



WIER HOUSE
50 RIVERSIDE WAY
UXBRIDGE
LONDON

BIRD HAZARD MANAGEMENT PLAN

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APPENDIX 1 HABITAT DISTANCE PLAN

1.0 INTRODUCTION

1.1 In May 2026, ACD Environmental Ltd commenced ecological inputs for Wier House, 50 Riverside Way, Uxbridge, London UB8 2YF.

1.2 Planning consent for demolition of the existing building and the erection of a part four and part five storey block providing 34 residential units (Use Class C3), associated access and other works including landscaping and amenity space, car and cycle parking and refuse storage was granted by London Borough of Hillingdon on 26th January 2022 (ref: 43495/APP/2020/888). Hereafter, the site is referred to as 'the Approved Development Site'.

1.3 The following reports/plans have been consulted during the preparation of this report:

- Ecological Appraisal prepared by Jones & Sons Environmental Ltd (April 2016), which was prepared to inform a previous planning application.¹
- Tree Reference Plan prepared by ACD Environmental Ltd (November 2019).²
- Preliminary Roost Assessment (PRA) prepared by CSA Environmental Ltd (December 2019).³
- CFA Piling Method Statement prepared by NFS Piling Contractors (July 2026).⁴
- Construction Management Plan prepared by Life Build (July 2026).⁵
- Tree Reference Plan prepared by ACD Environmental Ltd (July 2026).⁶
- Soft Landscape Management and Maintenance Plan prepared by ACD Environmental Ltd (July 2026).⁷
- Soft Landscape Proposals prepared by ACD Environmental Ltd (July 2026).⁸
- Arboricultural Impact Assessment and Method Statement prepared by ACD

¹ Jones & Sons Environmental Ltd. *Weir House 50 Riverside Way Uxbridge UB8 2YF Ecological Appraisal*.

² ACD Environmental Ltd (05/11/2029). *Weir House 50 Riverside Way Uxbridge Tree Survey Plan*. PRI22688-01.

³ CSA Environmental Ltd (18/12/2029). *Weir House, Uxbridge: Preliminary Roost Assessment (PRA)*. Ref: 4589_01_A.

⁴ NFS Piling Contractors (03/07/2026). *CFA Piling Method Statement Weir House Riverside Lane Uxbridge UB8 2YF*. Ref: 260318.

⁵ Life Build (16/07/2026). *Construction Management Plan Weir House Riverside Way Uxbridge UB8 2YF*. Revision 1.

⁶ ACD Environmental Ltd (16/07/2026). *Weir House 50 Riverside Way Uxbridge Tree Survey Plan*. PRI22688-01A.

⁷ ACD Environmental Ltd (July 2026). *Weir House, 50 Riverside Way, Uxbridge Soft Landscape Management and Maintenance Plan*. Ref: PRI22688 man A.

⁸ ACD Environmental Ltd (July 2026). *Weir House, 50 Riverside Way, Uxbridge Soft Landscape Proposals*. Ref: PRI22688 B.

Environmental Ltd (July 2026).⁹

- Ecological Enhancement Scheme (EES) prepared by ACD Environmental Ltd (July 2026).¹⁰

1.4 The Approved Development Site measures 0.2977 hectares and is located in an urban context in the town of Uxbridge in the London Borough of Hillingdon. The site is accessed via Riverside Way, which provides access to a series of warehouse/industrial units. However, the Approved Development site is adjacent to the Grand Union Canal to the east and River Colne to the west; there are nearby ribbons of woodland; and green space and bodies of open water associated with/adjacent to Summerleaze Quarry to the north-east.

1.5 The PRA (December 2019) notes the following:

*“The majority of the Site comprises a two storey, brick and glass built building surrounded by a car park and hard standing [although part of Riverside Way is also included within the site boundary]. The existing building is currently in residential use. The car park is formed of block paving with ephemeral vegetation growth around the edges, species present are as expected with such habitats and include cudweed *Filago vulgaris*, spurge *Euphorbia* sp. and Canadian fleabane *Conyza canadensis*. Ornamental tree and shrub planting is present around the Site boundaries and to the north-east of the Site...”*

1.6 The Tree Reference Plan (July 2026) notes a total of 36 trees/tree groups. All of the trees are broadleaved and the most frequently occurring are ash *Fraxinus excelsior* and sycamore *Acer pseudoplatanus*. Other species noted are crack willow *Salix fragilis*, dogwood *Cornus sanguinea*, elder *Sambucus nigra*, field maple *Acer campestre*, hawthorn *Crataegus monogyna*, hazel *Corylus avellana*, pink cherry *Prunus* 'Kanzan', rowan *Sorbus aucuparia*, silver birch *Betula pendula*, spring cherry *Prunus subhirtella*, wild cherry *Prunus avium* and whitebeam *Sorbus aria*. The PRA (December 2019) also notes cherry laurel *Prunus laurocerasus*.

1.7 The earlier Tree Reference Plan (November 2019) included an additional four trees to the north adjacent to Riverside Way and the Grand Union Canal comprising three ash and one cider gum *Eucalyptus gunnii*.

1.8 This report is a Bird Hazard Management Plan (BHMP) in relation to RAF Northolt to address

⁹ ACD Environmental Ltd (27/07/2026). *Weir House 50 Riverside Way Uxbridge Arboricultural Impact Assessment and Method Statement*. Ref: PRI22688aia-ams_A.

¹⁰ ACD Environmental Ltd (29/07/2026). *Weir House 50 Riverside Way Uxbridge London Ecological Enhancement Scheme*. Ref: PRI22688_EES.

Condition 24, which states:

“No development shall take place until a Bird Hazard Management Plan has been submitted to and approved in writing by the Local Planning Authority, in consultation with MOD. The Bird Hazard Management Plan shall include design measures to minimise any increase in the numbers of hazardous species (primarily large or flocking birds) as a result of the development proposed, in particular provisions to prevent gulls from breeding (using appropriate licensed means) on site should be provided. The development shall be carried out strictly in accordance with the details set out in the approved Bird Hazard Management Plan in perpetuity or until RAF Northolt is no longer operational.

