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Ilkley Neighbourhood Development Plan Preferred Options Habitats Regulations Assessment

Ilkley Parish Council

January 2019

Quality information

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1. Introduction

Background to the Project

AECOM has been appointed by Ilkley Parish Council ("the Council") to assist in undertaking a Habitats Regulations Assessment (HRA) of the potential effects of Ilkley Parish Council's Neighbourhood Development Plan (2017-2030) on the Natura 2000 Network and Ramsar sites. The objectives of the assessment are to:

- identify any aspects of the Plan that would cause a likely significant effect on Natura 2000 sites, otherwise known as European sites or internationally designated sites; and,
- to advise on appropriate policy mechanisms for delivering mitigation where such effects were identified

The HRA work undertaken to support this Neighbourhood Plan draws extensively, where appropriate, on the work undertaken for the Ilkley Neighbourhood Development Plan Strategic Environmental Assessment, Habitats Regulations Assessment Screening Report Version 1 December 2017, the Bradford Core Strategy Habitats Regulations Assessment 2015 and the consultation response from Natural England relating to the Ilkley Neighbourhood Development Plan Strategic Environmental Assessment, Habitats Regulations Assessment Screening Report Version 1 December 2017.

The HRA is required to evaluate the Likely Significant Effects (LSE) of the Ilkley Neighbourhood Development Plan Preferred Options on internationally important wildlife sites within the zone of influence, and determine if there is a relevant connecting pathway.

Neighbourhood Plans are required to be in conformity with the relevant Local Plan; in this case the current development plan for the Bradford District is the Replacement Unitary Development Plan which was adopted in October 2005. The Council's Planning Policy Team is now in the process of preparing a new Local Plan.

Neighbourhood Planning authorities have no authority to consent or refuse transport or highways schemes that fall within the remit of the local highways authority or Highways England. They can only express their support (or otherwise) for such schemes and set out their opinions in their Neighbourhood Plan. These opinions would constitute a material consideration in the planning process but the inclusion of a highways scheme in a Neighbourhood Plan is essentially on a 'for information' basis since the making of the plan could not in itself result in delivery of the road scheme. They do not therefore constitute free standing policy.

Legislation

The need for HRA is set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by the Conservation of Habitats & Species Regulations 2017 (**Box 1**), as amended late 2018. The ultimate aim of the Habitats Directive is to "*maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest*" (Habitats Directive, Article 2(2)). This aim relates to habitats and species, not the European sites themselves, although the sites have a significant role in delivering favourable conservation status. European sites (also called Natura 2000 sites) can be defined as actual or proposed/candidate Special Areas of Conservation (SAC) or Special Protection Areas (SPA). It is also Government policy for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status to Natura 2000 sites.

The Habitats Regulations applies the precautionary principle to Natura 2000 sites (SAC and SPA). As a matter of UK Government policy, Ramsar sites are given equivalent status. For the purposes of this assessment candidate SACs (cSACs), proposed SPAs (pSPAs) and proposed Ramsar (pRamsar) sites are all treated as fully designated sites. In this report we use the term "European designated sites" to refer collectively to the sites listed in this paragraph.

The Habitats Directive applies the precautionary principle to protected areas. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. This is in contrast to the SEA Directive which does not prescribe how plan or programme proponents should respond to the findings of an environmental assessment; merely that the assessment findings (as documented in the 'environmental report') should be 'taken into account' during preparation of the plan or programme. In the case of the Habitats Directive, plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

There has also been a recent change (April 13th 2018) as to which stage mitigation can be applied during a Habitats Regulations Assessment. The Court of Justice of the European Union published its ruling in the Case C323/17 (known as 'People Over Wind') with regards to the Habitats Directive. It has been the practice that mitigation or compensation measures that were part of the project/plan could be taken into account at the screening stage of a habitats regulations assessment. If such measures are seen as capable of avoiding or offsetting the adverse effects of development on a site protected by the Habitats Directive, then a finding of 'no significant effects' could be made at the screening stage, and a full HRA assessment would not be required. However, the latest judgement states that the Habitats Directive "*must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects of the plan or project on that site*". In light of this ruling, this new report has been created and contains both Screening (which looks at Likely Significant Effects) and Appropriate Assessment sections. All avoidance and reduction measures are discussed in the Appropriate Assessment section.

All the European sites mentioned in this document are illustrated in **Appendix A, Figure A1.** In order to ascertain whether or not site integrity will be affected, an Appropriate Assessment should be undertaken of the plan or project in question:

Box 1: The legislative basis for Appropriate Assessment

Habitats Directive 1992

"*Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives*."

Article 6 (3)

Conservation of Habitats and Species Regulations 2017 (as amended)

"*A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for a plan or project which -*
a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects) and
b) is not directly connected with or necessary to the management of the that site, must make an appropriate assessment of the implications for the site in view of that sites conservation objectives"

Regulation 63 (1)

Over the years the phrase 'Habitats Regulations Assessment' has come into wide currency to describe the overall process set out in the Conservation of Habitats and Species Regulations from screening through to Imperative Reasons of Overriding Public Interest (IROPI). This has arisen in order to distinguish the process from the individual stage described in the law as an 'appropriate assessment'. Throughout this report we use the term Habitats Regulations Assessment for the overall process.

Report layout

Chapter 2 of this report explains the process by which the HRA has been carried out. **Chapter 3** explores the relevant pathways of impact. **Chapter 4** undertakes the Test of Likely Significant Effects of the policies and site allocations of the Plan considered 'alone' and 'in-combination). **Chapter 5** undertakes the Appropriate Assessment 'alone' by examining in detail those policies 'screened in' and what impact pathways could lead to adverse significant effects 'alone. ' Chapter 6 examines the 'in-combination' assessment resulting from the Plan policies and other project and plans. **Chapter 7** contains the conclusion and a summary of recommendations.

Consultation

Consultation was undertaken with Natural England for the Ilkley Neighbourhood Plan Preferred Option SEA/HRA Report in December 2017. Natural England responded with a number of concerns in relation to loss of supporting habitat for South Pennine Moors (Phase II) SPA. The previous assessment stated that the impact/loss of sites could be dismissed because they were not classed as 'greenfield' sites, and also stated such impacts to the loss of supporting habitat for the aforementioned SPA could be left to the application stage.

The above concerns are being addressed in this updated HRA which assesses the updated policies (Preferred Options) of the Neighbourhood Development Plan.

2. Methodology

Introduction

This section sets out the approach and methodology for undertaking the Habitats Regulations Assessment (HRA). HRA itself operates independently from the Planning Policy system, being a legal requirement of a discrete Statutory Instrument. Therefore there is no direct relationship to the National Planning Policy Framework (NPPF) and the 'Tests of Soundness'.

A Proportionate Assessment

Project-related HRA often requires bespoke survey work and novel data generation in order to accurately determine the significance of effects. In other words, to look beyond the risk of an effect to a justified prediction of the actual likely effect and to the development of avoidance or mitigation measures.

However, the draft DCLG guidance[1] (described in greater detail later in this chapter) makes it clear that when implementing HRA of land-use plans, the Appropriate Assessment (AA) should be undertaken at a level of detail that is appropriate and proportional to the level of detail provided within the plan itself:

"The comprehensiveness of the [Appropriate] assessment work undertaken should be proportionate to the geographical scope of the option and the nature and extent of any effects identified. An AA need not be done in any more detail, or using more resources, than is useful for its purpose. It would be inappropriate and impracticable to assess the effects [of a strategic land use plan] in the degree of detail that would normally be required for the Environmental Impact Assessment (EIA) of a project."

More recently, the Court of Appeal[2] ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be "*achieved in practice"* to satisfy that the proposed development would have no adverse effect, then this would suffice. This ruling has since been applied to a planning permission (rather than a Neighbourhood Plan)[3]. In this case the High Court ruled that for "*a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of reg 61 of the Habitats Regulations"*.

In other words, there is a tacit acceptance that AA can be tiered and that all impacts are not necessarily appropriate for consideration to the same degree of detail at all tiers.

For a Neighbourhood Plan the level of detail concerning the developments that will be delivered is usually insufficient to make a highly detailed assessment of significance of effects. For example, precise and full determination of the impacts and significant effects of a new settlement will require extensive details concerning the design of the new housing sites, including layout of greenspace and type of development to be delivered in particular locations, yet these data will not be decided until subsequent stages.

The most robust and defensible approach to the absence of fine grain detail at this level is to make use of the precautionary principle. In other words, the plan is never given the benefit of the doubt (within the limits of reasonableness); it must be assumed that a policy/measure is likely to have an impact leading to a significant adverse effect upon an internationally designated site unless it can be clearly established otherwise.

