

Planning Services  
East Lindsey District Council  
The Hub  
Mareham Road  
Horncastle  
Lincolnshire  
LN9 6PH

28<sup>th</sup> November 2023

**Your Reference**  
RAF Coningsby

**Our Reference**  
RAF Coningsby, Echo and Sierra Dispersal  
Refurbishment

Dear Sir or Madam,

**Proposed Development at RAF Coningsby: Request for an Environmental Impact Assessment (EIA) Screening Opinion**

**1. Introduction**

AECOM write on behalf of our client, the Defence Infrastructure Organisation (DIO) (the Applicant) to seek a formal Environmental Impact Assessment (EIA) Screening Opinion pursuant to Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations, 2017 (the EIA Regulations) in respect of the Applicant's forthcoming development proposals at RAF Coningsby, Coningsby, Lincolnshire.

In accordance with the EIA Regulations the Local Planning Authority (East Lindsey District Council) have three weeks (21 days) in which to provide their formal EIA Screening Opinion from the date of receipt of this request, unless otherwise agreed with the Applicant (to a maximum of 90 days).

The following information forms part of this EIA Screening Request in accordance with Regulation 6, Paragraph 2:

- A plan sufficient to identify the land (Site Location Plan).
- A description of the development, including in particular a description of the physical characteristics of the development and, where relevant, of demolition works and a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected (see Section 3).
- A description of the aspects of the environment likely to be significantly affected by the development.
- To the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from the expected residues and emissions and the production of waste, where relevant; and
- Such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

**2. The Application Site**

RAF Coningsby ('the base') is located within East Lindsey District Council, to the immediate south of Coningsby / Tattershall. The base has an overall area of approximately 360 hectares (ha). It is largely surrounded by agricultural fields, with small settlements to the south (Hawthorn Hill, Scrub Hill and New York) and the town of Coningsby / Tattershall to the north. Tattershall Lakes Country Park (a holiday park) is located over 300m to the west. The flat Site largely consists of hardstanding (roads and runway), industrial buildings providing operational functions for the RAF, and residential units providing employee and family accommodation. The remainder of the land within the base mostly comprises semi-improved grassland.

RAF Coningsby in Lincolnshire is one of two RAF Quick Reaction Alert (QRA) Stations which protect UK airspace. RAF Lossiemouth is the other. RAF Coningsby is home to two frontline, combat-ready squadrons and is the training station for Typhoon pilots. Almost 3,000 Service Personnel, Civil Servants, and contractors work at RAF Coningsby<sup>1</sup>.

