

# London City Airport Biodiversity Strategy

2012 – 2017



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# Airport Biodiversity Action Plan

	OBJECTIVE	DATE OF IMPLEMENTATION (Calendar Year)
1	To participate as a "Delivery Partner" in the Newham Biodiversity Partnership	2012 - 2017
2	<p>To promote awareness-raising activities on the benefits of wildlife habitats, through support for the delivery of up to four annual outdoor events for the public in conjunction with local centres.</p> <p>Support will be offered through sponsorship of materials to the value of £250 for each event and volunteering, which shall be reported in the Annual Performance Report. Local centres include:</p> <ul style="list-style-type: none"> <li>• Royal Docks Learning &amp; Activity Centre</li> <li>• Britannia Village Hall</li> <li>• Thames Barrier Park</li> <li>• Beckton District Park</li> <li>• King George V Park</li> <li>• Newham City Farm</li> <li>• Trust Thamesmead or other West Thamesmead venue or club providing public services</li> <li>• Lee Valley Regional Park Authority sites in the east of Tower Hamlets.</li> </ul>	2012 - 2017
3	<p>In partnership with an expert organisation such as the Field Studies Council, or through an existing LBN* approved programme, to fund to the total value of up to £2,000, the development and delivery of specific biodiversity projects in schools within the 57dB noise contour<sup>1</sup> for 2012. At minimum, this must include:</p> <ul style="list-style-type: none"> <li>• Drew Primary School</li> <li>• Britannia Village School</li> <li>• Storey School</li> <li>• Discovery School</li> </ul>	4th Quarter 2012
4	<p>To advertise opportunities and consider sponsorship request from local schools and community-led organisations for the establishment of small educational wildlife gardens (or similar) at appropriate locations in the airport's catchment (guided by the 2012 57dB actual noise contour).</p> <p>Total sponsorship of £1000 per year will be available to fund projects meeting the advertised criteria.</p>	Annually from 2012

<sup>1</sup>The 57 dB LAeq, 16 Hour, Noise Contour is currently used by the Government as an indicator of the "onset of significant community disturbance". The contour relates to the average daily aircraft movements over the three month period 16 June to 15 September during the 16 hour period from 0700 to 2300 hours and can be found at <http://lcacc.org/noise/index.html#Contour>.

\*London Borough of Newham

	<b>OBJECTIVE</b>	<b>DATE OF IMPLEMENTATION (Calendar Year)</b>
<b>5</b>	To inform LCY <sup>**</sup> staff of the importance of biodiversity as part of a “sustainability awareness” briefing in their initial induction.	2012 - 2017
<b>6</b>	To fund, and assist the organisation of the placement of, interpretation boards at local Sites of Interest for Nature Conservation (SINC) and other sites within the Borough: <ul style="list-style-type: none"> <li>• North side of Royal Albert Dock (adjacent to Building 1000)</li> <li>• Newham City Farm SINC</li> <li>• King George V Park</li> <li>• Beckton District Park</li> </ul>	4th Quarter 2012
<b>7</b>	LCY will undertake a feasibility study on the costs and benefits of installing sedum mats (or alternative substrate) on the roof of Aviation House or another suitable building at the airport, with the objective of providing a microhabitat for Newham Biodiversity Action Plan priority species such as invertebrates.  Such installations would be designed to discourage nesting birds or other species which could create a direct or indirect hazard to aircraft.	4th Quarter 2012
<b>8</b>	LCY will undertake an aquatic ecological survey of the King George V Docks, in conjunction with RoDMA <sup>***</sup> , to determine whether any enhancements can be made to the bio-chemical quality and ecology of this water body.	4th Quarter 2012
<b>9</b>	LCY will undertake a terrestrial ecological survey of the airport site in order to monitor and record flora and fauna at the site, including the abovementioned micro-habitats (if introduced).	Every 5 years
<b>10</b>	LCY will consider any further biodiversity opportunities as and when new buildings or structures are constructed or refurbished on the airport site.	As required.

<sup>\*\*</sup>London City Airport

<sup>\*\*\*</sup>Royal Docks Management Authority Limited

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# 1 LCY Commitment to Biodiversity

London City Airport (LCY) is committed to supporting the wider protection, enhancement and understanding of biodiversity as an important aspect of its overarching commitment to sustainability. This Strategy outlines LCY's approach to achieving this.

LCY supports the London Borough of Newham's aspiration to further regenerate the Royal Docks area, including ecological and other environmental improvements, so long as these are compatible with the continued and safe operation of the airport. As such, this Airport Biodiversity Strategy is consistent with and supports some of the key objectives of the Newham Biodiversity Partnership and the Newham Biodiversity Action Plan (BAP) 2010, which includes the following objective:

**“To reduce deficiencies in access to nature for Newham’s existing and future residents, and undertake awareness-raising to promote appreciation of the Borough’s wildlife by all”.**

Accordingly, the main objective of the Airport Biodiversity Strategy is:

**“To help promote awareness of biodiversity issues by LCY staff, local residents and school children”**

LCY will also explore opportunities to enhance biodiversity at the airport (or elsewhere in Newham borough) where such enhancements do not compromise the safety, operational controls or other functions of the airport.

## 2 Ecological Status of the Airport

The airport has a low ecological and biodiversity value. This is largely as a consequence of it being an intensively managed facility that, by necessity, discourages breeding and foraging birds and other animals that could endanger or disrupt flights and other essential airport operations. The only habitat present airside is the grassland bordering the runway and this is periodically mown and managed to comply with Civil Aviation Authority (CAA) requirements. Areas of scattered semi mature trees and shrub planting are present around the boundary of the airport.