REASON

To minimise the potential of the works approved to provide a habitat desirable to hazardous large and/or flocking birds which have the potential to pose a considerable hazard to aviation safety in accordance with Policy DMAV 1 of the Hillingdon Local Plan: Part Two (2020).”

- 1.9 As detailed further below, this report is focused on RAF Northolt, which is within the defined safeguarding area; however, it is also important to note that the Approved Development Site is also within the safeguarding area for Heathrow Airport. Although this report is focused on RAF Northolt to address Condition 24, the mitigation measures are suitable for the Approved Development Site and any aerodromes that are within the safeguarding areas. However, Heathrow Airport is referenced where appropriate.
- 1.10 This report will address bird hazard management during the site preparation, construction phase and operational phase of the development as appropriate to birds (and their habitats) within the Approved Development Site. The aim is to implement and maintain measures to disperse birds considered a hazard to aviation and to prevent bird strikes (bird - aircraft collisions) in close proximity to the aerodrome. This report does not extend to any other potential environmental impacts.
- 1.11 It is important to note that this report relates to the Approved Development Site only and includes recommendations to deter hazardous birds from the construction site (e.g. preventing exposed areas of soil, puddling and water within excavations) and completed development (e.g. limiting provision of fruit/berry-bearing tree/hedgerow species) and is not related to any active bird deterrence (e.g. bird scaring).

2.0 AIMS AND OBJECTIVES

Aims

2.1 The aims and objectives of this BHMP and how this relates to specific sections are as follows:

- Detail the context of the Approved Development Site in relation to RAF Northolt (**section 3.0**).
- Detail the ecological baseline in terms of birds and the corresponding bird strike risk evaluation (**section 4.0**).
- Detail bird hazard management measures to be implemented (**section 5.0**).

3.0 SITE CONTEXT IN RELATION TO RAF NORTHOLT

3.1 The UK was signatory to the Chicago Convention on International Civil Aviation (CCICA, signed on 7th December 1944) and the UK is signatory to Annex 14 to the CCICA (July 2018)¹¹, which includes a commitment to control birds ‘in the vicinity of aerodromes’ and ‘wildlife strike hazard reduction’ commitments respectively.

3.2 Most bird strikes are recorded below 2,000ft and an aircraft on a standard approach enters this height at a distance of c.13km from a runway. The internationally accepted safeguarding area with reference to bird hazards is defined by International Civil Aviation Organization (ICAO) as this 13km radius around the aerodrome (starting from the middle of the runway) and that bird hazards are a planning consideration for proposed development within this area. The 13km radius is specified in guidance from the Airport Operators Association in Association with the Civil Aviation Authority (CAA)¹² and separate guidance from the CAA.^{13 14}

3.3 However, the following is noted regarding military aerodromes¹⁵:

“In order to protect aerodromes against these hazards, safeguarding maps include, 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 and an eight mile (about 12.87 kilometre) radius in the case of military aerodromes, centred on the safeguarded aerodrome reference point to indicate the area within which developments likely to attract birds require similar consultation.”

3.4 The Approved Development Site is located c.3.89km from the closest edge of the runway at RAF Northolt. However, it is also important to note that the Approved Development Site is also c.7.35km from the closest edge of the closest runway at Heathrow Airport. Although this report is focused on RAF Northolt, the mitigation measures are suitable for any aerodromes within a 13km (as applicable to civilian aerodromes) and 12.87km (as applicable to military aerodromes).

3.5 The habitats in-between the Approved Development Site and RAF Northolt are summarised

¹¹ International Civil Aviation Organization (July 2018). *Annex 14 to the Convention on International Civil Aviation Aerodromes Volume I Aerodrome Design and Operations Eighth Edition*.

¹² Airport Operators Association in Association with Civil Aviation Authority (August 2016). *Safeguarding of Aerodromes Advice Note 3 – Wildlife Hazards round Aerodromes*. Available at: <https://www.aoa.org.uk/wp-content/uploads/2016/09/Advice-Note-3-Wildlife-Hazards-2016.pdf>

¹³ Civil Aviation Authority (January 2022). *CAP 168 Licensing of Aerodromes Edition 12*. Available at: [https://publicapps.caa.co.uk/docs/33/CAP%20168%20Licensing%20of%20Aerodromes%20v12%20c0123%20\(004\).pdf](https://publicapps.caa.co.uk/docs/33/CAP%20168%20Licensing%20of%20Aerodromes%20v12%20c0123%20(004).pdf)

¹⁴ Civil Aviation Authority (October 2017). *Wildlife hazard management at aerodromes CAP 772 second edition*. Available at: https://publicapps.caa.co.uk/docs/33/CAP772_Issue2.pdf

¹⁵ HM Government Department for Transport. Guidance The town and country planning (safeguarded aerodromes, technical sites and military explosives storage areas) direction 2002 Updated 22 December 2016. Available at:

<https://www.gov.uk/government/publications/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>

as follows:

- Built environment - comprising the town of Uxbridge with residential/commercial areas; and roads (including the A40).
- Amenity areas - the built environment has some associated green areas with parks (including Fassnidge Park, Dowding Park, Hillingdon Court Park and Elephant Park); Uxbridge Common; school/sports provision (including Rockingham Recreation Ground, Hillingdon House Farm Sports Grounds, RAF Sports Ground and John Locke Academy); Hillingdon Golf Course; gardens; allotments; and roadside verges.
- Farmland - arable and pasture adjacent to the built environment.
- Woodland - blocks and ribbons of woodland adjacent to the built environment, some of which form part of amenity areas.
- Gutteridge Wood and Meadows Local Nature Reserve (LNR) - LNRs are notified under Section 21 of the National Parks and Access to the Countryside Act 1949 (as amended) by local authorities. They are places with wildlife or geological features and are intended for public appreciation, enjoyment and education. The LNR designation does not afford special protection; however, LNRs are protected under legislation and planning policy. The LNR is 25 hectares and contains oak *Quercus* spp. and hazel *Corylus avellana* woodland, some of which is ancient woodland, and wildflower meadows. It also contains a section of Yeading Brook.¹⁶
- Open water - there are a number of water features (including the Grand Union Canal, Fray's River, River Pinn and Yeading Brook). The closest water body from the closest edge of the runway is noted as a drain c.306m from the closest edge of the runway, which is closely adjacent to both Yeading Brook and a pond.

