



Defence
Infrastructure
Organisation



Your reference:
London Borough of Harrow- New Local Plan 2021-
2041 – Consultation on Proposed Submission
version, including proposed Site Allocations



Our reference:
DIO 10061797
Planning Policy Team
London Borough of Harrow
Forward Drive
Harrow
HA3 8FL

17th December 2024

Dear Sir/Madam

I write to confirm the statutory safeguarding position of the Ministry of Defence (MOD) in relation to the new draft local plan proposal regulation 19 including proposed site allocations document.

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 101 of the National Planning Policy Framework (December 2023) 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 Department for Levelling Up.

The area covered by any London Borough of Harrow local plan is washed over by safeguarding zones that are designated to preserve the operation and capability of RAF Northolt.

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 areas of concern is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.

The airspace above and surrounding aerodromes is safeguarded to ensure that development does not form a physical obstruction to the safe operation of aircraft using that aerodrome. Colour coded zones are marked on safeguarding maps that provide heights which, if proposed development would reach or exceed them, would trigger MOD consultation. These zones also indicate areas where development might reduce the capability or otherwise compromise the operation of technical assets such as communications, navigation, or surveillance systems including radar. In addition to permanent physical development within these zones, the change of use of land to allow/facilitate flying activities; and the use of cranes, piling rigs or other tall plant or equipment to implement development may also be of concern.

Birdstrike safeguarding zones with a radius of 12.87km are designated around certain military aerodromes and marked on safeguarding maps with a heavy dotted line. Aircraft within these zones are most likely to be approaching or departing aerodromes and would be at critical stages of flight. Within these statutory consultation zones the creation or enhancement of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect. This can include:

- the landscaping schemes associated with developments including the provision of green/brown roofs, or roof gardens. This would also include both on and off-site provision of Biodiversity Net Gain (BNG). Where off-site provision is to provide BNG, the locations of both the host development and any other site should both/all be assessed against statutory safeguarding zones and MOD consulted where any element falls within the marked statutory safeguarding zone; and/or
- the creation of new waterbodies such as reservoirs, wetlands, ponds and/or attenuation basins and other elements associated with sustainable drainage systems.

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 where proposals include a wind turbine or roof mounted solar PV system.

Where development falls outside designated safeguarding zones the MOD may 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; and
- Any development, including changes of use and regardless of height, outside MOD safeguarding zones but in the vicinity of military training estate or property.

Within the Tall Building Design Considerations policy, the MOD notes and welcomes the provision in section 2.4.11 “Located to the west of LB Harrow is RAF Northolt, whose operations rely on aircraft flying over Harrow Town Centre. As part of operations, safeguarding zones cover the borough and provide a threshold or circumstances as to when to consult with the Ministry of Defence (statutory consultee). The safeguarding thresholds are available on the Council’s website”

The MOD additionally note the support for the proposed Policy GI3: Biodiversity and nature recovery and welcomes that the Council have identified in section 7.3.11 “Some forms of environmental improvement or enhancement may not be compatible with aviation safety. Where off-site provision is to provide BNG, the locations of the host development and any other site should be assessed against statutory safeguarding zones and the Ministry of Defence should be consulted where significant elements are in the statutory safeguarding zone for RAF Northolt”

The MOD note proposed draft Policy CN2: Energy Infrastructure- 8.2.10: Development proposals should maximise the amount of renewable and secondary energy generated on site. This includes the use of solar photovoltaics (PV), heat pumps and solar thermal, both on buildings and at a larger scale on appropriate sites. There is also potential for wind based renewable energy in some locations.

The MOD has, in principle, no objection to any renewable energy development, though some infrastructure enabling renewable energy production, for example wind turbine generators or solar photo voltaic panels can, by virtue of their physical dimensions and properties, impact upon military aviation activities, cause obstruction to protected critical airspace surrounding military aerodromes, or impede the operation of safeguarded defence technical installations.

Solar PV development can impact on the operation and capability of communications and other technical assets by introducing substantial areas of metal or sources of

electromagnetic interference. Depending on the location of development, solar panels may also produce glint and glare which can affect aircrew or air traffic controllers.

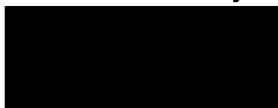
In addition, where turbines are erected in line of sight to defence radars and other types of defence technical installations, the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations potentially resulting in detriment to aviation safety and operational capability. This potential is recognised in the Government's online Planning Practice Guidance which contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of, or exceeding 2m.