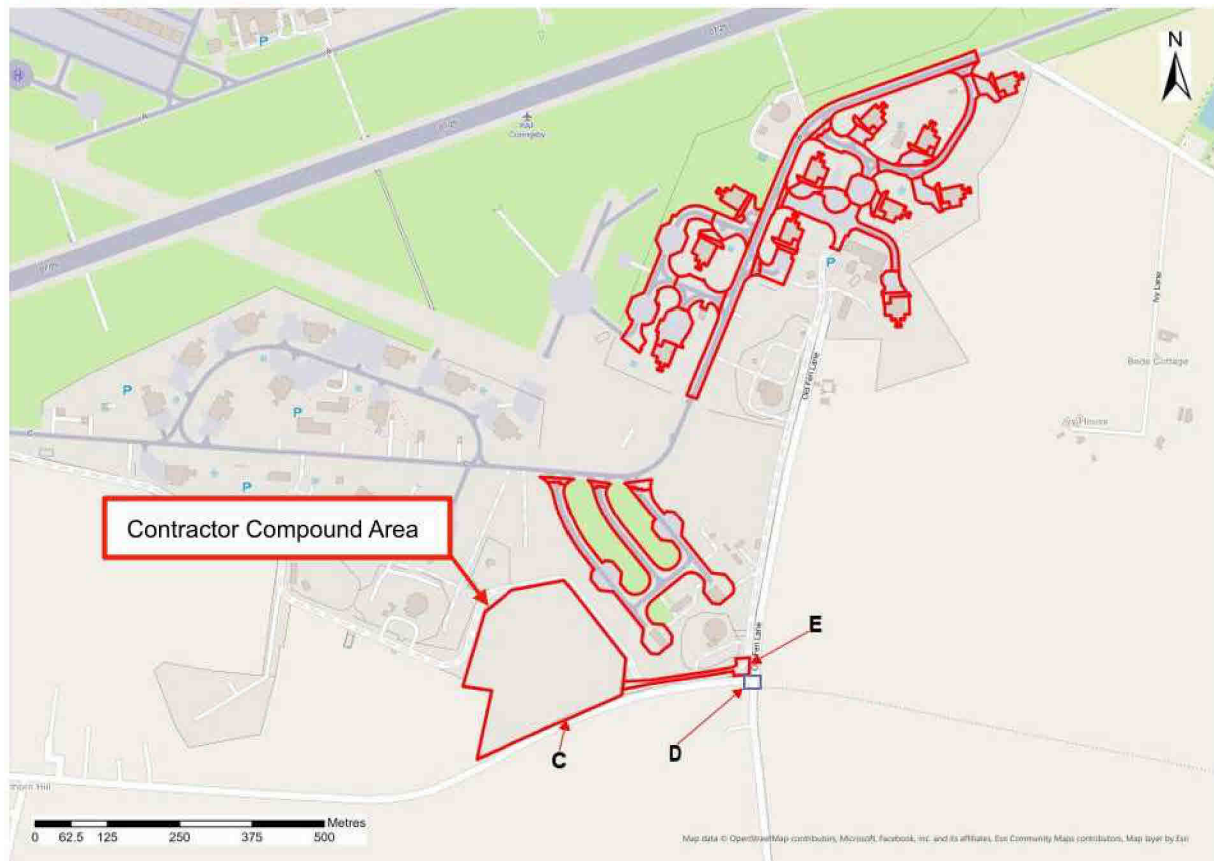
The Site subject to this screening request includes only parts of the Site at RAF Coningsby, as well as land adjacent to the Site on Hawthorn Hill / Old Fen Lane. The areas subject to the above proposals are shown on Figures 1 and 2 below.

**Figure 1 1:240: Location Plan**



<sup>1</sup> <https://www.raf.mod.uk/our-organisation/stations/raf-coningsby/> (Accessed 12/08/2023)

Figure 2 1:500 Site Plan



### 3. The Proposals

The Applicant are proposing to undertake works for the refurbishment of facilities to enable use of the airfield to continue in accordance with the Site's proposed future operational requirements. The proposed refurbishment and maintenance works are considered necessary to ensure the overall resilience of the Site in the long term.

The following works are proposed:

- **Proposal A:** Replacement and refurbishment of the existing Aircraft Operating Surface (AOS), labelled as 'Echo and Sierra Dispersal sites.
- **Proposal B:** Replacement and reprovision of aeronautical ground lighting (AGL).

Recent inspection reports on Site highlighted the deterioration of the AOS in both the Echo and Sierra Dispersal sites. The traditional design life of a concrete surface in accordance with Design and Maintenance Guide (DMG) 27 is 30 years. The Echo construction areas are now 26, 38 and 67 years old respectively, whilst the Sierra Dispersal surface is also 67 years old. Due to the increasing age of the surfaces, they are showing signs of nearing the end of their serviceable life. Given the operational output of RAF Coningsby, a lack of suitable aircraft operating surfaces would impact the wider operational remit of the Station.

AGL associated with the pavement areas being refurbished will be replaced for LED lights, at the same height of those existing (sitting at ground level).

Areas subject to resurfacing works are shown in blue and purple on Figures 4 and 5 below (covering a total of 17,405sqm (1.7ha) of resurfaced area for 'Echo' and 18,818sqm (1.88ha) of resurfacing for 'Sierra'), with the areas in green, subject to patchwork repairs where required.