3.6 This is shown in **Appendix 1**.

¹⁶ London Wildlife Trust. *Gutteridge Wood and Meadows*. Available at: <https://www.wildlondon.org.uk/nature-reserves/gutteridge-wood-and-meadows>

4.0 ECOLOGICAL BASELINE AND BIRD STRIKE RISK EVALUATION

4.1 CAP 772 from the CAA (2017)¹⁷ states the following regarding specific species:

“...priority should be given to reducing the presence of large and/or flocking birds and, where practicable, to managing other congregations of birds that present a threat to aircraft safety whether on or off-aerodrome.”

4.2 Guidance on Biodiversity and Aerodrome Safeguarding for London City Airport, which is referred to within this report where relevant to this context, states the following under the heading of ‘Concerning species’:¹⁸

“Almost all species are a threat to aircraft, but medium to large size birds and those exhibiting flocking behaviour are particularly concerning.”

4.3 A study titled ‘A Practical Method to Assess Bird Strike Risk in Air Operations Using a Count-Based Risk Mitigation Tool’ (2025)¹⁹ states the following regarding ‘hazard probability’ and ‘hazard severity’:

“The hazard probability is dependent on air traffic movements, the probability of a bird species to collide with an aircraft, and the number and species of birds present at the airfield...”

Hazard severity is dependent on mass of the bird and the size of bird groups. As measure of hazard severity, body weight of a bird species can be used, as body weight correlates strongly with impact...”

4.4 The CAA publish data on reported bird strikes including a ‘Top 20’ list of species, which represents the 20 most reported species.

4.5 The CAA publish data on reported bird strikes including a ‘Top 20’ list of species, which represents the 20 most reported species. The latest recording period from the CAA is from 2023 and 2024 where there was a total of 1,675 and 1,691 confirmed bird strikes respectively. The highest number of bird strikes occurred between the months of June and October with the highest numbers in August in both years. The Top 20 list of confirmed bird strikes in both years comprised gulls *Laridae* spp.; pigeons *Columbidae* spp.; herring gull *Larus argentatus*;

¹⁷ Civil Aviation Authority (20/10/2017). *Wildlife hazard management at aerodromes CAP 772 second edition*. Available at: https://publicapps.caa.co.uk/docs/33/CAP772_Issue2.pdf. p13.

¹⁸ London City Airport. *Guidance on Biodiversity and Aerodrome Safeguarding*. pp.1-2. Available at: https://assets.ctfassets.net/ggj4kbqgcch2/5RSakrIKBXk4kdyGJypbul/9ff825e061e27ca4796aa1433efe1533/Guidance_on_Biodiversity_2022.pdf. pp.2.

¹⁹ Teunizen, M., van Gasteren, H. 1,2, Karen L Krijgsveld, K.L. (02/09/2025). *A Practical Method to Assess Bird Strike Risk in Air Operations Using a Count-Based Risk Mitigation Tool*. Available at: <https://pmc.ncbi.nlm.nih.gov/articles/PMC12663906/>

swallow *Hirundo rustica*; woodpigeon *Columba palumbus*; kestrel *Falco tinnunculus*; barn owl *Tyto alba*; black-headed gull *Chroicocephalus ridibundus*; skylark *Alauda arvensis*; starling *Sturnus vulgaris*; buzzard *Buteo buteo*; meadow pipit *Anthus pratensis*; swifts *Apodidae* spp.; house martin *Delichon urbicum*; crows *Corvus* spp.; wagtails *Motacilla* spp.; hawks, eagles and vultures *Accipitriformes* spp.; lesser black-backed gull *Larus fuscus*; hares *Lepus* spp.; carrion crow *Corvus corone*; and ringed plover *Charadrius hiaticula*.²⁰ Further details on Top 20 lists including earlier data (from 2012 onwards) is discussed below.

4.6 The Ecological Appraisal (April 2016) noted the following:

*“The adjacent waterways and trees within and adjacent to the site are of value for birds. The trees and shrubs support suitable song perches, foraging and nesting habitat. Birds recorded within the site during the site visit included: house sparrow *Passer domesticus*, great tit *Parus major*, blue tit *Parus caeruleus* and pigeon *Columba livia* [domestica]. Mallards *Anas platyrhynchos* were observed along the Grand Union Canal and a coot *Fulica atra* was observed on the River Colne.”*

4.7 The PRA (December 2019) noted the following:

*“Several sycamore trees are located along the southern end of the eastern boundary adjacent to the building, as well as to the south. A small number of off-site hazel and ash saplings are also present along the southern boundary. Whilst these trees do not have any features suitable to support roosting bats, bird feeders have been placed on some of the trees on the southern boundary and great tits *Parus major* were observed feeding during the survey.”*

4.8 However, these observations are historical and only a ‘snapshot’ and are by no means a full bird inventory.

4.9 Given the context of the Approved Development Site in London and proximity to buildings and open water, it is considered that gulls will also inevitably be present in the area and fly over the Approved Development Site.