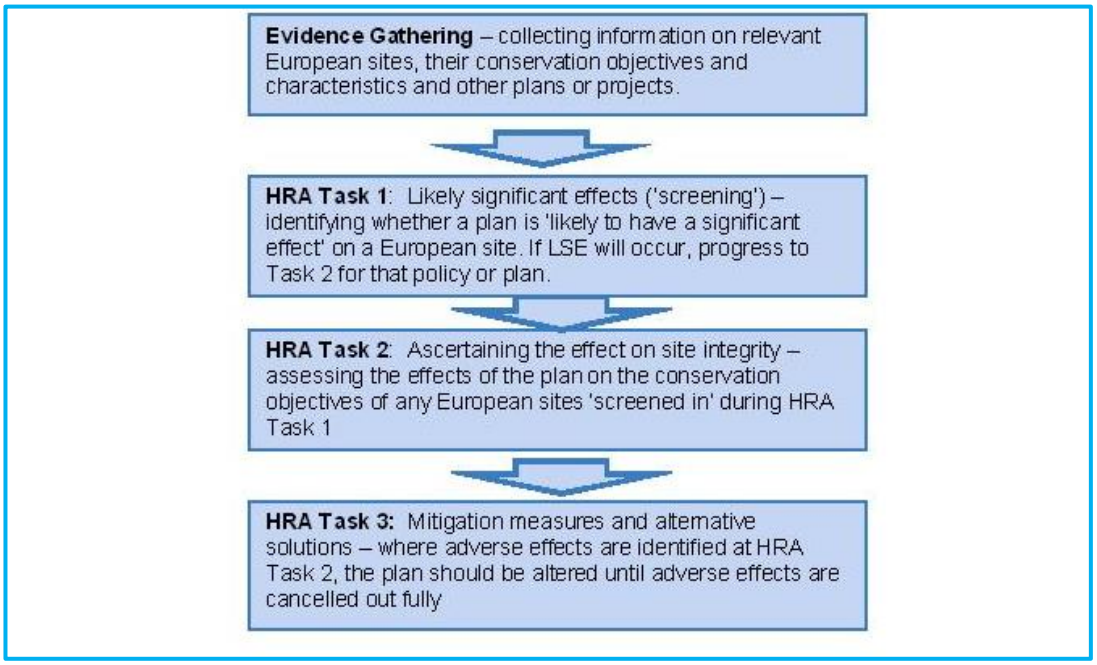
[1] DCLG (2006) Planning for the Protection of European Sites, Consultation Paper
[2] No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015
[3] High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

The Process of HRA

The HRA is being carried out in the continuing absence of formal central Government guidance. DCLG released a consultation paper on AA of Plans in 2006[4]. As yet, no further formal guidance has emerged from DCLG. However, Natural England has produced its own informal internal guidance and Natural Resources Wales has produced guidance for Welsh authorities on "*the appraisal of plans under the Habitats Regulations*" as a separate guidance document aimed at complementing and supplementing the guidance/advice provided within Technical Advice Note 5: Nature Conservation and Planning[5]. Additionally DTA Publications have produced The Habitats Regulations Assessment Handbook which reflects available HRA guidance[6]. Although there is no requirement for an HRA to follow any guidance, it has been referred to in producing this HRA.

Box 2 outlines the stages of HRA according to current draft DCLG guidance (which, as government guidance applicable to English authorities is considered to take precedence over other sources of guidance). The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan until no likely significant effects remain.

Box 2: Four-Stage Approach to Habitats Regulations Assessment



In practice, this broad outline requires some amendment in order to feed into a developing land use plan such as a Local Plan. The four staged approach shows for simplicity a basic progression from step to step, but it is quite usual for the process to be more iterative and cyclical, with each stage being fed back to the local authority to inform further amendments to the plan which are then re-assessed for implications on internationally designated sites. The following process has been adopted for carrying out the subsequent stages of the HRA.

Task One: Test of Likely Significant Effect

The first stage of any Habitats Regulations Assessment is a Likely Significant Effect test - essentially a high level risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

"*Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites*?"

[4] DCLG (2006) Planning for the Protection of European Sites, Consultation Paper
[5] Welsh Government. Technical Advice Note 5, Nature Conservation and Planning (2009) http://gov.wales/topics/planning/policy/tans/tan5/?lang=en [accessed 01/12/2016]
[6] DTA Publications (2017). The Habitats Regulations Assessment Handbook

In evaluating significance, AECOM have relied on professional judgment and experience of working with the other local authorities on similar issues. The level of detail concerning developments that will be permitted under land use plans is rarely sufficient to make a detailed quantification of effects. Therefore, a precautionary approach has been taken (in the absence of more precise data) assuming as the default position that if a likely significant effect (LSE) cannot be confidently ruled out, then the assessment must be taken the next level of assessment Task Two: Appropriate Assessment. This is in line with the April 2018 court ruling relating to 'People Over Wind' where mitigation and avoidance measures are to be included at the next stage of assessment.

Task Two: Appropriate Assessment

In light of the People Over Wind Judgement the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018 were introduced to confirm that Neighbourhood Plans that identify the need for an appropriate assessment can be '*made'*.

European Site(s) which have been 'screened in' during the previous Task will have a detailed assessment undertaken on the effect of the policies on the European Site(s) site integrity. Avoidance and mitigation measures to avoid adverse significant effects will be incorporated where necessary.

As established by case law, 'appropriate assessment' is not a technical term; it simply means whatever further assessment is necessary to confirm whether there would be adverse effects on the integrity of any European sites that have not been dismissed at screening. Since it is not a technical term it has no firmly established methodology except that it essentially involves repeating the analysis for the likely significant effects stage, but to a greater level of detail on a smaller number of policies and sites, this time with a view to determining if there would be adverse effects on integrity. For example, for the air quality pathway the appropriate assessment is where detailed traffic and air quality modelling is reported.

One of the key considerations during appropriate assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the appropriate assessment takes any policies or allocations that could not be dismissed following the high-level Screening analysis and analyse the potential for an effect in more detail, with a view to concluding whether there would actually be an adverse effect on integrity (in other words, disruption of the coherent structure and function of the European site(s)).

The Scope

There is no pre-defined guidance that dictates the physical scope of an HRA of a Local Plan. Therefore, in considering the physical scope of the assessment we were guided primarily by the identified impact pathways rather than by arbitrary "zones", i.e. a source-pathway-receptor approach. Current guidance suggests that the following European sites be included in the scope of assessment:

- All sites within the Ilkley Parish Boundary;

Briefly defined, pathways are routes by which a change in activity within the Local Plan area can lead to an effect upon a European site. In terms of the second category of European site listed above, DCLG guidance states that the AA should be "*proportionate to the geographical scope of the* [plan policy]" and that "*an AA need not be done in any more detail, or using more resources, than is useful for its purpose*" (CLG, 2006, p.6[7]).

South Pennine Moors Phase 2 Special Protection Area (SPA) and South Pennine Moors Special Area of Conservation (SAC) fall within the Ilkley Neighbourhood Plan boundary (refer to Table 1 below). Locations of European designated sites are illustrated in **Appendix A, Figure A1**, and full details of all European designated sites discussed in this document can be found in **Appendix B**. detailing their qualifying features, conservation objectives and threats to integrity.

Note that the inclusion of a European sites or pathway in the table below does not indicate that an effect is expected but rather than these are pathways for investigation.

Table 1: Physical Scope of the HRA

European Designated Site	Reason for Inclusion (Potential Impact Pathways Present)
South Pennine Moors Phase 2 Special Protection Area (SPA),	Located with the Plan Boundary. • Recreational pressure • Changes in hydraulic conditions • Loss of functionally linked land
South Pennine Moors Special Area of Conservation (SAC)	Located with the Plan Boundary. • Recreational pressure • Changes in hydraulic conditions • Atmospheric Pollution

[7] Now MHCLG

The "In Combination" Scope

It is a requirement of the Regulations that the impacts and effects of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the European designated site(s) in question. In practice, "in combination assessment" is of greatest importance when a Plan would otherwise be scoped out because the individual contribution is inconsequential. It is neither practical nor necessary to assess the "in combination" effects of the Plan within the context of all other plans and projects within the region. The principal other plans and projects considered:

For the purposes of this assessment, we have determined that, due to the nature of the identified impacts, the key other plans and projects with potential for in combination likely significant effects are those schemes that have the following impact pathways: recreational pressure, atmospheric pollution, changes in hydraulic conditions and loss of functionally linked land. The following plans have been assessed for their in combination impact to interact with the Ilkley Neighbourhood Plan Preferred Options:

- Bradford Core strategy DPD (adopted 2017)[8];
- Bradford Waste Management DPD (adopted 2017)
- Local Plan for the Bradford District Allocations Development Plan Issues and Options Wharfedale Sub Area (May 2016)
- Yorkshire Water Ltd (2018) Revised Draft Water Resources Management Plan.[9]

When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plans which in themselves have minor impacts are not simply dismissed on that basis, but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential. The overall approach is to exclude the risk of there being unassessed likely significant effects in accordance with the precautionary principle. This was first established in the seminal Waddenzee[10] case.

For the purposes of this assessment, we have determined that, due to the nature of the identified impacts, the key plans and projects that are likely to result in "in-combination" effects with the Plan relate to additional housing and allocations proposed for neighbouring settlements. Table 2 shows the net total number of homes which are expected to be built from valid planning permissions within the district of Bradford. The table only includes sites which have current planning permission and are either at least 0.20ha in size or are for at least 5 units. Based on the initial calculations provided in the table, all settlements have a shortfall of planned new homes even where permissions are already in place and as such further new sites will need to be allocated[11].

[8] The Bradford Core Strategy is currently commencing a partial review. However, all that is currently publically available is a Scoping Report. The actual Core Strategy review will emerge in due course.

