

COMAG Works, Tavistock Road, West Drayton
(1006546-01)

**Bird Hazard Management Plan
(addressing the requirements of
Condition 13
of Planning Permission Ref:
24843/APP/2022/2403)**

February 2025

Quality Management	
Client:	Bellway Homes Limited (North London)
Project:	COMAG Works, Tavistock Road, West Drayton
Report Title:	Bird Hazard Management Plan
Project Number:	1006546-01
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1 Introduction

1.1 Background and Proposals

1.1.1 Aspect Ecology has been commissioned by Bellway Homes Limited (North London) in respect of proposed redevelopment of land at the former COMAG Works, Tavistock Road, West Drayton, centred at grid reference TQ 058 801 (see Plan 6546-01/BHMP1), hereafter referred to as 'the site'.

1.1.2 The site is proposed for the construction of 105 residential units, with associated accesses, car parking, cycle parking, and landscaping, which is the subject of planning permission (Ref: 843/APP/2018/269) granted by The Council of the London Borough of Hillingdon.

1.1.3 The site is located within Heathrow Airport's 13km safeguarding zone, within which aircraft are at lower altitudes and therefore at an increased risk of bird strike. Accordingly, the planning permission is subject to a number of conditions, of which this report is concerned with Condition 13.

1.1.4 Condition 13 states:

'Prior to above ground works, a Bird Hazard Management Plan shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Heathrow Airport Limited. The submitted plan shall include details of:

- management of any flat/shallow pitched 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'.

- signs deterring people from feeding the birds. The Bird Hazard Management Plan shall be implemented as approved on completion of the development and shall thereafter remain in force for the life of the development.

REASON

In the interests of aircraft safety in compliance with Policy DMAV 1 of the London Borough of Hillingdon Local Plan Part 2 - Development Management Policies (January 2020).

1.2 Site Location and Characteristics

1.2.1 The site is located within an urban setting situated in West Drayton, bound to the south by Tavistock Road, to the northwest by Winnock Road and to the east and northeast by residential development. Beyond this lies existing development.

1.2.2 In line with the site visit conducted by Aspect Ecology in June 2022, the habitats present within the site are limited to a large area of bare ground with some dense scrub at the edges of the site and an area of concrete hardstanding in the southeast corner.

1.3 Ecological Survey Work

1.3.1 The site was previously subject to survey by a third-party consultancy, with a preliminary report produced and submitted in line with a previous planning

application ((Ref: 24843/APP/2017/2974) Preliminary Ecological Appraisal, WSP, August 2017).

- 1.3.2 The site has since been subject to an update phase 1 survey from Aspect Ecology in June 2022 in order to inform a Biodiversity Net Gain Assessment.

1.4 Purpose of the Report

- 1.4.1 This report evaluates the potential for the development to support bird species of particular concern to Heathrow Airport, and detailed management prescriptions to be followed to minimise incidences of bird nesting, roosting and loafing within the site, particularly associated with flat rooftops and vegetated areas, in order to address the stated requirements of Condition 13 of the planning permission for the site.

2 Bird Risk Evaluation

2.1 Summary of Survey Work and Site Assessment

- 2.1.1 Not all bird species pose a bird strike risk to aircraft. Although species such as Swallow *Hirundo rustica*, Swift *Apus apus* and Skylark *Alauda arvensis* are known to be regularly subject to bird strike incidences, these strikes do not generally result in reported damage to aircraft. However, damage to aircraft is regularly reported from birds that occur in flocks and/or are larger in size¹, and it is this group of birds that are of higher concern to bird strike management. As such, the species of highest concern to aviation generally include birds such as Gull species, Pigeon species, Corvid species and Starling *Sturnus vulgaris*.
- 2.1.2 The previous survey work undertaken across the site recorded this to be dominated by bare ground, which is unlikely to be of value to species of higher concern, albeit a number of species have been recorded on-site typical with those common in the surrounding area.

2.2 Relevant Planning Policy

- 2.2.1 The site is located outside of, and well-removed from the identified Public Safety Zone as set out within the London Borough of Hillingdon Local Plan Part 2 (adopted January 2020). As such, this is not relevant to the permitted development and not discussed further.
- 2.2.2 Further relevant information is set out within ODPM Circular 01/2003 (Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas: The Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002), which sets out that *'in addition to the requirements related to the height of buildings and structures, a dotted circle, with a 13 kilometre radius in the case of civil aerodromes..., centred on the safeguarded aerodrome reference point to indicate the area within which developments likely to attract birds...'* require specific consultation.
- 2.2.3 The site is located approximately 3.5km north of Heathrow Airport and accordingly is located within the identified 13km radius.
- 2.2.4 ODPM Circular 01/2003 further sets out:

'The most important types of development in this respect are: facilities intended for the handling, compaction, treatment or disposal of household or commercial wastes, which attract a variety of species, including gulls, starlings, lapwings and corvids; the creation or modification of areas of water such as reservoirs, lakes, ponds, wetlands and marshes, which attract gulls and waterfowl; nature reserves and bird sanctuaries; and sewage disposal and treatment plant and outfalls, which can attract gulls and other species. Planting trees and bushes normally creates a bird hazard only when it takes place relatively near to an aerodrome, but a potential starling roost site further away from an aerodrome can create a hazard. Mineral extraction and quarrying can also create a bird hazard because, although these processes do not in themselves attract birds, the sites are commonly used for landfill or the creation of wetland.'