4.10 There are suitable opportunities for birds within buildings, trees and shrubs.

4.11 A breakdown of these species into those that are ‘particularly concerning’ (with reference to the Guidance on Biodiversity and Aerodrome Safeguarding from London City Airport) and

²⁰ Civil Aviation Authority. *UK Reported Birdstrikes 2023 & 2024*. Available at: <https://www.caa.co.uk/media/u0tdft10/uk-reported-birdstrike-2023-2024.pdf>. Note that the dataset has 21 species/species groups (although under the heading Top 20) and includes a mammal group (hares) and vultures are not wild birds in the UK and only appear in the UK in exceptional circumstances.

those on Top 20 lists are shown in **Table 1**.

Table 1. Assessment of bird species recorded/assumed to fly over the Approved Development Site.

Species	Species group	Particularly concerning (medium - large)	Particularly concerning (flocking)	Top 20 species (2012 - 2016)	Top 20 species (2017 - 2021)	Top 20 species (2022)	Top 20 species (2023 - 2024)
Blue tit	Tits		•				
	Crows	•	•	•	•	•	•
Coot	Rails	•	•				
Feral pigeon	Pigeons	•	•	•	•	•	•
Great tit	Tits		•				
	Gulls	•	•	•	•	•	•
House sparrow	Passerines		•	•			
Mallard	Ducks	•	•				
Ring-necked parakeet	Parrots	•	•				
Starling	Passerines	•	•	•	•	•	•

4.12 Traditional nest sites for gulls are inaccessible places on coastal cliffs, sandy beaches, sand dunes and islands; however, some species (e.g. herring gull) have adopted the roofs of buildings.²¹ Rock dove, which are the wild ancestors of the feral pigeon, traditionally nest in sea caves and steep cliffs but the feral pigeon primarily nests on and within buildings and built structures such as bridges²² and they can nest at any time of the year. Blue tits, crows, great tits and starling are associated with nesting within buildings and trees whilst house sparrows are associated with nesting in buildings, trees and hedgerows. Mallards are associated with nesting on land within vegetation adjacent to open water and coots are associated with floating nests within open water. Given the building, trees and shrubs onsite, there are some opportunities for nesting birds associated with these habitats, although these opportunities are limited and there are many such opportunities in the broader context.

²¹ Data Zone by BirdLife. *European Herring Gull Larus argentatus Laridae (Gulls, Terns, Skimmers)*. Available at: <https://datazone.birdlife.org/species/factsheet/european-herring-gull-larus-argentatus>

²² British Trust for Ornithology (BTO). *Rock Dove Columba livia*. Available at: <https://www.bto.org/understanding-birds/birdfacts/rock-dove>

- 4.13 Coot, crows, feral pigeon, gulls, mallard, ring-necked parakeet and starling are all considered to variously be medium - large birds, albeit that starling is at the lower end of medium, and all are known to exhibit flocking behaviour. In general terms, birds form flocks for a variety of reasons such as to have a better chance of spotting potential predators; to confuse or overwhelm potential predators through mobbing; to gather together for warmth during colder times of the year; and for foraging e.g. seeds, earthworms and other invertebrates in arable fields after ploughing and, in the case of gulls, food sources on refuse tips and fish from fishing boats.^{14 23}
- 4.14 Crows, gulls, feral pigeon and starling appear on all Top 20 lists; however, coot and mallard are not on any of these lists. Gulls represent the highest number of collisions in each of the recording period and are mentioned specifically in Condition 24. The ring-necked parakeet is associated with nesting in tree cavities in urban parks, large gardens and orchards. These habitats are not present within the Approved Development Site. This species does not appear on the Top 20 lists and it is possible that this species does not appear on these lists because it is only resident in London and surrounds and whilst it winters elsewhere in England and South Wales, it is currently absent in large parts of the UK, and may therefore not appear on data that is prepared nationally.²⁴
- 4.15 Blue tit, great tit and house sparrow do exhibit flocking behaviour; however, they are small passerines and none of these species appear on the Top 20 lists, with the exception of 'sparrows' (likely house sparrow) in data from 2012 - 2016. In this data set, the number of bird strikes was c.45 and this represents c.0.5% of the total.
- 4.16 The following is noted in A Practical Method to Assess Bird Strike Risk in Air Operations Using a Count-Based Risk Mitigation Tool (2025)¹³:
- "...birds that are abundant on an airfield pose a hazard risk but not all bird species have the same risk in terms of flight safety due to variation in hazard probability and severity. For example, a strike with an individual small passerine does not result in damage and is not considered a major hazard, and thus, passerines are considered to be low risk, whereas a strike with a goose can cause considerable damage and is considered a major risk in terms of flight safety..."*
- 4.17 Although there is a large degree of variation, a study titled 'Air speeds of migrating birds

²³ Wildfowl and Wetlands Trust (WWT). *Marvellous murmurations: why do birds flock together?* Available at: <https://www.wwt.org.uk/discover-wetlands/blog/marvellous-murmurations-why-do-birds-flock-together>

²⁴ RSPB. *Birds and Wildlife Ring-necked Parakeet Psittacula krameria*. Available at: <https://www.rspb.org.uk/birds-and-wildlife/ring-necked-parakeet>

observed by ornithodolite and compared with predictions from flight theory' found the following mean air speeds: black-headed gull (11.4mps), common gull *Larus canus* (12.9mps), herring gull (13.4) and lesser black-backed gull (14.4).²⁵ Using this data, this means that birds of these species could fly between RAF Northolt and the Approved Development Site at c.3.89km separation in 270 - 341 seconds. This is, of course, theoretical but highlights the distance between the Approved Development Site and RAF Northolt.

- 4.18 Once relevant planning conditions are discharged, the groundworks and construction will commence. The planning permission includes the creation of a tall, flat-roofed building and green provision, which will present potential opportunities for birds, and must include avoidance/mitigation measures for high collision risk species.
- 4.19 The subsequent measures are focused on detracting larger bird species and flocking behaviour generally.