[9] https://www.yorkshirewater.com/sites/default/files/Revised%20Draft%20Water%20Resources%20Management%20Plan%202019.pdf

[10] ***Waddenzee*** case (Case C-127/02, [2004] ECR-I 7405)

[11] *Bradford Interim Land Supply Update Document (May 2018)*

Table 2: Housing to be delivered within the district of Bradford under most recent published proposals (housing numbers may be subject to change)

Location	Core Strategy Apportionment
Regional City	***21,500***
North East	4,400
North West	4,500
South East	6,000
Shipley	750
South West	5,500
Principal Towns	***6,900***
Bingley	1,400
Ilkley	1,000
Keighley	4,500
Local Growth Centres	***4,900***
Burley	700
Mentions	600
Queensbury	1000
Silsden	1200
Steeton	700
Thornton	700
Local Service Centres	***2,550***
Addingham	200
Baildon	350
Cottingley	200
Cullingworth	350
Denholme	350
East Morton	100
Haworth	400
Harden	100
Oakworth	200
Oxenhope	100
Wilsden	200

Source: *Taken from Bradford Interim Land Supply Update Document (May 2018)*

It should be noted that, while the broad potential impacts of these other projects and plans will be considered, a full HRA is not carried out on each of these plans – the assessment does, however, draw upon existing HRA that have been carried out for surrounding regions and plans.

3. Pathways of Impact

The following indirect pathways of impact are considered relevant to the HRA of the Plan:

- Recreational pressure and disturbance
- Atmospheric Pollution
- Loss of functionally linked land outside of the European Site
- Human induced changes in hydraulic conditions

Recreational Pressure and Disturbance

Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily and the time they spend responding to disturbance is time that is not spent feeding (this will apply all year round)[12]. Disturbance therefore risks increasing energetic output while reducing energetic input, which can adversely affect the "condition" and ultimately survival of the birds. In addition, displacement of birds from one feeding site to others can increase the pressure on the resources available within the remaining sites, as they have to sustain a greater number of birds[13]. Moreover, the more time a breeding bird spends disturbed from its nest, the more its eggs are likely to cool and the more vulnerable they, or any nestlings, are to predators.

Research into the effects of urban development on southern lowland heathlands has identified a number of pressures that threaten their habitat condition, arising from a range of factors that have been reviewed by a number of studies. Visitors surveys have revealed how much the open, remote and natural features of lowland heathland are appreciated by the local population and make them attractive for a range of recreational uses, particularly walking and dog walking although horse riding, cycling, jogging, picnicking and bird watching are also identified as regular activities Clarke et al., 2006, Liley et al., 2006, Pincombe & Smallbone, 2009a&b).

The potential for disturbance may be less in winter than in summer, in that there are often a smaller number of recreational users. In addition, the consequences of disturbance at a population level may be reduced because birds are not breeding. However, activity outside of the summer months can still cause important disturbance, especially as birds are particularly vulnerable at this time of year due to food shortages. Disturbance which results in abandonment of suitable feeding areas can have severe consequences for those birds involved and their ability to find alternative feeding areas. Several empirical studies have, through correlative analysis, demonstrated that out-of-season (October-March) recreational activity can result in quantifiable disturbance:

Tuite et al[14] found that during periods of high recreational activity, bird numbers at Llangorse Lake decreased by 30% as the morning progressed, matching the increase in recreational activity towards midday. During periods of low recreational activity, however, no change in numbers was observed as the morning progressed. In addition, all species were found to spend less time in their 'preferred zones' (the areas of the lake used most in the absence of recreational activity) as recreational intensity increased;

Underhill et al[15] counted waterfowl and all disturbance events on 54 water bodies within the South West London Water Bodies Special Protection Area and clearly correlated disturbance with a decrease in bird numbers at weekends in smaller sites and with the movement of birds within larger sites from disturbed to less disturbed areas;

[12] Riddington, R. *et al*. 1996. The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* 43:269-279

[13] Gill, J.A., Sutherland, W.J. & Norris, K. 1998. The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* 12: 67-72

[14] Tuite, C. H., Owen, M. & Paynter, D. 1983. Interaction between wildfowl and recreation at Llangorse Lake and Talybont Reservoir, South Wales. *Wildfowl* 34: 48-63

[15] Underhill, M.C. et al. 1993. Use of Waterbodies in South West London by Waterfowl. An Investigation of the Factors Affecting Distribution, Abundance and Community Structure. Report to Thames Water Utilities Ltd. and English Nature. Wetlands Advisory Service, Slimbridge

Human activity can affect birds either directly (e.g. through causing them to flee) or indirectly (e.g. through damaging their habitat). The most obvious direct effect is that of immediate mortality such as death by shooting, but human activity can also lead to behavioural changes (e.g. alterations in feeding behaviour, avoidance of certain areas *etc.*) and physiological changes (e.g. an increase in heart rate) that, although less noticeable, may ultimately result in major population-level effects by altering the balance between immigration/birth and emigration/death[16].

The degree of impact that varying levels of noise will have on different species of bird is poorly understood except that a number of studies have found that an increase in traffic levels on roads does lead to a reduction in the bird abundance within adjacent hedgerows - Reijnen et al (1995) examined the distribution of 43 passerine species (i.e. 'songbirds'), of which 60% had a lower density closer to the roadside than further away. By controlling vehicle usage they also found that the density generally was lower along busier roads than quieter roads[17].

Other Disturbing activities are on a continuum. The most disturbing activities are likely to be those that involve irregular, infrequent, unpredictable loud noise events, movement or vibration of long duration. Birds are least likely to be disturbed by activities that involve regular, frequent, predictable, quiet patterns of sound or movement or minimal vibration. The further any activity is from the birds, the less likely it is to result in disturbance.

Haworth, P.F etal 1990[18] found short-eared owls *Asio flammeus* appeared to prefer parts of the study area frequented by gamekeepers, possibly because keepers' activities enhanced the prey supply. The paper also found breeding short-eared owls are insensitive to disturbance; an incubating bird often stays sitting on eggs or small young even when an observer is very near.

Ruddock, M. and Whitfield, D.P., 2007[19] found that despite being comparatively well-studied regarding ecology and behaviour, surprisingly little has been published on the effects of human disturbance on merlin *Falco columbarius*. Recreational facilities e.g. camping and picnic areas can displace merlins from breeding territories (James et al. 1989). Flushing distances of wintering birds ranged from 17 – 180 m for pedestrian disturbance and from 44 – 85 m in response to vehicles (Holmes et al. 1993). In excess of 90% of birds flushed to pedestrians whilst only 38% flushed to vehicles.

Pearce-Higgins, J.W., etal 2007 found that, although relatively insensitive to disturbance during incubation, golden plovers *Pluvialis apricaria* exhibit a strong behavioural response to disturbance when guarding chicks, when the adults alarm call in response to human intrusions within 200 m (Yalden & Yalden 1989a, 1990). Consequently, pairs with chicks utilized suitable habitat within 200 m of the Pennine Way at a lower rate than surrounding areas (Finney et al. 2005). However, this avoidance was dependent upon human behaviour, being maximized when the footpath was eroded and the movement of people widespread and unpredictable, but was reduced to 50-m avoidance following resurfacing of the Pennine Way with flagstones, after which over 96% of walkers remained on the path (Pearce-Higgins & Yalden 1997, Finney et al. 2005). Thus, although high levels of disturbance can negatively impact upon habitat utilization by upland waders, it is possible to mitigate such detrimental effects where they occur through appropriate footpath management.

[16] Riley, J. 2003. Review of Recreational Disturbance Research on Selected Wildlife in Scotland. Scottish Natural Heritage.
[17] Reijnen, R. et al. 1995. The effects of car traffic on breeding bird populations in woodland. III. Reduction of density in relation to the proximity of main roads. Journal of Applied Ecology 32: 187-202
[18] Haworth ,, F. and Thompson, D.B.A., 1990. Factors associated with the breeding distribution of upland birds in the South Pennines, England. Journal of Applied Ecology, pp.562-577
https://www.jstor.org/stable/pdf/2404302.pdf?refreqid=excelsior%3A37ee9f650b75ff31faea95fceb00f1b8
[19] Ruddock, M. and Whitfield, D.P., 2007 A review of disturbance distances in selected bird species. A report from Natural Research (Projects) Ltd to Scottish Natural Heritage, p.181.
https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010038/EN010038-000953-First%20round%20of%20Question%20responses%20from%20C.gen%20Killingholme%20Ltd%20(Habitats,%20Ecology%20and%20Nature%20conservation%201%20of%202),%20appendix%20H18_APP%201.pdf.PDF

Atmospheric pollution

The main pollutants of concern for European sites are oxides of nitrogen (NOx), ammonia (NH3) and sulphur dioxide (SO_2). NOx can have a directly toxic effect upon vegetation. In addition, greater NOx or ammonia concentrations within the atmosphere will lead to greater rates of nitrogen deposition to soils. An increase in the deposition of nitrogen from the atmosphere to soils is generally regarded to lead to an increase in soil fertility, which can have a serious deleterious effect on the quality of semi-natural, nitrogen-limited terrestrial habitats.

Table 3: Main sources and effects of air pollutants on habitats and species

Pollutant	Source	Effects on habitats and species
Acid deposition	SO_2, NOx and ammonia all contribute to acid deposition. Although future trends in Sulphur (S) emissions and subsequent deposition to terrestrial and aquatic ecosystems will continue to decline, it is likely that increased Nitrogen (N) emissions may cancel out any gains produced by reduced S levels.	Can affect habitats and species through both wet (acid rain) and dry deposition. Some sites will be more at risk than others depending on soil type, bed rock geology, weathering rate and buffering capacity.
Ammonia (NH_3)	Ammonia is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but levels have increased considerably with expansion in numbers of agricultural livestock. Ammonia reacts with acid pollutants such as the products of SO_2 and NO_X emissions to produce fine ammonium (NH_4+) containing aerosol which may be transferred much longer distances (can therefore be a significant trans-boundary issue.)	Adverse effects are as a result of nitrogen deposition leading to eutrophication. As emissions mostly occur at ground level in the rural environment and NH_3 is rapidly deposited, some of the most acute problems of NH_3 deposition are for small relict nature reserves located in intensive agricultural landscapes.
Nitrogen oxides NO_x	Nitrogen oxides are mostly produced in combustion processes. About one quarter of the UK's emissions are from power stations, one-half from motor vehicles, and the rest from other industrial and domestic combustion processes.	Deposition of nitrogen compounds (nitrates (NO_3), nitrogen dioxide (NO_2) and nitric acid (HNO_3)) can lead to both soil and freshwater acidification. In addition, NO_x can cause eutrophication of soils and water. This alters the species composition of plant communities and can eliminate sensitive species.
Nitrogen (N) deposition	The pollutants that contribute to nitrogen deposition derive mainly from NO_X and NH_3 emissions. These pollutants cause acidification (see also acid deposition) as well as eutrophication.	Species-rich plant communities with relatively high proportions of slow-growing perennial species and bryophytes are most at risk from N eutrophication, due to its promotion of competitive and invasive species which can respond readily to elevated levels of N. N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.
Ozone (O_3)	A secondary pollutant generated by photochemical reactions from NO_x	Concentrations of O_3 above 40 ppb can be toxic to humans and wildlife,

	and volatile organic compounds (VOCs). These are mainly released by the combustion of fossil fuels. The increase in combustion of fossil fuels in the UK has led to a large increase in background ozone concentration. Reducing ozone pollution is believed to require action at international level to reduce levels of the precursors that form ozone.	and can affect buildings. Increased ozone concentrations may lead to a reduction in growth of agricultural crops, decreased forest production and altered species composition in semi-natural plant communities.
Sulphur Dioxide SO_2	Main sources of SO_2 emissions are electricity generation, industry and domestic fuel combustion. May also arise from shipping and increased atmospheric concentrations in busy ports. Total SO_2 emissions have decreased substantially in the UK since the 1980s.	Wet and dry deposition of SO_2 acidifies soils and freshwater, and alters the species composition of plant and associated animal communities. The significance of impacts depends on levels of deposition and the buffering capacity of soils.

Sulphur dioxide emissions are overwhelmingly influenced by the output of power stations and industrial processes that require the combustion of coal and oil as well as (particularly on a local scale) shipping.

Ammonia emissions are dominated by agriculture, with some chemical processes also making notable contributions. As such, it is unlikely that material increases in SO_2 or NH_3 emissions will be associated with Local Plans. NOx emissions, however, are dominated by the output of vehicle exhausts (more than half of all emissions). Within a 'typical' housing development, by far the largest contribution to NOx (92%) will be made by the associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison[20]. Emissions of NOx could therefore be reasonably expected to increase as a result of greater vehicle use as an indirect effect of the Local Plan.

According to the World Health Organisation, the critical NOx concentration (critical threshold) for the protection of vegetation is 30 μgm^{-3}; the threshold for sulphur dioxide is 20 μgm^{-3}. In addition, ecological studies have determined "critical loads"[21] of atmospheric nitrogen deposition (that is, NOx combined with ammonia NH_3). These are bespoke to particular habitats are available on the Air Pollution Information System apis.ac.uk.

Local air pollution

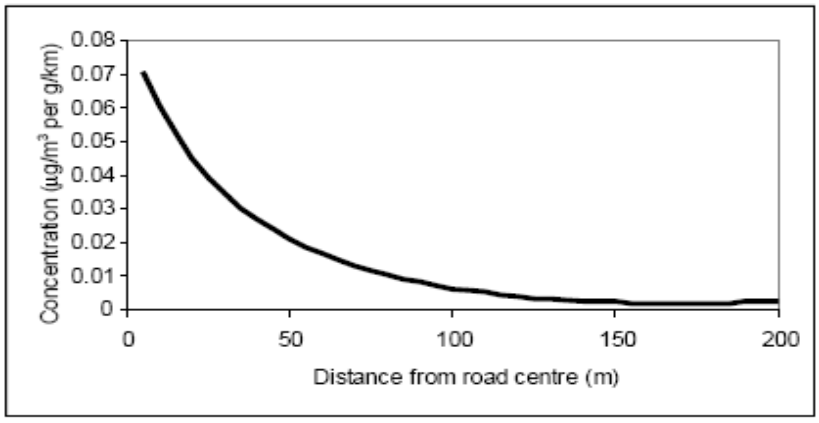
None of the allocations in the Ilkley Neighbourhood Plan are of an industrial nature. Industrial developments that would constitute significant 'point source' emitters (e.g. pig farms, Energy from Waste facilities, smelting works, power stations etc.) are not allocated via the Local Plan process. Such facilities would need to obtain a permit from the Environment Agency before they were allowed to operate and could not obtain that permit if they posed a risk of an adverse effect on a European site. The Ilkley Neighbourhood Plan HRA thus focuses on vehicle exhaust emissions as this is the only potentially significant source of emissions from the type of development allocated in the Local Plan.

According to the Department of Transport's Transport Analysis Guidance, "*Beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant*"[22]. This is because traffic exhausts are situated only a few inches above the ground and are horizontal to it, such that the vast majority of emitted pollutants are never dispersed far and are very quickly deposited.

[20] Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. http://www.airquality.co.uk/archive/index.php
[21] The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur
[22] www.webtag.org.uk/archive/feb04/pdf/feb04-333.pdf

This distance is also related to the mix of the exhaust gases, the small dimension of the exhausts and the velocity of the exhaust gases leaving the exhaust.

Figure 1: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT)



This is therefore the distance that has been used throughout this HRA in order to determine whether European sites are likely to be significantly affected by traffic generated by development under the Plan

Loss of Functionally Linked Land Outside of the European Site Boundary

While most European sites have been geographically defined in order to encompass the key features that are necessary for coherence of their structure and function, this is not the case for all such sites. Due to the highly mobile nature of wildfowl and waterfowl, it is inevitable that areas of habitat of crucial importance to the maintenance of their populations are outside the physical limits of the European site for which they are an interest feature. However, this area will still be essential for maintenance of the structure and function of the interest feature for which the site was designated and land use plans that may affect this land should still therefore be subject to further assessment.

The South Pennine Moors Phase (II) SPA qualifying features breeding short eared-owl *Asio flammeus*, merlin *Falco columbarius*, or European golden plover *Pluvialis apricaria.* These bird species breed and forage/feed in moorland/heathland habitat. Whilst these species may also forage/ feed away from the moorland during the breeding season, short-eared owl will feed over pastoral land, and both merlin and golden plover feed upon farmland or in-bye land (meadows rich in invertebrates) on the edge of the moors that is outside of the SPA boundary.

The South Pennine Moors (Phase II) SPA also supports a breeding bird assemblage including the following species all of which breed and forage/feed in the moorland/heathland habitat: These species may also forage/feed away from the SPA. Details of the feeding habitats of each species within the breeding assemblage are provided below:

- Dunlin *Calidris alpina schinzii,* Adults forage on boggy areas or areas with standing water with a high abundance of insect prey. Suitable areas for foraging are therefore, likely to occur on areas of moorland or bog and not managed pastoral land. Breeding dunlin is characteristic of moorland and upland habitat.
- Twite *Carduelis flavirostris*, Feeds on small seeds and invertebrates during the breeding season. Forages low to the ground, often in small groups, in open areas of pasture and cultivation (Snow & Perrins, 1998). In-bye land is important for nesting twite.
- Snipe *Gallinago gallinago,* Adults feed predominantly on wet ground at the edge of water or wet areas, taking items from below the surface through probing. Foraging areas, therefore, need to be sufficiently wet to enable birds to feed on invertebrate prey just below the surface by probing. Snipe may utilise in-bye land for feeding and in some instances for breeding.

- Curlew *Numenius arquata,* Feeds on a wide range of invertebrates using several techniques. Open habitats supporting good populations of invertebrates, typically extensive areas of damp grassland and rough pasture, are favoured (Snow & Perrins, 2008).
- Wheatear *Oenanthe oenanthe*, Primarily feeds on spiders and other small invertebrates, locating prey visually, chiefly on the ground or in low vegetation (Snow & Perrin, 1998). Wheatear nest in areas of short sheep - or rabbit-grazed - grassland where there is an abundance of grass root caterpillars. They build their nest under rocks, mountain screes or holes in stone walls
- Whinchat *Saxicola rubetra*, Foraging distances tend to relate to the availability of invertebrate prey but tend to be greater in intensively managed farmland (Britschgi, 2005).
- Redshank *Tringa totanus,* When breeding, the diet consists of insects, spiders and annelid worms (del Hoyo et al., 1996). Areas which are rich in these food items are therefore sought for foraging and include areas with a mosaic of vegetation structure.
- Lapwing *Vanellus vanellus* Adults forage in short swards are the most profitable foraging habitat for this species (Devereux et al. 2004) and the application of cattle-grazing (Olsen and Schmidt, 2004), preferably intensively (e.g. > 1 cow per hectare), may be successful in increasing abundances of the species on grasslands.

Human Induced Changes in Hydrological Conditions

Mires and Bogs are sensitive to changes in hydrology and maintenance of natural regimes, water quality, and avoidance of water table lowering are important factors. Areas that have suffered previous damaging activities require enhancement including re-vegetation of bare peat, increased vegetational diversity in response to past heavy sheep grazing and a reduction of erosion through gullying[23].