None of the buildings on site provide a suitable habitat for birds, bats and other animals due to their modern construction and lack of suitable roosting opportunities. Furthermore, the operational times of the airport (opening at 0630 and closing at 2230) is another factor which discourages the site supporting birds and other species. Despite this, skylarks, starling, carrion crow, gulls and cormorant species have been recorded within or close to the airport, indicating that these birds are somewhat resilient to aircraft movement and noise.

The airport site is located within close proximity to the King George V and Royal Albert Docks which are designated as Sites of Borough Importance for Nature Conservation (SBINC, Grade I), and the River Thames and Tidal Creeks to the south of the airport which represents a Site of Metropolitan Importance (SMI) for Nature Conservation. LCY will continue to respect and safeguard the ecological integrity of these designated water bodies, including the avoidance of water pollution from de-icing and other activities at the airport.

LCY has agreed with the London Borough of Newham (LBN) that the creation of significant ecological enhancements airside or landside is not possible at the airport, since these would be incompatible with the CAA regulations and operational requirements referred to later in this document. Similarly, providing funding towards habitat creation and enhancement in other areas in proximity to the airport has also been ruled out for the same reasons. However, some limited micro-habitat creation at the airport, such as green/sedum roof panels, may be financially and operationally acceptable and will therefore be the subject of a feasibility study.

An Environmental Impact Assessment completed in 2007 concluded that there would be no adverse effects on ecology or biodiversity caused by the operation of LCY to 120,000 flight movements per annum. This was accepted by the LBN in its determination of the planning consent in 2009. This position was further confirmed at a meeting with the LBN in July 2010, during which the potential content and objectives of the Airport Biodiversity Strategy were also discussed.

Previous ecological surveys of the airport site (in 2000 and 2007) determined that the ecological value of the airport and adjoining land is low. A verification walkover was also undertaken in April 2010 which confirmed that the airport's ecological status has not changed since 2007. The findings of these surveys are described in more detail in Appendix 2 of this Strategy.

### 3 Safeguarding of the Airport

The land management procedures necessary to meet CAA requirements with regard to the avoidance of “bird hazard” will remain unchanged under the 2009 planning consent. Consequently, there are no proposals from LCY to create habitats that might adversely affect or interfere with the operations of the airport and associated flight paths. In addition, LCY’s Aerodrome Safeguarding Team will continue to review all development applications within a designated 13km zone and, where appropriate, will object to any that are deemed to pose a risk to safe flying, for example, by the attraction of large birds to new landscaping areas.

In view of the operational, safety and space constraints at London City Airport, the Airport Biodiversity Strategy focuses on raising the general awareness and appreciation of biodiversity by LCY staff, school children and the local community, rather than creating new habitats or attracting wildlife to the airport itself. This objective is consistent with LCY’s long standing commitment to support local educational initiatives across a broad spectrum of age groups and learning abilities and will help meet the vision of the Newham Biodiversity Partnership, as reported in the Newham Biodiversity Study – Evidence Base (Land Use Consultants), May 2010.

## 4 Biodiversity Commitments & Objectives

The primary commitments and objectives of the Airport Biodiversity Strategy are provided below. These will begin to be implemented upon approval of the Strategy by LBN<sup>1</sup>, with the intent of reporting progress against these initiatives in the Annual Performance Report.

	<b>OBJECTIVE</b>	<b>DATE OF IMPLEMENTATION (Calendar Year)</b>
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<sup>1</sup>This strategy was approved by LBN on 13/04/12

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In addition to the above commitments, LCY will explore opportunities for localised enhancements to the biodiversity of the airport site. These on-site enhancements will only be implemented where these prove to be compatible with the safe operation of the airport. The following actions will be taken:

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## 5 Reporting Progress

LCY will report on the performance of the Airport Companies against the objectives and measures specified in the Airport Biodiversity Strategy in the Annual Performance Report (APR). Furthermore, every

five years LCY will submit to the Council a review of the performance of the Strategy and, where necessary, obtain written approval for any proposed changes to ensure improved performance against the objectives.

# Appendices

## APPENDIX 1: LEGISLATION AND POLICY

This appendix outlines the key ecological legislation and policy that is relevant to the day-to-day running of London City Airport (LCY).

### CIVIL AVIATION AUTHORITY POLICY

1. LCY is required to follow strict CAA regulations, particularly in terms of managing bird strike risks and safe aircraft movement. The key requirements are set out in CAP772 "Birdstrike Risk and Management of Aerodromes" (September 2008).
2. LCY operates a bird hazard management plan which implements bird scaring techniques and dictates habitat management practices at the airport and in the surrounding areas. The airport landscape planting is managed to minimise its attractiveness to all birds, but particularly larger species such as geese which could cause damage to aircraft taxiing on the runway and in flight. Whilst bird strikes do occur at LCY, the frequency of such incidents is typical of many airports and there have been no serious incidents to-date, underlying the effectiveness of the hazard management plan in place.
3. New developments in proximity to the airport and their associated landscaping can prove attractive to birds, particularly tree and shrub planting, and the creation or enhancement of water features. Therefore, where a proposed development is within 13km, the local planning authority has a statutory duty to consult with LCY. Furthermore, where a particular development is considered likely to attract birds, the developer is expected to undertake a bird hazard assessment and to communicate the results to the Council and LCY (CAA, Advice Note 3, August 2006). Where a significant risk is identified, the developer will be expected to modify his proposals to remove or mitigate such risk. LCY's Aerodrome Safeguarding team reviews all development applications in the surrounding area and formally objects to any that are deemed to pose a risk to safe flying.

