



City of
BRADFORD
METROPOLITAN DISTRICT COUNCIL

South Pennine Moors SPA/SAC
Planning Framework Supplementary
Planning Document (SPD).

Draft



South Pennine Moors SPA/SAC Planning
Framework



City of
BRADFORD
METROPOLITAN DISTRICT COUNCIL



FOOTPRINT
ECOLOGY

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FOOTPRINT ECOLOGY, FOREST OFFICE, BERE
ROAD, WAREHAM, DORSET BH20 7PA
WWW.FOOTPRINT-ECOLOGY.CO.UK
01929 552444

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1. The Supplementary Planning Document

Purpose of this SPD

- 1.1 This SPD is linked directly to the adopted Core Strategy DPD Strategic Core Policy SC8: Protecting the South Pennine Moors SPA and the South Pennine Moors SAC and their zone of influence and has a key role in providing further planning guidance in relation to this policy and sets out a mechanism for the calculation of the financial contributions, by reference to development types, the level of predicted recreational impact on the SPA or SAC, and the measures upon which such contributions will be spent as required under Strategic Core Policy SC8 (ii) 3.
- 1.2 In response to the requirements of Policy SC8, this planning framework has been prepared, working closely with departments across the Council and with wider stakeholders. This has helped to create a framework which is specific to Bradford and responsive to the challenges and opportunities in the District. The final draft was completed in January 2021 and this document which was subject to a consultation which ran for a period of six-weeks from the 8th February to 24th March 2020.
- 1.3 The planning policy requirement for developer contributions and other checks are found within the adopted Bradford Core Strategy Policy SC8: Protecting the South Pennine Moors, and this document provides further detail as to why these are in place and how they should be implemented.
- 1.4 Furthermore, Policy SC8 establishes the following matters:
- Tiered zonal framework and approach to development within each area:
 - Zones A (0.4 km, urban edge effects)
 - Zone B (0.4km to 2.5 km, Supporting foraging land).
 - Zone C (0.4km to 7km, Recreational impacts)
 - Structured approach to mitigation (where appropriate)
 - The mechanism for the calculation of financial contributions to support mitigation
- 1.5 The SPD provides further detail in relation to these key policy themes and delivers against the detail required for the SPD under Policy SP8.

- 1.6 This) document provides detailed information on the necessary steps to ensure compliance with the Habitats Regulations 2017, as amended ('the Habitats Regulations').
- 1.7 The South Pennine Moors are European sites, protected for their wildlife interest of international importance. Any proposals for development around the European sites (within 7km) pose risks that need to be addressed before planning permission can be granted.
- 1.8 Under the Habitat Regulations, a competent authority¹ should only give effect to a plan or authorise/undertake a project after having ascertained that it will not adversely affect the integrity of the European site, either as a result of the plan/project alone or in-combination with other plans/projects. This means that in the absence of certainty, the plan or project should not normally proceed (subject to the further exceptional tests set out within the legislation). Mitigation measures are counteracting measures that serve to avoid, cancel or reduce harmful effects. Guidance (Tyldesley & Chapman, 2021) is clear that, to be taken into account, at the appropriate stages, all 'mitigation measures' should be effective, reliable, timely, guaranteed to be delivered and as long-term as they need to be to achieve their objectives.
- 1.9 Additional new development within 7km of the designated site boundary has the potential to have impacts on the South Pennine Moors in relation to urban effects (including cat predation, fire risk, contamination and noise / light pollution), loss/deterioration of supporting habitats and increased recreation pressure. The Council must secure adequate protection for the South Pennine Moors in accordance with the legislation and must therefore put in place measures to prevent any deterioration of the wildlife interest of the moors that might otherwise occur as a result of the Plan. The COVID pandemic and climate change create further uncertainty in terms of future pressure, through for example changing patterns of recreational use and increasing the fire risk. By developing an approach strategically, this SPD provides a solution through an integrated suite of

¹ A competent authority is:

- a [public body](#) that decides to give a licence, permit, consent or other permission for work to happen, adopt a plan or carry out work for itself, such as a local planning authority
 - a statutory undertaker carrying out its work, like a water company or an energy provider
 - a minister or department of government, for example that makes national policy or decides an appeal against another competent authority's decision
 - anyone holding public office, such as a planning inspector, ombudsman or commissioner
- [Habitats regulations assessments: protecting a European site - GOV.UK \(www.gov.uk\)](#)

avoidance and mitigation measures that are supported by comprehensive evidence and experience in part gained from other European site mitigation strategies.

- 1.10 The SPD does not set new policy but rather sets out further detail regarding Strategic Core Policy SC8. It is therefore a solution to the legislative duties placed on Bradford Council as the competent authority, and is an enabling strategy, unblocking potential HRA issues at the individual development project level where recreation pressure is difficult to mitigate on a piecemeal basis because it relies on a suite of integrated activities.

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2. Legislation and Policy

Designations

- 2.1 The City of Bradford Metropolitan District lies on the edge of the Pennines. Within the District, there is a combination of the densely populated City of Bradford, with a large expanse of the internationally important Pennine Moorland habitat to the north and west.
- 2.2 This SPD relates to the South Pennine Moors, which are classified as a Special Protection Area (SPA) and designated as a Special Area of Conservation (SAC):
- South Pennine Moors SAC
 - South Pennine Moors Phase II SPA
- 2.3 The SAC and SPA overlap and when referring to the South Pennine Moors SAC and the South Pennine Moors Phase II SPA together, this SPD refers to the South Pennine Moors SPA/SAC. SPAs and SACs are European sites, also referred to as habitats sites.
- 2.4 European sites are shown in Maps 1 and 2 and details of the qualifying features for the South Pennine Moors SPA/SAC are summarised in Appendix 1. As the maps show, there are also other European sites close to Bradford and while subject to the same protection are outside the scope of this SPD.

The Habitats Regulations

- 2.5 As a public body, the Council is identified as a 'competent authority' within the Habitats Regulations, and the requirement to assess the implications for European sites is applicable in situations where the competent authority is undertaking or implementing a plan or project, or authorising others to do so. A HRA (Habitats Regulations Assessment) considers the implications of a plan or project for European wildlife sites. It assesses any possible harm to the habitats and species that form an interest feature of the European sites, which could occur as a result of the plan or project being put in place, or as a result of the plan or project in-combination with other plans or projects. In-combination effects include those cumulative effects that might arise from multiple plans or projects together.
- 2.6 The requirement for the HRA derives from the EU Habitats Directive and, notwithstanding the UK's withdrawal from the EU, UK law and policy remains currently largely unchanged. The legislation transposing the EU Directives has been changed so that they continue to operate effectively from 1st January 2021. The changes have been made by the

Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

- 2.7 The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) outline the procedure set out by the government that should be followed in deciding whether to approve a proposal (a plan or project) that will potentially affect a protected habitats site.
- 2.8 The NPPF recognises the value of our natural environment stating that the planning system should contribute to and enhance the natural and local environment², for example by protecting and enhancing valued landscapes, establishing coherent and resilient ecological networks and providing net gains for biodiversity. The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site³.

Core Strategy DPD and emerging new Local Plan

- 2.9 The Core Strategy DPD covers the plan period 2013-30 and was adopted in July 2017, setting a housing requirement of 42,100 over the plan period. There are approximately 217,000 households within the District⁴. The adopted Core Strategy housing figures represent an approximate 20% increase in dwellings over the plan period.
- 2.10 The Council embarked upon a partial review of the Core Strategy in 2019 and in 2021 consulted on a new single plan⁵ – integrating policies, sites and existing local plan documents. The original Core Strategy DPD was accompanied by an HRA and HRA work has been taking place alongside both the partial review and the emerging single Local Plan.
- 2.11 This mitigation strategy is initially prepared using the adopted Core Strategy housing figures, whilst being mindful that the adoption a new local plan with amended housing requirement figures will lead to an update of the strategy.
- 2.12 The HRA reports for the adopted Core Strategy (Cox & Pincombe, 2014); Core Strategy Partial Review (Hoskin et al., 2019) and Local Plan (Liley, Fleming and Caals, 2021) should be referred to for all background information leading to the requirement for a recreation mitigation strategy,

² Para 170 of the NPPF

³ Para 177 of the NPPF

⁴ Based on postcode delivery points

⁵ Draft Bradford District Local Plan (Regulation 18).2020-30

which is formalised through this South Pennine Moors SPD. In summary, the HRA reports identify likely significant effects from the amount of housing growth proposed within Bradford on the South Pennine Moors SPA/SAC due to:

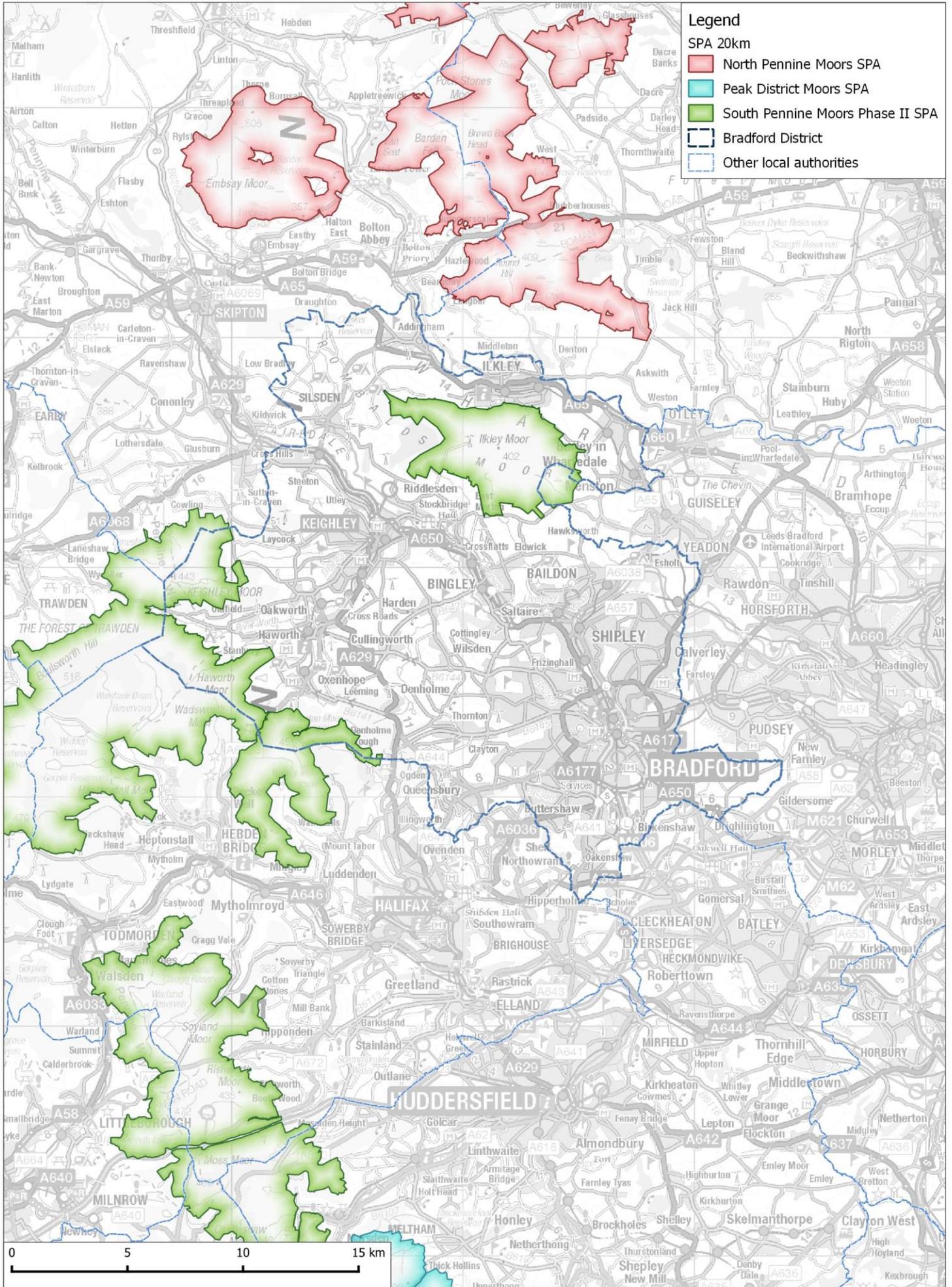
- Urban edge effects;
- Loss of supporting habitats;
- Recreational impacts.

