

20191024:11891/APP/2019/3171
Discharge of Condition 18

Bird Hazard Management Plan

Bourne Court, South Ruislip

On behalf of

Taylor Wimpey



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► Executive summary

The proposed development at Bourne Court, South Ruislip falls within the 13km safeguarding area of RAF Northolt, and therefore as a Planning Condition, the Local Planning Authority has requested that a Bird Hazard Management Plan (BHMP) is produced and adhered to.

This BHMP includes requirements to be incorporated into the design of the development and the ongoing site maintenance to deter hazardous birds, as well as a bird hazard monitoring scheme and potential control measures.

Design

- All flat roofs will be constructed in such a manner that all areas are safely accessible so that any nests and eggs can be cleared (under license from Natural England) and any birds can be dispersed;
- Roof overhangs will be kept to a minimum, with ledges beneath overhangs and external protrusions being avoided where possible;
- Any exposed building ledges considered to have the potential to attract roosting birds will be fitted with bird spikes: at a density suitable to exclude feral pigeons and larger birds;
- All waste disposal and storage containers will be self closing to prevent access for birds.

Management

- All waste to be removed will be collected regularly, and no waste containers will be allowed to be overfilled. If waste build-up is considered to be an issue, then the waste collection regularity will need to be increased;
- All waste imported to site, either during construction or operation, will be stored in sealed containers with self-closing lids;

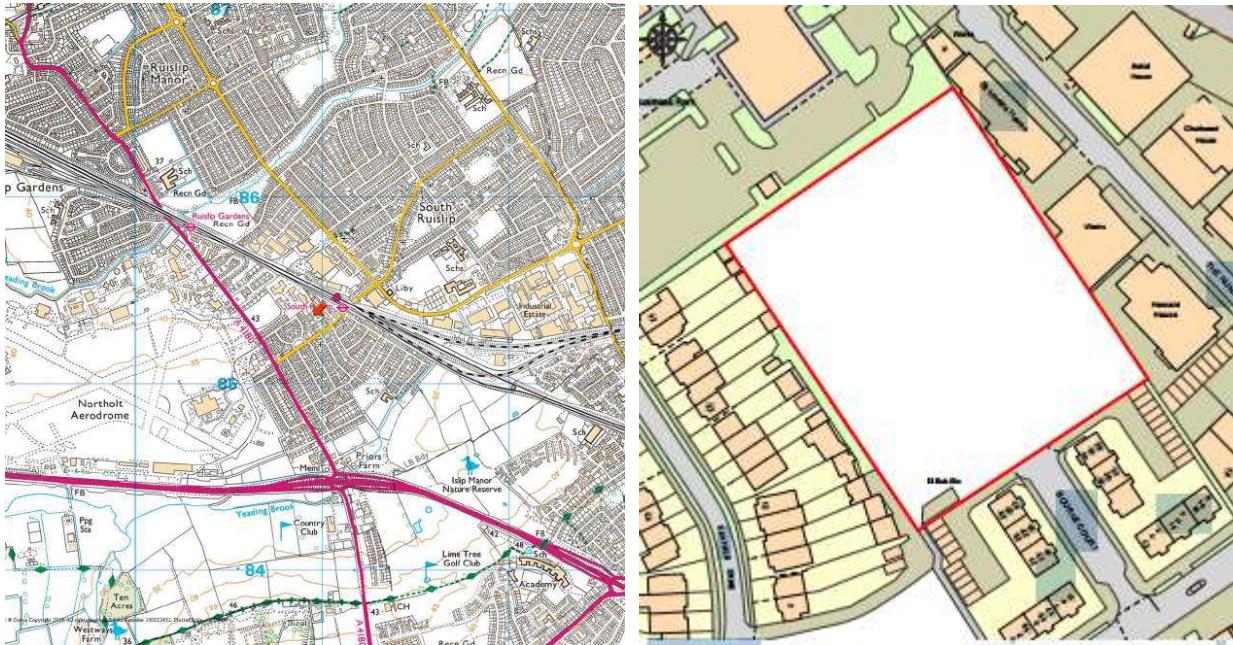
Monitoring

- Monitoring will be undertaken by a competent person commissioned by Taylor Wimpey;
- The Bird Hazard Management Plan includes a monitoring schedule of all habitats and flat roofs to detect if birds or congregations of birds, considered to be potentially hazardous, are establishing within the site, and , if necessary ensure their deterrence;
- Frequency of monitoring will increase during the breeding season (March to June) to monitor if birds are attempting to breed and if necessary take evasive action.