### BIODIVERSITY POLICY AND LEGISLATION

This section provides a brief summary of the nature conservation and biodiversity planning policies and legislation relevant to the airport and which have to be considered through the planning process.

1. Relevant planning policy documents include:
  - The UK Biodiversity Action Plan (2005), which identifies habitats and species for which targets and objectives have been set for their protection and enhancement;
  - Planning Policy Statement 9 (PPS9): Biodiversity and Geological Conservation – The Government's national planning guidance on nature conservation which is a material consideration in determining planning applications; and
  - Newham Unitary Development Plan (UDP, 2001) and its replacement, the Local Development Framework (LDF), which is currently being developed by LBN. The local plans identify the nature conservation features of the borough and include policies for their protection.
2. Until the Core Strategy and other Local Development Documents (constituting the LDF) are formally adopted by the Council, saved policies from the UDP represent the development strategy for the Borough. The UDP contains the following saved policies which are relevant to biodiversity:
  - EQ9 aims to protect SINCs from the adverse effects of development.
  - EQ10 requires appropriate mitigation for any development proposed on a SINC.
  - EQ11 protects species listed in the Wildlife and Countryside Act, or BAP species which are uncommon or declining in London.

- EQ12 requires the Council to create new SINCs during the Plan period.
  - EQ13-15 require the Council to apply Tree Preservation Orders to trees of particular importance, and adequate protection of trees from development.
  - EQ16 promotes the creation of green corridors within the Borough.
  - EQ17 highlights Council plans for woodland creation in appropriate parts of the Borough.
3. The airport lies within the area covered by the Newham Biodiversity Action Plan, BAP (June 2010). This plan outlines local priorities and actions which will contribute towards the implementation of the UK Biodiversity Action Plan Species and Habitat Action Plan targets. The local BAP aims to highlight species and habitats within Newham, which require positive conservation action to maintain and enhance their ecological value and integrity.
  4. Newham's Biodiversity Vision is: "To protect, enhance and create habitats for biodiversity across Newham, ensuring a net gain in BAP habitats, and to secure their positive management. To reduce deficiencies in access to nature for Newham's existing and future residents, and undertake awareness-raising to promote appreciation of the Borough's wildlife by all".
  5. Four broad Priority Habitat classes were selected for the Newham BAP, these being:
    - 1) Public open space and green corridors;
    - 2) Rivers and wetlands;
    - 3) The built environment; and
    - 4) Private gardens, grounds and allotments.
  6. The key Priority Species selected for the Newham BAP are listed below:
    - Birds (various);
    - Fish (various)
    - Invertebrates (various);
    - Hedgehog;
    - Bats (various);
    - Water vole and otter;
    - Reptiles – common lizard, grass snake and slow worm; and
    - Amphibians – frogs, newts and toads.
  7. LCY was consulted during the production of the Newham Biodiversity Action Plan and whilst generally supportive, did express concern that new habitats should not be created in proximity to the airport that might then attract hazardous bird species.

### LEGISLATION ON NATURE CONSERVATION

1. Key relevant legislation with regards to nature conservation and biodiversity includes:
  - a. The Conservation (Natural Habitats &c.) Regulations 1994;
  - b. Wildlife and Countryside Act 1981;
  - c. Countryside and Rights of Way Act 2000;
  - d. Natural Environment and Rural Communities Act 2006; and
  - e. Wild Mammals (Protection) Act 1996.
2. The relevance of this legislation with regard to wildlife recorded at the airport site is described in Appendix 2.

**APPENDIX 2: EXISTING ECOLOGICAL CONDITIONS**

**BACKGROUND**

1. RPS was previously instructed by LCY in May 2007 to carry out an ecological inspection of the airport and immediate surrounding area. The study was undertaken with reference to the Institute of Environmental Assessment's "Guidelines for Baseline Ecological Assessment" (1997). Whilst the topic of ecology was scoped-out from formal consideration in the EIA in agreement with LBN, an Ecological Report (July 2007) was prepared and included as Technical Appendix G of the Environmental Statement (ES), submitted with the planning application in August 2007. This report described the ecology and nature conservation value of the land at the airport and its surroundings.
2. LCY is situated within the Royal Docks area of east London (Figure 1) and is surrounded by both the Royal Albert Dock and King George V Dock. It is bordered to the west by the A112, to the south by Hartmann Road and the Docklands Light Rail (DLR), to the east by Woolwich Manor Way and Albert Island, and to the north by offices and the University of East London campus situated along Royal Albert Way.
3. The airport itself is dominated by hardstanding in the form of airport buildings and infrastructure, including the runway, aprons, aircraft parking, jet centre, main terminal building and associated car parking. The only habitat present airside in the grassland bordering the runway and this is periodically mown and managed to comply with CAA requirements. Areas of scattered semi mature trees and shrub planting are present around the boundary of the Airport.
4. The airport and immediate surrounding areas are of low ecological value, which has been confirmed by periodic surveys of the site in the years 2000, 2007 and 2010. This status is to be expected for an intensively managed facility that, by necessity, discourages breeding and foraging birds and other animals that could endanger or disrupt aircraft in flight and other essential airport operations.

**AIRPORT BASELINE ECOLOGICAL CONDITIONS**

5. The most comprehensive ecological survey of the LCY site was undertaken in May 2007, in advance of the Planning Application to increase the number of aircraft movements to 120,000 per annum. The results from this habitat survey are summarised below with full results shown on Figures 2a and 2b and a plant species list provided at Annex A.

**Habitats**

6. The habitat survey took account of the standard methodology as set out by the Joint Nature Conservation Committee Handbook for Phase 1 Habitat Survey: A technique for environmental audit (JNCC, 1993). The specific objective of the Phase 1 Habitat Survey in 2007 were to:
  - Identify and map the habitats present;
  - Assess the potential for legally protected fauna; and
  - Assess the need for further ecological surveys.
7. Habitats potentially suitable to support protected species were also noted, and signs of such animals, including direct sightings, tracks, droppings and burrows, were recorded. Due to the nature of the site, particular attention was paid to the landside buildings' suitability for roosting bats and to habitats of ornithological interest. There was found to be little potential for any other legally protected fauna.
8. The airport and surrounding area is highly urbanised, dominated by airport buildings including the main terminal and associated car parking and road network, aircraft parking aprons and runway. The only habitat present airside is the grassland bordering the runway. Semi mature trees of ecological value do exist along the south western boundary within the main terminal car park and adjacent to the Jet Centre at the western end of the site. This habitat provides some potential for nesting and foraging birds and small mammals within an otherwise sparsely vegetated environment.

**Birds**

9. Bird activity was recorded on the airport site during the ecological survey in May 2007. The birds recorded on site were:
 

Blackbird	Blue tit	Skylark
Swift	House sparrow	Cormorant
Feral pigeon	Black-headed gull	Carrion crow
Starling	Common gull	
10. Although a number of areas were identified as having potential for nesting common bird species, including the semi-mature trees and the areas of dense scrub, no evidence of birds nesting was observed during the walkover survey. Due to the modern building construction and sparse vegetation cover, none of the buildings or habitats recorded on site were deemed suitable for black redstart, which is a London BAP priority species found elsewhere in Newham.
11. The airport has a bird scaring system in place and follows a frequent mowing regime during the grass growing season in order to maintain a fairly close cropped sward to deter breeding and foraging birds. However, skylarks were heard singing and observed within the poor semi-improved grassland that borders the airport runway. Starlings and carrion crow were also observed foraging within the runway grassland.
12. Several cormorants were observed fishing off the site within the King George V Dock on the day of the survey. A pair of coots was observed nesting in one of the concrete dolphin blocks within the King George V Dock, nearest to the terminal building.

**Mammals**

13. The majority of the airport buildings, including City Aviation House, are modern in construction and material makeup, fully intact and flat roofed. The form of construction and general condition of these buildings makes them unsuitable for bats as they provide no roosting opportunities. One bricked building is present airside, but again is fully intact with a flat topped roof with no soffit boards or eaves. Occupied and disused warehouses exist to the south east of the site boundary, which are again unsuitable for bats due to their material makeup, exposed nature and lack of roof spaces.
14. The majority of the trees landside are juvenile in nature, with semi mature trees present along the site boundary to the south west. At present, these trees offer limited opportunities for roosting bats due to their lack of cracks, splits and holes.
15. Anecdotal evidence of foxes using the site for feeding was provided at the time of the walkover and further occasional sightings of these animals have since been made by LCY staff. Foxes were not recorded at the time of the 2007 survey.
16. A verification walkover was undertaken by RPS in April 2010. This walkover inspection confirmed that the airport's ecological value had not changed since 2007.

**SUMMARY OF LEGAL STATUS OF RECORDED SPECIES**

17. Table 1 below summarises the level of legal protection and policy status afforded to each species recorded at the airport. LCY staff are aware of the legal implications of working around protected species, but equally they must observe CAA regulations to maintain the safety of flights as an absolute priority.

**Table 1: Legislation in relation to Protected Species found at LCY**

Protected Species	Protecting Legislation
House sparrow	RSPB Red List, UK and Newham BAP
Starling	RSPB Red List, UK and Newham BAP
Skylark	RSPB Red List, UK BAP
Swift	Newham BAP
Cormorant	RSPB Amber
Black-headed gull	RSPB Amber
All breeding birds	Wildlife and Countryside Act Schedule 5
Fox	Wild Mammals Act

18. Under the Wildlife and Countryside Act 1981 (as amended), all wild birds and their nests are protected during the breeding season against intentional damage or disturbance of their nests, eggs or young whilst on the nests.
19. House sparrow, starling and skylark are included on the UK Biodiversity Action Plan and on the Red List under the criteria set out in the RSPB's Birds of Conservation Concern: 2002-2007. Inclusion in these lists means the populations of these species are threatened or have suffered declines in range or numbers.
20. Cormorant and black headed-gull are also listed on the Amber List as birds of medium conservation concern as there are between 1 and 300 breeding pairs in the UK (five-year mean) (RSPB et al. 2002).
21. House sparrow, starling and skylark are also a priority species in the Newham Biodiversity Action Plan (BAP).
22. Foxes are protected under the Wild Mammals (Protection) Act 1996.

#### OFF SITE ECOLOGICAL CONDITIONS

23. The airport is located within the Royal Docks, between the King George V Dock (KGV) and the Royal Albert Dock. The Docks are designated as a Site of Borough Importance for Nature Conservation (SBINC) Grade I and are also part of the Green Corridor Network of Newham due to its association with the River Thames and tidal creeks, the latter of which are situated 500m to the south of the airport and are designated as a Site of Metropolitan Importance (SMI).
24. The quality of the Dock waters is directly influenced by the quality of the water in the tidal Thames. Water is pumped into and out of the Thames so as to maintain water levels in the Docks at a reasonably consistent level. Levels do of course vary, for example because of continual water seepage through the dock bed or rainfall and surface water running off in to the Docks.
25. The Royal Docks Management Authority (RoDMA) monitors the docks fortnightly at six pre-selected sites. They are responsible for the maintenance of the marine infrastructure, impounding and the maintenance of water quality through dredging and the removal of litter, leaves and other floating debris. The observations at each site take into account the colour of the water, the presence or absence of oil film and floatables and the weather condition. Continuous measurements record the pH levels, electrical conductivity, water and ambient temperature and the transparency of the water as well as dissolved oxygen saturation.
26. As a major stakeholder in the Docks, LCY takes responsibility for helping to maintain the quality of the dock waters and thereby indirectly protecting the aquatic ecology it supports. Many of its activities have the potential to affect the water quality. These include the de-icing of aircraft and the runway as well as the use of pesticides and herbicides for habitat management. It is therefore imperative that the airport should have both a drainage system which minimises any potential contamination by containing it on the airport site and a comprehensive system of operational procedures to prevent pollution incidents.
27. With the recent extension of the apron, a new set of slot drains and pipes was constructed including a new fuel/oil interceptor. This has an automatic closure device, so that any pollution from the apron is detected and contained.
28. There are a total of 41 Site of Importance for Nature Conservation (SINC) in the Borough of Newham, as shown on Figure 3. The SINC's cover a range of habitat types such as meadow grassland, reedbeds and woodland. Many of these SINC's are also public open spaces within the built environment, including Beckton District Park and Newham City Farm SINC which is a popular community facility and plays a role in promoting the understanding and appreciation of wildlife and biodiversity generally.
29. Several waterbodies are also designated as SINC's including the River Thames and tidal tributaries.

#### APPENDIX 3: AIRPORT OPERATIONAL PROCEDURES AND RESPONSIBILITIES

1. This appendix elaborates upon the current environmental procedures and practices that are undertaken by LCY to ensure that the legal obligations under the Civil Aviation Authority (CAA) regulations and other environmental requirements are met.

#### ENVIRONMENTAL RISKS AND CONTROL PROCEDURES

2. Several risks are posed to the environment from the day-to-day running of any airport. For example, incidents or circumstances may arise that require control procedures and documented remedial action plans to be put in place to ensure the safe movement of aircraft and passengers, and the protection of the surrounding environment. These include:
  - The occurrence of wildlife airside, particularly birds;
  - Incidents of fire (both accidental and for fire training purposes);
  - Oil, fuel and chemical spills and contamination; and
  - Adverse weather.
3. The Airfield Operations and Safety Unit (AOSU) manage the potential conflicts of biodiversity and essential operational requirements and procedures at LCY. The role of the AOSU and its responsibilities are detailed below.

#### Airside Bird Control & Habitat Management

4. Airside bird control and habitat management falls within the remit of the AOSU Manager. The AOSU Manager is responsible for ensuring there is a Bird Control Plan in place in accordance with CAA requirements and that is fully implemented to minimise potential bird hazards.
5. The AOSU is responsible for maintaining the airfield (paved and grassed areas) to meet requirements of CAA/ICAO regulations and to ensure a wildlife free airfield.
6. The Operational Controllers and Assistants are responsible for fulfilling the Bird Control Plan, carrying out bird control, maintaining a bird and wildlife free habitat on the airfield during operational hours, monitoring the landscaped areas and advising of any areas that require attention (with regards to weed removal, insect levels, grass cutting).
7. Bird Control is primarily about deterring birds from the airfield using a range of techniques, from imitating bird distress calls to mimicking birds of prey with lures, scaring the birds with pyrotechnics, or just physical activity on the airfield.
8. Records of birds sighted and cleared, and by what method, are held on an internet based site called "Click Airport". This system works by operators completing an electronic form on a handheld device whenever birds are sighted. It is also used to record aircraft bird strikes including the completion of a bird strike recording form which is provided to the CAA for their records.

#### Landside and Off-Airport Bird Control

9. Landside Bird Control falls within the remit of the Director of Operations, Policy & Planning under Safeguarding.
10. An external bird expert completes monthly audits of areas within a 13km radius of LCY and submits reports to the AOSU and the Safeguarding Team to highlight any changes to sites, or bird behaviour in the area.
11. Through the safeguarding process, development plans submitted to the local planning authorities for approval are reviewed to determine whether proposals are likely to increase or change wildlife activity near the airport or its flight paths. The proposals are reviewed by the LCY team and, where necessary, are sent to an independent consultant for expert advice.

#### Airfield Grounds Maintenance

12. Airfield Grounds Maintenance falls within the remit of the AOSU Manager.
13. An external company undertakes maintenance of grass areas on the airfield between the months of May to December.
14. This maintenance includes a grass cut approximately every 3 weeks, or more if necessary, eight general weed sprays around the whole airside site; and three large sprays for insects and weeds across the grassed areas around the airfield.

**Bad Weather Incidences**

15. Snow events and the clear up operation fall within the remit of the AOSU.
16. The AOSU team uses a fleet of four snow brush and blower systems which are towed behind prime movers, and three de-icing units to clear snow from the manoeuvring areas and then de-ice the surfaces prior to opening the runway.
17. The majority of snow is generally brushed away from the hard surfaces and cleared from the Airfield Lighting, but any snow on the grass areas is left to melt naturally. In severe weather, when large amounts of snow are present, the snow is brushed into piles and moved to the eastern end of the airfield to melt.
18. The de-icing fluid used is Kilfrost Runway, which is spread over the manoeuvring area after clearing snow or following a frost to leave the surface with adequate friction levels to operate a safe runway. Records of the amount of de-icing fluid used and the location of its application are stored on an electronic spreadsheet in the AOSU department.

**STAFF AND RESPONSIBILITIES**

19. Key members of staff at LCY have dedicated roles in environmental management including control measures which ensure the airport not only adheres to the strict CAA regulations but also safeguards the surrounding area. Table 2 below lists the key staff and companies involved in the day to day environmental procedures carried out at the airport.