2.13 The HRA for the adopted Core Strategy (Cox & Pincombe, 2014) concluded that measures to avoid and mitigate for the potential increased recreation pressure needed to be put in place. The Core Strategy was therefore adopted with a dedicated policy, SC8, to this effect. Policy SC8 sets out the broad requirements for mitigation and sets out the need for this SPD and the zones within which it will be applied.⁶

2.14 Background and context on the impacts of development on the European sites and the evidence for the zones used in SC8 are set out in Appendix 2.

⁶ For tracking policies, in the review of the Local Plan policy SC8 is updated and referred to as Strategic Core Policy SP11: Protecting the South Pennine Moors SPA / SAC and their Zone of Influence.

Map 1: Special Protection Areas around Bradford



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3. Overall Strategy

Overview

- 3.1 The Core Strategy Policy SC8 provides protection for the South Pennine Moors SPA/SAC and mitigation for impacts from development through:
- A clear presumption against any net increase in residential development within 400m of the South Pennine Moors European sites, unless as an exception, the development and/or its use would not have an adverse effect upon the integrity of the site;
 - A requirement that any application (including non-residential development) within 2.5km of the European site boundary will need to confirm whether or not supporting habitat that might be functionally linked to the SPA is present, and depending on these findings, ensure any impacts are addressed through mitigation before any planning application can be approved;
 - Any development within 400m – 7km that results in a net increase in residential units (or certain other types of development), will need to secure mitigation for recreation impacts. This can either be through bespoke mitigation or developer contributions. Mitigation will need to be sufficient to rule out adverse effects on integrity, alone or in-combination and this may be difficult to achieve with bespoke mitigation.

The zone approach

- 3.2 The different zones are illustrated in **Figure 1** and **Map 3**.

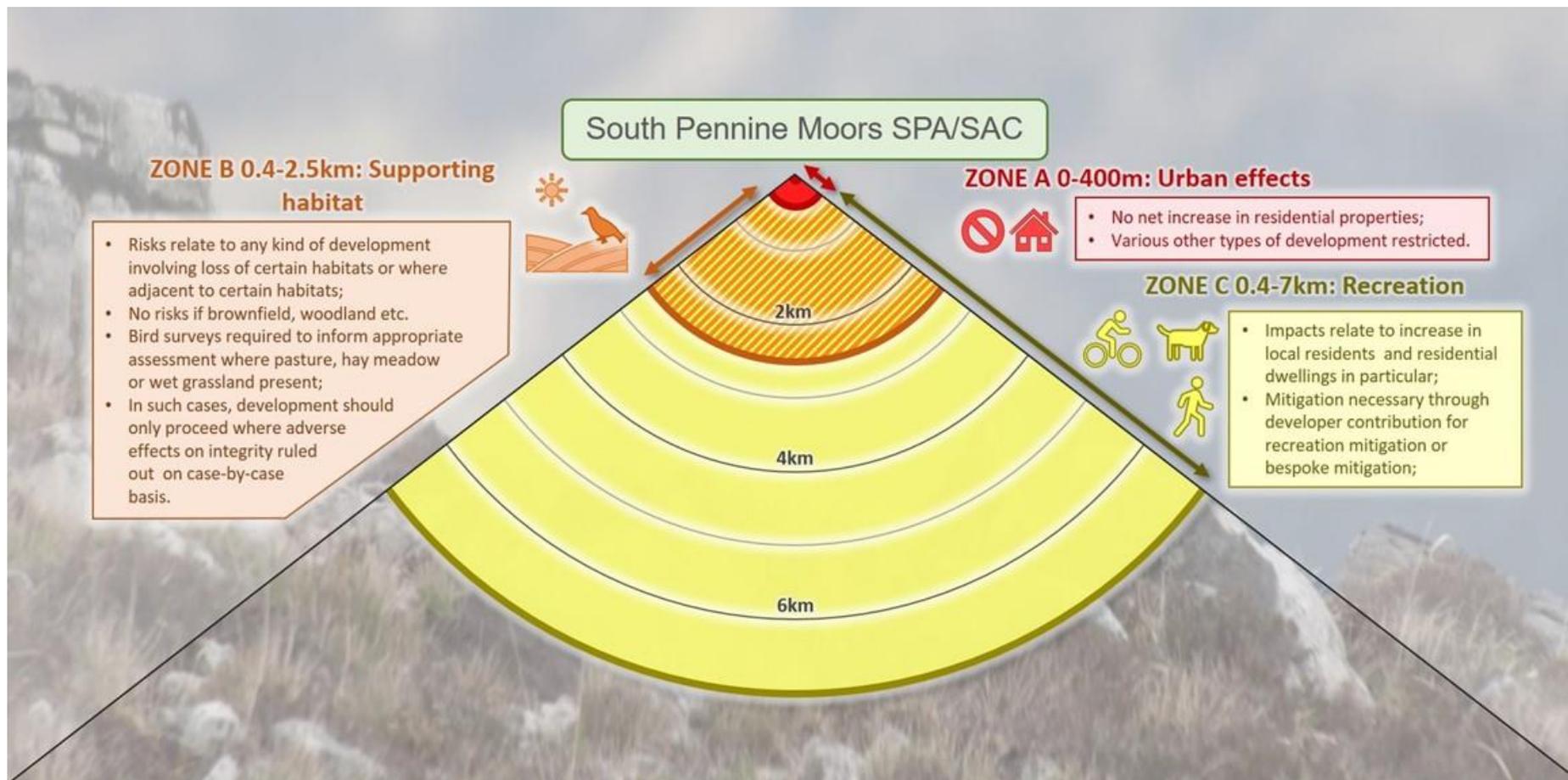
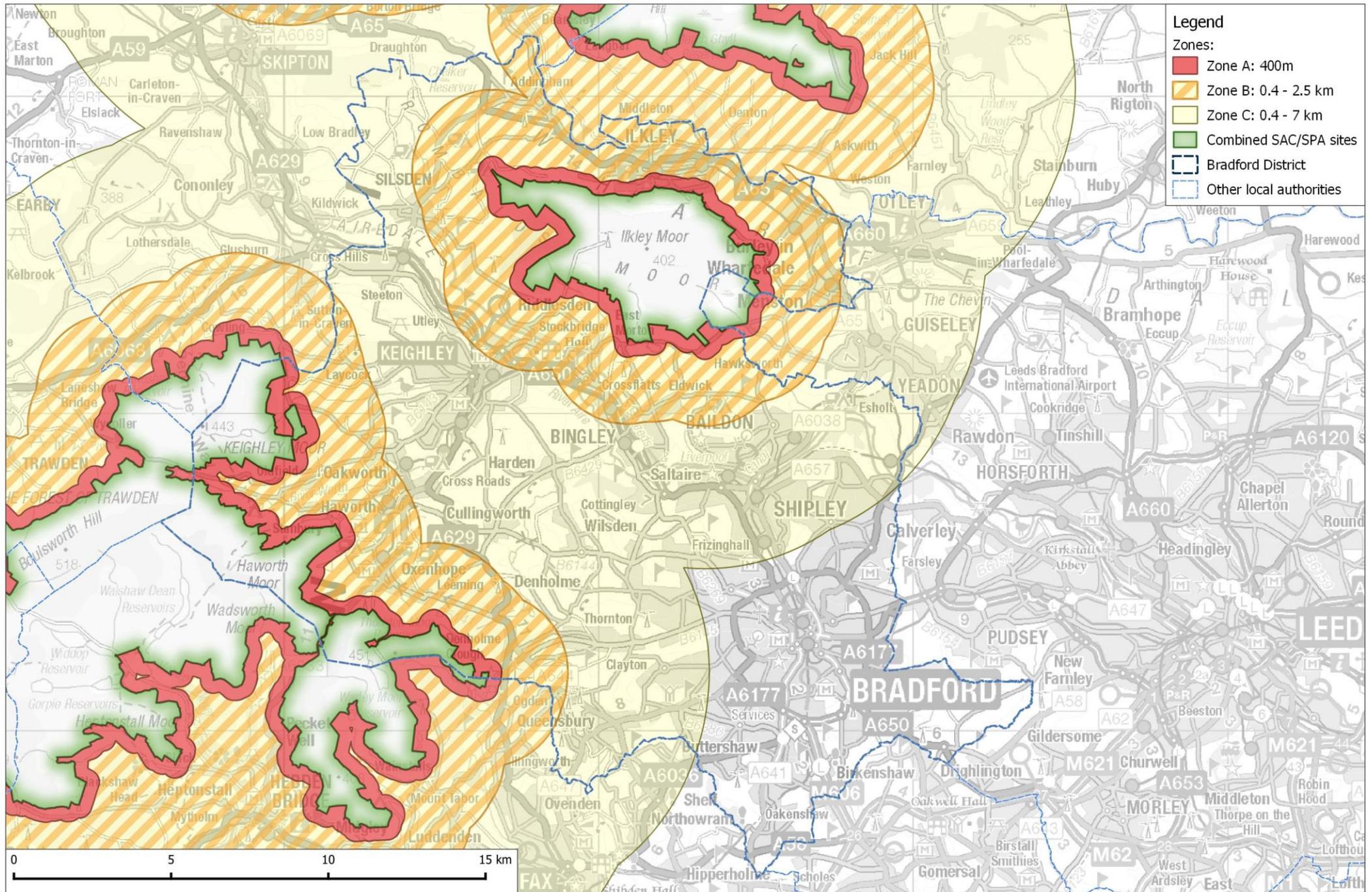


Figure 1: Schematic summary of the zones in Policy SC8 of the Core Strategy

Map 3: Combined SAC/SPA and buffer zones.