Figure 3 Proposal A & B (yellow box areas)

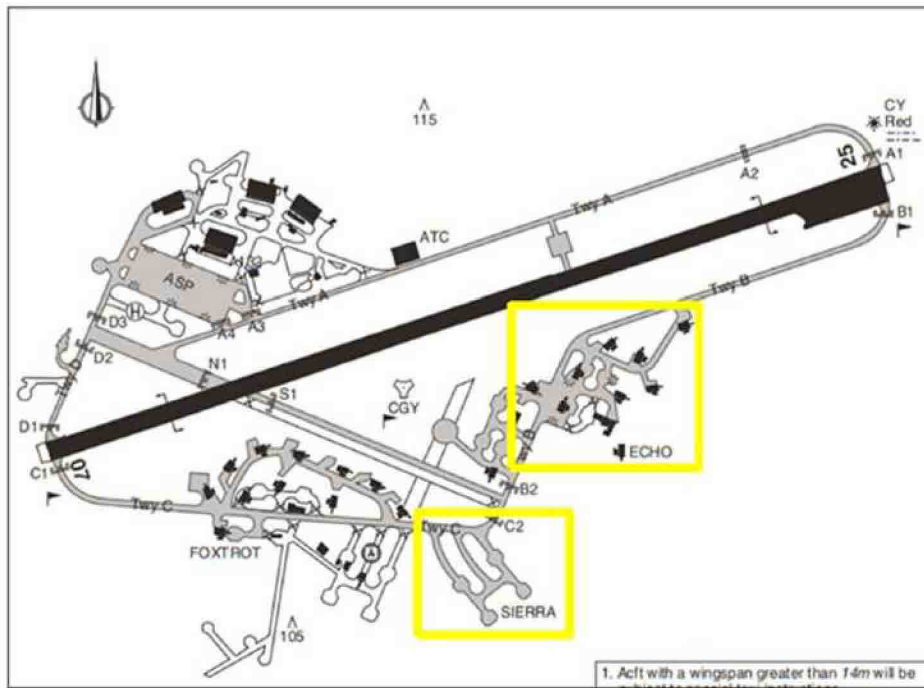
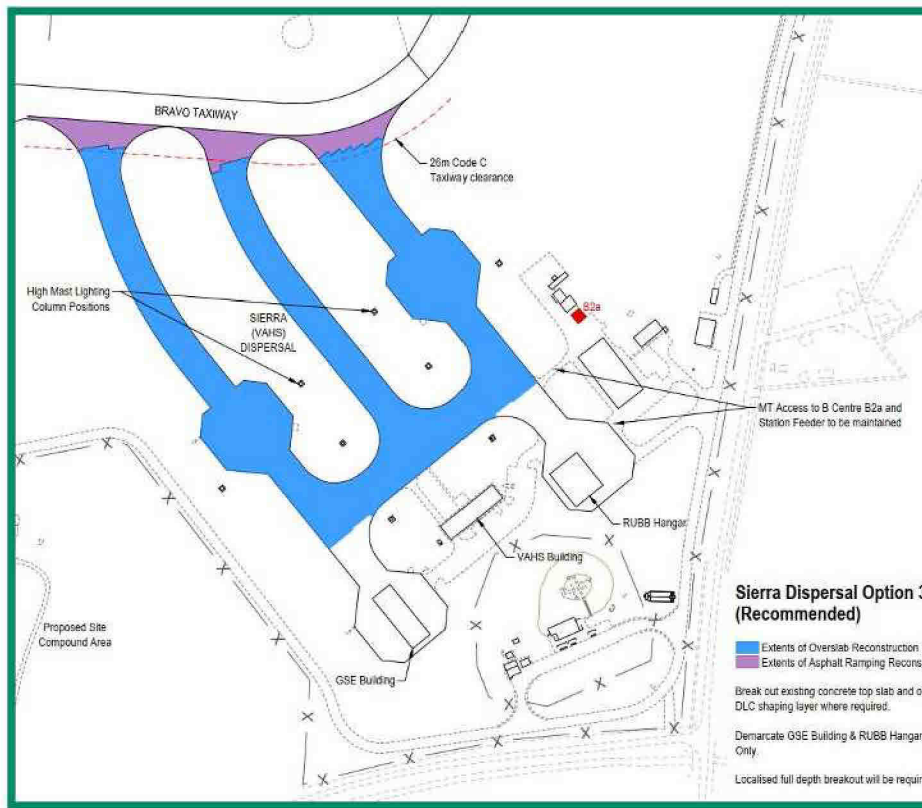