Changes in hydrological conditions that could affect the South Pennine Moors SAC habitats brought about by additional housing requirements would be through increased water demand and its potential abstraction from reservoirs within the SPA/SAC. Reduction in water levels/ changes in the water table could affect the following habitats within the SAC: blanket bogs (* if active bog); Northern Atlantic wet heaths with *Erica tetralix*; and transition mires and quaking bogs.

[23] https://www.highpeak.gov.uk/media/960/Habitats-regulation-screening-assessment-March-2010/pdf/Habitats_Regulation_Assessment_March_2014.pdf

4. Test of Likely Significance

Introduction

The initial scoping of European designated sites illustrated in **Table 1** identified that the South Pennine (Phase II) Moors SPA is potentially vulnerable to:

- Recreational pressure
- Changes in hydraulic conditions and
- Loss of functionally linked land

And the South Pennine Moors SAC is potentially vulnerable to:

- Recreational pressure
- Changes in hydraulic conditions; and
- Atmospheric pollution

The full Test of Likely Significant Effects for the Ilkley Neighbourhood Plan policies is presented both alone and in-combination in **Appendix C.** The assessment took into consideration the above potential vulnerabilities of the both the SPA and the SAC.

Appendix D, contains the detailed assessment for housing site allocations for Plan Policy INDP2 (INDP2/1, 2/2, 2/3 and 2/4), and employment land allocation for Plan Policy INDP 22 (INDP22/1). The site allocations and employment land allocation have each been assessed both alone an in-combination Figure A2 provides the location of the housing site allocations and the employment land allocation in context with the European Sites.

Summary of Results for Test of Likely Significance

Of the twenty three Plan policies, twenty two have been screened out as having no likely significant effects alone or in-combination on either the South Pennine (Phase II) Moors SPA or the South Pennine Moors SAC.

The remaining Plan policy - INDP2 Housing Site Allocation - has been screened in as having Likely Significant Effects alone and in- combination, with potential pathways including:

- Recreational pressure (to both the South Pennine (Phase II) Moors SPA and the South Pennine Moors SAC.)
- Human induced changes in hydraulic conditions (to both the South Pennine (Phase II) Moors SPA and the South Pennine Moors SAC.)

All INDP2 site allocations (INDP2/1, 2/2, 2/3 and 2/4) have been screened in both alone and in-combination for the following pathways: recreational pressure and human induced changes in hydraulic conditions and will therefore be discussed further in the appropriate assessment.

All INDP2 site allocations have been screened out for the following pathways both alone and in-combination and will not be taken to Appropriate Assessment: atmospheric pollution, and loss of functionally linked land for non-breeding SPA birds.

5. Appropriate Assessment 'Alone'

Introduction

This chapter presents a detailed assessment of the European designated sites, and the impact pathways associated with the Site Allocations Policy INDP2 screened in during the Test of Likely Significant Effects. This section determines any adverse effects on integrity 'alone' on the South Pennine (Phase II) Moors SPA and South Pennine Moors SAC in relation to recreational pressure and human induced changes in hydrological conditions.

South Pennine (Phase II) Moors SPA

The Test of Likely Significance found that Plan policy INDP2 could have likely significant effects on the qualifying features of SPA due to both:

- Recreational Pressure; and
- Human induced changes in hydrological conditions.

Recreational Pressure- Alone

There are a large range of activities that occur in habitats where breeding and foraging birds are present which include; walking, and dog walking, bird watching, cycling, running, and horse-riding for example. These recreational activities can cause direct disturbance to breeding birds causing them to abandon their eggs, also trampling of eggs and nests, displacement of birds (including breeding and non-breeding birds) from areas with high levels of disturbance; and increased risk of accidental or intentional fire.

Increasing recreational pressure is thought (Lilley 2003, Underhill-Day 2005 etc.) to increase the exposure of Annex 1 birds (The Birds Directive) to disturbance, whilst increased damage to habitats may occur through trampling, soil compaction, erosion and nutrient enrichment. Other human-induced impacts frequently associated with sites at or close to the urban edge, the frequency of which may also increase through urbanisation as a result of the Neighbourhood Plan Policy INDP2, include fly-tipping, wildfire and arson, invasive species, and use of off-road vehicles.

The Pennine Moors are subject to a wide range of recreational effects. These are reviewed in the 1998 South Pennine Moors Integrated Management Strategy and Conservation Action Programme and include; walking (with & without dogs), horse-riding, cycling/mountain biking, hang gliding (particularly at breeding sites or seasons), rock climbing, model aircraft flying, orienteering, large walking events, fell running, off-road driving (including 4x4 & scrambling), grouse shooting and angling. The Strategy considered that "*these activities may have significant localised impacts, and have the potential to have wider conservation implications. Plans to extend or develop recreational activities in the area must be accompanied by appropriate assessment and monitoring*."

In relation to visitor activity research into the effects of urban development on southern lowland heathlands, it has been that identified a number of pressures that threaten their habitat condition, arising from a range of factors that have been reviewed by a number of studies. The Bradford Core Strategy HRA (2015) found visitors surveys revealed how much the open, remote and natural features of these lowland heathland are appreciated by the local population and make them attractive for a range of recreational uses, particularly walking and dog walking although horse riding, cycling, jogging, picnicking and bird watching are also identified as regular activities (see for example Clarke et al., 2006, Liley et al., 2006, Pincombe & Smallbone, 2009a&b).

The impacts of recreational access on birds of prey are difficult to assess as they exist at low densities and will select nest sites in secluded locations away from human disturbance. There is likely to be a critical threshold level of disturbance above which they will be unable to utilise an area of moorland for nesting. Ground nesting birds of prey such as merlin and short-eared owl are likely to be particularly vulnerable to such disturbance.

Ground nesting merlins may have a reduced detection capability for sources of disturbance, with tree nesting birds likely to detect disturbance at greater distance. Despite a likely improved detection capability, however, once human activity is detected tree-nesting birds may respond at shorter distances as some studies have shown birds at a higher elevation appear to have a shorter response threshold (e.g. Watson & Pierce 1998, although see González et al. 2006). However, that, like most other raptors, if previously exposed to relatively innocuous disturbance merlins are capable of developing a tolerance to relatively high levels of at least some forms of human disturbance when free from direct interference. Tree nesting merlins rely on abandoned nests of other species with a limited lifespan which suggests that long-term management of populations may not be best served by simple 'no-cut' zones as the sole forestry policy.

W. Yalden & Patricia E. Yalden (1989) investigated the sensitivity of breeding golden plovers to human intruders. The paper revealed that the anxious calling (alarming) used by golden plovers when they are guarding their chicks was exploited to determine the distance at which they are sensitive to human intruders. It was concluded that golden plovers are likely to alarm at any human within 200 m during the chick-rearing phase of their breeding cycle. The alarming behaviour must itself cost energy, and reduce the time for feeding, preening or resting for example. It may prevent the chicks from feeding, because they hide in response to alarm calls, and it certainly prevents the adults from brooding their chicks, which could be particularly serious in wet weather. There may be some risk that persistent alarming attracts the attention of real predators, such as mustelids, raptors or corvids, and increases the likelihood of parents losing their chicks (which scatter in response to the alarm calls). golden plover, react at a considerable distance, which means that their chicks are left unbrooded and reliant on their own camouflage. This active defence by the adults might be very effective against mammalian predators—dogs certainly are likely to be led away by the adults. As a reaction to a regular stream of hikers passing along a moorland path, not actually interested in the birds, it seems ill-adapted.

Finney et al, 2005 investigated effects of recreational disturbance on upland breeding birds including golden plovers. Data collected over 13 years was examined to investigate the impact of recreational disturbance on the distribution and reproductive performance of golden plovers breeding in close proximity to the Pennine Way, an intensively used long-distance footpath. Importantly, the Pennine Way was resurfaced in 1994 to prevent further erosion of the surrounding vegetation and therefore Finney et al were able to examine if the response of golden plovers to recreational disturbance was influenced by changes in the intensity and extent of human activity resulting from the resurfacing work. Before the Pennine Way was resurfaced, golden plovers avoided areas within 200 m of the footpath during the chick-rearing period. At this time over 30% of people strayed from the footpath and the movement of people across the moorland was therefore widespread and unpredictable. Following resurfacing, over 96% of walkers remained on the Pennine Way, which significantly reduced the impact of recreational disturbance on golden plover distribution; golden plovers only avoided areas within 50 m of the footpath at this time. Despite the clear behavioural responses of golden plovers to the presence of visitors, there was no detectable impact of disturbance on reproductive performance. In many countries, a conflict arises between the use of the countryside for recreational purposes and the protection of habitats or species of high conservation value.

Whilst the Finney et al 2005 study was carried out on different moorland, the context is the same with the Pennine Moors. Therefore taking this into consideration, the findings indicate that on well-used unsurfaced access routes across the Pennine Moors there is likely to be an avoidance by breeding golden plover and potentially other waders. The width of this disturbance zone can be as much as 400m (200m either side of the path). This effect was studied in relation to golden plover, the most numerous species for which the South Pennine Moors (Phase II) SPA has been selected. However, it is also likely to affect other ground nesting birds, such as dunlin and curlew, in similar ways.

Dog walking has been shown to be a popular reason to visit the Pennine Moors and according to the 2013 visitor surveys 77% of the people surveyed let their dogs off the lead. In accordance with the Bradford Core Strategy HRA (2015) dogs have been recorded preying on ground nesting birds and studies have shown a variety of bird species being flushed from their nest by dogs. Studies have also shown birds to be warier of dogs and people with dogs than people alone, with birds flushing (flying away) more readily, more frequently and at greater distances, and staying longer off the nest when disturbed (Murison, 2002). Dogs also chase and worry livestock. As a consequence, conservation grazing schemes can be affected due to graziers not being prepared to graze sites with open access to dog walkers (Underhill-Day, 2005).