²⁵ Pennycuik, C.J., Åkesson, S. and Hedenström, A. (06/09/2013). *Air speeds of migrating birds observed by ornithodolite and compared with predictions from flight theory*. Available at: <https://pmc.ncbi.nlm.nih.gov/articles/PMC3730693/>

5.0 BIRD HAZARD MANAGEMENT PLAN

RAF Northolt

5.1 A publicly available document titled 'RAF Northolt Aerodrome Operating Hazard Log (AOHL)' (2025)²⁶. This includes the following measures:

- Hazard: *"Area of short grass located on the airfield increased presence of birds".*
- Mitigation:
 - "a) Airfield Wildlife Control Unit present during published opening hours.*
 - b) Warnings recorded on ATIS[Automatic Terminal Information Service]/passed via ATC [Air Traffic Control]*
 - c) ATC lookout from Tower."*
- Hazard: *"Bird Activity in Vicinity of Aerodrome".*
- Mitigation:
 - "a) Airfield Wildlife Control Unit employed to manage and disperse bird activity.*
 - b) Airfield Wildlife Management Plan.*
 - c) Long Grass Policy (LGP) in place on airfield to deter bird activity.*
 - c) Cat I Hold bars present at all runway intersections, alongside illuminated hold signs. Some intersections also have Cat II holds.*
 - d) Guard lights are located at BRAVO 1 and DELTA 1 holds.*
 - e) Painted Runway Ahead markers located on BRAVO and DELTA holds.*
 - c) Enhanced taxiway markings located at DELTA 1 and ALPHA 1 holds.*
 - d) ATC lookout. Subsequent instructions may be given to other AC to avoid incident (e.g. Initiating a go-around).*
 - e) LVP [Low Visibility Procedure] orders in place. This includes use of 'Follow me' escort vehicle and restrictions on how many AC operating at once."*
- Hazard: *"No AWCU [Aerodrome Wildlife Control Unit] Outside of Published Airfield Hours."*
- Mitigation:

²⁶ RAF (04/11/2025). *RAF Northolt Aerodrome Operating Hazard Log (AOHL)*. Available at: https://irp.cdn-website.com/e64f5f62/files/uploaded/20240301-RAF%20Northolt%20AOHL%20V1.6_O.pdf

- “a) AWCU able to conduct limited activity with sufficient notice. ATC to notify AWCU of pre-planned movements to assure cover where possible.*
 - b) Pilot look out detects wildlife activity.*
 - c) ATC look out detects wildlife activity and reported to AC via RT and/or ATIS.*
 - d) ATC procedures to hold AC.*
 - e) ATC conduct a runway inspection to confirm roosting birds are not settled on the Rwy prior to departure.*
 - f) CFO procedure requires aircraft to ground taxi to minimise risk of wildlife ingestion whilst in the low hover.”*
- Hazard: *“High bird (gulls) activity in the vicinity of the Suez Recycling Centre.”*
 - Mitigation:
 - “a) Regular engagement with the Suez Recycling Centre to share wildlife control practices.*
 - b) Engagement with DIO and local council for updated permissions and mitigation measures.*
 - c) NOTAM [Notice to Air Missions] high bird activity.*
 - d) Proactive bird control on the aerodrome to scare migrating gulls from the Suez site.”*

5.2 Bird hazard management measures used by Heathrow Airport are detailed below. This is then followed by construction phase and operational phase measures at the Approved Development Site.

Heathrow Airport

5.3 A document titled ‘Operational Safety Instruction Wildlife Hazards and Reporting of Birdstrikes’ (2023)²⁷ includes the following measures:

Wildlife Hazard Management

“HAL [Heathrow Airport Limited] employs a variety of measures designed to reduce the risks associated with wildlife activity in the vicinity of the aerodrome.

²⁷ Heathrow Airport (21/11/2023). *Wildlife Hazard Management Operational Safety Instruction Wildlife Hazards and Reporting of Birdstrikes*. Ref: ASWHM_OSI_077, Version 3.0. Available at: https://www.heathrow.com/content/dam/heathrow/web/common/documents/company/team-heathrow/airside/operational-safety-instructions/ASWHM_OSI_077%20Wildlife%20Hazards%20and%20Reporting_v3.pdf

Active wildlife control is exercised at and around the airport by the HAL Airfield Operations team and its authorised contractors.

Off-airport monitoring and proactive management are carried out by a contracted organisation on behalf of HAL...

Disposal of Waste Products

"Food items must be properly disposed of and not left in the outside environment and/or in an opened container. Such items will act as a wildlife attractant and could potentially become FOD [Foreign Object Debris].

All waste bins, skips and/or any other waste container are required to have cover or lids that exclude birds and other wildlife. All of these MUST be closed or covered when not in use.

Feeding of birds and/or any wildlife is strictly prohibited anywhere airside...

HAL Airfield Operations team conducts daily patrols on works sites, waste disposal areas and known areas of potential food sources within the airside areas...

Breaches of these requirements may lead to enforcement actions taken by HAL, including AOT issuance and levying of fines for clearance of waste and deep cleaning of areas."

Reporting of Wildlife Strikes

"Regulation (EU) No 376/2014 of the European Parliament and of the Council states that occurrences which may represent a significant risk to aviation safety must be reported through the Mandatory Occurrence Reporting system, also known as MOR. This includes wildlife strikes as set out in Commission Implementing Regulation (EU) 2015/1018.

Upon discovering evidence or witnessing a wildlife strike incident, the HAL Airfield Operations team must be contacted immediately...

The wildlife remains and any evidence associated with the incident must not be touched, removed or cleaned until a member of the HAL Airfield Operations team has attended and given permission to do so.

A member of the HAL Airfield Operations team will be dispatched to visit the aircraft involved, take details of the incident, and if available, recover the remains or trace evidence of the strike (forensically if necessary) for species identification.

Once approval has been given by a member of the HAL Airfield Operations team, any follow-up action deemed necessary by the airline/ground handler or engineer involved may take place, including removal of wildlife remains, clean-up and repair of the area affected.”

Reporting of Wildlife Activity

“Under any of the following activities, reports must be made to the HAL Airfield Operations team immediately...