¹ Civil Aviation Authority 'Reported birdstrikes 2012 -2016'

- 2.2.5 The permitted development does not include any of the identified important types of development, and accordingly (particularly given the presence of substantial similar development within the surrounding areas, including within West Drayton situated immediately between the site and Heathrow Airport), minimal measures are likely to be required in respect of the permitted development. Nonetheless, in order to address the stated planning condition requirements, a number of proposed measures are set out below.

2.3 Design Measures

- 2.3.1 The site is located within an urbanised setting, with extensive industrial and residential development surrounding the site, whilst the permitted development within the site itself is for residential development, which will therefore remain highly active and subject to regular use and disturbance. As such, the permitted redevelopment of the site is unlikely to result in any significant increase in bird populations associated with the local area, albeit in line with planning requirements in relation to the permitted development there are proposed enhancement measures for smaller bird species in the form of nest boxes.
- 2.3.2 Nonetheless, in line with planning policy requirements and aspirations relating to biodiversity enhancement, new vegetation will be incorporated at the site, whilst flat roofs will be provided, which also incorporate green roofs. As such, the presence of vegetation and green roofs could potentially result in increased opportunities for bird nesting and loafing on roof tops.
- 2.3.3 On this basis, this Bird Hazard Management Plan will focus on the potential issues associated with the nesting, roosting or loafing of birds on the roofs of buildings, which are primarily likely to comprise Gull species, Pigeon species, Corvid species and Starlings.

3 Bird Hazard Management Actions

3.1.1 In order to minimise the potential risk of bird strike resulting from the development of the site, the following active management measures will be implemented in relation to bird species of concern (other/smaller bird species such as garden birds are unlikely to be of concern and no measures are required):

- A representative of the appointed management company will be made responsible for on-site bird control management and recording where appropriate;
- Where flat roofs are proposed over communal buildings/apartment blocks etc, these will be constructed in such a way as to allow safe access for personnel to undertake rooftop inspections;
- Any birds considered hazardous to aircraft (Gull species, Pigeon species, Corvid species and Starling) found nesting, roosting or loafing during the breeding season will be dispersed when detected and/or when requested by BAA Heathrow bird control / operations staff. Before any birds are dispersed, contact must first be made with the BAA Heathrow bird control / operations staff;
- If required, any nests or eggs of these species that are found will be removed (excepting that, where necessary such removal shall only take place once appropriate licence(s) have been obtained from Natural England);
- Any birds considered hazardous to aircraft (Gull species, Pigeon species, Corvid species and Starling) found nesting, roosting or loafing outside of the breeding season will be dispersed when detected and/or when requested by BAA Heathrow bird control / operations staff. Before any birds are dispersed, contact must first be made with the BAA Heathrow bird control / operations staff;
- The method of dispersal used will primarily be by physical presence. However, the designated representative will have access to a hand-held distress call unit to undertake bird dispersal if necessary, to be used in liaison with BAA Heathrow bird control / operations staff;
- If significant bird activity is identified within the site relating to birds considered hazardous to aircraft (Gull species, Pigeon species, Corvid species and Starling), particularly in association with the green roofs, consideration will be given to the need for further measures or dispersal to deter future use, such as netting of features;
- Rooftop inspections will be undertaken monthly (or sooner if bird activity dictates) by the designated representative to monitor bird activity. This is particularly important during the bird nesting season, which runs from March to August inclusive, although it is noted that feral pigeons may nest all year round;
- A log will be kept which will detail the following information, which will be made available to BAA Heathrow bird control / operations staff upon request:
 - Dates and times of inspections;
 - Name of person undertaking inspection;