Process for applications within different zones

3.3 Figure 2 provides a flow-chart to show the checks necessary for individual planning applications, in line with Policy SC8.

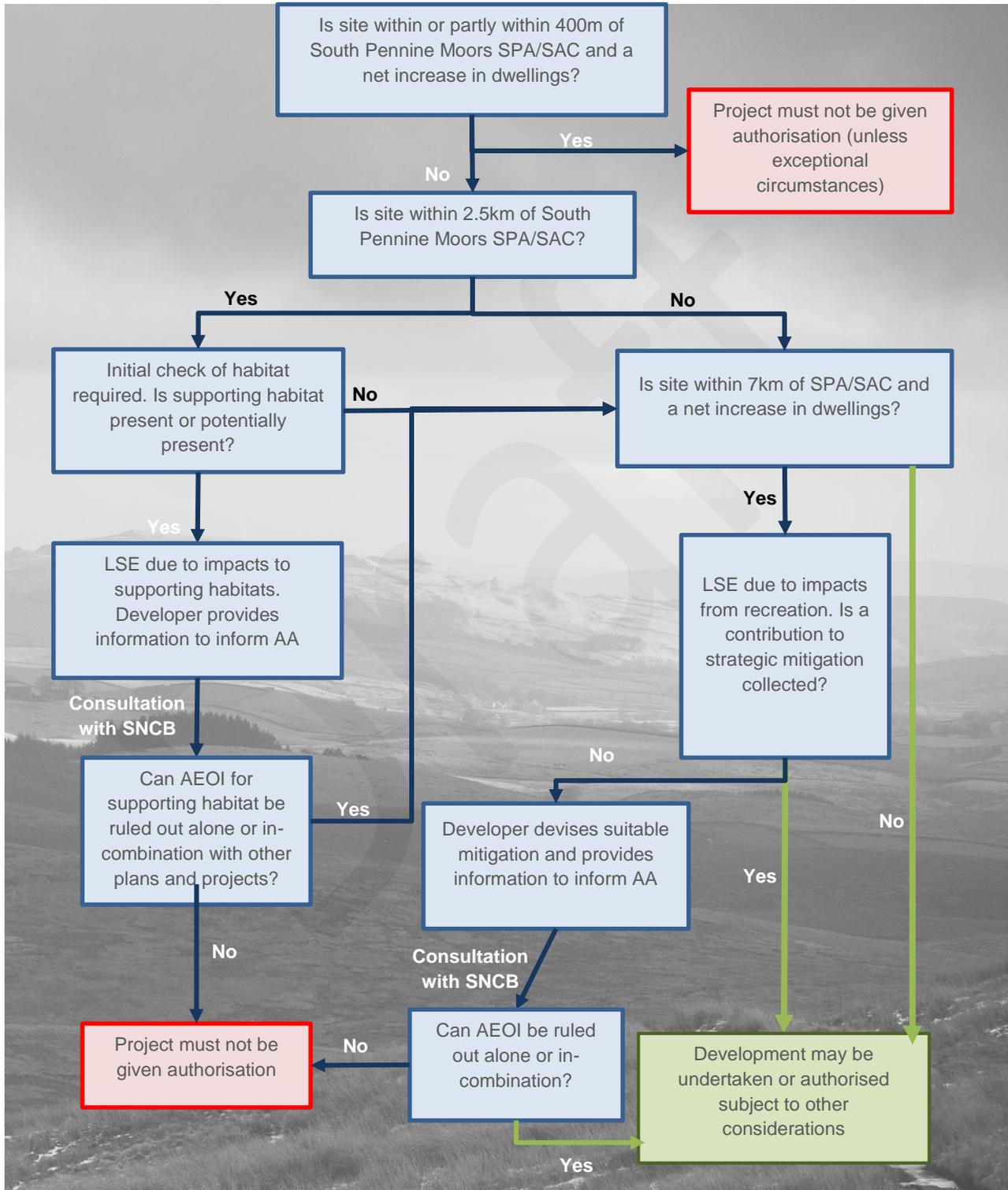


Figure 2: Flow-chart indicating necessary checks for residential planning applications. Abbreviations used are: LSE likely significant effects; AA appropriate assessment; AEIO adverse effects on integrity; SNCB Statutory Nature Conservation Body (Natural England).

3.4 A simple standard HRA statement / form will need to be signed by applicants contributing to the strategy (where appropriate), which fulfils the requirement to do a HRA. Where the applicant is not contributing to the mitigation strategy, then a full HRA will be required with identification of mitigation measures.

3.5 In the rest of this section, we consider in more detail some of the particular steps shown in the flow chart, in particular:

- Exceptional circumstances and the 400m zone;
- Identifying sites within 2.5km where supporting habitat is present or potentially present;
- Ruling out adverse effects on integrity for sites where supporting habitat is present or potentially present;
- Which developments are required to provide mitigation for recreation impacts.

Exceptional circumstances within the 400m zone

3.6 Instances of exceptional circumstances by their very definition are very rare. The 400m zone is necessary to provide protection for the supporting habitat around the periphery of the European site boundary, to reduce the impacts from recreation and to address urban effects. As such the presumption is that there will be no net increase in dwellings as these pose particular risks (from urban effects, loss of supporting habitat or recreation) and the only types of residential or holiday accommodation that might therefore be permitted would be replacement dwellings (C3) or replacement houses in multiple occupation (C4) or the following, which would require assessment on a case-by-case basis:

- Use Class C1 (Hotels) - Hotel or as a boarding or guest houses, where in each case, no significant element of care is provided;
- Use Class C2 (Residential Institutions) - residential accommodation and care to people in need of care; hospital or nursing home; residential school, college or training centre.
- Use Class C2A (Secure residential institutions) – provision of secure residential accommodation.

3.7 There is a large body of appeals from other parts of the country where similar policies to SC8 are in place and planning inspectors have consistently turned down residential development within 400m.⁷ These provide a clear body of evidence that pet covenants, fencing or the presence of other buildings between the European site are not sufficient

⁷ Selected examples include: Talbot Village Trust, land south of Wallisdown Road, Poole Dorset APP/Q1255/V/10/2138124 (12 December 2011); Lantern Cottage, Collinswood Road, Bucks APP/N0410/W/20/3252014 (9 November 2020); Connaught Road, Brookwood, APP/A3655/A/08/2090309 (23 April 2009).

to rule out adverse effects on integrity from urban effects for residential development.

Identifying sites within 2.5km where supporting habitat is present or potentially present

3.8 Within the 400m-2.5km zone it is necessary to confirm whether or not supporting habitat that might be functionally linked to the SPA is present and the applicant will be required to provide such information. Some types of habitat or types of site are straight forward to discount as supporting habitat and would generate no credible risk. Likely significant effects would be ruled out if the entire site comprised one or more of the following:

- Brownfield sites;
- Within the immediate curtilage⁸ of an existing farm building or house;
- Within a settlement boundary or within 25m of a settlement boundary;
- Within 25m of a main road⁹;
- Woodland;
- Arable¹⁰.

3.9 If the entire site does not fall into the above categories, habitat survey using an agreed approach to initial evidence gathering by a suitably qualified ecologist with experience of the relevant bird species will be necessary to identify whether a site is likely to provide suitable habitat. Given the presence of the 400m zone, risks are only likely in relation to those species that will move beyond 400m from the SPA (Golden Plover, Curlew, Twite and possibly Lapwing). Golden Plover is the main species of interest likely to be encountered. The use of areas outside the SPA by these birds will be patchy and only certain areas are likely to be important (Bertinussen, 2018). The following habitats, if present within the red line boundary or adjacent to it, would be indicators of credible risk:

- Grassland with abundant molehills;
- Semi-improved pasture or rough grazing;
- Hay-meadows;
- Floodplain grassland or wet grassland habitat.

3.10 The habitat survey will need to be site specific and extend to take into account any supporting infrastructure such as roads or power lines that

⁸ the open space situated within a common enclosure belonging to a dwelling-house.

⁹ Research indicates that species such as Golden Plover tend to avoid field edges and areas close to roads when foraging – see Appendix 2

¹⁰ Note that arable land can be used by the SPA qualifying features for foraging, however there is limited arable land within the District and in the Bradford area it is likely to be of limited importance beyond 400m from the SPA boundary

may be required for the proposed development and the land directly adjacent to the site.

- 3.11 The habitat survey will identify where likely significant effects are triggered and this will mean further evidence (including species surveys) will be necessary to inform appropriate assessment. A guidance note on foraging bird surveys has been produced and is available for applicants (SPA Bird Survey Methodology: Standardised method for surveying sites in West Yorkshire with potential functional linkage to Special Protection Areas: Version 1.0. Approved by the West Yorkshire Ecology Advisory Group 16th December 2020).
- 3.12 In due course it is anticipated that Natural England advice and modelling will be available (drawing on the modelling results in Bertinussen, 2018), to provide further information of areas of high risk and further clarification as to where bird surveys will be necessary. There is also a considerable current national focus of conservation effort on the Curlew (see Douglas et al., 2021 for overview) and this may generate further information to help clarify where further survey effort might be required.