Wildlife activity is witnessed and thought to have an immediate threat to aircraft safety;

Any unusual or excessive wildlife activity is witnessed; or

A bird’s nest or evidence of nesting around the airfield is identified.

If the flight crew reported any wildlife-related activity whilst operating an aircraft into or out of Heathrow Airport, the details of which will be relayed to the HAL Airfield Operations team by ATC [Air Traffic Control]...”

Assessment of Wildlife Hazards

“A Wildlife Hazard Steering Group meets on a regular basis to review policy and active bird control measures.

A risk identification approach is taken to assessing wildlife hazards, as outlined in CAP 772. This approach takes the occurrence of a strike over the prior 5 years against its likely severity, to give an overall risk rating, against which wildlife hazard management plans are created.”

5.4 It is further noted that the following measures are used by Airfield Operations:¹⁵

- Liaison with local authorities on planning applications to minimise the risk of increased bird activity caused by new developments or changes of land use.
- Intelligence gathering on bird species, population and food sources.
- ‘Bird-proofing’ of buildings and infrastructure.
- Netting of open water sources.
- Grass is kept at 150mm - 200mm as this length deters birds (reduced visibility and increased perception of vulnerability to predation and reduced access to the soil for

foraging).

- Airfield operations vehicles fitted with an electronic bird deterrent system called 'Digiscare', which is pre-programmed with the distress calls for various species.
- On the rare occasions that Digiscare does not work, airfield officers will use a cartridge gun, which produces only a loud sound without a projectile, to scare birds away.
- Heathrow Airport helps manage over 170 hectares of biodiversity areas around the airport, ensuring the habitats for over 2,000 species of flora and fauna are maintained. However, it is important to deter birds from the airport operations.

Approved Development Site - Construction Phase

- 5.5 The groundworks will require exposure of soil, which will in turn expose seeds, earthworms and other invertebrates, and may create puddling on uneven ground. There is also a risk that excavations for the foundations of buildings/creation of hardstanding may become filled with water. These could become attractants for birds. Furthermore, food waste and litter, even in bin bags, can attract a range of bird species including gulls.
- 5.6 There are separate mechanisms requiring a Demolition and Construction Management Plan (Condition 10)²⁸ and a CFA Piling Method Statement (Condition 23).
- 5.7 The CFA Piling Method Statement includes the following measures:

"Site Specific

...Main Contractor will also ensure that the site is fenced with hoarding or similar to keep the site safe and to prevent intruders or children entering the site. Main Contractor must also ensure that piling areas are segregated from other site operations and personnel...

The Main Contractor will be responsible for wheel washing and if need be street cleaning...

Method of Working

...All excess concrete is removed using the attendant excavator and will be removed from site along with the pile spoil by the main contractor...

²⁸ Note that the report prepared is a Construction Management Plan as demolition of the existing building has already been completed.

Environmental Controls

The skips, water bowser and licensed carriers will be provided by the Main Contractor, unless otherwise is stated in the contract.

- *Operation should only take place within specified working hours.*
- *General waste shall be deposited into designated skips.*
- *Special waste, such as oil contaminated materials, used oil spill kits, etc. shall be disposed of by a licensed carrier.*
- *Fuel/ oil spills should be prevented. Drip trays and emergency oil spill kits shall be used to catch and clean the spills/ leaks. Oil spill kits contain colour coded bags to contain any used spill equipment. These shall be disposed of by a licensed carrier.*
- *The vehicles shall not be run unnecessarily. Engines shall be extinguished when not in use.”*

5.8 The Construction Management Plan includes the following measures:

Phased works

- Demolition of the existing building has already been completed. The remaining phases are as follows: enabling works and site set-up; removal of hardstanding; reduce level dig and installation of drainage; piled foundations; construction of 34 no flats in one block; external parking area and hard and soft landscaping

Fencing/tree protection

- *“Installation of perimeter Heras fencing & Timber hoarding to the site boundary with vehicular and pedestrian gates provided”*
- *“The planning granted for the scheme has various tree surveys, reports and protection plans submitted that allowed full planning to be granted. We will have tree protection in place before works begin where required, using Heras fencing and signage erected as per BS 5837: 2012... and will be monitored throughout the works.”*

Mud/dirt tracking

- *“Vehicle movements may result in some dust emissions but the size of the project does not lend itself to long movements by plant. However, several control measures will be adopted to eliminate or minimize such emissions or debris on roads:*

- *Wheel washing facility on site to prevent mud from construction operations being transported on to adjacent public roads*
- *Damping down of site road area using water during prolonged dry periods*
- *Regular wet cleaning of hard-surfaced roads used to enter site with sweeper vehicle*
- *Ensuring that dusty materials are transported appropriately and sheeted*
- *Hoarding and gates erected to prevent dust break out*
- *Appropriate dust site monitoring*

Storage

“As demolition has been completed and arisings removed there is no use of reclaimed materials on site going to happen. All new materials delivered to site will be in sheeted / protected vehicles and safely stored under cover on site. Stone materials will be sheeted to avoid dust. Most other materials will be ordered and delivered on a ‘Just in time’ basis, so moved and used at the workplace straight away.”

5.9 Additional/supplemental measures are as follows:

Phased groundworks

- Soil must only be exposed in sections to prevent large, exposed areas.
- Exposed soil must not be left over the winter as this could attract winter flocks.

Site users and fencing/signage

- Heras fencing will be installed around the site boundaries and to protect Root protection Zones (RPZs) in line with BS5837:2012 as above. There will also be fencing/signage to establish clear pedestrian and vehicle routes; and site compound and working zones. This will help to control areas of disturbance to the ground.

Waste management

- There will be no dumping of waste on or adjacent to the Approved Development Site under any circumstances.
- Food waste and litter, which would arise from contractors onsite, must be placed within designated recycling/refuse bins, and these bins must be animal-proof and regularly emptied. Exposed food waste, even in bin bags, can attract species such

as gulls and will not be permitted.