1.0 Current Situation

1.1 Site Setting

Bourne Court is situated in South Ruislip, a suburban area of west London in the London Borough of Hillingdon.



Local amenities are found along Station Approach, offering a variety of cafés, restaurants and independent retailers. A range of supermarkets are located in close proximity of the site, including large format Sainsbury's, Asda and Aldi stores that are all within 0.9 km (0.5 miles).

The site is located approximately 0.68km east of the threshold of RAF Northolt's main runway (07/25) specifically the site is within the approach to runway 25 and is within the take off and climb area serving runway 07.

1.2 Site Description

The site is broadly rectangular in shape and extends to approximately 0.72 Ha (1.79 acres). There were previously 3 detached buildings within the site which have been demolished and the site is cleared.

The site is currently vacant following demolition of previous structures; demolition material is currently stockpiled on site.

The area immediately surrounding the site is mixed-use in nature. The site is bounded to the south west by the rear gardens of two-storey predominantly terraced houses in Canfield Drive; to the north west by Odyssey Business Park, which comprises office buildings and associated parking areas; to the north east by commercial buildings located on The Runway; and to the south east by three-storey blocks of flats in Bourne Court. An electricity substation is situated in the south western corner of the plot.

The development proposed, and the construction process, has the potential to attract and support bird species deemed hazardous to aircraft safety.

1.3 Planning

The applicant seeks permission to discharge Condition 18 (Bird Hazard Management Plan) attached to planning permission reference 11891/APP/2018/3414, dated 17/06/2019 (Redevelopment to provide 87 residential units in two blocks, together with associated access, car and cycle parking; communal and private amenity space; and landscaping)

Condition 18 states:

The proposed development hereby approved, shall not commence until a Bird Hazard Management Plan has been submitted to and approved in writing by the Local Planning Authority. To maintain air traffic safety this plan should make provision for the applicant to: - Prevent the successful breeding of gulls at the site by appropriate licensed means. - At the reasonable request of the MOD disperse any gulls or other bird populations considered by the MOD to pose an unacceptable hazard to air traffic. - Management of any flat/shallow pitched roofs on buildings within the site which may be attractive to nesting, roosting and "loafing" birds. The management plan shall comply with Advice Note 8 'Potential Bird Hazards from Building Design'. - Ensure the landscaping plan includes no more than 10% of berry bearing species. - Provide access to the roof for personnel undertaking bird control measures.

The Bird Hazard Management Plan shall be implemented as approved upon completion of the roofs and shall remain in force for the life of the building. No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by the Local Planning Authority.

1.4 RAF Northolt and Bird Hazard Management

RAF Northolt Aerodrome is situated approximately 0.6 km (0.4 miles) to the west of the development site. The Station is home to the 32 (The Royal) Squadron along with numerous lodger units including London Air Ambulance. It is a busy aerodrome, operating 24/7 with approximately 1000 aircraft movements per month.

The development falls within the Aerodrome safeguarding requirements, summarised below:

In accordance with Civil Aviation Policies – CAP 738 and 772, the risk of bird strike by aircraft requires active management by the aerodrome operator through development control and consultation on developments that have the potential to attract birds in significant numbers, in addition to on-site habitat management and bird scaring techniques as and when required.

RAF Northolt is officially safeguarded in accordance to the criteria set out by the Civil Aviation Authority (CAA) to ensure that developments on and around aerodromes do not infringe with internationally agreed safety margins around aircraft flight paths, nor interfere with the visual and non-visual aids to navigation which guide aircraft on those flight paths. The safeguarding function is also a condition which forms part of the Aerodrome License to operate.

