

# Matter 6: Environment

Sub-Matter 6B: Countryside and Coast

Written Submission of Defence Estates

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# 1 Introduction

- 1.1 This paper sets out the response of Defence Estates (DE) to the Panel's list of matters in respect of Sub Matter 6B: Countryside and Coast. This response should be read in association with representations made by DE to the Draft South East Plan (the Plan), notably their response to policy CC6. This explained in detail the importance of the Ministry of Defence (MoD) to the local and regional economy, the social fabric of the local communities within which they are sited, and to the preservation and enhancement of the environment of the region. The MoD's importance is most evident within the rural areas of the region.
- 1.2 The vast majority of the MoD estate within the South East (totalling approximately 30,000 hectares of freehold and leased/licensed land) comprises the Defence Training Estate (DTE) and 'backdoor' training areas within MoD establishments which form part of the countryside. The DTE in the South East is of particular importance to the delivery of the Government's Defence Vision for the UK<sup>1</sup>. These rural training facilities are critical to the delivery of military capability, without them the MoD would be unable to meet the level of demand for military training necessary to ensure that service personnel are properly trained prior to deploying on operations in support of government policies and objectives.
- 1.3 The MoD has already given evidence to the Examination in Public in relation to the importance of DTE Home Counties, an area of approximately 10,500 hectares within and around the Blackwater Valley and Central Hampshire<sup>2</sup>. This area is used intensively as it provides a wide variety of dry training facilities<sup>3</sup> and has some of the most comprehensive ranges in Europe. By way of example, it provided in excess of 2,600,000 man training days during 2005/06. There is an ongoing need to maintain and improve these facilities and, in some cases, redevelopment will be necessary in order to meet the changing demands of military training.
- 1.4 In addition, DTE South East covers approximately 8,600 hectares in Kent and East Sussex. This is the principal centre for all UK based pre-deployment operational training and provides dry training areas with a wide variety of terrain including seashore, shingle banks, marshes, chalk downland, woodland and heathland. It includes two highly sophisticated live firing range complexes at Lydd and Hythe on the Kent coast<sup>4</sup>. The Lydd Range Complex extends to 1,340 hectares, whilst the Hythe complex covers a total of 180 hectares with a total sea

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<sup>1</sup> The Defence Vision is to defend the United Kingdom and its interests and to strengthen international peace and stability.

<sup>2</sup> Presentation of the Defence Training Estate Home Counties – Military Needs Paper by Lt Col Paul Norrington-Davies OBE to the Thames Basin Heaths SPA Technical Session on Wednesday 22<sup>nd</sup> November 2006. A copy of his Paper and a summary version are held within the EiP library/website (TBH12 and 12A).

<sup>3</sup> Dry Training Areas are non-live training areas using blank ammunition and pyrotechnics for tactical training exercises.

danger area of 4,500 hectares. The ranges are complimentary and provide some of the most complex and advanced small arms ranges and urban ranges in the world. Consequently, they are intensively used and figures set out at Appendix One show that usage has increased in the last two years to over 200,000 man training days per year. It is also the unique juxtaposition of specialist ranges, dry training areas and barrack accommodation that enables units to complete complex pre-deployment operational training in one area without the loss of valuable training time travelling to dispersed training facilities.

- 1.5 The nature and importance of DTE South East has been demonstrated in the context of justifying the need for improvements to flood defence at Lydd Range<sup>5</sup>. The report concluded that the Lydd Range complex is a strategic national asset that is vital to the delivery of operational capability and military output. It also noted the important contribution the MoD made to the local economy.
- 1.6 In this context, it is imperative that the Plan's approach to development within the countryside and coast recognises the strategic importance of these areas to the MoD and to the delivery of the Defence Vision. In addition, the MoD's stewardship role and its social and economic contribution to the countryside need to be recognised within the Plan. The Plan must therefore provide a clear and positive framework that allows for defence use and development of the countryside and coastal areas. It should be noted that DE Strategy 2006: In Trust and On Trust commits DE to improving the stewardship of the MoD estate and to promoting an economically vibrant and socially inclusive countryside.
- 1.7 Although DE has not objected to the policies referred to under Matter 6B, it wishes to make the following comments in respect of the Panel's questions.

