



Defence Infrastructure Organisation

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Your reference: Replacement Vale of Glamorgan Local
Development Plan 2021 – 2036. Deposit Consultation
Our reference: DIO 10053188

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11th March 2026

Dear Sir/Madam

It is understood that Vale of Glamorgan Council are undertaking a Deposit Plan consultation regarding their proposed replacement Local Development Plan 2021 - 2036. This consultation details the overall Strategy, development policies, areas to be protected, and specific land allocations for development (including new housing, employment) over the 15-year period

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.

The Welsh Government's Development Management Manual as revised May 2025, identifies, at figure 7, that a number of non-site-specific directions are currently in force, the list includes the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002. Through this direction the MOD is involved in the planning system as a statutory consultee. Statutory consultation occurs as a result of the provisions of the Direction, and the plans issued to Local Planning Authorities by the Welsh Government, which are provided by MOD.

The area covered by any Vale of Glamorgan Council Local Plan is partially covered by a safeguarding zone that is designated to maintain the effective operation of a MOD technical site that is retained at St Athan, at which is located a High-Resolution Direction Finder (HRDF) technical asset. This is a navigational aid which serves to maintain air traffic safety.

To illustrate the various issues that might be fundamental to MOD safeguarding assessments, a brief summary of the technical safeguarding zone is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.

The dimensions and materials used in the construction of a development may be relevant factors in assessing the impact of a given scheme. Developments that incorporate renewable energy systems may be of particular concern given their potential to introduce large expanses of metal or electrical noise interference, which may be a particular issue where solar farms are developed.

The MOD notes and welcomes the intentions of Policy EMP2: MOD ST ATHAN. However, it is recommended that additional wording is added to make clear that this policy relates to the safeguarded MOD technical site. Therefore, it is recommended that wording is updated. "New development within or adjoining MOD St Athan

and the safeguarded MOD technical site that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. Proposals for non-military or non-defence related development within or in the areas around *MOD St Athan, or the safeguarded MOD technical* site will not be supported where it would adversely affect military operations or capability, unless it can be demonstrated that there is no longer a defence or military need for the site.”

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:

Tall or narrow profile structures such as masts or flue stacks with a height of 50m or greater above ground level may introduce obstruction hazards to low flying military aircraft using the UK military low flying system.

The MOD also needs to be consulted on all proposals to develop wind turbines that are 11m or greater in height to blade tip or, that have a rotor diameter of 2m or greater. This is necessary to safeguard defence radar coverage across the UK used to manage MOD ranges, provide air traffic control and maintain UK air defence.

The MOD notes that Draft Policy CC3 assigns the renewable energy local search areas that have been defined in the deposit plan. This supports the generation of non-domestic renewable, low and zero carbon energy. The Renewable Energy assessment from 2023 identifies potential opportunity areas for renewable energy and provides a high-level assessment of wind and solar energy resource within the Vale of Glamorgan and identifies several sites, known as ‘search areas’ where the potential for development is greatest, and identification of 20 of the largest sites for both wind and solar.

Draft policy CC4 defines requirements that any development will need to demonstrate compatibility with. It is noted that specific reference to aviation safeguarding is included. However, the MOD considers it necessary that this is expanded to include specific reference to those technical assets which facilitate aviation safety such as navigational aids. In addition, the MOD also considers it necessary that specific mention of the need to account for defence radar coverage in relation to wind energy development is specifically identified.

In principle, the MOD has no objection to any renewable energy development occurring in the renewable energy local search areas that have been defined, subject to confirming that that it will be compatible with defence safeguarding requirements.

Some renewable energy generation infrastructure, for example wind turbine generators can, by virtue of their physical dimensions and properties, impact upon the effective operation of safeguarded defence technical installations. Solar farm developments located in proximity to safeguarded navigational aids, or other types of technical sites, can impact upon their effective operation by introducing substantial areas of metallic types of surfaces that may affect transmissions.

Where turbines are erected in line of sight to defence radars, the rotating motion of their blades can degrade and cause interference to their effective operation.

The MOD recommend that any emerging policy makes clear that, where an MOD assessment indicates that a development would have a detrimental impact on the operation and capability of defence assets or sites, that such an application would be refused or that conditions may be attached to any consent that might be issued which may include the removal of permitted development rights.

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 housing allocations 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



Chris Waldron
DIO Assistant Safeguarding Manager

Appendix A

POLICY REFERENCE/POTENTIAL DEVELOPMENT SITE	SAFEGUARDING ZONE(S) AFFECTED	DEVELOPMENT TRIGGERING STATUTORY SAFEGUARDING CRITERIA
Policy HG1 KS4	MOD St Athan (technical safeguarding zone)	• Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement • Development of, or exceeding, 45.7m in height above ground level will trigger statutory consultation requirement
Policy HG1 KS5	MOD St Athan (technical safeguarding zone)	• Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement • Development of, or exceeding, 45.7m in height above ground level will trigger statutory consultation requirement
Policy HG1 (7)	MOD St Athan (technical safeguarding zone)	• Any development or change of use will trigger statutory consultation requirement • Development of, or exceeding, 10.7m in height above ground level will trigger statutory consultation requirement
Policy HG1 (8)	MOD St Athan (technical safeguarding zone)	• Any development or change of use will trigger statutory consultation requirement