

FORD ENERGY RECOVERY FACILITY AND
WASTE SORTING AND TRANSFER FACILITY,
FORD CIRCULAR TECHNOLOGY PARK



AERODROME
SAFEGUARDING STATEMENT

**FORD ENERGY RECOVERY FACILITY AND WASTE SORTING AND TRANSFER
FACILITY, FORD CIRCULAR TECHNOLOGY PARK, FORD**



TERENCE
O'ROURKE

AERODROME SAFEGUARDING STATEMENT

FORD ENERGY FROM WASTE LTD, GRUNDON WASTE MANAGEMENT LTD,
VIRIDOR ENERGY LTD

MARCH 2021

1.0 Introduction

- 1.1 This Aerodrome Safeguarding Statement is part of a set of documents submitted in support of an application for planning permission by Ford EfW Limited, Grundon Waste Management Limited and Viridor Energy Limited (the applicants) to West Sussex County Council (WSSCC) for the construction and operation of an Energy Recovery Facility (ERF) and Waste Sorting and Transfer Facility (WSTF) on land at Ford Circular Technology Park, Ford, West Sussex.
- 1.2 The statement describes the enquiries made to Goodwood Aerodrome regarding the potential effects of the proposed development on the aerodrome operations and to describe any mitigation that may be required to address the issues raised.

2.0 Consultation

- 2.1 The proposed development is subject to Environmental Impact Assessment and a scoping request for a substantially similar proposal was made to WSSCC on 24 January 2020. The information sent with the scoping request included details of the proposals. WSSCC contacted Goodwood Aerodrome's Aviation Operations Manager and NATS Safeguarding by email as consultees, and sent the scoping information with the email.
- 2.2 A response from NATS was received by WSSCC on 4 February 2020. However, a response was not received from Goodwood by the time the scoping opinion was issued on 13 March 2020.
- 2.2 The applicants were aware that WSSCC had contacted the aerodrome for comment and were awaiting any response before making further contact to discuss any issues arising. In the absence of a response, Terence O'Rourke contacted the Aviation Operations Manager by email on 16 March 2020, with a copy of the scoping information, and asked for comments on the proposals. The correspondence is provided in Appendix 1.

3.0 Goodwood Aerodrome's response

- 3.1 A response was received on 12 May 2020, and is provided in Appendix 2 along with subsequent correspondence.
- 3.2 The response confirmed that the proposed development in terms of height (80m) and scope does not present a flight safety issue. Whilst the site is partially within the safeguarded bird circle (13km), as there are no approaches to runways in that area, the Aviation Operations Manager judged there to be a very low risk of birdstrike for the Aerodrome operation at Goodwood.

- 3.3 The Aviation Operations Manager confirmed that there is no objection to the proposed development.
- 3.4 The applicants subsequently requested clarification about the need or otherwise for aviation warning lights on the flue, pointing out that it was now to be at 85m above ground level (having been 80m in the scoping material).
- 3.5 The Aviation Operations Manager's response explained that the need for lighting on permanent or temporary obstacles is defined in Article 219 of the Air Navigation Order (CAP393), as applicable to structures 150m above ground level and in the vicinity of a licensed aerodrome/airport. The general definition of ‘.in the vicinity..’ would mean an obstacle within the safeguarded surfaces of the Aerodrome. He indicated that the height at 85m does not penetrate or sit close to any of the Goodwood safeguarded surfaces, and therefore does not present a risk to aeroplanes landing or taking off.

4.0 The NATS Safeguarding response

- 4.1 The NATS group provides air traffic control services and is subject to safety regulation by the UK Civil Aviation Authority. NATS en route (NERL) operates under license issued by the UK Government to manage UK upper airspace. NATS en-route is a statutory consultee and is responsible for ensuring that all of their air traffic control assets are protected from interference.
- 4.2 The response received on 4 February 2020 by WSCC is provided in Appendix 3.
- 4.3 The response confirmed that the proposed development does not conflict with safeguarding criteria, and there is no safeguarding objection to the proposal.