Ruling out adverse effects where supporting habitat is present or potentially present

- 3.13 Where initial habitat surveys have identified the potential for supporting habitat then bird surveys will be necessary. Separate guidance on bird survey methods has been produced by the Council¹¹.
- 3.14 Applicants will need to provide information to inform appropriate assessment in the form of habitat and bird survey results and this will need to cover the potential scale of any loss and/or deterioration of the supporting habitat in light of the conservation objectives¹² for the SPA. Areas that hold large field systems (e.g. over 5ha¹³ in size), where old field systems are present or where there are fields supporting high earthworm density (e.g. abundant molehills) are likely to be particularly important. This may mean that mitigation measures will be necessary and if it is not possible to rule out adverse effects on integrity (after taking account of any mitigation measures), then the application will not be approved. Options for mitigation are limited but could include:
- Modifying the design to lessen or avoid impact;
 - Creation of open habitats suitable for the SPA qualifying features;

¹¹ [WEBLINK TO ADD](#)

¹² See [Natural England website - Conservation Objectives for South Pennine Moors](#)

¹³ This is drawn from Whittingham et al who recorded a mean field size of 5.04 (range 0.60 – 19.4ha) and found larger fields were preferred.

- Grassland management to provide suitable/improved breeding or foraging habitat for qualifying features in other locations (closer to the SPA);

Which developments are required to provide mitigation for recreation impacts

3.15 Section 4 of the SPD indicates that mitigation has been developed strategically, ensuring an appropriate, adequate and robust level of mitigation. By contributing to this strategic approach, individual developments can ensure compliance with the legislation in relation to recreation impacts. Mitigation is focused around recreation from new residential growth and Table 1 summarises the relevant types of uses (within the 0.4 - 7km zone) where new planning applications will be expected to provide mitigation and how the contributions for different types of use can be calculated. Details relating to the mitigation and the cost are set out in section 4.

3.16 There may be circumstances, such as large developments just outside the 7km zone where mitigation would be required, and these would be considered on a case-by-case basis, in consultation with Natural England.

Table 1: Summary of types of use which are expected to provide developer contributes for mitigating recreation impacts (development within 7km radius of the South Pennine Moors SPA/SAC).

Use Class	Use description	Likely significant effect?	Mitigation	Contribution for recreation mitigation
C1 (Hotels)	Use as a hotel or as a boarding or guest house where, in each case, no significant element of care is provided	Possibly	Case by case basis	1 room = 1 residential unit
C2 (Residential Institutions)	Residential accommodation and care to people in need of care	Yes	Contribution as per C3 housing.	1 dwelling ¹⁴ = 1 residential unit
C2 (Residential Institutions)	Nursing home	No	No publicly available parking capacity if in proximity to SPA/SAC	
C2 (Residential Institution)	Residential school, college or training centre	Yes	Contribution as per C3 housing. No publicly available parking capacity if in proximity to SPA/SAC.	1 room = 1 residential unit
C2 (Residential Institution)	Hospital	No	No publicly available parking capacity if in proximity to SPA/SAC	

¹⁴ Dwelling – generally a self-contained building or part of a building used as a residential accommodation, and usually housing a single household -<https://www.planningportal.co.uk>

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Use Class	Use description	Likely significant effect?	Mitigation	Contribution for recreation mitigation
C2A(Secure Residential Institutions)	Use for the provision of secure residential accommodation	No	No publicly available parking capacity if in proximity to SPA/SAC	
C3 (Dwelling houses)	Net additional dwelling	Yes	Standard as set out in report	Contribution for each unit
C3 (Dwelling houses)	Replacement dwelling	No	No	
C3 (Dwelling houses)	Residential annexe (granny annexe)	Yes	As per net additional dwelling	Contribution for each unit
C3 (Dwelling houses)	Retirement dwellings intended for permanent residence, (including but not exclusively non-mobile park homes and lodges/chalets) ¹⁶	Yes	Contribution as per C3 housing.	Contribution for each unit
C4 (Houses in Multiple Occupation)	Use of a dwelling house by not more than six residents as a 'house in multiple occupation' (HMO)	Yes	Contribution as per C3 housing.	HMO = 1 unit
Sui Generis	Houses in Multiple Occupation with over 6 residents	Yes	Contribution as per C3 housing.	Every extra room>6 residents is: 1 unit
Sui Generis	Self-contained holiday accommodation, caravan and touring holiday accommodation	Yes	Contribution as per C3 housing.	Each space/holiday unit = 1 residential unit with option to adjust down for occupancy
Sui Generis	Gypsies and traveller pitches	Yes	Contribution as per C3 housing.	1 pitch = 1 residential unit
C4 (Houses in Multiple Occupation) / Sui Generis	University managed student accommodation	Yes	Contribution as per C3 housing. Potential for exemptions for large scale managed student accommodation assessed on case by case basis.	Each self-contained cluster flat or studio=1 unit

¹⁶ Mobile homes and caravans while possibly intended for permanent residence generally fall under the Caravan Sites and Control of Development Act 1960 or Caravan Sites Act 1968 definitions, subject to structural details and individual cases. There may also be other instances in which other structures fall within the definition of a caravan / mobile home.

4. Developer contributions for recreation mitigation

What is the developer contribution used for?

- 4.1 Bradford Council has a longstanding and comprehensive understanding of the access management requirements for the South Pennine Moors, and its Countryside Service either proactively manages or works in partnership with private landowners to enable public enjoyment of the moors whilst conserving the important wildlife that the moors support. The Council has duties as a public body to maintain and enhance the conservation interest of the South Pennine Moors, which are bound in legislation, national and local policies.
- 4.2 Developer contributions provide the means to enable development and ensure appropriate mitigation for recreation impacts can be delivered. A suite of mitigation measures for recreation mitigation has been devised using good practice from other strategic mitigation schemes for designated sites, and an understanding of the particular nature of the recreation pressure on the South Pennine Moors. A range of measures are identified that will add to the existing management of the South Pennine Moors, giving greater management capacity in recognition of the new residential growth coming forward. The measures will specifically target the protection of the sensitive habitats and species for which the South Pennine Moors are designated as European wildlife sites.
- 4.3 The mitigation strategy is a suite of measures to be reviewed and updated over time. The measures have been developed in discussion with Bradford Council staff, Natural England and other stakeholders at a mitigation strategy workshop and the experience and expert opinions of the Footprint Ecology team assisting the Council. Many of the measures are successfully used around the country, but the package has been chosen based on the local circumstances and needs for the South Pennine Moors within the Bradford growth context.
- 4.4 The mitigation package has been developed to focus on mitigation streams that include:
- Dedicated staff
 - Education and awareness raising
 - Infrastructure (including enhancement of existing greenspaces).
- 4.5 Each of these mitigation work streams is explained in turn below and measures set out in detail in Appendix 4.

Dedicated staff

- 4.6 Dedicated staff to deliver a strategic mitigation scheme are essential. Their recruitment should be prioritised over the delivery of other measures, because they are fundamental to the effective delivery of those measures. A delivery officer is the minimum requirement to project manage the strategy delivery, and should be the first aspect of the strategy to be acted upon as funds are collected. Following this, on the ground ranger/warden staff are also needed to bring the specialist skills necessary to deliver the measures.
- 4.7 The South Pennine Moors SPA/SAC are expansive and host numerous access points and car parks. The European site is spread over several parcels around the north, west and south west of the District. Visible staff presence on the ground, and to implement the range of mitigation measures will not be possible without a new team of staff, for which it is proposed to be three full time rangers and a delivery officer. The presence of rangers/wardens along with the range of other measures has continually been shown to be effective in ensuring the successful delivery of such strategies elsewhere and a gradual positive change in visitor behaviour. The expansive and multiple site nature of the South Pennine Moors is the primary reason for the inclusion of three ranger staff. The team of staff could have discrete individual roles, depending on the skills and experience of those appointed, but will collectively deliver the strategy through their promotion of positive visitor behaviours. Essential skills will therefore be their engagement with people as well as being knowledgeable about nature conservation.
- 4.8 This number of rangers also has regard for the predicted increase in visitor pressure – currently 20%, as discussed in Section 2, and some of the locations where housing growth is likely to occur. There will be a requirement for the rangers to work unsociable hours and to potentially have some enforcement role. They will need to work across land under different ownership and their roles will need to supplement and fit alongside existing staff and volunteers for example those of the Friends of Ilkley Moor.
- 4.9 A mobile ranger team is a feature of other mitigation schemes such as the Solent, the South-Devon sites, the Thames Basin Heaths and the Dorset Heaths. In these examples the rangers form a mobile team that spend the majority of their time outside, talking to visitors, influencing how visitors behave and showing people wildlife. The advantage of such an approach is that the staff can focus their time at particular sites/locations as required. This means that as particular projects are set up, as development comes forward, or if access issues become a concern at a

particular location, the staff can be present and target their time accordingly. Monitoring data can help inform the ranger effort and ensure their work is directly linked to where development comes forward and where there are issues. This then leaves the delivery officer to focus on overseeing the mitigation strategy and management of specific mitigation projects.

Education and awareness raising

- 4.10 Changing visitor perceptions of the South Pennine Moors from a vast recreation space to an understanding that it is a highly sensitive and internationally important wildlife asset that needs sustainable management to retain into the long term is the aspiration of this mitigation work stream.
- 4.11 This work stream includes a range of education options and these will be developed by the ranger staff, utilising an allocated budget. Key activities will include a strong website presence and communication through social media will ensure visitors can access information about the mitigation package, the work being undertaken and be made aware of particular initiatives. This will extend the reach of the rangers and help provide links to the wider conservation community in the area.
- 4.12 Social media/website promotion could potentially include information on events, natural history and wildlife sensitivity, where to park, where and how to see wildlife without causing disturbance, and the promotion of alternative recreation sites. This could also be supported by the development of apps to help visitors understand and interpret their surroundings. Apps would also have the potential to influence visitor behaviour by indicating when the user was in an area with sensitive nature conservation interests or directing access. Mitigation budget has also been allocated for an education programme.
- 4.13 An important finding from the stakeholder workshop was the need for improved signage and the mitigation package includes funding for an audit of current provision and the design of new interpretation boards. Signs direct people or inform them of how they should behave whereas interpretation provides information about the place being visited. The audit should establish what is required and have regard for the long-established honeypot sites around the South Pennine Moors. Careful thought on how signage and interpretation can be more effective in these areas is required. The audit will also need to consider existing branding and the different signage requirements of different landowners.

