LONDON GATWICK

12 June 2024

Jason Hawkes
Development Section
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Dear Jason

Re: EIA/24/0003 – Amended EIA Screening Opinion in relation to a mixed use development on Land West of Ifield Our Ref: LGW5536

Thank you for your letter/email dated 3rd June 2024, regarding the above-mentioned revised EIA Screening Opinion.

I note that aerodrome safeguarding has only been mentioned in terms of SUDS and drain down times. As far as I can see there has been no mention of other aerodrome safeguarding requirements.

In our response of November 2023 (LGW5339) to the previous screening opinion being EIA/23/0007 we requested that other aerodrome safeguarding requirements be taken into account.

The site is only around 1.1km South, at its closest point, of the extended centreline for runway 08R/26L and it is vital that the safe operation of the aerodrome is not impacted upon by new developments.

It is important that aerodrome safeguarding considerations are covered in full in the EIA as follows:

Obstacle Limitation Surfaces (OLS)

The Obstacle Limitation Surfaces (OLS) are designed to ensure that aircraft are safe from obstacles whilst taking off and landing and flying in the vicinity of the aerodrome.

Most of the site, from the Southern boundary of Ifield Court southwards is situated under the IHS (Inner Horizontal Surfaces) which is a flat surface and is located at 104.35m AOD (Above Ordnance Datum). No buildings or structures must infringe that height. However please be aware that it might not be possible to build up to that height as other surfaces relating to CNS (Communication, Navigation & Surveillance) and Instrument Flight Procedures (IFPs) may be lower.

The remaining site area to the north is situated under several complex OLS which are far more restrictive than the above mentioned IHS. If any structures are intended for this area of the site we would ask that the developer contacts us for more details with regard to height restrictions.

Please see CAST Advice note 1 'Safeguarding of Aerodromes' available at CAST Advice Notes | Civil Aviation Authority (caa.co.uk)

Communications, Navigation & Surveillance (CNS) Equipment

Development has the potential to impact on CNS equipment utilised by the airport. Potential issues can include: signal reflection, refraction, shielding or interference and the display of 'clutter' and false plots on radar displays.

The height restrictions relating to CNS equipment can be lower than the OLS as mentioned above. Therefore, it is important that as soon as details of the building heights and locations are available we are consulted further.

IFPs (Instrument Flight Procedures) Safeguarding

Instrument flight procedures are designed to ensure that aircraft are kept at a safe distance from any building or obstacle, especially in times of bad weather and low visibility, therefore it is important that these surfaces are not compromised.

The safeguarded surfaces for the IFPs differ from those of the OLS & CNS, therefore it is important that as soon as details are available of the building heights and locations we are consulted further.

Lighting

Any lighting will need to be carefully designed and laid out to ensure that there will be no issues for pilots, aircrew and ATC. At night and in periods of poor visibility during the day pilots rely on a particular pattern of the aeronautical ground lights, principally the approach and runway lights to assist in aligning themselves with the runway to touch down at the correct point. Therefore, other lights must not be displayed which would distract pilots or confuse them by being mistaken for aeronautical ground lights.

There must not be a high level of background lighting which could diminish the effectiveness of runway lighting, no light spill above the horizontal and no lighting that could cause dazzle or distract pilots or Air Traffic Control such as laser lights or flashing lighting.

Please see CAST Advice Note 2 'Lighting near Aerodromes', available at for further general information. CAST Advice Notes | Civil Aviation Authority (caa.co.uk)

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Bird Hazard Management

Aircraft are vulnerable to wildlife strike, birds are the most problematic species in the UK. Gatwick Airport Ltd works hard to minimise that risk, for instance there is 24/7 bird control on the airport and our bird consultants Birdstrike Management Ltd carry out regular audits of the environment within the 13km 'Bird Circle' to assess any risk.

We work with developers, third parties and Planning Authorities to ensure that proposed developments achieve the biodiversity requirement, without increasing the birdstrike risk to the airport. The following factors need to be fully taken into account:

Landscaping

Landscaping must be carefully designed to ensure that it does not attract birds hazardous to aviation in large numbers for instance Gulls, Corvids, Pigeons, water birds and flocking birds.

The amount of berry/fruit bearing species must be kept to a minimum and there should be no dense areas of trees planted over and above that which exists.