5.0 The Civil Aviation Authority

- 5.1 The CAA has no responsibilities for safeguarding sites other than its own property: aerodrome operators are responsible for safeguarding their own sites. The CAA is therefore not a statutory consultee on the planning application, that role being taken by the owner and operator of Goodwood Aerodrome.
- 5.2 It should be noted that lighting or marking of structures is not routinely required for structures under 300 ft. (91.4m) unless specifically requested by an aviation stakeholder.
- 5.3 However, if an aviation stakeholder makes a request for lighting/marketing of structures of lesser height it is highly likely that the CAA would support such a request.

5.4 In this instance, the height of the flue stack is 85m and the aviation stakeholder (Goodwood Aerodrome) has not requested any lighting or marking of the structure. There is therefore no need to consult the CAA.

6.0 The revised proposals

6.1 The applicants have withdrawn the original planning application (WSCC/036/20) to which the above consultation relates.

6.2 However, a revised application has been submitted that is substantially similar to the withdrawn proposal. The proposed buildings have been reduced in height and the proposed single stack is now two stacks of the same height (85 metres) located adjacent to each other.

6.3 Goodwood Aerodrome has been contacted by the applicants' representatives to ask whether the revision to the proposals would be likely to change their position, in the context that a height of 85 metres does not penetrate or sit close to any of the Goodwood safeguarded surfaces and therefore does not present a risk to air traffic using the Aerodrome.

6.4 The response from Goodwood Aerodrome confirms that there is no objection (see Appendix 4) and that no issues are raised.

Appendix 1

Emails to Goodwood Aviation Manager requesting comments.

From: Emma Robinson <emma.robinson@torltd.co.uk>
Date: Monday, 16 March 2020 at 11:21
To: "mark.gibb@goodwood.com" <mark.gibb@goodwood.com>
Cc: Steve Molnar <steve.molnar@torltd.co.uk>, Paul McLaughlin <paul.pgm@outlook.com>
Subject: Ford Energy Recovery Facility - Environmental Impact Assessment Scoping

Dear Mr Gibb,

On the 24th January 2020 Terence O'Rourke Ltd, on behalf of Ford EfW Ltd, wrote to West Sussex County Council (WSSC) and requested an environmental impact assessment (EIA) scoping opinion in relation to proposals to build and operate a conventional energy recovery facility (ERF) to treat non-hazardous, non-recyclable residual waste at the Ford Circular Technology Park at Ford Road, Ford. Alongside the letter, we sent a Scoping Report, please see attached for your reference.

I understand from James Neave, the case officer for the project at WSSC, that he forwarded the Scoping Report to you in case there were any concerns in relation to the operation of Goodwood Aerodrome and any requirement for lighting the proposed stack, which will be approximately 80m high.

The deadline for receipt of the council's formal Scoping Opinion was last Friday, however, as your comments had not been received at that stage, I would be very grateful if you could let me know (either directly or via James Neave) whether there are any issues that you consider we should be taking into account during the preparation of our planning application and EIA.

Please let me know if you require any further information.

I look forward to hearing from you.

Kind regards

Emma
(EIA co-ordinator)

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Emma Robinson
Associate Director

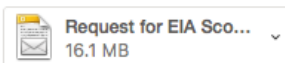


Steve Molnar <steve.molnar@torltd.co.uk>

mark_gibb@ [REDACTED] Emma Robinson

Tuesday, 12 May 2020 at 11:02

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! This message is high priority.

Dear Mark,

Further to our conversation, please see below and attached regarding the proposed development at Ford.

As discussed, we would be most grateful if you could respond regarding any issues to be addressed regarding Goodwood Aerodrome.

Kind regards

Steve Molnar BA(Hons) MPhil Dip UP MRTPI
Technical Director

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MARCH 2021

Appendix 2

Goodwood Aviation Manager response and related correspondence



mark_gibb@:

Steve Molnar; Emma Robinson

Tuesday, 12 May 2020 at 19:23

[Show Details](#)

Good evening Steve. Many thanks for giving me the opportunity to comment on the proposed development at Ford Circular Technology Park.

I have assessed the proposed site against the obstacle limitation surfaces (defined within CAP738) for Chichester Goodwood Aerodrome, and can confirm that the proposed development in terms of height (80m) and scope does not present a flight safety issue for the Aerodrome operation at Goodwood. The proposed site is partially within the safeguarded bird circle (13km) but as we have no approaches to runways in that area, I judge it to be a very low risk of birdstrike.

On behalf of Goodwood Aerodrome, I confirm that there is no objection to the proposed development.