Infrastructure (including enhancement of existing greenspaces)

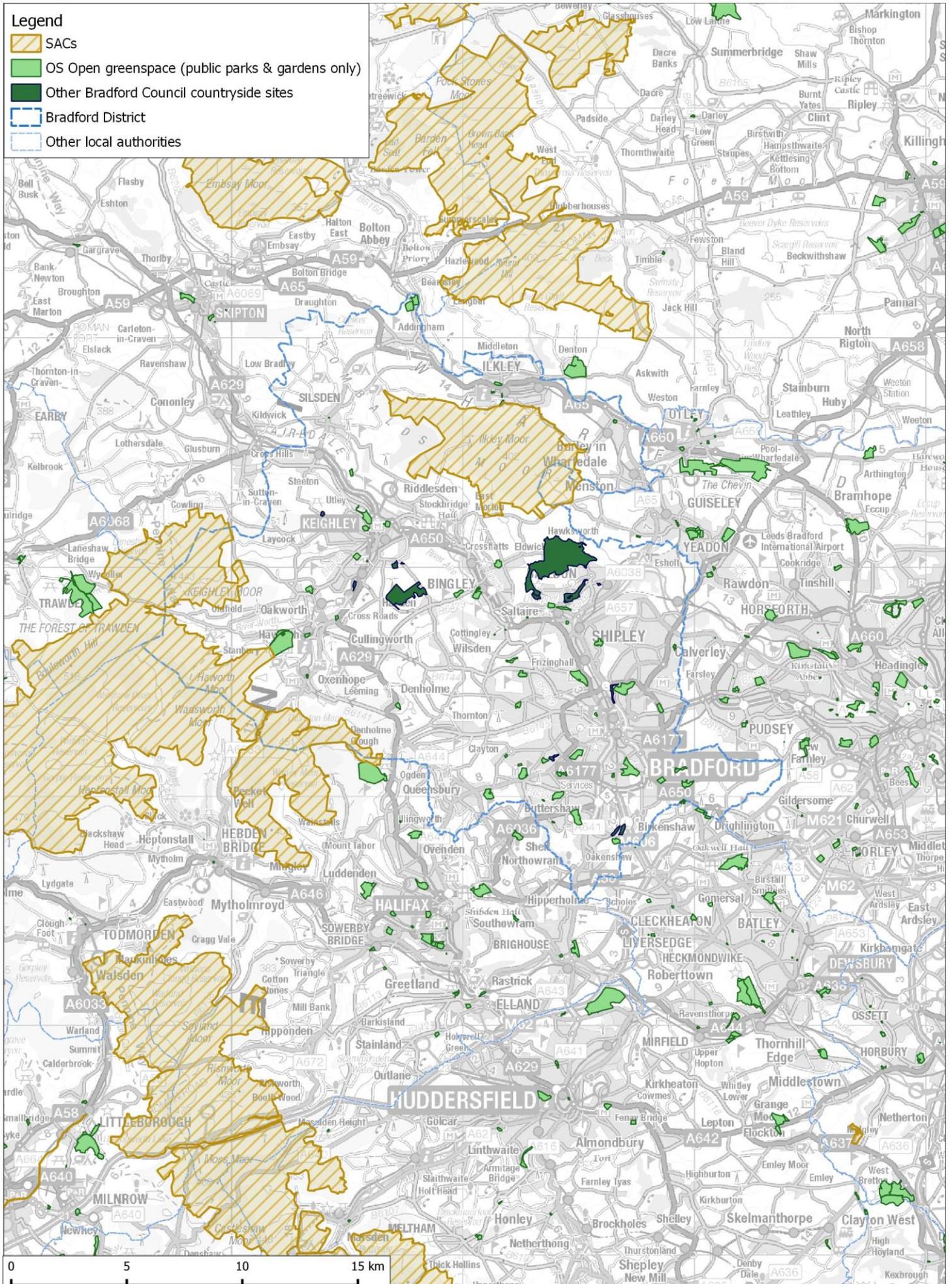
- 4.14 A range of measures relating to infrastructure are included. These include the provision of dog bins on the South Pennine Moors SPA/SAC, measures relating to parking (on and around the South Pennine Moors SPA/SAC), footpath improvements (on and around the South Pennine Moors SPA/SAC) and improvements to greenspaces to divert recreational use.
- 4.15 Suitable Alternative Natural Greenspaces (SANGs) is the term given to greenspaces that are created or enhanced with the specific purpose of absorbing recreation pressure that would otherwise occur at sites designated as European wildlife sites. SANGs are created, or existing greenspaces enhanced to create a SANG, in order to mitigate for the effects of new housing development, absorbing the level of additional recreation pressure associated with the new development. Within Dorset, the concept has been expanded to include a range of other recreation sites in close proximity to the Dorset Heathlands SPA/SAC/Ramsar site, which are not necessarily larger sites but provide an additional supporting function to alleviate pressure and where possible introduce positive management of any functionally linked heathland habitat.
- 4.16 Larger housing sites have greater potential to provide a quantum of suitable green space within the development that can accommodate a good level of on-site recreational activity. Given the Bradford context, viability and the way in which new housing is likely to be distributed and delivered, there may be relatively few opportunities where large scale development can deliver SANGs, and land availability will be a constraint on the provision of any strategic SANGs. It is therefore proposed that, with the exception of any larger sites/urban extension sites coming forward in the future through new site allocations, the mitigation strategy should focus on maximising opportunities for enhancing the capacity and recreation experience at existing greenspace sites.
- 4.17 There are a range of sites that could be enhanced to draw access away from the European sites. Map 4 shows existing greenspace sites (extracted from the Ordnance Survey national GIS data on open greenspace), with only public parks and gardens shown (i.e. excluding sports fields, allotments and other kinds of greenspace less likely to be suitable). In addition, we have also shown countryside sites (away from the European sites) that the Council are responsible for. It can be seen that there are a range of locations of a good size and in locations which will work to divert visitors away from the European sites. A review of sites and audit will be necessary in order to identify which are likely to work best and to identify a prioritised list of enhancements that will be required.

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We have provided costs for such an audit and a budget to fund measures as identified. Any improvements to greenspace will need to be secured and maintained in the long-term and the audit will consider how management and maintenance of the sites can be secured in-perpetuity

Draft

Map 4: Greenspace outside the European sites



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Level of growth to be mitigated

- 4.18 The total number of houses to which this SPD will apply has been calculated using the adopted housing figures within the current Bradford Core Strategy. The total housing figure has been reduced to allow for developments that have already been completed. This SPD sets out a means of mitigating for potential recreation impacts that will be secured through S106 legal agreements. This is an updated approach to that previously used, whereby mitigation funding was provided for from the Community Infrastructure Levy (CIL).
- 4.19 The calculation of housing numbers will need to be reviewed and updated with new figures once the new Local Plan is adopted. The emerging new plan I includes a proposed update to Policy SC8 for which this SPD provides the delivery mechanism.
- 4.20 It should be noted that for the Bradford urban areas the calculation is based upon how much area is covered by the SPA 7km buffer and then this proportion has been used to derive an estimated figure from the total housing delivery in the urban area.
- 4.21 The level of housing growth for which mitigation is required (i.e. within 7km of the South Pennine Moors SPA/SAC) is estimated to be 17,326. Mitigation will need to therefore address impacts from this level of growth and a per dwelling cost can be calculated. Housing totals used to derive this overall total are summarised in Appendix 3 and are tracked to the Core Strategy growth figures and reviewed annually once housing completion data is available.

Cost of mitigation and per dwelling tariff

- 4.22 The total cost of the mitigation measures is estimated at **£6,507,795** (see Appendix 4 for breakdown). The cost estimates which are indicative, drawn primarily from other mitigation strategies, discussion between the Council and the HRA consultants, and the collective experience of the costs of different works. The costs are broad estimates and allow a per dwelling cost to be identified that will ensure appropriate levels of mitigation are possible.
- 4.23 The number of dwellings required in the adopted Core Strategy still to come forward within the 7km zone of the SPA/SAC is calculated to be **17,326** (see Appendix 3).
- 4.24 The required contribution is therefore calculated to be **£375.61 per residential unit** and is applicable to any development with a net increase

in residential units within 0.4-7km of the South Pennine Moors European wildlife sites. This sum will be index linked and subject to regular review.

- 4.25 This tariff is applicable until a review of this SPD is undertaken. The Local Plan Review will provide the opportunity to undertake a review and update of this SPD to take account of the most up to date information on housing growth and any necessary adjustments to the tariff will be made accordingly, in light of progress achieved at the time. Under normal operation conditions a review will take place every five years as a maximum. Once the mitigation measures begin to be delivered, there is the opportunity to refine the measures based on how implementation progresses. A first priority is to secure the delivery officer in place, as this is a key member of staff to then progress with the other practical measures. The appointment of ranger staff should shortly follow or ideally be recruited together with the delivery officer.
- 4.26 Mitigation needs to be effective in the long-term, lasting as long as necessary to address any impacts. Costs have been derived assuming that mitigation will be delivered in-perpetuity¹⁸. Implementation of measures will be phased with housing growth, ensuring sufficient mitigation is in place before new housing is occupied. This means not all measures will be instigated at once and some measures do not require funding in-perpetuity as they are one-off or short-term in nature. For example, the delivery officer post is necessary in the short-term to oversee the initial infrastructure delivery and other elements of the strategy (and would be one of the first mitigation elements to be funded) but the post is not required in the long-term, whereas funds are included for ranger time in-perpetuity.
- 4.27 Staffing levels and in-perpetuity costs should be regularly reviewed and updated with future iterations of the SPD. Overall there should be flexibility to allow funds to be directed as required to ensure mitigation is effective and this is especially important given the changes in access likely as a result of the pandemic. A 5% contingency is included, to allow for unforeseen changes to costings and requirements and provide flexibility in the funds available and how money is prioritised.

The legal mechanism to secure developer contributions

- 4.28 Since the adoption of the Core Strategy, measures to manage recreation access on the South Pennine Moors has been funded through the Community Infrastructure Levy. This has now changed to a s.106 as the

¹⁸ We assume this to mean 80 years.

more appropriate and effective means of securing the mitigation that is necessary to protect the moors from new residential development within 7km. A S106 legal agreement provides a direct means by which developer contributions can be sought that are proportionate to the increased recreation pressure risk.

- 4.29 The requirement for developer contributions for the South Pennine Moors will be calculated using the net increase in residential units for which planning permission is being given. The requirement will be included within the S106 legal agreement accompanying planning permissions. The legal requirement will be for the payment of the required funds on commencement of development¹⁹.
- 4.30 Providing the funds on the commencement of development ensures that the funding is aligned with mitigation delivery. A key principle for mitigation delivery to prevent adverse effects is that the mitigation should be functioning prior to the completion of the development so that the mitigation is preventing an adverse effect from occurring. For the strategic mitigation package for the South Pennine Moors, delivery is primarily through the Countryside Service within Bradford Council. Developer contributions will be ring-fenced by the Council and used specifically to fund mitigation.
- 4.31 The Council has prepared a standardised Unilateral Undertaking (UU) form which will be the legal mechanism for the tariff collection and a copy is available [online](#). A unilateral undertaking is a legal document made pursuant to Section 106 of the Town and Country Planning Act 1990, but a simplified version of a planning agreement. This document requires that if planning permission is granted and implemented certain payments must be paid, in the form of planning contributions.
- A unilateral undertaking can only be entered into by the owner of the land to be developed and therefore if the applicant does not own the land to which the application relates they will need to ask the owner to enter into this.
 - If the land is owned by more than one person, each landowner must enter.
 - In order to determine who owns or has an interest in the land, the applicant may be able to obtain the title from the Land Registry.
- 4.32 The standardised Unilateral Undertaking agreement forms part of the local validation process for all relevant planning applications for development which will result in a net increase in residential units, located within 7km of

¹⁹ Commencement of development is defined by Section 56 of the Town and Country Planning Act 1990 as the earliest date on which a material operation is carried out. This includes any works of construction, demolition, digging foundations, laying out or constructing a road and a material change in the use of the land.

the South Pennine Moors European sites. The form is to be completed and signed before planning permission is granted.

4.33 The Unilateral Undertaking includes:

- The per house tariff – to be paid upon commencement of development²⁰. - no dwellings shall be occupied until the tariff is paid.
- A combined administration and monitoring fee – payable before planning permission is granted. This fee is not returnable if the planning permission expires without commencement.

4.34 The Council has introduced a flat rate fee per application to meet the Council's administration and monitoring costs associated with any drafting, checking, overseeing and approving the unilateral undertaking. This fee is published separately on the Bradford Council website: [link](#). This fee will be subject to review annually.

4.35 The amount payable in terms of the tariff is set out in Appendix 5.

²⁰ Commencement of development is defined by Section 56 of the Town and Country Planning Act 1990 as the earliest date on which a material operation is carried out. This includes any works of construction, demolition, digging foundations, laying out or constructing a road and a material change in the use of the land.

- 4.36 An instalments policy has been developed with this SPD to allow developers to pay their Unilateral Undertaking tariff in instalments to provide flexibility and assist with development viability and delivery by improving the cash flow of a development. Without such an arrangement, the whole charge is liable on the commencement of development. Details of the instalments policy which may be updated from time to time is available on the Council's [website](#).
- 4.37 Funding received through the habitat mitigation tariff will be reported under s.106 income within the annual Infrastructure Funding Statement.

Hosting of staff and delivery oversight

- 4.38 With an existing team of staff present within the Council managing greenspaces and countryside sites, it is logical and most resource efficient for the new mitigation strategy team to work alongside existing staff within the Countryside Service. There will be notable efficiencies with placing the staff within an established and longstanding team, line managed by the Countryside Manager who has an in-depth knowledge of the South Pennine Moors and its access management needs. The salary levels proposed within Table 3 are aligned with the Council's pay structure and the likely grades for the mitigation strategy staff. An outline of how the team is likely to fit within the existing Countryside Service is provided within Appendix 6.
- 4.39 The team will establish itself over time and with on the ground experience of the South Pennine Moors SPA/SAC. The team themselves will establish what aspects of the strategy are priorities for early implementation, and this can be facilitated by developing relationships with stakeholders, including those that attended the workshop. (landowners, NGOs, statutory bodies, local authorities, existing rangers and site management staff etc.).
- 4.40 By placing the mitigation strategy team within an existing Council team, it is essential that the funding stream for the team remains separate and expenditure is recorded and monitored as part of the overall strategy monitoring described below.

Governance

- 4.41 A mitigation strategy needs to be implemented within a governance structure that will ensure its success. This will oversee how a strategy is implemented in terms of its prioritisation and apportionment of time to activities, management of funds, resolution of issues and response to changing circumstances and opportunities. Whilst the staff will be hosted within the Countryside Service a wider governance structure is to be

established, consisting of key stakeholders and external partners to provide direction and oversight of the strategy delivery over time. This adds transparency, and ensures that the work of the team does not get subsumed into other work of the Countryside Service.

- 4.42 This SPA “mitigation partnership” is not involved in the daily work of the mitigation strategy team, but meets on a bi-annual basis to enable the team to report on progress and give external input to key decisions and review of the strategy over time. This includes priorities for new measures as those in the initial strategy start to be implemented. This approach to governance provides the flexibility for the budget to be adjusted and the mitigation measures be targeted as relevant at the time.

Monitoring

- 4.43 Critical to the success of a strategic mitigation strategy is its effective monitoring. The dedicated staff are responsible for monitoring strategy delivery over time, and monitoring will include the following:
- Effective delivery of measures
 - Timely delivery of measures in alignment with housing growth coming forward
 - Checking that mitigation delivery aligns with any peak locations for housing coming forward at any given time.
 - Visitor monitoring and ecological monitoring to check whether measures are effective and what additional measures may be needed over time.
- 4.44 The monitoring work streams inform the review of the strategy, which are likely to take the form of a light touch annual review and more significant reviews at key points in time, aligned with the Local Plan work programme.

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Appendix 1: The Nature Conservation Interest of the European Sites

5.1 Links in the table cross-reference to the Natural England website and the relevant page with the site’s conservation objectives. In the qualifying features column, for SPAs, “nb” denotes non-breeding and “b” breeding features. For SACs, # denotes features for which the UK has a special responsibility. Qualifying features are those listed on the Natural England website, designated sites view for the site in question. The descriptive text is adapted from Natural England’s site improvement plan or the supplementary conservation advice.

Table 4: Summary of relevant European sites, their interest features and relevant pressures/threats. Pressures/threats are taken from the Site Improvement Plans (SIPs).

European Site	Qualifying Features	Description
South Pennine Moors SAC	H4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> H4030 European dry heaths H7130# Blanket bogs H7140 Transition mires and quaking bogs H91A0 Old sessile oak woods with Ilex and Blechnum in the British Isles	This site covers the key moorland blocks of the Southern Pennines from Ilkley Moor in the north to the Peak District in the south. The moorlands are on a rolling dissected plateau formed from rocks of Millstone Grit at altitudes of between 300m – 600m and a high point of over 630m at Kinder Scout. The greater part of the gritstone is overlain by blanket peat with the coarse gravelly mineral soils and shales occurring only on the lower slopes.

European Site	Qualifying Features	Description
<p>South Pennine Moors Phase 2 SPA</p>	<p>A098(B) <i>Falco columbarius</i>: Merlin A140(B) <i>Pluvialis apricaria</i>: European golden plover Breeding bird assemblage: <i>Pluvialis apricaria</i> : European golden plover <i>Actitis hypoleucos</i>: Common sandpiper <i>Calidris alpina schinzii</i>: Dunlin <i>Carduelis flavirostris</i>: Twite <i>Gallinago gallinago</i>: Common snipe <i>Numenius arquata</i>: Eurasian curlew A222(B) <i>Oenanthe oenanthe</i>: Northern wheatear <i>Saxicola rubetra</i>: Whinchat <i>Tringa totanus</i>: Common redshank <i>Turdus torquatus</i>: Ring ouzel <i>Vanellus vanellus</i>: Northern lapwing <i>Asio flammeus</i>: Short-eared owl</p>	<p>The site includes the major moorland blocks of the South Pennines from Ilkley in the North to Leek and Matlock in the South. It covers extensive tracts of semi-natural moorland habitats including upland heath and blanket mire. The diverse mosaic of habitats contributes greatly to the ornithological interest, which comprise birds of prey and waders.</p>

Appendix 2:

Relevant impacts of development

Urban effects

- 5.2 There are particular risks associated with development in such close proximity to European site boundaries. These risks relate to increased recreation use, cat predation, increased occurrence of predators associated with gardens (e.g. Fox *Vulpes vulpes*, Magpie *Pica pica*, Brown Rat *Rattus norvegicus*), increased fire risk (garden bonfires, Chinese lanterns, barbeques), dumping of garden waste and the physical proximity of the built environment. The impacts of urbanisation and the synergistic effects of development have been the subject of a range of reviews (Chace & Walsh, 2006; McDonald et al., 2008; McDonald & Boucher, 2011; Underhill-Day, 2005).
- 5.3 These issues are relevant where the housing is in direct proximity to the edge of the European site and creates particular pressures around the periphery of the site. In general, more houses are likely to result in greater levels of impact and the impacts relate to wherever there is development close to the boundary.

Recreation

- 5.4 Increased recreation use of nearby countryside sites is related to urban growth and impacts can extend over considerable distances. We treat recreation and urban effects therefore as separate issues, though they are closely linked. Recreation involves people walking, cycling or driving to the European site for recreational activity such as dog walking, jogging, walking etc. This can lead to impacts such as disturbance to birds, trampling damage and increased fire risk. A summary of the different impacts from recreation is provided in Table 3.

Impacts to supporting habitats

- 5.5 A number of qualifying features of the South Pennine Moors SPA Phase II SPA are relatively mobile species and will use areas outside the SPA boundary. This is particularly the case with some of the wading birds such as Golden Plover and Curlew which will forage in areas outside the SPA. For example, birds nesting on the moors could use nearby pastures to feed.

- 5.6 The issues are relevant for the following species: Golden Plover, Curlew, Lapwing, Ring Ouzel and Twite. Development that affects the quality or availability of supporting habitat clearly has implications for the SPA population and has the potential to undermine the conservation objectives. Risks could include the direct loss of supporting habitat or issues such as infrastructure (power lines), lighting, disturbance, drainage that might affect the suitability for the relevant species. For example, the Supplementary Conservation Advice for the South Pennine Moors Phase II SPA recognises the extent and distribution of supporting breeding habitat for Golden Plover as an attribute and sets a target to restore the extent, distribution and availability of suitable breeding habitat for all necessary stages of its breeding cycle (courtship, nesting, feeding). The explanatory notes clearly state that the objective applies to any critical supporting habitat which is known to occur outside the site boundary. The notes state that Golden Plover may travel up to 4km from their nesting sites to feed. Marginal pastures adjacent to the SPA are also known to be likely important feeding grounds for the birds. Where this supporting habitat is regularly used and ‘functionally-linked’ to the SPA, it will be key to breeding success on the moorland.
- 5.7 The importance of functionally-linked land and a summary of relevant case law relating to the Habitats Regulations and HRAs where functionally-linked land is a consideration are provided by Chapman & Tyldesley (2016).

