

British Aggregates Association

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CAP 680 Birdstrike Risk management Edition 2 – consultation draft

This response is made on behalf of BAA (British Aggregates Association) who represents the interests of some 80 members. 55 are independent and privately-owned SME quarry companies throughout the UK with some 10% of national output and who operate from over 100 sites. We are part of the consultation and lobbying process both in the UK and Europe – and are active members of both the CBI Minerals Group and CPA (Construction Products Association). Many of our members have been involved in mineral developments which have been associated within the 13km zones around airfields, and have had contacts with both CAA and MOD. We have also attended various industry, airfield operator and advisor, and heritage meetings on the subject over the last few years.

We are pleased to note that the guidance is written in a much clearer and more concise style than the previous version. It would be helpful to have an introductory section to give a wider perspective of the current situation with respect to data on the incidence and severity of bird-strike incidents specifically those endangering life; and the specific bird species which are of most concern.

In our view it is paramount to establish a proportionate based approach to determine the risk of bird-strike to ensure a fully sustainable policy which balances the true risk to human life against society needs and expectations. Minerals can only be extracted where they are placed, whereas other forms of development have wider choices of location. In this respect CAP680 still needs a more balanced approach that, whilst recognising that passenger air safety is paramount, provides guidance on how to balance the need to reduce any bird strike risk against the need to enable mineral extraction operations which take place within the 13 km consultation zones to be restored in a way that meets Government and community objectives for sustainable development.

In this respect the risk assessment approach in section 2.5 is a most significant and useful start of this process.

More detailed comments on sections relating to mineral workings are as follows:

2.2.4 This explanation of the origin of the 13 km safeguarding radius is helpful although we understand that it may incorporate a level of additional safety margins *"the 13km circle is based on a statistic that 99% of birdstrikes occur below a height of 2000ft. and that an aircraft on a normal approach would descend into this circle at approximately this distance from the runway."*

- 2.4.4 5th bullet. Sand, gravel and clay pits. It acknowledges that mineral extraction does not in itself attract birds, but large voids created sometimes fill with water either during working or are allowed to flood and be restored as amenity lakes or nature reserves which are potential bird attractions. Whilst having this at the end of runway might be foolish, elsewhere however might be quite acceptable.
- 2.5 We are particularly pleased to note the risk assessment section. We believe that this is an essential part of a meaningful way forward and the most significant change in the guidance. However, this is just the start and very much more detail is required. In particular this is required for the different bird species under 2.5.1.2 and their relative importance, significance or not. There are also no definitions eg *adjacent to flight paths, distances*. This section needs much more work and needs expanding and to be consistent with other risk assessment procedures like CSL.
- 3.1.2 We are pleased this recommends dialogue and cooperation with planners, developers and land owners when looking at options to reduce birdstrike risk. The guidance should, however, in addition recognise the need to adopt a balanced approach when assessing risk that takes account of need to maintain the Country's essential mineral supplies – and a proper basis for discussion is required rather than using an over-zealous precautionary approach.
- 3.4.3.8 This should acknowledge that water bodies provide valuable facilities for recreation and fishing which make an important contribution to the community and to Government's biodiversity targets. Your proposed design criteria reduce the attraction of water to birds but also result in the area being unsafe for visitors particularly children, visually unattractive and of little value to biodiversity. The guidance needs to balance safe, visually attractive and ecologically sustainable water bodies with reduced attractiveness to bird species that may present significant birdstrike risk.
- 3.4.7.1 The guidance should recommend an holistic site specific approach that balances the need to maintain the bird strike risk at an acceptable level with the need to provide satisfactory restoration and aftercare. It should recommend a staged approach to bird strike risk reduction which initially assesses the level of risk and then establishes appropriate design criteria that balances this risk with the need to provide safe visually attractive and ecological sustainable water bodies. We believe the dialogue referred to in Paragraph 3.1.2 should be restated in this paragraph.
- 3.4.10.1 This refers to the importance of liaison with local farmers. We would suggest that a similar approach should be encouraged with all landowners and users within the 13km zone.

We trust that our comments are helpful. If you require any further information or explanation please do not hesitate to contact me further.

Yours Sincerely

Peter Huxtable
Secretary, British Aggregates Association