- Contractors will be explicitly forbidden from feeding birds within or adjacent to the Approved Development Site.

Covering excavations

- Any excavations (e.g. trenches/pits) must be covered when works are not taking place to ensure that they do not fill with water.

- 5.10 Guidance on Biodiversity and Aerodrome Safeguarding for London City Airport, and of relevance to this context, states the following:

“Large unbroken blocks of planting are more likely to attract roosting, nesting or feeding birds than small blocks or widely spaced trees...”

Dense or sheltered vegetation has the potential to become a starling roost, therefore staggering plants in rows or spreading them out to prevent roosting is essential. Moreover, avoiding fruiting and berry-bearing trees, shrubs and any species with the potential to attract birds is desirable. Dispersing bird-attracting plant species within other unattractive species is another acceptable method...

Green and brown roofs are gaining popularity in larger developments as part of Planning Authorities’ green agendas, and have the potential to increase the risk level. The number of birds likely to be nesting on a roof less than 100m² are not significant, however this may not be the case if the roof is located close to the airport or under the approach...”

- 5.11 This guidance specifies berry fruit bearing planting dispersed subject to maximum 15% within 4km of London City Airport. However, no such definitive measure appears to be in place for RAF Northolt or Heathrow Airport.
- 5.12 The Approved Development Site measures 0.2977 hectares and given the context of the proposed residential development, there will not be any large areas of any one habitat type (e.g. large areas of grassland) that are often associated with flocking birds, and planting will be in small broken-up areas interspersed around the built environment. As such, large unbroken blocks of planting, large grassland covered areas and meadows are not applicable for the proposed development. There are small gardens and the open spaces will be managed for amenity use and used by local residents/pedestrians/dog walkers and one area will be a secure communal amenity garden with a children’s play area. This will limit opportunities in terms of large numbers of seeds and aggregations of earthworms and

other invertebrates and small mammals.

- 5.13 There will also be no open water within the proposed development, which can attract bird flocks.
- 5.14 There are proposals for solar photovoltaic (PV) panels to be installed on the roofs. Although this contributes to broader environmental/sustainability objectives, measures must be taken to ensure that the panels do not attract nesting birds. The issue with solar PV panels in this context relates to the niches created underneath the panels, which could provide nesting opportunities, particularly for feral pigeons and starlings. The surface of the panels themselves are unlikely to support nesting birds; however, they could provide perches in association with nests. With reference to guidance on Biodiversity and Aerodrome Safeguarding from London City Airport London City Airport, this must comprise either **bespoke netting over the panels (e.g. high-density polyethylene, HDPE) or bespoke wire mesh installed around the outer edge of the panels.**
- 5.15 With reference to the Soft Landscaping Proposals (July 2026), there are no large areas of any habitat and there is limited provision of soft fruit/berry-bearing tree/hedgerow species and there are columnar/fastigate trees (growing erect and parallel and non-canopy forming), which limits opportunities for flocking birds. The following green habitats are proposed:
- Existing trees and vegetation - trees and areas of vegetation retained and protected. Some trees are lost as part of the proposals.
 - Proposed grass areas - grass areas either to receive good quality shade tolerant amenity grass turves laid on prepared ground in line with good horticultural practices; or Shade Tolerant 80/20 Meadow Wildflowers at a sowing rate of 5g/m² on prepared ground in line with good horticultural practices, as supplied from John Chambers Wildflowers (or similar). There are no large areas of grass (in terms of providing opportunities for flocking birds).
 - Proposed tree/shrub planting - tree planting with no berry or soft fruit bearing species (some species bear nuts e.g. hornbeam *Carpinus betulus*) and a fastigate hornbeam cultivar, namely hornbeam *Carpinus betulus* 'Fastigiata'. There are also bed planting, decorative planting mix, flowering plant mix and canal side native planting mix areas to have plants evenly distributed within planting areas. The proposed decorative planting mix and canal side native planting mix areas will

contain plants to be arranged in groups between 3 and 21 with taller growing species located to the rear of the bed and smaller growing species located towards the front of the bed. Of the 13 species of shrubs, there are four that are berry bearing/potentially berry bearing, namely black matipo *Pittosporum tenuifolium*, box honeysuckle *Lonicera nitida* 'May Green', Japanese laurel *Aucuba japonica* 'Variegata' (only if male pollinator present) and variegated holly olive *Osmanthus heterophyllus* 'Variegatus'. Berry bearing species are limited, new tree planting is scattered and does not form a canopy and there are no large areas of shrubs (in terms of providing opportunities for flocking birds).

- Proposed hedgerow planting - planting in a double staggered row and maintained in a neatly clipped form to a maximum height of 1.2m. The hedgerows comprise two sections and are single species, namely hornbeam. The short lengths of hedgerows and interspersed built environment reduces any habitat continuity.

Operational phase measures

5.16 As above, there are no large areas of any one habitat type and the planting comprises small broken-up areas interspersed around the built environment. The open spaces will be managed for amenity use and used by local residents/pedestrians/dog walkers. This will also limit opportunities in terms of large numbers of seeds and aggregations of earthworms and other invertebrates and small mammals.

5.17 The new buildings provide potential new nesting opportunities for birds, including high-risk species such as gulls and pigeons, especially on flat roofs. However, as above, there are no large areas of any one habitat type. CAP772 from the CAA states the following with regards to buildings:

“Prevention systems, such as exclusion netting of the correct mesh size and installation type for the target species or ledge spikes, should be used to prevent any wildlife accessing these sites at any time and you should be able to demonstrate that this is being achieved.”

5.18 Netting/meshing is already proposed with regards to the solar PV panels.

5.19 Rubbish/recycling bins with collections by London Borough of Hillingdon will be in place once occupied.

5.20 Additional/supplemental measures are as follows:

Grass

- The grass within open spaces/play areas will be mown with a close sward for amenity use and therefore provide limited structural diversity, lacking a 'thatch' layer of value for small mammals.
- With reference to the Soft Landscape Management and Maintenance Plan (July 2026), the amenity grass will be managed with a short sward and cut to 35mm with a maximum height of growth at any time of 75mm, whilst wildflower grass will be cut to 100mm with a maximum height of growth of 150mm.