*As a result, proposed developments on, and up to 13km around, RAF Northolt must undergo a process known as **Aerodrome Safeguarding**. This process ensures that alterations to the local built-up environment are carefully assessed to check that they have no adverse impact on aircraft safety. Potential aerodrome safeguarding breaches can be identified and, if necessary, amended and/or rejected to ensure that safety on and around the aerodrome is not compromised.*



A bird hazard management plan is therefore required to manage the development to minimise its attractiveness to birds which could endanger the safe movement of aircraft and the operation RAF Northolt.

The bird deterrent measures presented within this bird hazard plan shall be implemented in strict compliance with the Wildlife and Countryside Act and its Licensing conditions.

2.0 Bird Hazard Assessment

2.1 Site Observations

A site survey was carried out by NBC on Monday December 16th, 2019. Site photos recorded by NBC are shown below:



The majority of site is soft covered following breaking out of previous hard standing. The southwest corner remains hard covered. The underlying ground conditions to comprise Made Ground to a depth of 1m,

As the site has been excavated from its existing level, there was no topsoil encountered, with the site make-up consisting of gravelly, sandy, clay/silt.

Drainage is located within the site access, into which it is proposed this development will connect. The surface water runoff would have naturally infiltrated through the topsoil. NBC conclude standing water will not be present on site.

2.2 Incidence of Bird Strikes

Statistics released by the UK Civil Aviation Authority (CAA) in 2009 indicate that registered aircraft strike a bird

approximately once in every thousand flights. It is further indicated that between 15 and 20% of bird strikes cause damage to the aircraft.

In terms of altitude, the majority of bird strikes occur at very low altitudes (<200m above ground level). Research by the European Aviation Safety Agency in 2008 indicates that approximately 70% of bird strikes occur at altitudes less than 75m, 15% occur between 75m – 250m and only 15% of bird strikes occur above 250m. Aircraft at the point of these operations will be at low level on take-off or final approach which presents the greatest risk to pilots and aircraft.

Bourne Court development is located within 600m of the RAF Northolt runway and therefore the risk to low flying aircraft is significant should birds of significant size or numbers be attracted to the site.

The CAA additionally outline at which phase of flight bird strikes are most likely to occur. Statistics gathered by the CAA for 2008, indicate that 35% of bird strikes occur on approach to land and 30% occur at take-off. The CAA additionally indicates that 65% of bird strikes occur during the day.

2.3 Target Bird Species

Sources of attraction for birds do exist within the locale. Rural patches in the vicinity of Bourne Court and RAF Northolt that may attract heightened bird feeding activity include fields, farmland local parks, water systems (e.g. Ruislip Lido & Stokers Lake), and landfill sites. Trees and hedgerow provide ideal nesting and roosting opportunities for small and medium sized birds. Urban buildings, particularly expansive flat roofs may also attract gulls for seasonal nesting. And numerous nooks and crannies and ledges on urban buildings may attract feral pigeons for roosting and nesting.

Not all bird species pose a significant bird strike risk to aircraft. Species or types of birds specific to bird strike management are those that occur in flocks and/or are large in size.

Typical ‘problem’ birds are gulls, rooks, crows, jackdaws, waterfowl, wood pigeon, feral pigeons, blackbirds, starlings, and buzzards. From the 2008 bird strike statistics for the UK collated by the CAA, 1480 bird strikes were reported. The top bird species identified from reported bird strikes comprises woodpigeon (93 bird strikes), black-headed gull (73 bird strikes), skylark (71 bird strikes), swallow (64 bird strikes), gull (64 bird strikes), common gull (61 birds strikes), pigeon (59 bird strikes), swift (58 bird strikes), kestrel (45 bird strikes) and herring gull (45 bird strikes).

While there are many species susceptible to bird strikes by aircraft, each species of bird possesses different behaviour and habitat preferences. It is therefore essential to outline specific target species in the context of the site.