Figure 4 Proposal A (Echo area)



**Figure 5 Proposal A (Sierra area)**



- **Proposal C:** Installation of temporary construction compound ('Contractor Compound Area'), including a temporary area of hardstanding to security check construction vehicles into the Site.

The proposed compound Site would be located within the Site boundary of the RAF base. The area for Proposal C is surrounded by the RAF Coningsby perimeter fence and benefits from an internal security fence and access gate onto the perimeter road. The Site itself is a maintained grassed area. The compound will be pulled back from the Site boundary to avoid existing vegetation.

- **Proposal D:** Minor Highways Works, adjacent to RAF base to allow for construction access. These works are required in association with the maintenance and upgrade of facilities used for air traffic services,
- **Proposal E:** Amendments to gates/fencing along RAF Site boundary.

Permitted Development Rights

Given that the proposals are located on and around an operation airfield on Crown Land, it is likely that the majority of the Development Proposals will benefit from Permitted Development Rights (PD Rights). A formal pre-application request will be submitted to the Council alongside this Screening Request requesting comment from the LPA on PD Rights, and where planning permission for the above works will likely be required, this is therefore not covered as part of this Screening Request.

**4. Environmental Constraints**

Works for Proposals A, B, C and E are located within areas of the Site not covered by any environmental constraints, Proposal E sits on the Site boundary to the south-east. No environmental constraints have been

identified within close proximity of the Site, with the exception of parts of the Site being located within Flood zone 2 and 3- this however, does not impact the areas of the Site subject to Proposals A-E.

**Biodiversity:** The majority of the area subject to the proposed development is made up of existing hard standing, with maintained grassed areas elsewhere on Site (Proposals A-E). There appears to be a limited number of trees on site, none of which are protected by a Tree Preservation Order (TPO)- as per desktop review on East Lindsey District Council's interactive planning map.

No statutory designated sites were identified on the or immediately adjacent to the Site. The following were identified beyond the Site boundary:

- Tattershall Lakes Country Park, 0.3km West.
- The Pingle Local Nature Reserve 0.8km North.
- Troy Wood Site of Special Scientific Interest (SSSI), 0.8km North-East.
- Tattershall Carrs SSSI, 1.5km North-West.
- Tattershall Old Gravel Pits SSSI, 2.7km North-West.
- Fulsby Wood SSSI, 3.3km North-East.
- Kirkby Moor SSSI, 4.0km North.

Given the low impact nature of the proposals and the distances from the Site, it is not anticipated that these non-statutory designated sites will be adversely affected by the Proposals.

An Ecological Survey was undertaken in June 2021 by AECOM following initial survey work that was undertaken in 2018. The report assesses potential ecological constraints related to works to improve the areas of hardstanding associated infrastructure. It provides an assessment of the protected and/or notable habitats and species which occur or have the potential to occur in or near to the proposed development areas within the Site.

For Proposals A and B, the report states that there are no ecological constraints relating to the hardstanding pavement areas and the habitats are the same as the baseline reported in the PEA report which was subject to surveys undertaken in 2018. An Ecology Inspection Report (AECOM, September 2023) was undertaken specifically relating to Proposals A, B and C.

