



Defence Infrastructure Organisation

Michael Briginshaw
London Borough of Hillingdon
Planning & Community Services
Planning Services
3 North, Civic Centre
High Street

Your reference: 75111/APP/2025/739
Our reference: 10048524

Dear Michael,

MOD Safeguarding – RAF Northolt

Proposal: Redevelopment of site to deliver extension to existing Union Park data centre campus consisting of (a) free standing data centre building; (b) energy, power, and water infrastructure; (c) site access and internal roads; (d) site security arrangements; (e) hard and soft, green landscaping; and (f) other ancillary and auxiliary forms of development.

Location: Union Park UP4, North Hyde Gardens, Hayes, Middlesex, UB3 4QQ

Grid Ref: 510424, 179323

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

The application site occupies statutory safeguarding zones surrounding RAF Northolt. In particular, the application site occupies aerodrome height, technical and birdstrike safeguarding zones surrounding the aerodrome and is approx. 5.5km from the centre of the runway at RAF Northolt.

Aerodrome Height

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29 August 2025

The proposed application site occupies the statutory height and technical safeguarding zones that ensure air traffic approaches, and the line of sight of navigational aids and transmitters/receivers are not impeded.

I can confirm, there are no aerodrome height or technical safeguarding objections with this proposal.

Birdstrike

The proposed application site occupies the statutory birdstrike safeguarding zone surrounding RAF Northolt. Within this zone, the principal concern of the MOD is with the creation of new habitats which may attract and support populations of large and, or flocking birds, close to an aerodrome.

The proposed buildings will feature large flat roofs planted with sedum and pitched solar panels will also be installed on the roof. These features, in addition to the landscaping scheme and amenity pond, have the potential to attract nesting and roosting birds which are hazardous to air traffic. The applicant is aware of this issue from the MOD's previous responses to applications relating to this site and has submitted a Bird Hazard Management Plan (BHMP) dated 28th February 2025 as part of the application. The BHMP also covers Heathrow Airport's birdstrike safeguarding requirements.

Overall, the submitted BHMP is good, however, the MOD requires the following inclusions and amendments to ensure the BHMP is fit for purpose:

- The BHMP should make clear that the BHMP, and its requirements, are in perpetuity.
- Section 9.5 outlines the frequency of inspections. Inspections will increase if bird activity is 'high', however a definition of 'high' is not provided. As this is subjective, a precise definition of 'high' should be included in the document i.e. more than 10 gulls or pigeons outside of the breeding season.
- An ecologist is to be contacted if nesting birds are found. Instead, the BHMP needs to clearly state that nests once found will be removed (in accordance with the terms of the appropriate licence from Natural England).
- Bird spikes to deter roosting birds will be added to rooftop infrastructure. The MOD is pleased to hear this, but we would request that the edges of solar panels are also included in the list of infrastructure to be fitted with bird spikes.
- The MOD also welcomes that 'do not feed the birds' signs will be installed near the picnic tables and that food waste will be managed using appropriate containers and bins on the site which will be lidded.

Subject to the below condition being applied to the planning consent, if granted, for an amended BHMP to be submitted and the terms complied with, the MOD has no safeguarding objections to this application.

No development shall take place until a robust Bird Hazard Management Plan (BHMP) has been submitted to the Local Planning Authority for written approval, in consultation with the Ministry of Defence (MOD), and implemented in full as approved.

Reason

In the interests of aviation safety - to limit the potential of the site to attract and support populations of those bird species that may cause detriment to aviation safety.

I would be grateful if you could acknowledge receipt of this letter and confirm that a relevant condition covering the MOD's requirements is included in any consent, if granted.

The MOD must emphasise that the advice provided within this letter is in response to the data and/or information detailed above in the documents titled Landscape Plans, Site Location, Bird Hazard Management Plan and Design and Access Statement dated 07/04/2025. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

It is important that the condition requested in this response is included in any planning permission granted. As per Planning Circular 01/03: Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas, if the London Borough of Hillingdon decides to grant planning permission contrary to our advice, then we must be notified 28 days prior to a decision being made.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely

M. W. Howells

Micheal Howells
Assistant Safeguarding Manager
DIO safeguarding