Additionally, it may be necessary in certain circumstances for MOD to require the removal of permitted development rights, where the use of these rights introduces elements that would not be compatible with MOD safeguarding requirements.

A number of the sites allocated in the London Borough of Harrow new local plan 2021-2041 Regulation 19 fall within statutory safeguarding zones. For your convenience, please find a table at Appendix A which provides a summary of the safeguarding criteria that would apply to those potential development sites identified. MOD recommend that any more detailed policies for these sites include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets. The table below provides a summary of those sites and the triggers for statutory safeguarding consultation that would apply:

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



DIO Assistant Safeguarding Manager

Appendix A

POTENTIAL SITE ALLOCATION REF	SAFEGUARDING ZONE(S) AFFECTED	DEVELOPMENT TRIGGERING STATUTORY SAFEGUARDING CRITERIA
Site OA1 – Queen's House Carpark	Raf Northolt (height, technical and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement, • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily
Site OA2 – Harrow on the Hill Underground and Bus Stations	Raf Northolt (height, technical and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily
Site OA3 – 15-29 College Road	Raf Northolt (height, technical and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily
Site OA4 – Havelock Place	Raf Northolt (height, technical and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement, • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.
Site OA5 – Station Road East, Harrow	Raf Northolt (height, technical and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement, • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily
Site OA6 – Greenhill Way-Harrow	Raf Northolt (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement, • Development that might result in the creation of attractant environments for

		large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.
Site OA7 – Tesco Station Road-	Raf Northolt (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.
Site OA8 – Former Royal Mail Postal Delivery Office, Elmgrove Road	Raf Northolt (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.
Site OA9 – Poet's Corner & Milton Road	Raf Northolt (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily
Site OA10 – Wealdstone Probation Office	Raf Northolt (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily
Site OA11 – Carpark Ellen Webb Drive	Raf Northolt (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.
Site GB1 – Royal National Orthopaedic Hospital (RNOH)	Raf Northolt (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an

		environment attractive to hazardous bird species to be formed temporarily.
Site GB2 – Watling Farm	Raf Northolt (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 45.7m in height above ground level will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.
Site O1 – Waitrose South Harrow	Raf Northolt (height, technical and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Any development or change of land use will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily
Site O2 – Roxeth Library & Clinic	Raf Northolt (height, technical and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Any development or change of land use will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily
Site O3 – Northolt Road Nursery and Carpark at rear of 27 Northolt Road	Raf Northolt (height, technical and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Any development or change of land use will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily
Site O4 – Grange Farm	Raf Northolt (height, technical and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Any development or change of land use will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily
Site O5 – Harrow School Estate & John Lyon School	Raf Northolt (height, technical and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Any development or change of land use will trigger statutory consultation requirement. Additionally encompasses different safeguarding criteria dependent on location. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily
Site O6 – Brethrens' Meeting Hall, The Ridgeway	Raf Northolt	<ul style="list-style-type: none"> • Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement.

	(height, technical and birdstrike safeguarding zones)	<ul style="list-style-type: none"> Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily
Site O7 – Rayners Lane Station Carpark	Raf Northolt (height, technical and birdstrike safeguarding zones)	<ul style="list-style-type: none"> Development of, or exceeding, 10.7m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.
Site O8 – Harrow West Conservative Association	Raf Northolt (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> Development of, or exceeding, 45.7m in height above ground level will trigger statutory consultation requirement, Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily
Site O9 – Pinner Telephone Exchange	Raf Northolt (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement, Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.
Site O10 – Harrow View Telephone Exchange	Raf Northolt (height, technical and birdstrike safeguarding zones)	<ul style="list-style-type: none"> Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.
Site O11 – North Harrow Methodist Church	Raf Northolt (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.
Site O12 – Hatch End Telephone Exchange	Raf Northolt (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.

		<ul style="list-style-type: none"> • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily
Site O13 – Harrow Arts Centre	Raf Northolt (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily
Site O14 – Vernon Lodge	Raf Northolt (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.
Site O15 – Belmont Clinic	Raf Northolt (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.
Site O16 – Travellers Rest, Kenton Road	Raf Northolt (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.
Site O17 – Kenton Road Telephone Exchange	Raf Northolt (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily
Site O18 – Wolstenholme	Raf Northolt (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for

		large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily
Site O19 – Marsh Lane Gas Holders	Raf Northolt (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily
Site O20 – Canons Park Station Carpark	Raf Northolt (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement, • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily
Site O21 – Anmer Lodge	Raf Northolt (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily
Site O22 – Stanmore Station Carpark	(Raf Northolt (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily