



Ministry of Defence

Ms Mary Hudson
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Your reference: MW.01115/21
Our reference: DIO10043458

Defence Infrastructure Organisation

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10 June 2022

Dear Mary

MOD Safeguarding

Proposal: Updated Bird Hazardous Management Plan (BHMP)

Location: Whitecross Farm, Reading Road, Cholsey, Oxfordshire

Thank you for consulting the Ministry of Defence (MOD) which was received by this office. Your email included an updated BHMP.

Application is for a proposed sand and gravel extraction and processing with restoration to farmland and nature conservation. The application area comprises mainly agricultural land that has been used for arable and livestock grazing. This site is located approximately 4.2km south from the centre of RAF Benson and 31.km from the O1 threshold and is alongside the River Thames.

The MOD had previously commented on this proposal on the 30/11/2021, we requested several amendments to the original BHMP.

An updated BHMP has now been submitted. After reviewing the updated BHMP I can confirm whilst some of our previously suggested amendments have been made to the BHMP there are a few amendments outstanding.

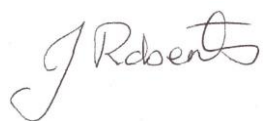
- The scrapes and shallow areas are removed from the restored floodplain, as these have the potential to be very attractive to hazardous birds. In addition, the BHMP should set out the frequency and extent of monitoring and a commitment to take action should the trigger levels be met. The trigger level for geese should be reduced to 20 birds, and the BHMP should include a commitment to disperse hazardous birds at the reasonable request of RAF Benson
- The trigger levels for geese have been reduced and there is a commitment to disperse hazardous birds at the reasonable request of RAF Benson.

- However, the BHMP still does not include a proposed frequency of monitoring, stating merely that monitoring will take place on a regular basis throughout the calendar year'. The monitoring frequency should be set out in the BHMP and should be agreed at the conditions stage, and prior to excavation starting. Monitoring should also be more frequent during flood events, although a higher threshold may be agreed during these times.
- In addition, the BHMP should set out the frequency and extent of monitoring and a commitment to take action should the trigger levels be met. The trigger level for geese should be reduced to 20 birds, and the BHMP should include a commitment to disperse hazardous birds at the reasonable request of RAF Benson.
- The trigger levels for geese have been reduced and there is a commitment to disperse hazardous birds at the reasonable request of RAF Benson. However, the BHMP still does not include a proposed frequency of monitoring, stating merely that 'monitoring will take place on a regular basis throughout the calendar year'. The monitoring frequency should be set out in the BHMP and should be agreed at the conditions stage, and prior to excavation starting. Monitoring should also be more frequent during flood events, although a higher threshold may be agreed during these times.
- In addition, the BHMP states that 'Should the numbers of bird species rise above the agreed levels, the relevant stakeholders will be notified and appropriate mitigation measures along with increased frequency of monitoring shall be agreed upon to minimise the risk will be implemented.' The agreed levels are indicative that the bird presence on the site is already posing an increased risk, and it should trigger immediate action. Should the numbers of bird species rise above agreed levels, then action should be taken to reduce the risk without having to first agree what that action should be, and this should be set out in the BHMP.
- The BHMP should also include failure criteria which will trigger a review of the management plan and further action to reduce any risk from hazardous birds attracted to this site.
- The site restoration shown in the BHMP still shows shallow scrapes in the wildlife area, adjacent to the River Thames. In this location, if these scrapes are open or with muddy edges or short vegetation around they have the potential to be very attractive to a range of large and flocking bird species hazardous to aircraft and therefore this habitat feature should be removed from the proposed restoration.
- Therefore, the MOD recommend that whilst some of our previously recommended amendments have been made to the BHMP, it should still include a monitoring frequency, a commitment to take action should the threshold levels be met and failure criteria that will trigger further review or management to reduce the risk. In addition, the scrapes should be removed from the proposed restoration.

The MOD must emphasise that the advice provided within this letter is in response to the information detailed above in the email titled Whitecross Quarry Development, updated BHMP sourced from Oxfordshire County Council dated 24 May 2022. 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.

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

Yours sincerely

A handwritten signature in black ink, appearing to read 'J Roberts'. The signature is written in a cursive, flowing style with a large initial 'J'.

Jill Roberts
DIO Safeguarding