**Table 2: Key Staff and Responsibilities at LCY**

Key Staff / Company	Responsibilities
Director, Operations, Policy & Planning, London City Airport	Overall operational control of the airport
Director of Airfield Operations & Safety, London City Airport	Responsible for airside operations and all safety matters and procedures at the airport.
Airfield Operations and Safety Unit Manager, London City Airport	Responsible for airside operations and safety matters including bird habitat control and ground maintenance.
LCY Fire Service	Respond to incidents of fire, apron fuel spills and other accidents.
Mark Worricker Contract Ltd	Maintenance of airside vegetation.
Countrywide Grounds Maintenance	Maintenance of landside trees, grassland and amenity planting at the Airport.
Environmental Scientifics Group	Monitor the docks and maintain water quality for RoDMA.
Food & Environment Research Agency (FERA)	Undertakes monthly audits of areas within a 13km radius of LCY. Reports to AOSU changes to sites or bird behaviour and makes recommendations for management.

**APPENDIX 4: BIODIVERSITY OPPORTUNITIES AND CONSTRAINTS: EVALUATION & CONSULTATION**

**BIODIVERSITY ENHANCEMENT CONSIDERATIONS**

**Site Considerations**

1. Several site meetings were held between RPS and LCY staff to understand and document the airport's environmental management procedures and discuss options to enhance biodiversity, both on and off the airport site. The following options were discussed for both airside and landside locations at the airport:
  - a. Green and brown roofs;
  - b. Bird boxes and terraces;
  - c. Bat boxes and bricks;
  - d. Wildlife plating;
  - e. Floating platforms for birds; and
  - f. Existing vegetation management, including grassland.
2. However, it was concluded from meetings with the AOSU that any significant ecological enhancement at the airport would raise safety concerns, particularly relating to bird strike by attracting more birds to the site through habitat creation or change in land management techniques.
3. It was also confirmed that no other land is owned or otherwise available to LCY to implement biodiversity enhancements away from the airport site.

**EXTERNAL CONSULTATION**

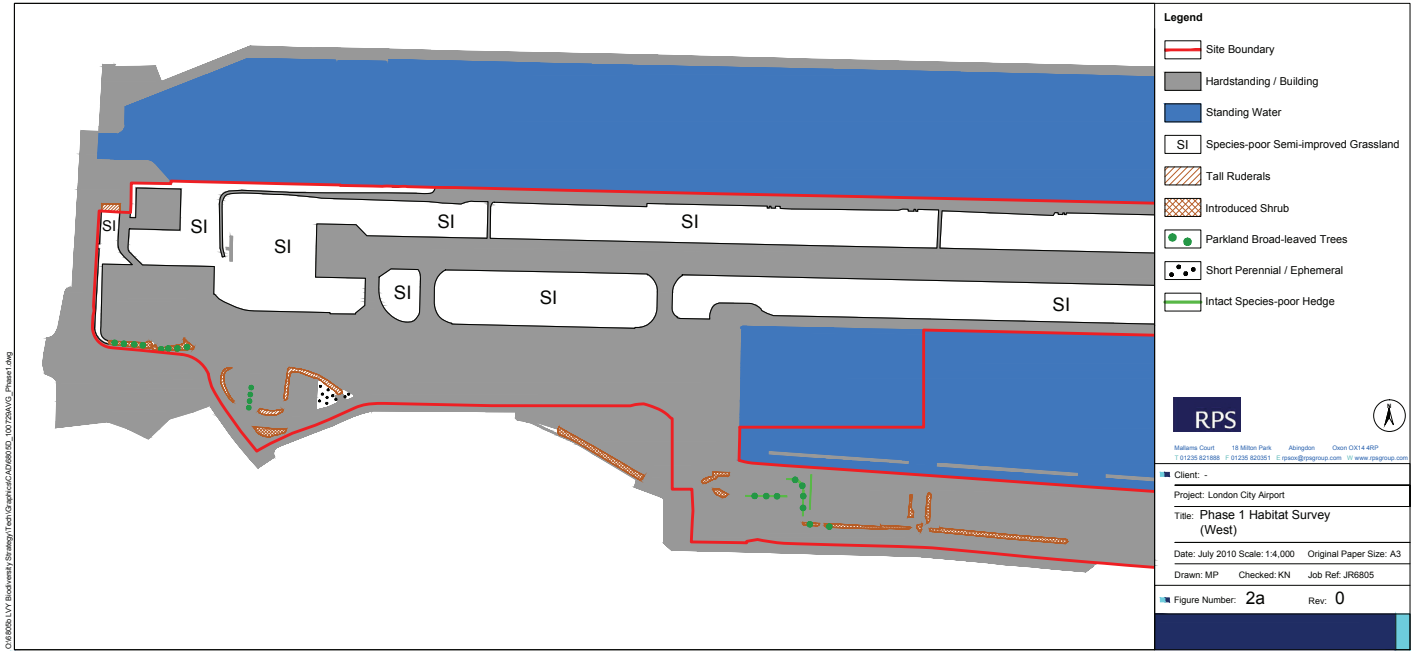
4. This Airport Biodiversity Strategy has also been informed by a technical review of the Newham BAP and the Newham Biodiversity Study – Evidence Base (Land Use Consultants, May 2010). This review identified certain recommendations in the draft BAP document that represented matters of potential conflict for LCY with regard to meeting its obligations under the CAA regulations. A meeting was therefore held with relevant officers of LBN in July 2010 to discuss LCY's concerns.
5. At present, the Newham BAP objectives for targeted habitats and species are very generic and not location specific. However, any significant increase in landscaping, habitat creation and enhancement within the 13km safeguarding zone of LCY may increase the risk of bird strike because such sites could attract more species of birds to the area through the introduction of new feeding, nesting and roosting habitats.
6. One of the aims of the Newham BAP is to provide ecological connectivity by reducing habitat fragmentation across the Borough, including the establishment of green corridors. During the consultation meeting in July, LBN agreed to consult LCY and provide detailed proposals associated with this objective, which would then be reviewed by the AOSU and Safeguarding Team to establish if such proposals would pose a risk to the safe functioning of the airport.
7. It was agreed at the consultation meeting with the LBN that the following proposals for habitat creation or developments surrounding LCY need to be considered directly by the AOSU:
  - Creation of waterbodies or water features (as these will attract gulls and other waterfowl into the area);
  - Creation of dense vegetation that may attract roosting and nesting habitat for starlings, rooks, wood pigeons and other larger bird species;
  - Creation of large areas of fruit and berry vegetation as these may attract large flocks of birds during the winter months when food is scarce; and
  - Linkage into wider open space which may increase the attractiveness to large flocks of birds to the area.
8. It was agreed that LCY would be actively involved in the consultation of all proposed habitat creation, enhancement and developer compensation proposed within the Newham area as part of the Newham BAP initiatives.

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- Royal Society for the Protection of Birds 'Birds of Conservation Concern: 2002–2007'
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- UK BAP 2010 UK Biodiversity Action Plan. List of priority species: www.ukbap.org.uk.
- Wild Mammals Act 1996, OPSI



**FIGURE 2**  
**2a – Phase 1 Habitat Survey (west)**



**FIGURE 2**  
**2b – Phase 1 Habitat Survey (east)**

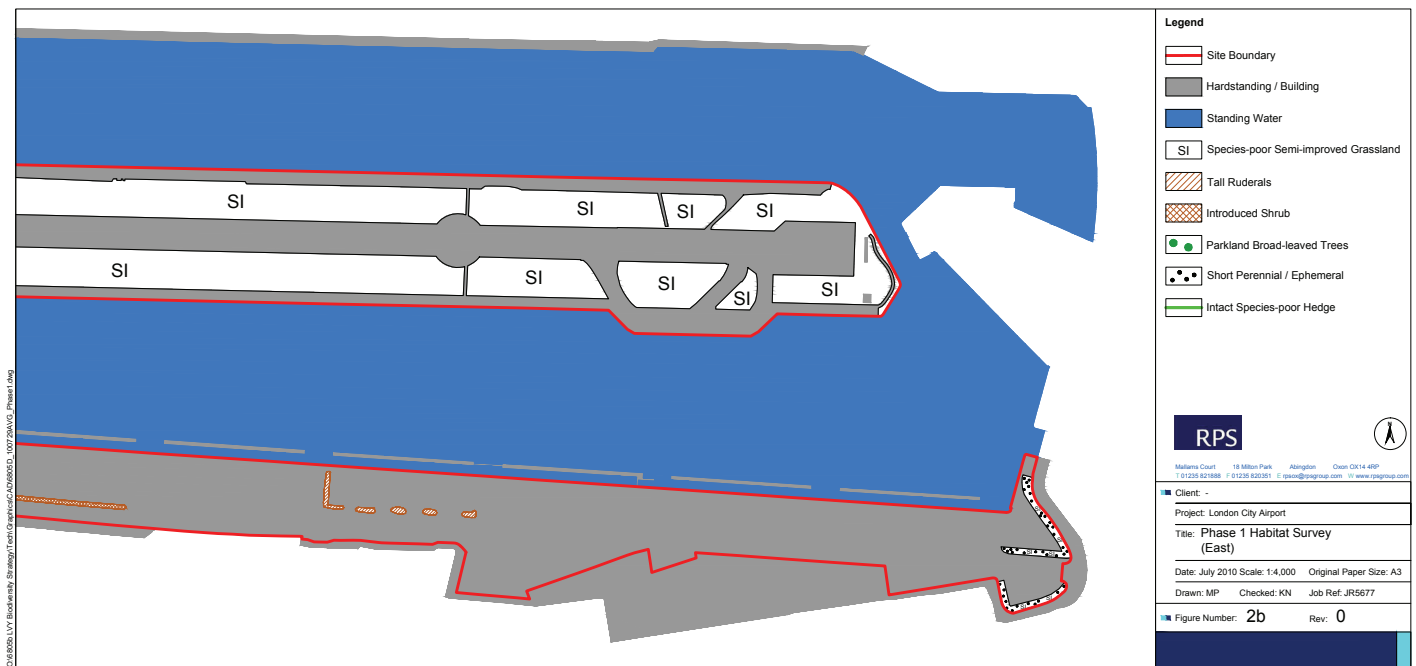
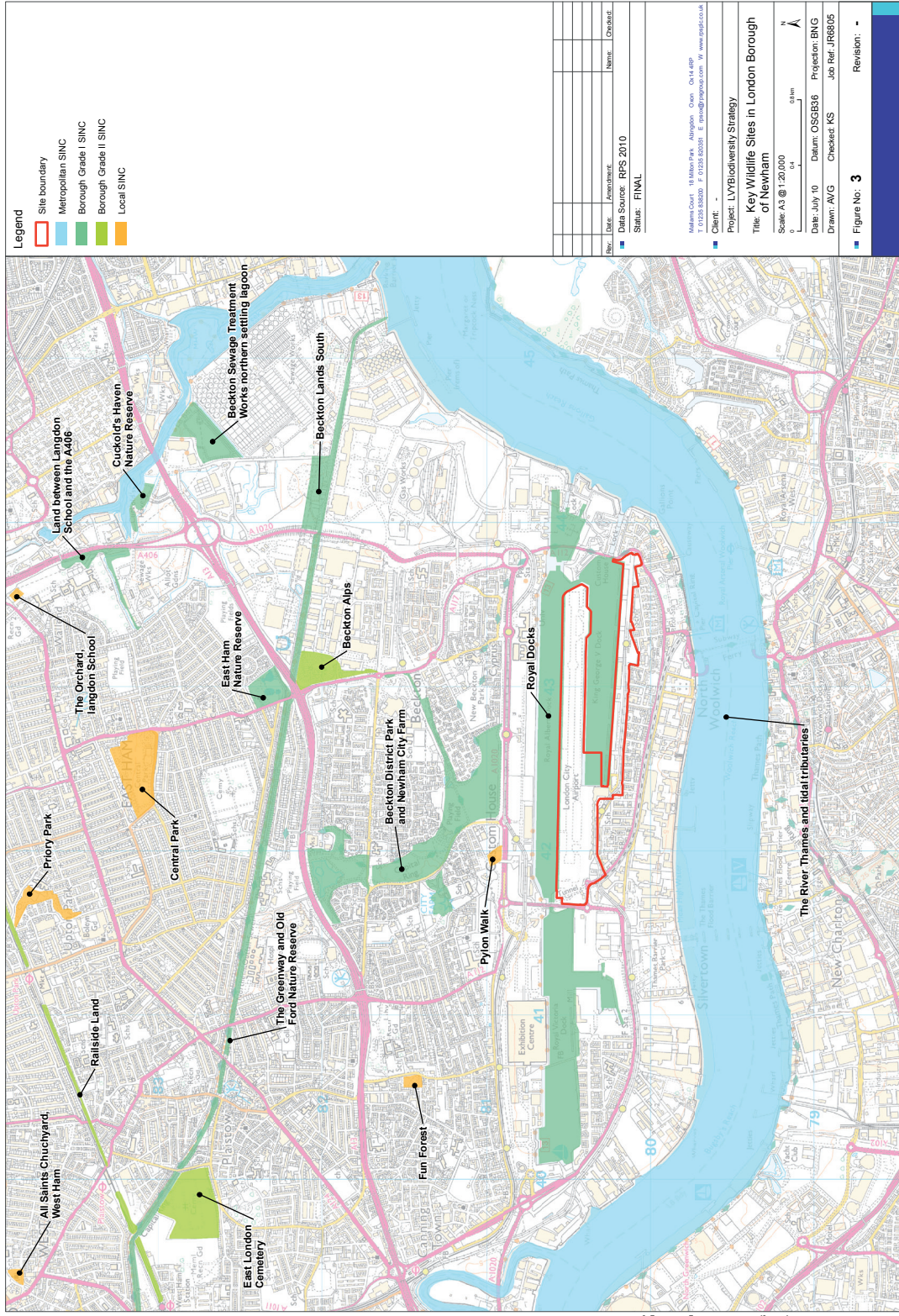


