



Grand Union Village SEND School

Bird Hazard Management Plan

Author		William Latimer MSc PhD CEnv FCIEEM	August 2021
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Latimer Ecology Coull Home Farm, Aboyne, Aberdeenshire, AB34 5JU
Tel. 013398 87118 | Mobile 07833 547240 | e-mail: latimer.ecological@gmail.com
Website: <https://www.latimer-ecology.co.uk/>

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1.0 Introduction

1.1 The Grand Union SEND School has received planning permission subject to a condition regarding air safety at the nearby RAF Northolt airfield which caters for both military and civilian flights. The development plot for the school, measuring approximately 80 x 140 metres, is located in Northolt West End, south of the A40 Western Avenue (at OS Grid Ref. TQ 122 843), approximately 2.8 km to the southeast of the airfield perimeter. The planning condition states:

“Prior to any works above ground level, a Bird Hazard Management Plan shall be submitted to and approved in writing by the Local Planning Authority in consultation with the MoD. The submitted plan shall include details of management of any flat/shallow pitched/green roofs on the building(s) and green spaces 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'.

The Bird Hazard Management Plan shall be implemented as approved, on completion of the development and shall remain in force for the life of the building. No subsequent alterations to the plan are to take place.”

REASON:

In order to minimise the attractiveness of the site to birds which could endanger the safe movement of aircraft and the operation of RAF Northolt, in accordance with Policy DMAV 1 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020).

This version of the plan has been amended in response to comments received from The MoD Defence Infrastructure Organisation on the 17th August 2021 (Ref. 10048632) and 23rd August 2021 (e-mail to The London Borough of Hillingdon from Defence Infrastructure Organisation).

1.2 The new development comprises the school building with associated car parking with a garden and play area. The single story southern elevation of the proposed school building supports a pitched roof rising at a slope of 16.74° to the higher elevation which supports a flat roof with parapet walls and projecting flat roofs of the school hall, hydrotherapy unit and plant room. The garden area, approximately 80 x 60 metres has around 50% of the area devoted to artificial play surfaces with peripheral landscaping of amenity grassland, wildflower grassland with garden shrubs and small trees along the boundary.

1.3 New developments near airports raise implications for air safety if the building design, or any associated landscaping, encourages significant new populations of birds into the area by the airport or near flight paths. Colonial species such as gulls and rooks may nest upon buildings and in tree stands respectively: for the former large colonies can become established on flat roofs. In addition to air safety concerns such colonies may have health and safety implications relating to public health or the functioning of drains and ventilation equipment upon the roof.

1.4 Gulls readily use flat roofs as secure breeding sites in coastal locations and while gull populations are declining nationally, an increase in the urban gull population and breeding sites in cities has been recorded, particularly where food waste may be available, where large rivers act as conduits from coastal habitats or where large water bodies are present. A significant increase in the gull population of Worcester, for example, has been recorded ([2020-Gull-Population-Survey.pdf \(worcsregservices.gov.uk\)](#)). However, urban centres far inland are increasingly being colonised (e.g. Birmingham: see <https://www.bto.org/sites/default/files/bto-urban-gull-survey-2018-summary-for-volunteers.pdf>). Gulls are colonial nesters so that birds are attracted to sites where birds have commenced to nest. Such sites are used from year to year.

2.0 Methodology

2.1 The assessment and hazard management plan has been compiled with reference to guidance in documents published by the British Airports Authority and Airport Operators Association/CAA, principally:

- AOA/CAA Safeguarding of Aerodromes, Advice Note 3 (2016), Wildlife Hazards around Aerodromes
- AOA & General Aviation Awareness Council Advice Note Advice Note 8 (2008). Potential Bird Hazards from Building Design
- AOA & General Aviation Awareness Council Advice Note 3 (2006). Potential Bird Hazards from Amenity Landscaping and Building Design

2.2 The risk assessment and management plan has been further informed by developed protocols for the International Bird Strike Committee (Alan 2000) and the consultant's own knowledge of bird distribution and behaviour. The MAGIC map and database ([Magic Map Application \(defra.gov.uk\)](https://www.magicmap.org/)) has been consulted for contextual information on sites of wildlife importance in the locality. Risk categories are considered below in 4-scale range of: very low, low, moderate and high, taking into account anticipated bird behaviour and proximity to the airfield.