Evidence to underpin the zones

- 5.8 The justification for the zones defined in Policy SC8 and shown in is set out in detail within the Core Strategy HRA (Cox & Pincombe, 2014) and also set out below.
- Urban effects and the 400m zone (Zone A)*
- 5.9 The use of a 400m exclusion zone (i.e. where there is a presumption of no development) has been incorporated into a range of local authority plans to address concerns about urbanisation and urban effects directly on the periphery of European sites. For example, a 400m zone is an integral part of the mitigation package in the following locations:
- Around the Dorset Heaths²¹;
 - Across the Thames Basin Heaths (11 local planning authorities)²²

²¹ [Dorset Heaths planning framework](#)

²² [Thames Basin Heaths Delivery Framework](#)

- In the Brecks (e.g. Breckland District²³);
- Around the East Devon Pebblebed Heaths (East Devon District Council²⁴);
- Around Cannock Chase SAC (e.g. Cannock Chase Council Local Plan²⁵);
- At Ashdown Forest SPA/SAC (e.g. Wealden District's Core Strategy Local Plan)²⁶;
- At Burnham Beeches (e.g. Draft Chilterns and South Bucks Local Plan 2036)²⁷;
- At Epping Forest (e.g. Epping Forest District Local Plan submission version)²⁸

5.10 The exclusion zone provides a mechanism for the most severe impacts to be avoided and ensures protection for the European site. On the South Pennine Moors it helps reduce the scale of impacts relating to functionally-linked land, and recreation impacts, as well as resolving any risks for the wider suite of urban effects.

5.11 The exclusion is necessary as impacts tend to be more severe from development in close proximity and mitigation measures (such as access management and wardening) are likely to be less effective. For example, people living within 400m of the SPA/SAC are likely to use the Moor at a wide range of times of day (and even during the night) and potentially access it from multiple informal access points (e.g. back gardens and cut-throughs). Such use will be by people who have the greenspace literally on their doorstep – their de facto space to use and potentially seen as an extension to their garden. That use will differ from the use by people who travel to the site and make an effort to visit, potentially driving and arriving at a main car-park. Such visitors are much easier to intercept through wardening, interpretation etc. With increased risk and limited effectiveness for mitigation, adverse effects on integrity cannot be ruled out. Mitigation approaches such as alternative greenspace and wardening can be applied for development that is outside the exclusion zone with the confidence that they will work effectively.

Supporting habitat 0.4-2.5km (Zone B)

5.12 The adopted policy follows the advice of the Core Strategy HRA, and subsequent HRA work, that SPA qualifying bird features will move in and out of the European site boundary. SPA birds will regularly use habitat

²³ See 3.73 in the [Breckland Core Strategy](#)

²⁴ [East Devon Local Plan, strategy 47](#)

²⁵ See para 4.89 of [Cannock Chase Local Plan](#)

²⁶ [Wealden District Local Plan Policy EA2](#) (note this has since been withdrawn)

²⁷ Section 9.3 of the [Draft Chilterns and South Bucks Local Plan 2036](#) (note this has since been withdrawn)

²⁸ See Policy DM2 in the [Epping Forest District Local Plan submission version](#)

outside the SPA boundary, for example for additional food sources, and this habitat may therefore be of significance in maintaining SPA bird populations, i.e. it is 'functionally linked.' A zone of 2.5km is therefore referenced within the policy as a zone within which functionally linked land could be present and needs to be checked for at the development project proposal stage.

5.13 The risks are more relevant in close proximity to the SPA and therefore the 400m zone ensures a degree of protection for some of the most important supporting habitat.

5.14 Data for relevant species are summarised in Table 2, which draws on studies that give specific data on how far birds roam from moorland breeding sites. It can be seen that it is Golden Plover that are the most relevant species and most likely to be using fields well away from the moorland edge.

Table 2: Examples from the literature on the relevant species and use of wider areas during the breeding season

Species	Distance measures relating to likely use outside European site boundaries	Habitat use and other additional information	Reference
Golden Plover	Foraging birds 1.1-3.7km from nest. Fields used by foraging birds were 0.43km-2.02km from the moorland edge.	Birds breeding on moorland radio-tracked and shown to use limited number of enclosed pasture fields, selecting calcareous grassland with high earthworm density (lots of molehills), particularly large fields, away from roads.	Whittingham <i>et al.</i> (2000)
Curlew	Foraging birds using fields around 500m from moor	Larger fields preferred for foraging and those closest to the nest	Robson (1998)
Twite		1km squares around moorland edge with high percentage cover of vegetation above 5cm and where length of river or reservoir shore is large	Brown et al (1995)
Twite	Usually feed up to "several kilometres" from the nest		Langston <i>et al.</i> (2006)
Lapwing		Much lower density and levels of use on improved fields (i.e. those that were drained/fertilised/reseeded).	Baines (1988)
Ring Ouzel	Up to 500m from nest sites to feed	Breeding birds feed in short grass swards or	Burfield (2002)

Species	Distance measures relating to likely use outside European site boundaries	Habitat use and other additional information	Reference
		heather/grass mosaics with high earthworm abundance	

Recreation visits from within 7km (Zone C)

- 5.15 The Core Strategy HRA considers the data collected during visitor surveys conducted on the South Pennine Moors in 2013. Visitor survey data can help to identify the extent to which people are travelling to the European site. The 2013 data concluded that the majority of visitors were travelling under 7km, and this distance was therefore used in the Core Strategy as a ‘zone of influence’ within which additional housing may add to the visitor pressure on the moorlands.
- 5.16 A zone of influence is the zone within which it is deemed that there is an ‘influence’ or potential impact on a European site. Visitor survey work (i.e. interviewing or counting visitors, cars or dogs on the European site) is used to assess the recreation use of the site by existing visitors, and this provides a means by which predictions can be made relating to future use as a result of new housing. Common practice for mitigation strategies for European sites elsewhere is to look at the distance within which 75% of visitors are travelling to the European site, or to assess the visitor origins on a graph to see the distance at which there is a tail off of visitors, which is normally somewhere near 75% of visitors. Outliers in the survey results are often individuals on less frequent trips or holiday makers. For the 2013 survey data, there was a clear tail off at just under 7km, representing 81% of visitors.
- 5.17 Taking 7km as the zone of influence, the Core Strategy HRA concluded that measures would be required to mitigate for the recreational impact of new residential development coming forward within the 7km zone. The HRA recommended that a range of measures should be developed, the provision of alternative natural greenspace for recreation and visitor management at the European sites. These recommendations are set out within existing Core Strategy Policy SC8, and now developed in more detail within this SPD.
- 5.18 Recognising the need to regularly update the visitor survey work, Bradford Council commissioned new visitor surveys to be undertaken in 2019. This survey found that the greatest numbers of visitors to the South Pennine

Moors SPA/SAC live in close proximity to the moors, particularly those visiting from postcodes around Ilkley, Addingham, Oxenhope, Haworth and the Airedale area. 21% of visitors were walking to the moors rather than travelling by car. This visitor survey work provides information relevant to the implementation of the mitigation strategy including the key access points and car parks used, the reasons for coming to the Moors and where they go once they are there.

- 5.19 The new 2019 survey data is consistent with the 2013 data showing a tail off in visits from postcode origins over 7km. Again, this represents approximately 81% of the visitors surveyed. This gives confidence that the 7km zone of influence continues to be fit for purpose in informing the zone for this SPD. It should be noted that the COVID pandemic has resulted in a change in access patterns and for example survey results²⁹ indicate two-fifths of the population are spending more time outside than before Covid-19 and around a third of adults have been exercising more in the outdoors. There is uncertainty as to how access patterns will change in the long term and visitor data will be important to check the zones in the future.
- 5.20 The zone of influence for developer contributions nonetheless remains at 7km, in accordance with Core Strategy Policy SC8, and will be used as the policy is updated through the Local Plan Review.
- 5.21 Increased levels of recreation can undermine the conservation objectives in a range of ways. Issues are summarised in Table 3.

²⁹ December interim indicators: <https://www.gov.uk/government/statistics/the-people-and-nature-survey-for-england-monthly-interim-indicators-for-december-2020-experimental-statistics/the-people-and-nature-survey-for-england-monthly-interim-indicators-for-december-2020-experimental-statistics>

Table 3: Impact pathways on interest features (relevant to the South Pennine Moors Phase 2 SPA and South Pennine Moors SAC) potentially vulnerable to recreational pressure. Relevant months describe when the impact can occur. In source/evidence column “SIP” refers to relevant site improvement plan³⁰ produced by Natural England.

Pathway	Interest feature	Relevant months	Source/evidence	Notes
Disturbance to breeding birds	Short-eared Owl, Eurasian Curlew, Common Redshank, Whinchat, Northern Wheatear, Ring Ouzel, Twite, Dunlin, Common Sandpiper, Common Snipe, Merlin, Golden Plover, Northern Lapwing.	March-August	SIP; Lowen <i>et al.</i> (2008); Finney <i>et al.</i> (2005); Yalden (1992)	Disturbance may result in otherwise suitable habitat being unused or reduced breeding success. Impacts may extend to functionally linked land outside the SPA boundary. Damaging activities varied and potentially include dog walking, mountain biking, paragliding, model aircraft, walking etc.
Increased risk of wild fire	H4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> ; H4030 European dry heaths; H7130# Blanket bogs. Breeding bird assemblage.	All year, but particularly during dry weather	SIP; Lowen <i>et al.</i> (2008); Underhill-day (2005).	Results in long term damage to peat and vegetation. Fires during bird breeding season will result in loss of eggs and chicks as well as loss of breeding habitat. Linked to access through BBQs, discarded cigarettes, matches, campfires etc. Parked vehicles can make access difficult for emergency services. Climate change will exacerbate the risks.
Trampling damage	H4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> ; H4030 European dry heaths; H7130# Blanket bogs.	All year	SIP; Lowen <i>et al.</i> (2008).	Damage from footfall, bicycles and also motorbikes/illegal vehicles. Results in vegetation wear, ground compaction and erosion.
Challenges achieving suitable management	H4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> ; H4030 European dry heaths; H7130# Blanket bogs.	All year	SIP.	Sheep worrying, disturbance to livestock, damage to infrastructure and gates left open etc. may lead to challenges in achieving suitable grazing levels with high levels of public access.
Dog fouling	H4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> ; H4030 European dry heaths; H7130# Blanket bogs.	All year	SIP; Lowen <i>et al.</i> (2008).	Dog fouling leads to eutrophication.