For Proposals A and B, the report notes the following- *“there may be minimal encroachment of grassland adjacent to the pavement areas through temporary ground disturbance associated with new lighting up 1 metre from the pavement areas. Adjacent grassland also has the potential to support nesting birds such as skylark or other ground nesting birds (for a period from March to September inclusive) and may be indirectly impacted through disturbance as a result of the works. Recommendations should be followed to render these areas less suitable for ground nesting birds prior to work and if work has not started by March 2024 an Ecological Clerk of Works (ECoW) to visit to check for nesting birds. Three waterbodies (EWS 4, 5 and 399) adjacent to the pavement areas (within 50m) were considered suitable for GCN but the species was confirmed as absent following eDNA testing”.*

For Proposal C, the report states that *“this site compound is part of the airbase but not part of the main airfield. It comprises a species poor tussocky grassland surrounded by a fence and is regularly mown. As there are desk study records for Great Crested Newt (GCN) and waterbodies nearby as identified in the PEA report, this area was deemed to have suitability to support GCN and presence/absence surveys of relevant waterbodies were recommended prior to works. Following inspection of relevant waterbodies, information was used to calculate an index of habitat suitability for Great Crested Newts (between 0 and 1 (poor, below average, average, good or excellent suitability), where 1 is the maximum index of suitability), one waterbody was considered suitable to support GCN (EWS 5) located approximately 380m to the north of this grassland.*

*An eDNA sample returned a negative result from the eDNA testing, indicating an absence of GCN. There are therefore no constraints likely to occur regarding GCN in relation to these works. General precautions are recommended for other species of amphibians, transitory reptiles and ground nesting birds.”*

The majority of areas of grass adjacent to operational runways and taxiways appeared to be regularly mown and managed much like amenity grassland; this is also the case with land up to the Site's parameter. Given the conclusions of the above, it is not anticipated that there would be any significant ecological impact as a result of the Proposals above.

**Local Air Quality, Lighting and Noise Environment:** Repair and resurfacing works will be undertaken on the existing internal access roads. The operational use of these locations will therefore remain the same as existing. Noise from construction associated with these works may be likely, however this will be temporary only.

Any dust created through construction will be managed on Site by the contractor. The contractor undertaking the above Proposals will be asked to outline their mitigation strategies in their Construction Environmental Management Plan (CEMP). Some likely mitigations may include covering all vehicles carrying loose materials and dampening down haul roads, as necessary, to reduce dust emissions; conducting all cutting and grinding operations in a manner to reduce the risk of dust migration; covering any stockpiles to prevent the movement of dust in the wind; and using wheel wash facilities / road sweepers, where appropriate, to keep public roads clear of dust.

Temporary lighting may be used during construction only, such lighting would be fixed to plant equipment as well as assembled in locations that reduce light nuisance impacts to local neighbours and wildlife. The fittings will be positioned to direct light downwards to minimise any impact of light pollution on neighbours and wildlife and be switched off during periods of site inactivity. All of these will take place/ be in use only temporarily, in relation to the main works on Site. Land in use for temporary compound and batching will be returned to its existing condition on completion of all works.

New AGL will be installed replacing existing AGL. As noted above, this lighting will be installed in an area of hangars/outbuildings in active use on existing hard standing. Given that lighting is already installed in this area, it is concluded that impact from the installation of new AGL is likely to be minimal.

**Built Heritage:** There are a number of listed buildings located within close proximity of the runway sitting north of the site boundary. Whilst not within close proximity of the runway itself, a number of listed buildings are located to the north and south-east of the runway; these being:

- Scheduled Monuments: Dogdyke Pumping Station, 1km SW, Tattershall Castle and College, 1.1km WNW, Tattershall College Grammar School 1.1km NW and Butter Cross, Tattershall, 1.3km NW.
- Grade I listed: Church Close, 0.7km NW, Church of St Michael, 0.7km NW, Church of Holy Trinity, 0.9km WNW, Moat Walls at Tattershall Castle, 1km WNW, Kitchen Ruins to Tattershall Castle, 1km WNW, Tattershall Castle, 1km WNW, Round Towers, Tattershall Castle, 1km WNW, Stable Ruins, Tattershall Castle, 1.1km WNW, Ticket Office and Shop, Tattershall Castle, 1.1km WN and Market Cross, 1km NW.
- Grade II listed: Grange House, Grade II\* Black Holt former Atomic Bomb Store: D2 Missile Storage Bays, Grade II Black Holt former Atomic Bomb Store: Mounded Weapon Preparation Area, Grade II listed Black Holt former Atomic Bomb Store: Testing Building, Grade II listed Black Holt former Atomic Bomb Store: Component Testing Building, Grade II listed Black Holt former Atomic Bomb Store: 13 individual fissile core stores within a mounded earthen bund and Grade II Black Holt former Atomic Bomb Store: Weapon Inspection Building.