On December 16th, 2019 NBC carried out an initial bird survey to monitor the presence of birds, within the area Bourne Court. December is not an appropriate time to observe birds attracted for seasonal nesting as this nesting behavior peaks during the months of February through July. However, NBC does possess extensive local knowledge on bird activity in and around the locale. Using our survey observations together with NBCs local knowledge and experience, we have identified species that have the potential to be attracted to the site development and its surrounding buildings and grounds, namely:

Large Birds:

1. Gulls: Herring Gulls, Common Gulls Black Backed gulls, Black Headed Gulls (Seasonal Feb to July).

Medium sizes birds:

2. Corvids: Rooks, Crows, Jackdaw, Magpie (Annual)
3. Starling (Annual)
4. Wood Pigeons
5. Feral pigeons

Small Sized birds:

6. Various including hedge sparrow, tits, greenfinch, wagtail etc.

These above bird species can be identified as target species for the Bird Hazard Management Plan during the construction and operational phases of Bourne Court.

Gulls, Corvids, Pigeons, and Starlings pose the greatest risk to aircraft leaving/arriving at RAF Northolt, as these species tend to congregate in flocks and have the potential to be attracted by the buildings, landscaped areas; when nesting, roosting and food scavenging opportunities present themselves.

Principal Birds on and around the site that present bird strike risk to RAF Northolt	
Herring Gull (<i>Larus argentatus</i>) 	The herring gull is a large and aggressive gull. It has a light grey back and has a white underneath. The herring gull has black wing tips and their legs are pink with webbed feet. Their bill is large with a slight hook that has a red spot. The herring gull is very noisy and is resident in the UK all year round. Widespread nesting on buildings and scavenging around West London.
Black Headed Gull (<i>Chroicocephalus ridibundus</i>) 	Found commonly almost anywhere inland. Black-headed gulls are sociable, quarrelsome, noisy birds, usually seen in small groups or flocks, often gathering into larger parties where there is plenty of food, or when they are roosting. UK amber-listed bird of conservation concern.

Feral Pigeon (*Columba livia domestica*)



Rock (i.e., "wild"), domestic, and feral pigeons are all the same species and will readily interbreed. Feral pigeons find the ledges of buildings to be a substitute for sea cliffs, have become adapted to urban life, and are abundant in towns and cities.

Widely recognised as a pest species.

Abundant around South Ruislip, seeking out nesting and roosting opportunities in any recessed areas of buildings.

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Corvids: Rooks, Crows, Jackdaws and Magpie



Rooks and Crows are medium to large birds.

Jackdaws and Magpies are slightly smaller

Most crows are adaptable but often shy where persecuted. In towns, some become tame and may visit gardens. They all have strong, scaly feet, and stout (or downcurved) bills, mostly with a small patch of bristly feathers covering the nostrils.

Rooks and Jackdaws can gather in large numbers.

Starling *Sturnus vulgaris*



Smaller than blackbirds, with a short tail, pointed head, triangular wings, starlings look black at a distance but when seen closer they are very glossy with a sheen of purples and greens.

Their flight is fast and direct, and they walk and run confidently on the ground. Noisy and gregarious, starlings spend a lot of the year in flocks.

Quite common in west London.

Red List Species.

3.0 Risk

3.1 Bird Hazard Risk Assessment

Bird Strike Risk Matrix: Construction Phase - Earthworks.

Bird Strike Risk Assessment Matrix					
Activity: Development operations scraping off topsoil and stock piling					
Current Risk Rating without additional Controls					
Rating	Probability				
Severity	Almost certain	likely	possible	remote	improbable
Fatality			Herring Gull Lesser BBG		
Major injury or incident			Common Gull		
Moderate injury/incident			Rook Jackdaw	Feral pigeon Crow	
Minor			Starling		
Negligible				Other small bird	
Additional Controls					
Implementation of BHMP					
Risk Rating with additional Controls					
Rating	Probability				
Severity	Almost certain	likely	possible	remote	improbable
Fatality				Herring Gull Lesser BBG	
Major injury or incident				Black Headed Gull	
Moderate injury/incident				Rook Jackdaw	Crow
Minor					Starling,
Negligible					Other small bird
Summary: This Bird Hazard Management Plan incorporates adequate bird strike prevention and management methods to reduce the risk of bird strikes associated with the Development to such a minimum level that the likelihood is remote.					