Kind regards,

Mark Gibb
Aviation Operations Manager
Goodwood Aerodrome

On 13 May 2020, at 09:12, Steve Molnar <steve.molnar@torltd.co.uk> wrote:

Many thanks Mark,

I do have one query. On the basis of what you have said, it would appear that there will be no need, from Goodwood Aerodrome's point of view, to have red aviation warning lights on the flue. I'd be grateful if you could confirm whether this is the case.

Also note that although at scoping stage the flue was to be 80m high, the actual design height is now 85m.

Kind regards

Steve

Steve Molnar BA(Hons) MPhil Dip UP MRTPI
Technical Director

From: Mark Gibb [REDACTED]
Date: Wednesday, 13 May 2020 at 10:09
To: Steve Molnar <steve.molnar@torltd.co.uk>
Cc: Emma Robinson <emma.robinson@torltd.co.uk>
Subject: Re: Ford Energy Recovery Facility - Aerodrome Safeguarding Advice required - JN to Goodwood 29 04 20

Good morning Steve. The need for (red) lighting on permanent or temporary obstacles is defined in Article 219 of the Air Navigation Order (CAP393), as applicable to structures 150m above ground level and in the vicinity of a licensed Aerodrome/airport. The general definition of ‘..in the vicinity.’ would mean an obstacle within the safeguarded surfaces of the Aerodrome. In the case of the 85m flue, it does not penetrate or sit close to any of the Goodwood surfaces, and therefore does not present a risk to aeroplanes landing or taking off.

That said, the CAA (Directorate of Airspace Policy) May have a view on flight safety if the flue does not have an obs light, so it may be worth having a conversation with them just to make doubly certain.

I hope this helps.

All the best,
Mark

Appendix 3

NATS Safeguarding response

James Neave

From: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Sent: 04 February 2020 12:16
To: James Neave
Cc: NATS Safeguarding
Subject: RE: EIA Scoping Opinion - Ford Circular Technology Park - Consultation (SG29300)
- JN clarifications to NATS 04 02 20

Dear James

Thanks for providing the requested details below. The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully



NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

Appendix 4

Goodwood Aerodrome response to revised proposal

From: Mark Gibb <Mark.Gibb@goodwood.com>

Date: Monday, 8 March 2021 at 14:26

To: Steve Molnar <steve.molnar@torltd.co.uk>

Subject: RE: Ford Energy Recovery Facility - Aerodrome Safeguarding Advice required - JN to Goodwood 29 04 20

Hi Steve, many thanks for your email. I can confirm that we, Goodwood Aerodrome, have no objection or issues on the redesign of the facility.

Very best regards,
Mark.

Mark Gibb
Aviation Operations Manager/Head of Goodwood Aero Club
Goodwood, Chichester, West Sussex, PO18 0PH
T: 01243 755061 | M: 07801 868109

From: Steve Molnar [<mailto:steve.molnar@torltd.co.uk>]

Sent: 08 March 2021 12:47

To: Mark Gibb <Mark.Gibb@goodwood.com>

Cc: Mark Gibb <[REDACTED]>

Subject: Re: Ford Energy Recovery Facility - Aerodrome Safeguarding Advice required - JN to Goodwood 29 04 20

Dear Mark,

You may remember that we were in contact in May last year regarding a proposed development of an Energy Recovery facility at Ford in West Sussex, in relation to Goodwood Aerodrome.

We are writing to inform you that the proposed development at Ford (see attached site boundary) has been revised to address comments made through the consultation process, and we are in the process of preparing documents for a submission of the revised proposals to WSCC.

We therefore wish to see whether you are likely to have any further comments in relation to the revised proposals.

The revisions provide a lower main building height than the previous scheme, and will have two flues rather than one.

The two flues are both at the same height as in the previous scheme, namely 85m. They will be located immediately adjacent to each other, roughly in the centre of the site.

We would be most grateful if you could confirm whether this revision to the proposals will raise any issues for Goodwood Aerodrome, noting that previously your response was that an 85m flue does not penetrate or sit close to any of the Goodwood surfaces, and therefore does not present a risk to aeroplanes landing or taking off.

Do let me know if you would require additional information to assist with your consideration of this request for comments,

Kind regards

Steve Molnar BA(Hons) MPhil Dip UP MRTPI
Technical Director