## 2 Response to Matters

### **6B.1 Does the Plan set out a positive, integrated strategy for the Region's countryside in general? Would it be appropriate to include a 'Countryside Quality' indicator as a measure of the success of the strategy?**

- 2.1 The Plan's Preferred Spatial Strategy for the region (paragraph 3.4.1) contain a number of objectives relevant to the countryside and rural areas which together are considered to provide a positive strategy. These objectives take a balanced approach to the countryside by promoting sustainable development in rural communities, supporting economic growth where appropriate, providing for development to support the maintenance of communities and

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<sup>4</sup> The exact locations of these sites can be seen in Appendix One of the Defence Estates and SEERA Joint Studies on the Development Potential of the Ministry Defence Estate in the South East Region (EiP Reference: Sr16).

<sup>5</sup> Source: Chapter 3 of the Military and Economic Justification for Improvements to the Standard Flood Defence Protection – Lydd Ranges, Dungeness, Kent (submitted to the EiP Library/Website).

protecting and enhancing the region's most important environmental assets. However, DE is concerned that this strategy has not been adequately reflected in the policies of the Plan. In particular, DE has objected to the policies focus on urban areas (Policy CC8a) and its failure to allow for development that contributes towards sustainable rural communities, highlighting as an example the particular need for MoD development in rural areas.

- 2.2 DE consider that should the Panel decide there is a need for the Plan to contain a specific integrated strategy for the region's countryside then it must include reference to the important role it has in terms of the Defence Vision and providing areas for military training for the MoD. The ability for the MoD to continue to use and invest in its training facilities to meet changing military demands, in a manner consistent with the principles of sustainable development, will be important to the delivery of the Defence Vision and should be supported by the Plan. Similarly, the inclusion of a 'countryside quality' indicator must have regard to the fact that the achievement of 'quality', in whatever form that is measured, may not be consistent with the reasons for which large areas of the countryside are held by the MoD, i.e. to provide military training.

**6B.2 Does the Plan set out a positive vision for National Parks and AONBs that reflects the opportunities they provide for the region and beyond? Is the policy guidance on New Forest and proposed South Downs National Parks appropriate?**

- 2.3 DE consider the policy guidance in respect of the South Downs (Policy C1b) is appropriate for two reasons. Firstly, the Plan should not seek to prejudge the decision of the Secretary of State in determining whether there is to be a National Park in the South Downs and, if so, what its precise boundary is to be. Secondly, the Plan should not repeat the statutory process of considering the designation and boundary of the National Park through the proposed changes to the South East Plan. The Panel will be aware that the National Park Inquiry sat for 91 days hearing evidence on a wide range of objections to the proposed designation. These included objections made by DE in respect of the Longmoor Training Area<sup>6</sup>, an area not currently worthy of AONB designation or conducive to quiet recreation and yet put forward for inclusion within the proposed National Park. It would not be appropriate for those objections to be addressed again through the South East Plan process.
- 2.4 Clearly, in the event that the Secretary of State does designate the South Downs as a National Park, it would be appropriate for SEERA to review Policy C1b and provide a vision and guidance for the area that takes account of the importance of the Longmoor Training Area to the MoD.

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<sup>6</sup> Described in more detail within paragraph 4.2 (page 33) of the Defence Training Estate Home Counties – Military Needs Paper (TBH12).

- 2.5 The policy guidance within the Plan in respect of AONBs is also considered appropriate, particularly its encouragement for proposals which support the economy and social wellbeing of the area and its communities. This is important to the MoD given their landholdings within a number of the region's AONBs (most notably the Kent Downs AONB) and MoD's need to continually maintain and improve their facilities to meet the changing and potentially increasing demands for military training. It should be noted that DE already manage its estate in a sustainable way and are committed to safeguarding and improving valued landscapes, such as AONBs, through careful design of new facilities and removal of redundant structures<sup>7</sup>.

**6B.3: Is there a need for regional guidance on the River Thames Corridor? What should this contain?**

- 2.6 DE does not wish to comment on these questions.