Bird Strike Risk Matrix: Operational Phase.

Bird Strike Risk Assessment Matrix					
Activity: Residential					
Current Risk Rating without additional controls					
Rating	Probability				
Severity	Almost certain	likely	possible	remote	improbable
Fatality				Herring Gull Lesser BBG	
Major injury or incident				Common Gull	
Moderate injury/incident				Rook Jackdaw Feral pigeon Crow	
Minor				Starling	
Negligible				Other small bird	
Additional Controls					
Implementation of BHMP					
	Risk Rating with additional Controls				
Rating	Probability				
Severity	Almost certain	likely	possible	remote	improbable
Fatality					Herring Gull Lesser BBG
Major injury or incident					Common Gull
Moderate injury/incident					Rook Jackdaw Feral pigeon Crow
Minor					Starling
Negligible					Other small bird
Summary: This Bird Hazard Management Plan incorporates adequate bird strike prevention and management methods to reduce the risk of bird strikes associated with the Site to such a minimum level that the likelihood is remote.					

3.2 Summary

The site is small and enclosed and once built birds are unlikely to be attracted specifically to Bourne Court in large enough numbers where they will create a hazard that is likely to present a significant additional risk to air flight movements; especially when considered in the context of the site being situated within what is already a heavily urbanised location. Low risk attractants comprise:

- Flat roof buildings may provide attractive space for nesting gulls.
- Nooks, crannies window ledges may provide attractive space for roosting and nesting pigeons and starlings.
- Trees and shrubs may provide nesting and roosting opportunities for small birds.

During the construction phase it is possible that bird activity may be periodically increased during the excavation and general movement of soils, when food sources could theoretically become exposed and available to birds. However, topsoil's have been stripped and the site soils are largely comprised of made ground, and birds should soon learn that the availability of insects, worms and other food attractants will be low.

During the construction phase, standing water could theoretically present an additional local attraction during prolonged periods of rain.

4.0 Bird Hazard Management Plan

Bird numbers are not expected to significantly change as a result of the development, and therefore it is not considered that the development will cause a significant bird hazard risk. However the measures described in the Bird Hazard Management Plan (BHMP) below will be implemented into the site design and management to ensure that a bird hazard risk is kept to a minimum at the site, and that any bird hazard would be detected and dealt with swiftly if it was to occur.

Taylor Wimpey are developing the site and are currently responsible for the ongoing implementation of the BHMP. Responsibility will be passed to the site management company and other relevant parties on completion.

The Bird Hazard Management Plan is to be operated and complied with in perpetuity, or until RAF Northolt is no longer operational.

4.1. Design

The following features will be incorporated into the design to ensure that hazardous birds and bird congregations are not attracted to the site as a result of the proposed development.

4.1.1. Landscaping

There is little landscaping and none that it is believed would attract hazardous birds, however, as part of the BHMP, these areas will be monitored and if they are observed to be attracting potentially hazardous congregations of birds, then deterrent action will take place. Monitoring will be the responsibility of the site management.

4.1.2. Buildings

Flat roofs

Flat and shallow-pitched roofs have the potential to attract nesting birds such as gulls, whilst pigeons can roost on buildings ledges and starlings can roost on and in buildings in vast numbers. Some of the buildings proposed for the development will contain flat roofs. These flat roofs may appeal to nesting, roosting or

loafing birds, such as gulls. Therefore the roofs will be constructed in such a manner that all areas are safely accessible so that any nests and eggs can be cleared and any birds can be dispersed.

Building features

The following practical options will be integrated into the building designs to avoid attracting nesting, loafing and roosting birds.

- Roof overhangs will be kept to a minimum, with ledges beneath overhangs and external protrusions being avoided where possible.
- Any exposed ledges will be fitted with bird spikes at a density suitable to exclude feral pigeons and larger birds.