The housing site allocations are all within 2 miles (3km) of the South Pennine Moors SAC and South Pennine Moors (Phase II) SAC. The total amount of housing being allocated 113 dwellings is small-scale, leading to a small rise in the population of Ilkley. As such it is considered unlikely that this development would lead to adverse effects to the qualifying features of the South Pennine Moors (Phase II) SPA through recreational pressure 'alone'. However, consideration is also required of the potential impact in combination with growth throughout Bradford and surrounding the SPA.

Human Induced Changes in Hydrological Conditions- Alone

Changes in hydrological conditions that could affect the SPA bird species and assemblages brought about by additional housing requirements would be through increased water demand and it potential abstraction from reservoirs within the SPA/SAC. Reduction in water levels/ changes in the water table could affect damp/wet/ boggy areas of the SPA some of which is required for foraging of a number of the bird species included in the SPA designation and include: dunlin, snipe, and curlew. However, due to the low numbers of housing included this this Policy (113 dwellings, hence small/scale) it is unlikely that alone this would cause the requirement for increased demand that would lead to adverse effects on the SPA alone. However, this pathway is discussed further in-combination in Section 6.

South Pennine Moors SAC

The initial scoping of European designated sites illustrated in **Table 1** identified that the South Pennine Moors SAC is potentially vulnerable to:

- Recreational Pressure
- Human Induced Changes in Hydrological Conditions

Recreational Pressure- Alone

In relation to visitor activity research into the effects of urban development on southern lowland heathlands has identified a number of pressures that threaten their habitat condition, arising from a range of factors that have been reviewed by a number of studies. Visitors surveys have revealed how much the open, remote and natural features of these lowland heathland are appreciated by the local population and make them attractive for a range of recreational uses, particularly walking and dog walking although horse riding, cycling, jogging, picnicking and bird watching are also identified as regular activities (see for example Clarke et al., 2006, Liley et al., 2006, Pincombe & Smallbone, 2009a&b). These trends are reflected in surveys of visitors to the South Pennine Moors SPA/SAC undertaken and outlined above in the South Pennine Moors (Phase II) SPA section

Increasing recreational pressure is thought (Lilley 2003, Underhill-Day 2005 etc.) to increase the exposure of Annex 1 birds (The Birds Directive) to disturbance, whilst increased damage to habitats may occur through trampling, soil compaction, erosion and nutrient enrichment. Other human-induced impacts frequently associated with sites at or close to the urban edge, the frequency of which may also increase through urbanisation as a result of the Neighbourhood Plan Policy INDP2, include fly-tipping, wildfire and arson, invasive species, and use of off-road vehicles. Rombalds and Ilkley Moors, an isolated patch of SAC/SPA in the north of district, appear particularly vulnerable to this range of impacts, given their size and relative proximity to urban areas on all sides.

Erosion from increased recreational use of tracks and paths in the SAC has significant potential to cause damage to both heathland and blanket bog habitats. The increased risk of fire to the SAC from

greater urbanisation of the moorland edge poses a potentially significant impact upon heathland and blanket bog (*priority feature*) habitats. Other studies have shown dog fouling, linked to impacts of trampling and increases in the number of visitors accompanied by dogs, to cause changes in heathland vegetation with a reduction in heather and increase in grass abundance due to the effects of nutrient enrichment (eutrophication). These effects are only likely to occur locally and not to the extent where the qualifying features are adversely affected. According to the Bradford Core Strategy HRA 2015 fire mapping data has shown the current relatively high levels of fire associated with the most urban moors such as Ilkley Moor. It states that research indicates that heathland vegetation takes between 4 and 20 years to recover and that fire events present a serious risk to ecological integrity. In relation to fly-tipping (domestic, garden and commercial), any development near to the SAC or with easy access to car parks on the moorland fringe has the potential to result in damage to SAC habitats from introduced invasive species.

There is a risk of loss of Annex 1 habitat extent, structure and function due to increased recreational use and consequent erosion and trampling, an increased threat of fire and risks from the consequences of fly-tipping and invasion of alien species.

The housing site allocations are all within 2 miles (3km) of the South Pennine Moors SAC and South Pennine Moors (Phase II) SAC. The total amount of housing being allocated 113 dwellings is small-scale, leading to a small rise in the population of Ilkley. As such it is considered unlikely that this development would lead to adverse effects to the qualifying features of the South Pennine Moors SAC through recreational pressure 'alone'. However, consideration is also required of the potential impact in combination with growth throughout Bradford and surrounding the SAC.

Human Induced Changes in Hydrological Conditions- Alone

Changes in hydrological conditions that could affect the SAC habitats brought about by additional housing requirements would be through increased water demand and its potential abstraction from reservoirs within the SPA/SAC. Reduction in water levels/ changes in the water table could affect the following habitats within the SAC: blanket bogs (* if active bog); Northern Atlantic wet heaths with *Erica tetralix*; and transition mires and quaking bogs. However, due to the low numbers of housing (small-scale) included this this Policy (113) it is unlikely that alone this would cause the requirement for increased demand that would lead to adverse effects on the SAC alone. However, this pathway is discussed further in-combination in Section 6.

6. Appropriate Assessment "In Combination Effects"

Introduction

This chapter investigates in-combination effects of recreational pressure and human changes in hydraulic conditions in relation to South Pennine Moors SAC and South Pennine Moors (Phase II) SPA.

Other plans and projects

Other plans and projects being prepared or implemented in the area may have the potential to cause negative effects on the integrity of European sites. These effects may act in combination with the effects of the Ilkley Neighbourhood Local Plan Preferred Options Report, possibly leading an insignificant effect to become significant. It is therefore important to consider which other plans and projects could generate similar effects as development within Bradford district, at the same European sites, and which may act in-combination. The following plans or projects could act in combination:

- Bradford Core strategy DPD (adopted 2017);
- Bradford Waste Management DPD (adopted 2017);
- Local Plan for the Bradford District Allocations Development Plan Issues and Options Wharfedale Sub Area (May 2016);
- Yorkshire Water Ltd (2018) Revised Draft Water Resources Management Plan.

Recreational Pressure- In Combination

The following European designated sites have potential for adverse effects from increased recreational pressure associated with the Ilkley Neighbourhood Development Plan in combination with the aforementioned other projects or plans:

- South Pennine Moors (Phase II) SPA
- South Pennine Moors SAC

Given this, mitigation is required for inclusion in the plan.

Mitigation

The Ilkley Neighbourhood Development Plan Preferred Options Report does provide a reference to the following relevant Bradford Core Strategy Policies: SC8 (Protecting the South Pennine Moors) and EN2 (Biodiversity and Geology) in Policy INDP14. The policies (particularly the former) set out a clear policy context for protection of the European sites by breaking down the area around the European sites into three Zones (A, B and C, the latter of which is the zone within which all net new development must make a financial contribution to strategically managing recreational pressure on the European sites). However, it is recommended that additional text for Policy INDP14 is included where it references Policies SC8 and EN2 which is provided below (see underlined wording) by including the titles and additional information so the reader understands the background to the reference. An addition of a sentence relating to when development would not be permitted and a reference to mitigation in relation to recreational disturbances is also included.

Policy INDP/14

Proposals for new development that impact on habitats and wildlife referred to in Bradford Core Strategy Strategic Core Policy SC8 Protecting the South Pennine Moors and their zone of influence and Policy EN2 *Biodiversity and Geology (relating to the North and South Pennine Moors SPAs and*

SACs, and Sites of Special Scientific Interest) should demonstrate how biodiversity will be protected and enhanced.

New developments should identify and protect existing habitats on individual sites, and seek opportunities to reverse fragmentation. Development will not be permitted where it would be likely to lead to an adverse effect upon the integrity, directly or indirectly, of the South Pennine Moors (Phase II) Special Protection Area (SPA) and/or South Pennine Moors Special Areas of Conservation (SAC). To mitigate impacts on European Sites due to the increase in population and therefore an increase in recreational pressure on the European sites, an approach will be adopted that sets out a mechanism for the calculation of the planning contribution. In line with the Bradford Core Strategy all development within 7km of the SAC/SPA is to provide or contribute to additional natural greenspace for recreation, implementation of access and habitat management measures within the SAC/SPA to reduce the impacts of recreational pressure.

Additional text for Policy INDP2 Housing Site Allocations is to be included:

Development will not be permitted where it would be likely to lead to an adverse effect upon the integrity, directly or indirectly, of the South Pennine Moors (Phase II) Special Protection Area (SPA) and Pennine Moors Special Areas of Conservation (SAC). To mitigate impacts on European Sites due to the increase in population and therefore an increase in recreational pressure on the European sites, an approach will be adopted that sets out a mechanism for the calculation of the planning contribution. In line with the Bradford Core Strategy all development within 7km of the SPA/SAC to provide or contribute to additional natural greenspace for recreation, implementation of access and habitat management measures within the SAC/SPA to reduce the impacts of recreational pressure.

Provided that this wording is incorporated within the Plan it can be considered that recreational pressure from the Plan will not result in adverse effects upon the integrity of the South Pennine Moors SAC or South Pennine Moors (Phase II) SPA alone.

Provided that this wording is incorporated within the Ilkley Neighbourhood Development Plan Preferred Options it can be considered that recreational pressure from the Plan will not result in adverse effects upon the integrity of the South Pennine Moors SAC or South Pennine Moors (Phase II) SPA alone or in combination with other plans and projects.