Trees/hedgerows

- Trees could be coppiced/pollarded to limit canopy formation.
- Hedgerows will be managed to maintain a neatly clipped form with a maximum height of 1.2m.
- Although this report contains measures to detract birds, nesting birds are protected under the Wildlife and Countryside Act 1981 (as amended). Any hedgerow cutting must be carried out between October and February, which is timed outside of the main bird nesting season.

Roofs

- The proposed roof is flat and includes roof terraces (which may include plant pots); solar PV panels (made unsuitable for nesting with netting/meshing); and there are no green roofs. There are therefore no large areas of planting (in terms of providing opportunities for flocking birds).
- The roof terraces are likely to be used by people during good weather, which will detract potential nesting during the main nesting bird season.
- Furthermore, other prevention systems (exclusion netting and/or bird spikes) may be installed as detailed below.

Waste management

- The Management Company would aim to prevent any fly-tipping and/or littering, so it would not cause any impacts.
- The appointed Management Company should carry out regular litter picks.

- Any communal litter bins must be securely covered.
- As an additional measure, the dumping of garden/domestic waste should be prohibited within the property deeds of the new dwellings, which would provide a legal mechanism to ensure compliance by new homeowners.

Monitoring visits

- The management company appointed by the developer must conduct weekly monitoring for nesting birds and bird assemblages during the breeding season, and fortnightly monitoring outside of it. Monitoring must also ensure compliance with this report. It should be noted that feral pigeons may nest year-round and must be accounted for accordingly. All roof inspections should be recorded and made available to RAF Northolt/Heathrow Airport upon request. If changes to the planting palette are required then these can only be implemented in consultation with an ecologist and landscape architect. If further netting/meshing is required and/or other prevention systems (exclusion netting and/or bird spikes) then these must be installed in consultation with an ecologist.

Enhancements

- 5.21 The Guidance on Biodiversity and Aerodrome Safeguarding from London City Airport, which is of relevance to this context, states the following under the heading of 'Alternative ways to enhance biodiversity':²⁹

"There are many ways to increase biodiversity while not increasing bird populations and risk to aircraft."

- 5.22 This guidance then lists a series of potential measures of which bird boxes (targeting specific species) and native species planting (grass, trees and hedgerows) have been included within the proposals.

- 5.23 With reference to the Ecological Enhancement Scheme, the following has been recommended:

"4x 1B Schwegler Nest Boxes with a 26mm entrance hole will be incorporated into the development with 2x located on retained trees and 2x on the new building. Nest boxes

²⁹ London City Airport. *Guidance on Biodiversity and Aerodrome Safeguarding*. pp.1-2. Available at: https://assets.ctfassets.net/gg4kbqgcch2/5RSakrIKBXk4kdyGJypbul/9ff825e061e27ca4796aa1433efe1533/Guidance_on_Biodiversity_2022.pdf. pp.4.

should not be placed in direct sun or southern facing locations. Potential flight paths to and from the boxes should be free of obstructions.”

- 5.24 According to the Ecological Appraisal (April 2016), the provision of bird boxes should include those suitable for house sparrows. However, ‘sparrows’ (likely house sparrow) appear in Top 20 data from 2012 - 2016. The provision of bird boxes with 26mm entrance holes is therefore recommended, which specifically targets small passerines that do not appear on the Top 20 lists (targeting blue tit, coal tit *Periparus ater*, great tit and wren *Troglodytes troglodytes*).

6.0 CONCLUSIONS

- 6.0 This report addresses bird hazard management during the site preparation, construction phase and operational phase of the development as appropriate to birds (and their habitats) within the Approved Development Site. The aim is to implement and maintain measures to disperse birds considered a hazard to aviation and to prevent bird strikes (bird - aircraft collisions) in close proximity to the aerodrome. This report does not extend to any other potential environmental impacts.
- 6.1 It is important to note that this report relates to the Approved Development Site only and includes recommendations to deter hazardous birds from the construction site (e.g. preventing exposed areas of soil, puddling and water within excavations) and completed development (e.g. limiting provision of fruit/berry-bearing tree/hedgerow species) and is not related to any active bird deterrence (e.g. bird scaring).
- 6.2 The Approved Development Site measures 0.2977 hectares and there will not be any large areas of any one habitat type (e.g. large areas of grassland) that are often associated with flocking birds, and planting will be in small broken-up areas interspersed around the built environment. As such, large unbroken blocks of planting, large grass covered areas and meadows are not applicable for the proposed development. Furthermore, the open spaces will be managed for amenity use and used by local residents/pedestrians/dog walkers. This will limit opportunities in terms of large numbers of seeds and aggregations of earthworms and other invertebrates and small mammals.
- 6.3 Various construction phase measures include phased groundworks where soil must only be exposed in sections to prevent large, exposed areas; exposed soil must not be left over the winter as this could attract winter flocks; use of fencing/signage/boarding for site users; covering excavations; waste management measures; and bespoke netting/meshing over solar PV panels.
- 6.4 Various operational phase measures include weekly checks through the breeding season and fortnightly checks outside the breeding season by a Management Company and if further netting/meshing is required and/or bird spikes then these must be installed in consultation with an ecologist; and waste management measures. All roof inspections should be recorded and made available
- 6.5 According to the Ecological Appraisal (April 2016), the provision of bird boxes should include those suitable for house sparrows. However, 'sparrows' (likely house sparrow) appear in Top 20 data from 2012 - 2016. The provision of bird boxes with 26mm entrance

holes is therefore recommended, which specifically targets small passerines that do not appear on the Top 20 lists

APPENDIX 1 HABITAT DISTANCE PLAN