³⁰ See relevant part of the [Natural England website](#)

Appendix 3: Housing totals

This appendix gives the housing totals anticipated within 7km of the South Pennine Moors SPA/SAC and therefore the level of growth that will require mitigation for recreation. The totals are a snapshot and allow a per dwelling tariff to be calculated. It is recognised that the actual levels of growth coming forward may vary and the timing of that growth also vary. The per dwelling figure ensures that an appropriate tariff is set that will ensure adequate mitigation can be delivered. It will be the role of the delivery officer and the governance group to review the money collected and future levels of growth to ensure resources are targeted appropriately.

Settlement	Adopted CS Requirement	Delivery between 2013 and 2020	Remaining requirement
Bradford			
Bradford NE (Part c. 39%)	1716	506	1210
Bradford NW (Part c. 58%)	2610	537	2073
Bradford SW (Part c. 28%)	1540	199	1341
Canal Road Corridor (Part c. 62%)	1922	299	1623
Shipley	750	210	540
<i>Total</i>	<i>8538</i>	<i>1752</i>	<i>6786</i>
Airedale			
Baildon	350	176	174
Bingley	1,400	229	1,171
Cottingley	200	35	165
East Morton	100	14	86
Keighley	4,500	826	3,674
Silsden	1,200	270	930
Steeton	700	405	295
<i>Total</i>	<i>8450</i>	<i>1955</i>	<i>6495</i>
Wharfedale			
Addingham	200	80	120
Burley-in-Wharfedale	700	103	597
Ilkley	1,000	418	582
Menston	600	52	548
<i>Total</i>	<i>2500</i>	<i>653</i>	<i>1847</i>
South Pennine Towns and Villages			
Cullingworth	350	183	167
Denholme	350	138	212
Harden	100	23	77
Haworth	400	125	275
Oakworth	200	46	154
Oxenhope	100	34	66
Queensbury	1,000	443	557

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Settlement	Adopted CS Requirement	Delivery between 2013 and 2020	Remaining requirement
Thornton	700	118	582
Wilsden	200	92	108
<i>Total</i>	<i>3400</i>	<i>1202</i>	<i>2198</i>
Overall Total	22,888	5562	17,326³¹

Draft

³¹ Remaining requirement calculated from 1st April 2020.

Appendix 4: Mitigation measures for recreation

The proposed mitigation measures and approximate costs for each are set out below.

Type of measure	Measure	Capital/ one-off Cost	Annual Cost	No. years to budget for annual cost	Total Cost	Notes on how cost calculated	Justification
Staff	Delivery Officer		£41,450	10	£414,500	Estimated at £27,000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs.	Delivery Officer potentially supervising ranger team and overseeing delivery of various mitigation elements. Dedicated post to ensure timely implementation.
	1 Ranger (full time, with education focus)		£39,400	20	£788,000	Costs per ranger would be: £24,000 annual salary, plus 35% (to cover NI, superannuation, etc.) and in addition vehicle costs and other support costs (£7000 per annum).	Ranger post, with role to work with community groups, volunteers, children. Face-face contact and on-site presence.
	1 Ranger (full time, with practical/access infrastructure focus)		£39,400	75	£2,955,000	Costs per ranger would be: £24,000 annual salary, plus 35% (to cover NI, superannuation, etc.) and in addition vehicle costs and other support costs (£7000 per annum).	Ranger post, with role to provide on-site presence and funded in the long-term.
	1 Ranger (full time, with ecological/monitoring focus)		£39,400	15	£591,000	Costs per ranger would be: £24,000 annual salary, plus 35% (to cover NI, superannuation, etc.) and in addition vehicle costs and other support costs (£7000 per annum).	As above but with more of an ecological and monitoring focus. Still providing on-site presence, liaising with public and face-face engagement.
Education & awareness raising	Audit of current signage provision	£1,500			£1,500	Undertaken by rangers, small budget to cover costs of report production.	Initial work to review current provision, identify gaps and key locations for new provision. Audit needs to check messages and branding on current signs.
	Graphic design for new interpretation and signs	£8,000			£8,000	£8,000 for design of new interpretation and messaging relating to highlighting nature conservation importance, risks of fire etc.	Following initial audit
	New interpretation boards	£20,000			£20,000	£2,000 per board for production of timber frame and graphic panel, delivery and	New interpretation will provide on-site information for all visitors.

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Type of measure	Measure	Capital/ one-off Cost	Annual Cost	No. years to budget for annual cost	Total Cost	Notes on how cost calculated	Justification
						installation. Estimate of 10 boards. Costs allowed for 1x replacement, therefore 20 total	
	New Signs, way-marking etc.	£28,000			£28,000	Cost based on 25 posts at £300 per post to cover production, delivery and installation. Treated softwood marker posts, 1.6m high with slanting top and coloured band or marking incorporated. Costs allowed for 1x replacement, therefore 50 total. Additional £500 for way-marking discs or signs made of glass reinforced plastic for longevity.	Way-marking will help focus use in particular areas.
	Awareness raising strategy	£20,000			£20,000	Estimate of consultancy costs to cover production of strategy, to include messaging for rangers, branding, communication approaches etc. Closely linked to design of interpretation (for which separate budget).	Aim of education and awareness work is to raise profile of conservation and the conservation importance of sites and ultimately lead to more engagement from public and responsible access. Potentially complex messages/issues (e.g. encompassing ecosystem services, carbon, water etc) and need to influence behaviour so approach needs to be carefully thought out.
	Development of education material for children and community group	£5,000	£1,000	20	£25,000	Estimate for resources to support educational work with community, design and printing, consultancy input working with rangers.	Some printed material to help with school visits
	Funding for schools transport		£2,300	20	£46,000	Approximately £230 per day for coach, coast assumes 10 school trips per annum	Costs for schools to reach sites often a barrier.
	BBQ guidance and leaflet for shops	£7,500			£7,500	Costs to cover design, printing, potentially posters and leaflet dispensers in shops. May be possible to update existing leaflet produced by W. Yorkshire Fire Service.	Will highlight how to use barbeque to avoid risks and where safe to use
	Social media and website	£10,000	£200	20	£14,000	Costs to cover design and annual fee for updates, hosting etc.	Simple website with gazetteer highlight where to go, particularly for dog walking and barbeques. Code of conduct etc too

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Type of measure	Measure	Capital/one-off Cost	Annual Cost	No. years to budget for annual cost	Total Cost	Notes on how cost calculated	Justification
Infrastructure, parking and travel	Review of existing greenspaces near to European sites	£10,000			£10,000	Estimated budget for consultancy support to help with identifying sites that could be improved and potential works.	Review to check existing and potential greenspace sites that could absorb recreational use and identify scope for improvement
	Enhancement of local greenspace	£500,000			£500,000	Flexible budget and notional amount to be targeted as informed by review of existing greenspaces.	Funds to implement recommendations from review
	Provision of barbeque areas	£5,000	£1,000	20	£25,000	Will require litter bins/cans for ash and emptying as part of annual cost.	Safe areas for barbeques to encourage barbeques in safe locations. Locations will need to be carefully selected and checked as risk of mixed messaging if BBQs are banned.
	Path improvements		£17,500	20	£350,000	£35m ² for hoggin surfacing; budget would allow for 0.5km of path works at £35m (estimate for hoggin surfacing) per annum.	Creation/improvement of routes within or in vicinity of SPA to draw access
	Dog bins	£2,400	£1,600	20	£34,400	£600 per bin initial cost, for timber fronted dual waste bin; £400 per bin per year to empty. 4 bins	Additional bins to minimise impacts of fouling and also encourage responsible dog walking
	Review of parking	£10,000			£10,000	One-off cost for consultancy report, all car-parks on SPA visited, plus other greenspace nearby. All parking mapped and assessed and strategic review to consider potential changes and options for charging	Will inform potential for charging and long term strategic approach to management of parking.
	Parking improvements/modifications	£100,000			£100,000	Potential for costs to be used in conjunction with revenue collected for parking charges; £100,000 would be the equivalent of 1 new car-parks with around 25 spaces. Costs anticipated to be spread more widely for more minor changes across more car-parks.	Changes to car-parks to draw visitors to particular locations, based on review
Monitoring	Review of current monitoring and monitoring strategy	£10,000			£10,000	Costs to cover consultancy support to review current monitoring and data and produce a monitoring strategy as part of the mitigation	Review would ensure future monitoring was proportionate, fit for purpose and designed to be integrated to the mitigation. For example: providing early warning of emerging issues.
	Visitor interviews	£40,000			£40,000	Estimated cost for face-face interviews with visitors at stratified sample of locations across	Face-face interviews would give home postcodes, routes walked, awareness and

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Type of measure	Measure	Capital/ one-off Cost	Annual Cost	No. years to budget for annual cost	Total Cost	Notes on how cost calculated	Justification
						relevant European sites £20,000. Budget allows for repeat survey.	motivations for visiting. Will inform mitigation work. Initial survey early on to inform potential greenspace for improvements
	Visitor numbers and activities		£5,000	20	£100,000	Monitoring involving repeated transects/car-park counts and other counts done by consultant (potential to also use wardens/volunteers and/or automated counters, depending on findings of review)	Regular monitoring to identify the spatial use of different areas and monitor change
	Recording implementation of mitigation				£0	No cost as undertaken as part of core work by delivery officer	
	Levels of new development				£0	No cost as undertaken as part of core work by delivery officer/LPAs	
	Ecological		£5,000	20	£100,000	Annual sum available for targeted monitoring/match funding as required. Potential for ranger time as additional support.	Could be targeted to recording trampling damage, mapping fires etc.
	Total				£6,197,900		
	10% Contingency				£309,895		
	Total Including contingency				£6,507,795		

Appendix 5: Summary of tariff calculations

This appendix provides a summary of the cost calculations used to derive the tariff.

Cost of mitigation measures: **£6,507,795**.

Total dwellings estimated to be coming forward: **17,326**

Cost per dwelling for mitigation: **£375.61**

Administration and Monitoring Fee

Applicants are expected to meet the Council's administration and monitoring costs associated with any drafting, checking, overseeing and approving the unilateral undertaking. This fee is in addition to the statutory planning application fee and the contribution itself and must be reasonable.

The Council has introduced a flat rate fee per application to meet the Council's administration and monitoring costs associated with any drafting, checking, overseeing and approving the unilateral undertaking. This fee is published separately on the Bradford Council website: [link](#). This fee will be subject to review annually.

Appendix 6: Mitigation Strategy Staff within the Countryside Service

Structure diagram showing an indicative location for the mitigation strategy staff within the wider Countryside Service.

Countryside & Rights of Way Structure plus Mitigation posts