Trees such as Scots Pine and Oak species are particularly attractive to some species for nesting, roosting and loafing due to their broad canopies, therefore the numbers of those species should be kept to a minimum.

In areas where the ground is close to the OLS no fast growing or tall tree species should be planted to ensure that the OLS are not infringed and other safeguarded surfaces are not compromised.

Sustainable Urban Drainage Systems (SUDS) & Open Water

Preferably SUDS should consist of below ground storage tanks so that there is no open water to attract birds.

However, some above ground SUDS schemes can be permissible depending on their design. Any standing water should drain down quickly ie within 24 hours to ensure that there is no open water for long periods.

Depending on the design of the SUDS scheme and drain down times we may request that a Bird Hazard Management Plan is entered into to ensure that the bird strike risk to the airport is not increased.

We understand that some existing ponds on site are to be enhanced. It is important that the ponds are designed to ensure that they do not attract birds hazardous to aviation over and above the existing population.

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Building Design

The buildings should be carefully designed to ensure that birds are not attracted for nesting, roosting and loafing in large numbers. Ledges, gantries and overhangs can be an attractant for birds.

Large areas of shallow pitched roof (around 15 degrees or less) or flat roofs, can be attractive to Gulls and Pigeons in particular for nesting, roosting and loafing. Green roofs depending on their size and design can be particularly attractive to birds hazardous to aviation. We would ask that any green roofs be kept to a minimum and be small in area.

Should any large areas of flat/shallow pitched roofs be proposed in this development, we would request that a Bird Hazard Management Plan (BHMP) is entered into as part of the planning process to ensure that birds hazardous to aviation for example Gull species are deterred from utilising the roofs.

Please see CAST Advice Note 3 'Wildlife Hazards around Aerodromes' available at CAST Advice Notes | Civil Aviation Authority (caa.co.uk) for further general information.

Cranes & Construction Equipment

Cranes and construction equipment have the potential to cause interference with CNS equipment at the airport.

We strongly recommend that a construction methodology strategy is agreed at an early stage with the GAL Safeguarding, the document must cover the following:

- Use of cranes and construction equipment including, locations and heights
- Control of activities likely to produce dust or smoke
- The design of temporary construction lighting
- The storage of materials, particularly in relation to height limitations
- Control and disposal of putrescible waste to prevent the attraction of birds
- Earth works including standing water that may attract birds

Please see CAP1096 'Guidance to Crane Users', available at
Guidance to crane users on aviation lighting and notification (caa.co.uk)

Please also see Cranes | Permits | London Gatwick Airport

Building/Structure Induced Turbulence

Some buildings/structures have the ability to cause induced turbulence to aircraft departing and approaching the runway. Depending on the height and location of the buildings we may request that a building induced turbulence study is commissioned to ensure that there will be no issues for aircraft.

As this site is in close proximity to the airport we would request that we are consulted with regard to the above mentioned elements as soon as possible.

Renewables

Wind turbines have the ability to adversely affect the CNS equipment at the airport. They also have the potential to infringe the Obstacle Limitation Surfaces (OLS) and the protected surfaces for Instrument Flight Procedures (IFPs). Therefore, if any wind turbines are proposed we would ask that we are consulted at an early stage.

Should any large banks of solar panels be proposed as part of this development, we would ask that we be consulted as soon as possible so that we can ensure that there will be no glint or glare to pilots, air crew or Air Traffic Control and that there will be no issues with radar reflection.

Please see CAST Advice note 5 'Renewable Energy & Impact on Aviation' available at or further general information. CAST Advice Notes | Civil Aviation Authority (caa.co.uk)

Please note that this response relates to air safety matters only and you will receive a further response from the Gatwick Planning team with regard to other airport related matters.

Please be advised that the advice given is informal and without prejudice to the consideration of any planning application which may be referred to us pursuant to Planning Circular 01/2003 in consultation under the safeguarding procedure. It cannot be assumed that any response to consultation under Planning Circular 01/2003 will necessarily coincide with the informal advice now given. We will not have any liability to you or third parties who may follow this advice.

It should also be made clear that provision of this advice does not constitute support for the development nor an opinion that the development is acceptable under local planning policy.

If you have any queries, please do not hesitate to contact me.

Yours sincerely

Amanda Purdye, Aerodrome Safeguarding Officer
For and on behalf of London Gatwick

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