3.0 Risk Assessment

3.1 The development site is located in a largely residential area of low-rise housing with a small block of open countryside comprising fields of open grassland with mature deciduous shelterbelts and some areas of scrub to the east, bounded on its eastern edge by the Grand Union canal. It is an environment which appears unlikely to attract large populations of breeding gulls. Rooks may nest in the tree belts but in the absence of significant open agricultural foraging areas numbers would be expected to be very low. The development does not have any capacity to support or attract this species and would not therefore enhance any such population that might be present.

3.2 The proposed school building has, effectively, a flat roof which could provide a potential nesting site for gulls. The risk that gulls would be attracted to this site in a locality where other suitable nesting sites are very limited, might be judged to be low.

3.3 The landscaping proposals have been made in the light of the proximity of RAF Northolt and the risk that certain shrub and tree species may attract birds to feed or nest. The plans for the school include provision for a low number of small tree species in spaced plantings along the garden boundary and the car park. Tree species comprise principally *Pyrus calleryana* in the car park and *Acer campestre* in the garden, both species of around 10 metres in height when mature. Six well-spaced *Betula pendula* are also intended for the garden.

3.4 Amenity shrubs comprise low border plantings in the car park and garden, environments where daily use would be expected to deter large flocks of birds from assembling. While some of the proposed species, e.g. *Cornus* spp. have berries that are attractive to birds, significant extents of the same species will be avoided and the approach has been to provide a diverse, fine-grained mosaic of low shrubs including *Skimmia*, *Photinia*, *Sarcococca*, *Mahonia*, *Lavandula* and *Hebe* spp. The risk that the landscaping proposals in this relatively small site will attract significant numbers of birds again would appear to be low.

4.0 Bird hazard management plan

Construction Phase

4.1 Site staff will ensure, during construction, that no areas of the construction site shall become wet and ponded to the extent that birds such as gulls might be attracted to feed and roost. Construction activities will not result in the production of any waste that may attract birds. The scale and nature of the development, and its limited area are such that the risk of birds roosting or loafing upon the site appears to be very low.

4.2 The construction site manager will be apprised of the requirement to minimise wildlife hazards in relation to RAF Northolt and records will be maintained of any wildlife incidents and any presence of unusual assemblages of bird species. In any such case, the advice of a competent ecologist will be sought in relation to any danger that may arise in respect of flights from RAF Northolt. The site manager will ensure that regular inspections of the working areas are undertaken and will exercise vigilance and awareness in respect of bird activity, in particular, any increase in feeding, roosting or flocking behaviour.

Building design & management

4.3 The design of the new buildings may provide nesting opportunities for gulls upon the nearly- flat roof. Access to the nearly flat roof will be available externally and the roofs have been designed and stressed to permit inspection by staff walking along dedicated pathways on the roofs. Parapet walls will be provided.

4.4 During the operational life of the building any bird activity on the roof shall be monitored by inspections during the breeding season. Weekly inspections during the gull breeding season, with any prospecting gulls dispersed, are advised at the beginning of the months April, May and June after which new nesting activity is unlikely. A member of the buildings' maintenance staff will be provided with suitable training in the identification of nesting bird activity, legal requirements in respect of nesting birds and reporting and shall be assigned this duty and records kept of any relevant activity by birds which may concern air safety and the operators of RAF Northolt. Should any nesting activity be observed a suitably qualified and experienced ecologist will be contacted for advice and their recommendations **complied with**. Vents and other structures which may provide cavities for species such as house sparrow and starling to nest in should be screened with a suitable mesh.

4.5 If, through the process of regular inspections during the breeding season, attempted nesting by gulls on the roof or other structures, e.g., the surfaces of the parapet walls, appropriate action should be taken to prevent this. Small areas may be fitted with gull spikes, a dense array of upward pointing wires ([Pest Control Gulls - Seagull spikes to deter seagulls \(pestcontroldirect.co.uk\)](http://pestcontroldirect.co.uk)). Larger areas of roof should be fitted with gull wires which comprise parallel wire runs across the roof with a spacing which prevents gulls alighting and nesting on the roof (see: <https://www.ecoltd.net/bird-wire>). It should be noted that the physical barriers to flat surfaces provide the best protection and birds rapidly habituate to and ignore other supposed bird scarers such as devices moved by the wind, models of owls etc. A review of

the efficiency of gull control measures is available in the Scottish Government publication [Urban gulls and their management in Scotland: review - gov.scot \(www.gov.scot\)](http://www.gov.scot/publications/urban-gulls-and-their-management-in-scotland/review/pages/2.aspx).