FIGURE 3: Key Wildlife Sites in the London Borough of Newham



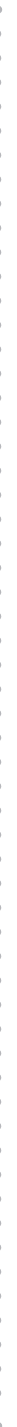
# Annexes

## ANNEX A: Indicative Plant Species List

Latin Name	Common Name
<i>Acer campestre</i>	Field maple
<i>Acer pseudoplatanus</i>	Sycamore
<i>Achillea millefolium</i>	Yarrow
<i>Anthriscus sylvestris</i>	Cow parsley
<i>Artemisia vulgaris</i>	Mugwort
<i>Betula pendula</i>	Silver birch
<i>Buddleja davidii</i>	Butterfly-bush
<i>Cerastium fontanum</i>	Common mouse-ear
<i>Chamerion angustifolium</i>	Rosebay willowherb
<i>Dipascus fullonum</i>	Teasel
<i>Fagus sylvatica purpurea</i>	Copper beech
<i>Festuca sp.</i>	Fescue
<i>Fraxinus excelsior</i>	Ash
<i>Galium aparine</i>	Cleavers
<i>Geranium molle</i>	Dove's-foot crane's-bill
<i>Geranium robertianum</i>	Herb Robert
<i>Glechoma hederacea</i>	Ground-ivy
<i>Hypochaeris radicata</i>	Common cat's ear
<i>Lavandula sp.</i>	Lavender
<i>Leucanthemum vulgare</i>	Oxeye daisy

Latin Name	Common Name
<i>Ligustrum ovifolium</i>	Garden privet
<i>Lolium perenne</i>	Perennial rye-grass
<i>Malva sylvestris</i>	Common mallow
<i>Medicago lupulina</i>	Black medick
<i>Papaver sp.</i>	Poppy
<i>Picris echioides</i>	Bristly oxtongue
<i>Plantago lanceolata</i>	Ribwort plantain
<i>Platanus x hispanica</i>	London plane
<i>Poa annua</i>	Annual meadow-grass
<i>Prunus sp.</i>	Laurel
<i>Prunus sp.</i>	Cherry
<i>Rosa canina</i>	Dog-rose
<i>Rubus fruticosus agg.</i>	Bramble
<i>Rubus obtusifolius</i>	Broad-leaved dock
<i>Rumex crispus</i>	Curled leafed dock
<i>Sorbus aucuparia</i>	Rowan
<i>Stellaria sp.</i>	Stitchwort
<i>Trifolium pratense</i>	Red Clover
<i>Vicia sp.</i>	Vetchling sp





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