**6B.4: Would it be appropriate to provide more regionally-specific guidance on the opportunities that may be available to improve land-use management and access including the provision of green space in town and country?**

- 2.7 DE would support more regionally-specific guidance on opportunities to improve the provision of green space in town and country as a means of relieving pressure for recreation on the DTE and reducing potential conflict with increasing demands for military training. There is a presumption in favour of public access to the defence estate wherever this is compatible with operational and military training uses, public safety, security, conservation and the interests of tenants. The MoD has a number of managed access areas across the South East. However, urban expansion and increased public access, especially in the DTE Home Counties area, is bringing the public into conflict with the military and is beginning to have a detrimental effect on military training. Any additional measures designed to divert pressure away from the DTE should be supported.
- 2.8 In terms of opportunities for improving land use management within the region, it should be noted that DE is already committed to improving the stewardship of its estate. The rural defence estate supports a range of agricultural activities and substantial areas of forestry, and the MoD have been successful in integrating military training with agricultural and forestry management. DE ensures that agricultural practices make a positive contribution to the conservation and enhancement of the landscape, cultural heritage and biodiversity of the rural defence estate. Furthermore, they have adopted national targets for biodiversity and to improve the condition of its SSSIs across varied inland and coastal sites. By way of example, its SSSI improvement project has delivered over £2.5m worth of improvement works that will contribute towards the attainment of its Public Service Agreement target of 95% 'recovering' or 'unfavourable recovering' condition by 2010.

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<sup>7</sup> Paragraph 6.5 of the Defence Estate Strategy 2006: In Trust and On Trust.

**6B.5 Does the Plan provide appropriate, regionally-specific guidance on coastline planning and management (Policy NRM6)? In particular:**

**a) are realistic forecasts of the impacts of climate change on the coast taken into account in framing policies for managing coastal development?**

**b) are the expectations for areas subject to Shoreline Management Plans, Coastal Habitat Management Plans and Estuary Management Plans made sufficiently clear?**

**c) should the draft RSS be more clear about the actions at regional and sub-regional levels that need to be taken to protect Heritage Coasts?**

2.9 As noted in paragraph 1.4, the region's coastline contains defence assets of national importance. These world class assets need to be maintained to meet the demands for military training and, where appropriate, improved to meet changing and increasing demands. DE therefore supports the reference in sub-point iv of Policy NRM6 to allowing development on the coastline that requires a rural coastal location. If regionally-specific guidance is to be given within Policy NRM6, reference must be made to the importance of the Kent and South Hampshire's coastline for military training. Where MoD development can be demonstrated to be in the national interest and where any adverse affects can be mitigated, it should be supported by the Plan. DE would also add that it is fully supportive of the references within NRM6 to enhanced collaboration between organisations in addressing coastal zone planning and management and is actively involved in such processes already.

## Appendices

## APPENDIX ONE



### Defence Training Estate South East (DTE SE)

### Lydd and Hythe Ranges – Usage Figures 2001 - 2006

1 December 2006

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THROUGHPUT FIGURES SINCE 2001

<b>2006</b>	Lydd with Rype	15581	14687	21338	18682	11900	39187	30908	19147	22453	13487			207730	
<b>2005</b>	Lydd with Rype	22990	30748	17063	8860	18314	15359	25806	19425	19775	10523	21349	10103	220279	
<b>2004</b>	Lydd with Rype	15909	24477	21690	9735	13173	11321	10989	15898	12883	8433	11067	8817	164392	
<b>2003</b>	Lydd with Rype	8923	17297	13870	10836	16650	10511	11623	12921	11815	23676	16148	10293	164563	
<b>2002</b>	Lydd with Rype	14508	15657	15769	14198	15583	12232	9951	15170	16472	13973	16138	6300	165951	
<b>2001</b>	Lydd with Rype	11738	13676	16109	15355	16367	22444	10717	9625	13975	15135	17325	2877	165343	
		<b>Jan</b>	<b>Feb</b>	<b>March</b>	<b>April</b>	<b>May</b>	<b>June</b>	<b>July</b>	<b>August</b>	<b>Sept</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>	<b>TOTALS</b>	