No direct effects on heritage assets as a result of the development are anticipated.

**Landscape and Visual:** From desktop review, the topography of the Site and surrounding area appears to be relatively flat. It is anticipated that visual impacts and landscape impacts will be minimal, with all resurfacing works taking place within the built area of the Site boundary, or along the existing hardstanding, and proposed lighting being similar in, appearance and location to that as existing. The AGL mast will be installed beside existing areas of hard surface, and thus well contained within the airfield site, and therefore considered unlikely to cause significant impacts visually. A temporary minimal impact may be anticipated during the placement of the temporary site compound and batching plant facility, which will be removed on completion of all works on Site, and will therefore not have a lasting, permanent impact on the immediate or surrounding landscape. No direct effects on landscape on a permanent basis as a result of the development are anticipated.



**Flood Risk:** The Site is largely located within Flood Zone 1 and is therefore at low risk of flooding, with a small area of the Site along the southern boundary located within Flood Zones 2 and 3; this however does not include any of the land required for the delivery of Proposals A-F above. The River Bain flows to the west of the Coningsby base, constrained between flood banks approx. 1.5m high. The river rises at Ludford, flowing approximately 27km to the River Witham, with the confluence approximately 940m downstream of the RAF base. The catchments of both rivers are dominated by arable land, with extensive artificial drainage of fens. To the south of the base, there is an artificial watercourse, the Catchwater Drain which is part of the fen drainage network.

The proposed works at RAF Coningsby are not predicted to be affected by fluvial flooding or impact upon flood risk elsewhere as they are located outside of any fluvial Flood Zones. There is some predicted existing surface water flooding to the works areas, but the Proposals under Proposals A and B constitute a direct replacement of an existing hardstanding and will not alter the current situation, therefore there will be no change in flood risk associated with the development or to the surrounding areas.

Overall, it is therefore concluded that there is no identified likely significant effect in relation to flooding.

**Ground Conditions:** Works under Proposals A, B, and E are the only proposals likely to involve any ground works. The site has historically been used as an airfield and will continue to be used as an airfield for the foreseeable future. Old Fen Lane (which looks to be a drainage channel) is shown within the Echo Dispersal from 1888 to 1905 but is not shown by 1971 so may have been infilled. Likewise, Reedham Lane (which also looks to be a drainage channel) is shown within the Sierra Dispersal from 1888 to 1905 but is not shown by 1971 so may also have been infilled. For Proposals E and F, this land is located on the border or adjacent to the RAF Site, on grassed areas typically forming highway verges. For Proposal A, a High Level Geo-Environmental Site Assessment report has been undertaken (AECOM, September 2021), the report is based on the depth of any excavation works will be limited to the upper 1m below ground level (bgl), ground works are therefore likely to be minimal.

A site inspection was undertaken in July 2021. The inspection included a general overall walkover of points of interest across the wider RAF Coningsby Station and a detailed inspection of the Sierra Dispersal area (part of Proposal A). The Echo Dispersal was not accessible during the site inspection due to security access restrictions; however, site management gave an overview of operations within this area (again, part of Proposal A). Given the shallow depth of the proposed development (500mm across hardstand areas / 1m in contractors compound area), a ground investigation is not considered necessary at this stage. It may be more appropriate to develop a monitoring and action plan (or similar) likely including a contamination watching brief, to be implemented during the development to manage any contamination encountered should contamination be found; this can be managed on Site by Construction Contractors.