Changes in Hydrological Conditions - In combination

The following European designated sites have potential for adverse effects from increased recreational pressure associated with the Ilkley Neighbourhood Plan in combination with other projects or plans:

- South Pennine Moors (Phase II) SPA
- South Pennine Moors SAC

As stated in Section 5, changes in hydrological conditions that could affect the SAC habitats (brought about by additional housing requirements would be through increased water demand and its potential abstraction from reservoirs within the SPA/SAC.) Reduction in water levels/ changes in the water table could have an adverse effect on the following habitats within the SAC: blanket bogs (* if active bog); Northern Atlantic wet heaths with *Erica tetralix*; and transition mires and quaking bogs. Equally, a change in these habitats could then cause adverse effects to a number of the SPA bird species who use damp/wet/boggy habitat to forage and feed, such as dunlin, snipe and curlew. INDP2 allocated 113 houses. Whilst alone, this is a low number of houses (small scale) and is unlikely this development would cause the requirement for increased demand that would lead to adverse effects on the SAC/SPA. However, in-combination with increased housing across the district, the Bradford Core Strategy (adopted 2017) states that 42,100 new homes will be required up to 2030, Table 2 shows the number of homes which are expected to be built from valid planning permissions within the district of Bradford.

Yorkshire Water Ltd is aware of the future rise in population and has prepared a Revised Draft Water Management Resources Management Plan (2018). This document is a key plan that will ensure that

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Yorkshire Water can provide a reliable and sustainable supply of water and how they will provide this taking into consideration climate change, population growth and environmental pressures. The Draft Water Management Resources Plan (2018) details a preferred solution to meet the risk of water deficit during the planning period beginning 2034/35 mainly due to the forecast impact of climate change. This preferred solution chosen minimises environmental risks and is flexible and sustainable. An HRA of the preferred solution has been carried out assessing the likely significance both alone and in-combination of the preferred option on both the South Pennine Moors SAC and South Pennine Moors (Phase II)SPA (amongst other European sites) and was found to have no likely significant effect on either European site.

Therefore there will be no significant adverse effects alone or in-combination from human changes in hydraulic conditions to South Pennine Moors SAC and South Pennine Moors (Phase II) SPA.

7. Conclusions

With the recommendations about recreational pressure in place and given the over-arching protective policy framework provided by the Bradford Core Strategy (specifically policies EN2 and SC8) it is considered that an appropriate mechanisms are in place to ensure that no adverse effects on the integrity of any European sites result in-combination from any Neighbourhood Plan allocations.

References

BURT, J., STEWART, D. & TURNER, M. 2014. Monitor of Engagement with the Natural Environment survey (2009 - 2012): Visit taking in the South Pennines. Natural England Commissioned Reports, Number 150.

Clarke R, Liley D, Underhill-Day J & Rose R (2006): Visitor Access Patterns on the Dorset Heathlands. English Nature Research Reports No. 683.

del Hoyo, J., Elliott, A. & Sargatal, J. (1996). Handbook of the Birds of the World. Vol. 3: Hoatzin to Auks. Lynx Edicions, Barcelona.

Clare L. Devereux, Claire U. McKeever, Tim G. Benton, Mark J. Whittingham (2004) The effect of sward height and drainage on Common Starlings *Sturnus vulgaris* and Northern Lapwings *Vanellus vanellus* foraging in grassland habitats, IBIS International Journal of Avian Science

Finney SK, Pearce-Higgins JW & Yalden DW (2005): The effect of recreational disturbance on an upland breeding bird, the Golden Plover Pluvialis apricaria. Biological Conservation 121, 53–63.

Haworth ,, F. and Thompson, D.B.A., 1990. Factors associated with the breeding distribution of upland birds in the South Pennines, England. Journal of Applied Ecology, pp.562-577
https://www.jstor.org/stable/pdf/2404302.pdf?refreqid=excelsior%3A37ee9f650b75ff31faea95fceb00f1b8
Tamara L. Holmes, Richard L. Knight, Libby Stegall and Gerald R. Craig Wildlife Society Bulletin (1973-2006)Vol. 21, No. 4 (Winter, 1993), pp. 461-468

Liley D, Jackson D & Underhill-Day J (2006): Visitor Access Patterns on the Thames Basin Heaths. A Report to English Nature.

Liley D, Clarke RT, Mallord JW, & Bullock JM (2006): The effect of urban development and human disturbance on the distribution and abundance of nightjars on the Thames Basin and Dorset Heaths. Unpublished report, Footprint Ecology / Natural England. © Natural England / Footprint Ecology Ltd.

Olsen,Henrick, Schmidt Niels S. 2004. Impacts of wet grassland management and winter severity on wader breeding numbers in eastern Denmark, Basic and Applied Ecology, 5:2, pp203-210

Pearce-Higgins, J.W., Finney, S.K., Yalden, D.W. and Langston, R.H.W., 2007. Testing the effects of recreational disturbance on two upland breeding waders. Ibis, 149, pp.45-55.

Pincombe NEJ and Smallbone K (2009a): Visitor Access Patterns on Ashdown Forest. UE Associates Ltd and University of Brighton Report for Mid Sussex and Wealden District Councils.

Pincombe NEJ and Smallbone K (2009b): Visitor Access Patterns on European Sites surrounding Whitehill and Bordon, East Hampshire. UE Associates Ltd and University of Brighton Report for the Whitehill Bordon Eco-town and East Hampshire District Council.

Ruddock, M. and Whitfield, D.P., 2007. A review of disturbance distances in selected bird species. *A report from Natural Research (Projects) Ltd to Scottish Natural Heritage*, p.181.

Standing Conference of South Pennine Authorities (SCOSPA1998) South Pennine Moors - South Pennine Moors - An Integrated Management Strategy and Conservation Action Programme LIFE95 NAT/UK/000824

Snow, D and Perrins, (1998) The Birds of the Western Palearctic Consise Edition.

D. W. Yalden & Patricia E. Yalden (1989) The sensitivity of breeding Golden Plovers *Pluvialis apricaria t*o human intruders, Bird Study, 36:1, 49-55, DOI: 10.1080/00063658909477002

Appendix A Figures

Appendix B European Designated Sites

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Table B.1 Interest Features, Conservation Objectives and Site Vulnerabilities/Threats to Site Integrity

• **Site Name**	• **Approx. distance from current bridge and proposed bridge options.**	• **Interest Features**	• **Conservation Objectives**[24]	• **Potential Threats to Site Integrity/Vulnerabilities**[25]
• South Pennine Moors Phase 2 Special Protection Area (SPA)	• Within the Plan boundary	**ARTICLE 4.1 QUALIFICATION (79/409/EEC) During the breeding season the area regularly supports:** ▪ Short eared-owl *Asio flammeus* 0.3% of the GB breeding population Count as at 1990 ▪ *Merlin Falco columbarius* 2.2% of the GB breeding population Count as at 1995 ▪ *European golden plover Pluvialis apricaria* [North-western Europe - breeding] 1.3% of the GB breeding population No count period specified • **Article 4.2 - supports an internationally important assemblage of birds.** • **During the breeding season the area regularly** • **supports:** Common Sand piper *Actitis hypoleucos,* Dunlin • *Calidris alpina schinzii*, Twite *Carduelis flavirostris*, • Snipe *Gallinago gallinago*, Curlew Numenius • arquata, Wheatear *Oenanthe oenanthe*, Whinchat • *Saxicola rubetra*, Redshank *Tringa totanus*, • Lapwing *Vanellus vanellus*	• Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the • site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; ▪ The extent and distribution of the habitats of the qualifying features ▪ The structure and function of the habitats of the qualifying features ▪ The supporting processes on which the habitats of the qualifying features rely ▪ The population of each of the qualifying features, and, ▪ The distribution of the qualifying features within the site.	• J02 Human induced changes in hydraulic conditions • J01 Fire and fire suppression • F03 Hunting and collection of wild animals (terrestrial), including damage caused by game (excessive density), and taking/removal of terrestrial animals (including collection of insects, reptiles, amphibians, birds of prey, etc., trapping • G01 Outdoor sports and leisure activities, recreational activities • K05 Reduced fecundity/ genetic depression
• South Pennine Moors Special Area of Conservation (SAC)	• Within the Plan boundary	**Annex I habitats that are a primary reason for selection of this site** ▪ European dry heaths ▪ Blanket bogs (* if active bog) ▪ Old sessile oak woods with Ilex and Blechnum in the British Isles **Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site** ▪ Northern Atlantic wet heaths with Erica tetralix ▪ Transition mires and quaking bogs •	• Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the • site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by • maintaining or restoring; ▪ The extent and distribution of the qualifying natural habitats ▪ The structure and function (including typical species) of the qualifying natural habitats, ▪ and, ▪ The supporting processes on which the qualifying natural habitats rely	• H04 Air pollution, air-borne pollutants • J01 Fire and fire suppression • A11 Agriculture activities not referred to in the citation threats list • J02 Human induced changes in hydraulic conditions • G01 Outdoor sports and leisure activities, recreational activities

[24] Taken from Natural England's Access to Evidence site [http://publications.naturalengland.org.uk/category/6490068894089216]
[25] Taken from Natura 2000- Standard Data Forms [http://jncc.defra.gov.uk/protectedsites/]

Appendix C Screening Assessment of the Plan Policies

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Screening Assessment of the Plan Policies

Policies identified in green in the "Likely Significant Effect- LSE (alone) plus reasoning" column do not provide for impact pathways that could link to a European designated site. Policies identified in green in the "Likely Significant Effect- LSE (In-combination) plus reasoning" column do not provide for impact pathways that could link to a European designated site in-combination with any other policies, Plans or Projects.

