming and RAF Wittering being considered as potential sites. The location of the restricted airspace that the Red Arrows require for training, which is subject to consultation with the CAA is also still to be determined. The Policy implications and difference between 'Operational Ministry of Defence Sites and and Recently Operational Ministry of Defence Establishments' below are not clear. If a difference is to be drawn the purpose and intention of the policy and the need for the difference need to be made clear and appropriate opportunities given for MOD to consider the wording and likely implications of any such policy. For the purposes of clarity, however, MOD would consider the following sites within the plan area to be in active military use; Barkston Heath (NK) Beckingham Training Area (NK) RAF Cranwell (NK) RAF Digby (NK) RAF Scampton (WL) RAF Waddington (NK) Under current plans, the RAF presence at, RAF Cranwell and RAF Waddington is set to grow over the next five years. RAF Waddington -is a core site for defence and is likely to see a significant scale of investment with additional or changes to units/ platforms located there. Several hundred additional service personnel and their dependants, as well as a number of supporting civil service and contractor posts are expected to be created at Waddington which could have implications for development both on existing military land and off site. Cranwell is a Defence Estate Optimisation (DEO) receiver site and as such is likely to see additional units and training. The closure of RAF Henlow in 2023 will see the relocation of some RAF elements to Cranwell. Under A Better Defence Estate, it was announced that RAF Cranwell would be home to the RAF Centre of Aviation Medicine, and subsequently that the No. 1 Recruit Training Squadron and the Airmen's Command Squadron would also move from RAF Halton to RAF Cranwell. In addition to the sites mentioned above and their associated Service Families Accommodation (SFA) there are a number of locations where MOD has further SFA: Bardney SFA (WL) Greylees SFA Sleaford (NK) Scampton SFA (WL) It is noted that at present policy LP57 does not make reference to MOD's housing requirements, we consider it should, given the need to provide high quality homes for service personnel in close proximity to where they work is essential. Given that Cranwell and Waddington remain core

sites for MOD it is almost certain that that new housing will be required proximate to each of these sites to support the housing needs of Service Personnel. This need should be recognised and catered for in the revisions to the plan and may provide wider opportunities for new housing. Given the significance of Cranwell and Waddington as locations for major investment and growth for Defence during the plan period MOD believe that consideration should be given to specific policies for both of these sites.

- 4.3. Question 22b asks "Do you think "recently operational" should be defined in the new Local Plan and if so what length of time do you think is reasonable to define this?" There were 83 responses to this question. 59 supported the proposal, and 24 disagreed. The additional comments are set out below:
 - The policy implications and difference between 'Operational MoD Sites' and 'Recently Operational MoD Establishments' are not clear. If a difference is to be drawn, the purpose and intention of the policy and the need for the difference need to be made clear and appropriate opportunities given for MOD to consider the wording and likely implications of any such policy. It may be helpful to consider using the terms rather than 'Operational' which has different implications within defence:
 - Agree that the term 'recently operational' should be defined in the new Local Plan;
 - The definition should be developed with the revised plan;
 - It would be helpful as an infrastructure provider to have a greater level of certainty about whether these sites are expected to come forward for development for alternative uses during the plan period for the new Local Plan;
 - In the event that 'recently operational' MoD sites become surplus to requirements clarity is needed about the scale and type of development which will be acceptable in principle. For example is a 'recently operational' site a formal allocation for specified uses in the new Local Plan for this purpose;
 - There must be scope to develop land that is no longer required by the MOD, and this would take some of the pressure off greenfield sites;
 - For clarity this should be defined, however rather than create a new definition does the MOD have a definition of recently operational? Is there an opportunity to develop a Local Plan Policy which deals specifically with ex MOD sites which have been decommissioned over a number of years ago and as a consequence experience a range of issues as a result;
 - The title is confusing. What about sites due to close, e.g. Scampton & Grantham;
 - For the duration of the plan or until the next review;
 - It should be when they are decommissioned and in discussion with the MOD take place in advance so plans are understood so that they do not fall into disuse;
 - Some sites pose a greater problem (pollution etc) than others;
 - It depends on the nature of the operations. In the case of the mustard gas, that took several years to clear and lots of final work;
 - Immediate, some that are left vacant are a disgrace. The vandals and thieves are on site the same night do not wait to next day;
 - These should be taken on a case by case basis;
 - Six months;
 - 12 months;
 - 3 years;
 - 5 years;
 - An arbitrary figure, perhaps, but suggest five years may be appropriate;
 - 5 to 10 years;

- We have in our area the example of the former RAF Swinderby being developed into a thriving residential village and employment site. For other MOD sites that are being phased out a successful transition as achieved at RAF Swinderby would be aided by inclusion for a 5-10 year period;
- 10 years;
- Recently operational should be a policy in the CLLP and in my view recently operational is within the last 10 years.

5. Regulation 18 Consultation

- 5.1. A Consultation Draft of the Local Plan was published for consultation between 30 June and 24 August 2021. During this eight week consultation comments were received on the plan, the policies within the plan, and supporting information and evidence.
- 5.2. Below is a summary of the responses received on this draft policy:
 - Support for the provisions of this policy.
 - Some concern about the wording of part 3 of the policy and suggestions that reference is required to heritage assets, biodiversity and green infrastructure.
- 5.3. The policy remains largely unchanged as the elements being sought in the responses are covered in other policies in the Local Plan.

6. Proposed Approach in Draft Local Plan

6.1. The Draft Local Plan includes a specific policy relating to Ministry of Defence Establishments. This policy is based on Policy LP57 of the adopted Local Plan but has been updated and expanded to provide greater coverage to address concerns raised by MOD about development affecting MOD sites. It is considered to provide a robust framework for both considering redevelopment of MOD assets and to ensure that adequate protection is given to the sites in use.

7. Reasonable Alternative Options

- 7.1. The following alternative options have been considered for this policy (option 1 being the preferred option).
 - **Option 1:** A policy which will deliver adequate pitches to meet the evidenced need and provide a criteria-based policy for considering applications for new sites.
 - **Option 2:** A policy which will deliver adequate pitches to meet the evidenced need but without a policy framework against which new sites can be considered.
 - Option 3: No policy and instead rely on wider Local Plan policies or national policy.
- 7.2. Option 1: This option gives the greatest degree of certainty that the evidenced need is met through allocations but also allows a criteria-based policy to be applied to sites that are not allocated.

- 7.3. Option 2: This option ensures local needs are met but was dismissed as it would not produce a policy framework in order assessed new sites during the plan period.
- 7.4. Option 3: No policy and instead relying on general policies in the Local Plan and national policy. This option was discounted because it would not provide an acceptable degree of certainty, potentially introducing risks from development affecting Ministry of Defence sites. Should the Ministry of Defence dispose of a site, this option would not provide certainty in ensuring that the benefit of any redevelopment outweighs any impacts.

8. Conclusion

8.1. This Evidence Report demonstrates the rationale for the proposed policy as contained in the Proposed Submission Draft Central Lincolnshire Local Plan. This helps bring together relevant evidence that has informed this policy and how we have responded to comments received during the plan making process, as well as how the latest evidence and national guidance has been taken into account.