The report states that risk from possible chemical and nuclear contamination for Site is considered to be very low.

The Proposals are likely to require little to no ground disturbance in association with the proposed works, given that the works comprise mostly of comprehensive repair works, whilst minor ground works may be required for the construction of the Proposals. The Site as existing is private, with no public access, it is therefore believed that the risk to sensitive receptors and/or members of the public is likely to be limited.

In regard to any below ground works, the Project intends to consult with the LPA's Archaeologist to agree an approach in the event any stripping of the land is required or when foundation excavations are undertaken to support the construction of Proposal D. The Project Team's intention will be to agree the mitigation actions to minimise any potential impact to any underlying archaeological deposits.

## 5. EIA Screening Opinion Request

In accordance with the EIA Regulations the determination of whether EIA is needed requires consideration as to whether the development is:

- Schedule 1 development – in which case EIA is mandatory: or
- Schedule 2 development – in which case EIA is necessary if the development is likely to have significant environmental effects.



Guidance states that “*schedule 1 development is excluded from being permitted development unless the Secretary of State has directed that the development is exempt from the 2017 Regulations. In all other cases Schedule 1 development always requires the submission of a planning application and an Environmental Statement (and, where relevant, a subsequent application and revised Environmental Statement)*”. The Site at RAF Coningsby is not Schedule 1 development, this is therefore not applicable to this screening request.

Additionally also, that “*If a proposed project is listed in the first column in Schedule 2 of the 2017 Regulations and exceeds the relevant thresholds or criteria set out in the second column (sometimes referred to as ‘exclusion thresholds and criteria’) the proposal needs to be screened by the local planning authority to determine whether significant effects on the environment are likely and hence whether an Environmental Impact Assessment is required*”<sup>2</sup>.

Schedule 2, part 10 (infrastructure projects), part (e) relates to the construction of airfields, where the area of works exceeds 1 hectare. This relates specifically to development involving the extension of a runway, or an area of works over 1ha; the works proposed as set out in this letter do not relate specifically to the ‘construction’ of airfields, and therefore is not applicable to the proposed works at RAF Coningsby.

Schedule 2, part 13, ‘changes and extensions’, part b states that “*(i) any change to or extension of development of a description listed in paragraphs 1 to 12 of column 1 of this table, where that development is already authorised, executed or in the process of being executed.*” The criteria threshold states that “*The development as changed or extended may have significant adverse effects on the environment; or (ii) in relation to development of a description mentioned in column 1 of this table, the thresholds and criteria in the corresponding part of column 2 of this table applied to the change or extension are met or exceeded.*” Whilst part (ii) is of relevance in relation to the proposals (works exceeding an area of 1ha but not an extension of, or creation of a new runway), the above analysis concludes that there are no likely significant effects identified in relation to the above works at RAF Coningsby.

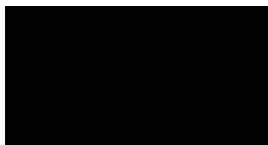
The GPDO, Article 3, paragraph 10, references EIA Regulations. This stipulates that any development determined to be EIA Development under the EIA Regulations cannot be classed as permitted development. An EIA Screening Opinion is therefore requested from East Lindsey District Council to confirm the proposals are not EIA development, under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. A request for formal pre-application advice will be submitted to the LPA so discuss Proposals A-F and whether these proposals do, or do not require planning permission.

## Summary

The proposed main works will be undertaken on areas of an existing hard standing, or mostly areas of maintained grassland or grass verges, with other parts of the development being temporary, and removed immediately on completion of replacement, maintenance and refurbishment works on the airfield, with proposed AGL being installed in similar locations.

Therefore, it is our view that the impacts of the development at RAF Coningsby do not amount to ‘likely significant effects’ and as such, would not trigger the requirement for EIA. We therefore consider that the proposals should be confirmed as not EIA/do not require the submission of an Environmental Statement.

Yours sincerely,



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<sup>2</sup> <https://www.gov.uk/guidance/environmental-impact-assessment#Screening-Schedule-2-projects>