4.2 Waste

The following proposals take into consideration the advisory documents; CAP 772 and BAA Advice Note 3: Potential Bird Hazards from Amenity Landscaping and Building Design.

The following precautions will be implemented during construction and following completion to minimize bird attraction.

- All waste disposal and storage containers will be self closing to prevent access for birds;
- A record will be kept by a person/company appointed by Taylor Wimpey of all waste imported onto site and all waste collected from site, including waste type and date/time of delivery/collection;
- All waste to be removed will be collected regularly, and no waste containers will be allowed to be overfilled. If waste build-up is considered to be an issue, then the regularity of waste collection will be increased;
- Any waste imported to site will be stored in sealed containers with self-closing lids;

This situation will be monitored as part of the BHMP.

4.3 Routine Monitoring

A competent person/company nominated by Taylor Wimpey will be tasked to conduct surveys to identify any loose soil, ponding or other attractants and detect if birds or congregations of birds, considered to be potentially hazardous, are establishing within the site.

These monitoring visits will involve walking a transect route through the site that covers all of the habitats and buildings present. Several of the buildings will have flat roofs and these can be used by nesting or loafing birds, such as gulls, therefore these flat roofs will be surveyed as part of the monitoring visit. Surveying of flat roofs may be possible from the ground, but if sufficient coverage is not considered to have been achieved, access to the roof should be sought.

During each survey, all birds seen or heard, the number of birds and the location will be recorded on a map. This data will be summarized on a form for each habitat within the site and maintained within a log. These records be available to the Northolt Airbase and their AWCU (Airfield wildlife control unit), who will assess the bird assemblages recorded and determine if they pose a potential bird hazard risk.

These designated inspectors will be competent in this activity having as a minimum completed a training course provided by recognized airfield wildlife control experts with content that includes;

- An understanding of the dangers birds can cause to aircraft.
- An understanding of the attractions and how they can be managed
- Detection of birds and reporting of risks within the aviation sector
- Species identification
- Electronic reporting and recording of wildlife presence

- Understanding the behaviours of birds to select the most appropriate form of deterrence
- Use of active and passive control techniques and the appropriate safety considerations for their deployment .
- Legal obligations under UK law and its implication for wildlife control on or near airports
- International and national regulations, guidance and best practice documentation

The minimum frequency of the monitoring shall be:

Schedule for frequency of inspections		
Phase	Frequency	Comments
Earth Works	Daily	To inspect for loose earth or ponding that could attract hazardous birds. Where there is evidence of this frequent checks will be carried out during the day until this potential attractant/habitat is removed or remedied.
Construction	Weekly	Particular attention to the management of contractors on site advising them of the need to not attract hazardous birds and measures they can take to avoid that such as control of waste.
After Construction	Monthly	Those carryout the inspections shall be vigilant for any hazardous birds, in particular Gulls using the roof between checks and during the non-breeding season.
After Construction 'between 10 th April and 30 th June	Every two weeks	With particular focus on monitoring for the potential for large Gulls to nest on the roof.

The monitoring records shall provide an auditable record of bird activity and response. Key data recorded shall comprise:

- Date and time.
- Operating times and site operational activity/stage of activity, i.e.. Groundworks, construction etc.
- Management of attractions on site, puddling, loose soil and measures to minimize.
- Bird Activity: species, numbers, location, behavior with gps tagging of locations, and RAG risk assessment rating. Direction of travel.
- Bird Control Activity and result of deterrence– e.g. type of control deployed, target bird's response to measures and direction of dispersal.
- An environmental change that may affect local bird/ wildlife behaviour patterns e.g. unusual weather, etc.



4.4 Action Trigger Levels

If any hazardous birds are seen on the roof areas, the monitoring team/individual shall proceed to the roof to disturb and disperse any gulls present. If and when the dispersal of a large number of birds is required, MOD Airside Operations at RAF Northolt will be contacted before dispersal actions are taken.

Following a gull dispersal incident, the designated inspector should increase the frequency of roof-visits (at least five visits every two weeks) to check for and disturb any gulls.