4.6 Where such deterrence methods have been fitted occasional inspections are advised outside the breeding season to check the structural integrity and functionality of the gull control measures, for example, spikes can accumulate debris over time which should be cleared to prevent the formation of a nesting platform.

4.7 In the event that, despite the installed control measures, gulls are found to have managed to nest on the roof, the removal of nests and eggs is permitted but in view of the national declines in overall gull populations, only through a licensing process which provides derogation from the legal provisions of the 1981 Wildlife & Countryside Act (as amended) which protects all wild birds, their nests eggs and depending young. Licences to remove nests and eggs are issued on application to Natural England (see: [Changes to licensing of the lethal control of herring gull and lesser black-backed gull - GOV.UK \(www.gov.uk\)](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/345678/Changes_to_licensing_of_the_lethal_control_of_herring_gull_and_lesser_black-backed_gull.pdf))

4.8 Operation of the kitchens and any related facility where food waste and food wrappings are generated should ensure that correct disposal is followed so that no scavenging bird species, of which gulls are a supreme example, are attracted into the site. The grounds of school will be maintained in a clean and tidy condition with removal of all litter.

4.9 Activities required in respect of this plan will be itemised in the buildings management schedule and a copy of this plan appended.

Landscape design

4.10 The condition of the landscape plantings, the taller birch trees in particular, shall be monitored annually in relation to tree health, public safety and for any instances of birds nesting, roosting and feeding. As noted above, records should be kept of any change in the ecological status of the site whereby there may be implications for air safety. Note will be made of any exceptional aggregation of birds in the garden areas and advice sought from a competent ecologist.

Undertakings

4.11 In the light of the information given above, buildings management shall commit to take action to prevent birds which may present a hazard to RAF Northolt from loafing, roosting or nesting on the Grand Union SEND school building. The areas of open flat roof will be monitored by weekly inspections and dispersal of any prospecting gulls during the breeding season. Should it be noted that the roof is attracting urban gulls to nest, the vulnerable surfaces will be fitted with appropriate deterrents to prevent access to gulls. Records will be maintained of any attempts by birds to nest on the building and the actions taken to deter nesting, liaising where necessary with the management team at RAF Northolt. Actions required will be itemised in the buildings maintenance schedule and carried out for the life of the facility.

5.0 Summary

5.1 A bird hazard assessment and management plan has been completed for the development of the Grand Union SEND school in Northolt, some 2.8 km to the south-east of RAF Northolt. It is considered that the development in this area of mainly residential housing presents a low risk of bird hazard to the airfield operations. The new building, however, has sections of essentially flat roof. Such roofs, in many locations, are attractive to gulls in particular as nesting sites.

5.2 The new building will therefore be inspected regularly, with monitoring of any activity by birds upon the roof by weekly inspections and dispersal of any prospecting gulls during the breeding season. Records will be maintained of any attempts by birds to nest and the actions taken to deter this.

5.3 The landscape design has taken account of the proximity of RAF Northolt in relation to bird hazard and has avoid the over-use of berry bearing species. The residual risk of the landscaping features resulting in any elevation of bird hazard is considered to be very low.

References

Allan J.R. (2000). A protocol for bird strike risk assessment. International Bird Strike Committee

AOA (2016) Safeguarding of Aerodromes, Advice Note 3, Wildlife Hazards around Aerodromes. Airport Operators Association/Civil Aviation Authority

AOA (2006) Safeguarding of Aerodromes, Advice Note 8, Potential Bird Hazards from Building Design. Airport Operators Association/General Aviation Awareness Council

AOA (2006) Safeguarding of Aerodromes, Advice Note 3, Potential Bird Hazards from Amenity Landscaping and Building Design. Airport Operators Association/General Aviation Awareness Council.