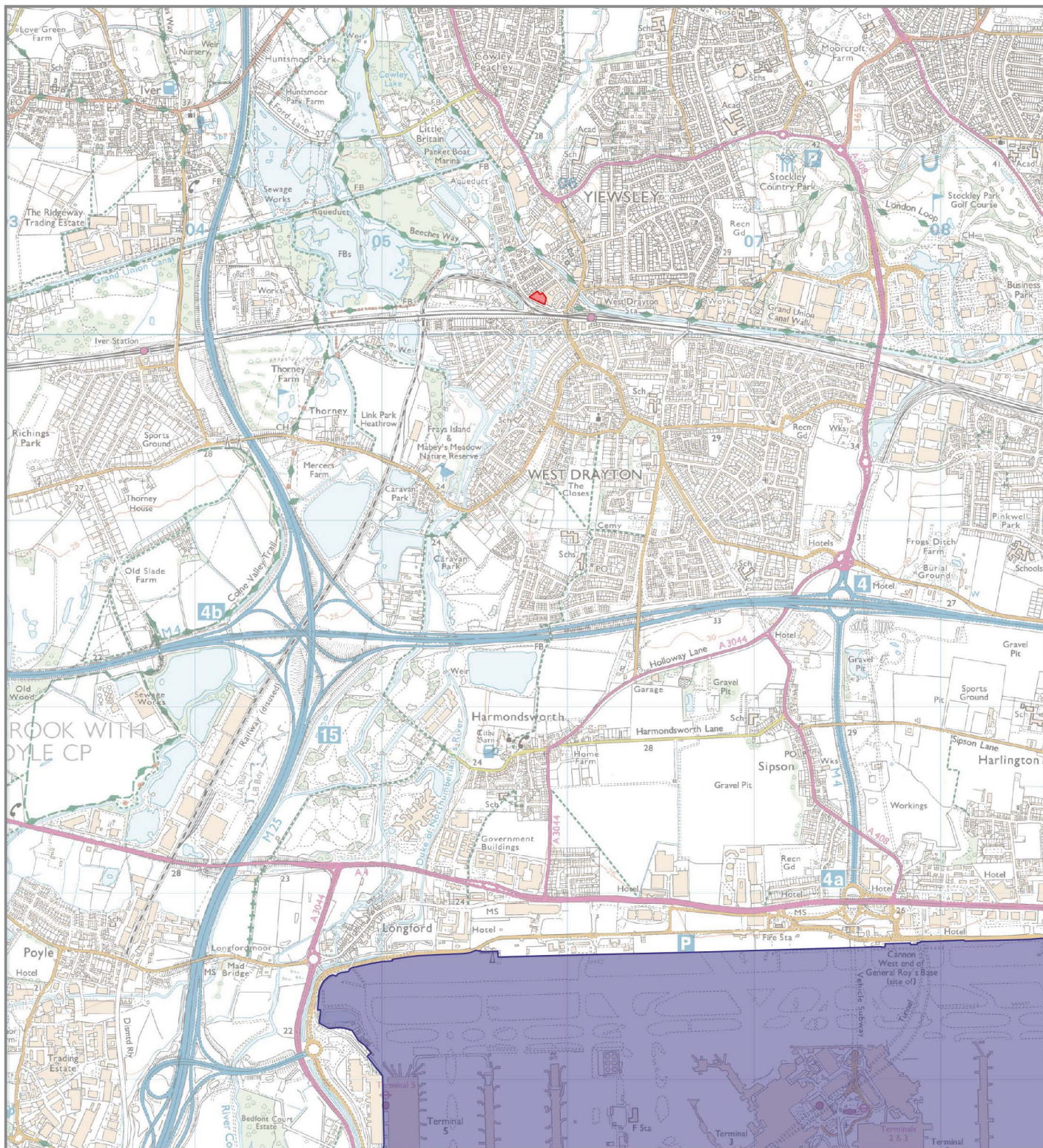
- Bird numbers and species observed; and
 - Details of any dispersal action taken (including method of dispersal and number of eggs/nests removed).
 - All residents and staff employed at the site will be instructed not to feed birds (or otherwise attract them to the site), with particular reference to Gulls, Pigeons, Corvids and Starling; and
 - Additional bird control and pest control measures will be considered if regular monitoring identifies unforeseen attractants to species of concern.
- BAA Heathrow bird control / operations staff will have the right to undertake inspections of roof areas at no notice to ensure the Bird Hazard Management Plan is being implemented and functions effectively.

4 Conclusion

- 4.1.1 Aspect Ecology has been commissioned by Bellway Homes Limited (North London) in respect of proposed redevelopment of land at the former COMAG Works, Tavistock Road, West Drayton.
- 4.1.2 The site is in receipt of planning permission for the erection of 105 dwellings and associated accesses, car parking, cycle parking, and landscaping. The planning permission is subject to a number of conditions, of which Condition 13 is of ecological relevance, requiring the submission and approval of a Bird Hazard Management Plan.
- 4.1.3 This report sets out active hazard management measures to reduce incidences of nesting, roosting and loafing by bird species of concern within the site, with particular reference to new vegetation and flat green rooftops. Subject to the appropriate and responsible implementation of measures set out in this report, it is considered that the use/attractiveness of the site by bird species of particular concern to Heathrow Airport will be suitably minimised (particularly given the presence of significant, extensive similar development types throughout West London, including surrounding the site and within the intervening areas between the site and Heathrow Airport) and the condition can therefore be safely discharged.

Plan 6546/BHMP1:

Site and Airport Location



Key:

- Site Boundary
- Heathrow Airport

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Comag, Tavistock Works

Bird Hazard Management Plan

6546-01/BHMP

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PROJECT

TITLE

DRAWING NO.

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DATE

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