Should potentially hazardous bird species congregate in **numbers exceeding five**, then it will be necessary to disperse and deter these birds. In such a situation, the RAF Northolt AWCU unit or SATCO would be consulted to determine the most appropriate form of action to undertake. There should be a zero tolerance of Gulls during the breeding season.

If any undesirable bird activity is noted from hazardous birds, appropriate dispersal methods (as described below) will be implemented on detection or within 30 minutes to ensure minimal dispersal methods are required and the safety risk is reduced. These will be monitored, and further deployment carried out until bird activity is once again below the relevant threshold.

4.5 Dispersal

The table below lists some potential dispersal/deterrent options that are proposed in the existing BAA Advice Notes and CAA CAP guidance.

Table 1. Potential dispersal options for hazardous birds and bird congregations

Feature	Potential Hazard	Dispersal/deterrent options
Site Wide	Presence of potentially hazardous birds or congregations of birds	Physical dispersal, such as scaring by human presence or using audio distress signals (see CAP 772)
Trees	Hazardous bird roosts	Thinning, topping or removal of roost trees (see BAA Advice Note 3)
Loose Earth or ponding	Attracting hazardous birds	The focus shall be on removing or compacting areas of loose soil and draining any areas of puddling or ponding to remove the attractant rather than on active dispersal of birds once present.
Flat roofs	Attracting nesting, loafing or roosting birds	Physical and audio deterrence (using distress calls) Physical removal of nests and eggs (under a Natural England licence).

Any dispersal techniques used or removal of nesting materials shall be carried out strictly in accordance with guidance issued by the licensing body Natural England.

Gulls

Gulls pose the biggest risk to flight safety within the area and inspectors will be vigilant for any Gulls being attracted to the site . If Gulls are seen , the monitoring team/individual will proceed to the roof to disturb and disperse any gulls present. If and when the dispersal of a large number of birds as required, MOD Airside Operations at RAF Northolt will be contacted before dispersal actions are taken. Following a gull dispersal incident, the designated inspector will increase the frequency of roof visits to at least five visits every two weeks to check for and disturb any gulls.

The designated inspector will immediately report to a designated contact at RAF Northolt Airside Operations when gulls are found nesting. If gulls are found to be nesting and the proposed management via disposing of nests and other dispersal methods as set out in the Bird Hazard Management Plan are unsuccessful, provision shall be made to employ further licensable interventions.

Furthermore, should any birds start to bring nesting materials onto site these materials shall be promptly removed; in compliance with licensing conditions.

4.6 Communications with RAF Northolt

The designated inspector will obtain the contact details of the SATCO at RAF Northolt and AWCU .

They will contact them immediately for any one of the following reasons;

- ▶ Hazardous Bird numbers increase above 5.
- ▶ Prior to dispersal of hazardous birds.
- ▶ Gull nesting is identified
- ▶ Dispersal methods ineffective

If required RAF Northolt Airside Operations staff may be able, depending on operational demands, to co-operate if dispersal action is requested on site at any time.

5.0 Summary

This Bird Hazard Management Plan is to be operated and complied with in perpetuity, or until RAF Northolt is no longer operational.

The site is small and enclosed and once built birds are unlikely to be attracted specifically to Bourne Court in large enough numbers where they will create a hazard that is likely to present a significant additional risk to air flight movements; especially when considered in the context of being situated within what is already a heavily urbanised location.

During the construction phase it is possible that bird activity may be periodically increased during the excavation and general movement of soils, when food sources could theoretically become exposed and available to birds. However, topsoil has been stripped and the site soils are largely comprised of made ground, and birds should soon learn that the availability of insects, worms and other food attractants will be low.

Post construction, in the unlikely event that hazardous accumulations of birds evade these management controls, consideration shall be given to augmenting the controls with permanent bird exclusion measures.

This Bird Hazard Management Plan incorporates adequate bird strike prevention and management methods to reduce the risk of bird strikes associated with new residential development to such a minimum level that the likelihood is Low.



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John Dickson

Managing Director

NBC Environment