Policies identified in orange in the "Likely Significant Effect- LSE (alone) plus reasoning" column have potential to provide for impact pathways that could link to a European designated site. Policies identified in orange in the "Likely Significant Effect- LSE (In-combination) plus reasoning" column have potential to provide for impact pathways that could link to a European designated site 'in-combination' with any other policies, Plans or Projects. In both cases the policy/policies is/are taken forward to the next stage of assessment – Appropriate Assessment and discussed within this document.

Draft Policy Reference	Policy Title	Policy Detail	Likely Significant Effect- LSE (alone) plus reasoning	Likely Significant Effect- LSE (In-combination) plus reasoning
Housing				
INDP1	New Housing Development within Ilkley	Within the existing built-up area of Ilkley, i.e. land not currently within the Green Belt, new development for housing will be supported when it: a) Re-uses previously developed land; b) Would not lead to the loss of protected open or local green spaces; c) Would not lead to the loss of an identified community facility; d) Would not have a significant adverse impact on a listed building and/or Conservation Area or the setting of such an asset; and e) It has been designed to meet the guidance contained in the design policies of this plan and the Ilkley Design Statement. Housing density on most sites should be a minimum of 30 dwellings per hectare. Higher densities will be supported in the following locations: i. in the town centre; ii. locations well served by public transport; and iii. in areas where the local built character is more suitable for higher density development Should Green Belt sites be released these should be developed at a density commensurate with other INDP policies, in particular INDP6. All housing sites over 10 units should have a suitable mix of house types, sizes and tenures so that they contribute to sustaining a healthy, balanced community when assessed against policies in the Core Strategy and the following criteria of the INDP: f) This mix should include dwellings suitable for starter homes and dwellings that would create downsizing opportunities. Development heavily favouring houses of one size or type will not be supported; or g) On sites of less than 10 dwellings the proposed mix should contribute to a healthy and balanced community when assessed in relation to the range of housing found within the immediate local neighbourhood of the site. To encourage the use of previously developed land and greenfield land within the existing urban area, i.e. that area not in the Green Belt, development should be phased in such a way that it seeks to support Policy H.04 of the Core Strategy. Phasing of sites should wherever possible, prioritise the use of previously developed land and non-Green Belt sites before development of Green Belt land.	This Policy relates to housing density, mix of housing types and reasons for support of housing development within built up areas. This policy does not lead to development and therefore there will be no Likely Significant Effects to European Sites	No Likely Significant Effects as there are no pathways present
INDP2	Housing Site Allocations	The following sites identified on the Policies Map are allocated for new housing development: INDP2/1 – Leeds Road, estimate 72 units INDP2/2 – Ashlands Road/Leeds Road, estimate 18 units INDP2/3 – Stockeld Road, estimate 11 units INDP2/4 – Beanlands Parade, estimate 12 units	**Likely Significant Effects.** This Policy provides details of four sites for housing allocations (see Appendix D for assessment of individual allocations). Potential impact pathways include: • Recreation • Loss of functionally linked land for non-breeding SPA birds • Air pollution associated with traffic movements • Human induced changes in hydraulic conditions	**Likely Significant Effects–In-combination due to :** Other residential developments/increased housing/growth in neighbouring districts. Potential impact pathways include: • Recreation • Loss of functionally linked land for non-breeding SPA birds • Air pollution associated with traffic movements • Human induced changes in hydraulic conditions
Community Facilities				
INDP3	Protecting and Enhancing Community Facilities	Existing Facilities There will be a presumption in favour of the protection of existing community facilities. Where planning permission is required, the change of use of existing community facilities, as listed below, will only be supported for other health, education or community type uses (such as community halls, local clubhouses, health centres, schools, public houses and children's day nurseries). When a non-community use (e.g. housing) is proposed to replace, either by conversion or re-development, one of the facilities listed below such development will only be supported when one of the following can be demonstrated: a) The proposal includes alternative provision, on a site within the locality, of equivalent or enhanced facilities. Such sites should be accessible by public transport, walking and cycling and have adequate car parking.; or	This policy relates to the protection of existing facilities, and does not lead to development, therefore there will be no Likely Significant Effects to European Sites	No Likely Significant Effects as there are no pathways present

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Draft Policy Reference	Policy Title	Policy Detail	Likely Significant Effect- LSE (alone) plus reasoning	Likely Significant Effect- LSE (In-combination) plus reasoning
		b) Where facilities are considered to be no longer needed or suitable for continued community facility use, satisfactory evidence is put forward by the applicant that, over a minimum period of 12 months, it has been demonstrated, through active marketing of the site, that there is no longer a need or demand for the facility. The facilities to be protected are listed as follows and shown on the Policies Map INDP3/1 - All Saints Church and Church House, Church Street INDP 3/2 - Ben Rhydding Methodist Church and Halls, Ben Rhydding Drive INDP3/3 - Christchurch, and associated halls and coffee centre, The Grove INDP3/4 - St John's Church and halls, Bolling Road, Ben Rhydding NDP3/5 - St Margaret's Church and halls, Queens Road INDP3/6 - Friends Meeting House (Quakers), Queens Road INDP3/7 - Ilkley Baptist Church, Kings Road INDP3/8 - Sacred Heart Catholic Church, Stockeld Road INDP3/9 -The Briery Retreat and Conference Centre, Victoria Avenue INDP3/10 - Jehovah's Witness Hall, Nelson Road INDP3/11 - The Town Hall and Library INDP3/12 - Kings Hall & Winter Garden INDP3/13 - Ilkley Manor House, Church Street INDP3/14 - Ilkley Playhouse, Weston Road INDP3/15 - Ilkley Cinema, Leeds Road INDP3/16 - Upstagers Theatre Group, Station Road INDP3/17 - Operatic House, Leeds Road INDP3/18 - Ilkley Health Centre, Springs Lane INDP3/19 - The Coronation Hospital INDP3/20 – The Warehouse (Children's Centre/ Ilkley Youth & Community Association), Little Lane INDP3/21 - Ben Rhydding Preschool Playgroup, Bolling Road INDP3/22 - Clarke Foley Centre, Cunliffe Road INDP3/23 - Abbeyfield Centre, Riddings Road INDP3/24 - Outside the Box, Bridge Lane INDP3/25 – White Wells complex, Ilkley Moor INDP3/26 - Hollygarth Club hall, Leeds Road INDP3/27 - Nell Bank Centre, Denton Road INDP3/28 – Riding Centre, Denton Road INDP3/29 - Air Training Corps Halls, Ashlands Road NDP3/30 - Ben Rhydding Scout & Guide Group halls, Wheatley Lane, Ben Rhydding INDP3/31 - Scout Hall, Beanlands Parade INDP3/32 - Curly Hill Scout Centre and Campsite, Curly Hill INDP3/33 – Cow and Calf Kiosk and toilets INDP3/34 – Ilkley Masonic Hall, Cunliffe Road INDP3/35 – Ilkley Constitutional Club, South Hawksworth Street INDP3/36 - Ben Rhydding Men's Club, Wheatley Lane INDP3/37 - Ilkley Moor Vaults, Stockeld Road INDP3/38 - Cow and Calf Hotel, Hangingstone Road INDP3/39 - Craiglands Hotel, Cowpasture Road INDP3/40 - The Wheatley, Wheatley Lane INDP3/41 - Bar Tat, Cunliffe Road INDP3/42 - Flying Duck, Church Street INDP3/43 - The Riverside, Bridge Lane INDP3/44 - The Yard, Brook Street Yard INDP3/45 - Lister's Arms, public house, South Hawkesworth Street INDP3/46 – Black Hat, Church Street INDP3/47 – Dalesway INDP3/48 – The Crescent INDP3/49 – Station Hotel INDP3/50 – Midland INDP3/51 – Public toilets – central car park and at riverside New Facilities Where new community facilities are proposed they should be in accessible locations for those seeking or needing to access the sites by walking, cycling and public transport, include off-street car parking to CBMDC standards and be of good quality design.		
INDP4	Protecting and Enhancing Recreation Facilities	There will be a presumption in favour of the protection of the existing recreation facilities listed below and identified on the Policies Map. INDP4/1 - Ben Rhydding Sports Complex INDP4/2 - Clevedon House, Ben Rhydding Drive (swimming pool) INDP4/3 - Ilkley Tennis and Squash Club INDP4/4 - Ilkley Bowls Club and hall INDP4/5 - Ilkley Cricket Club and pavilion INDP4/6 – West Holmes playing field and pavilion	This policy relates to the protection of existing facilities, and does not lead to development, therefore there will be no Likely Significant Effects to European Sites	No Likely Significant Effects as there are no pathways present

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Draft Policy Reference	Policy Title	Policy Detail	Likely Significant Effect- LSE (alone) plus reasoning	Likely Significant Effect- LSE (In-combination) plus reasoning
		INDP4/7 - Ilkley Lido & Swimming Pool INDP4/8 - Ilkley Rugby Union Football Club INDP4/9 - Olicana Cricket Club INDP4/10 – Ilkley Golf Club (that part in the neighbourhood area) INDP4/11 – Ben Rhydding Golf Club Proposals leading to the loss of these recreation facilities will only be supported when: a) The applicant has undertaken an assessment which clearly shows the identified facility is surplus to requirements; or b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a location accessible to existing users, including residents of the neighbourhood area; or c) The development is for alternative sports and recreation provision, the needs of which clearly outweigh the loss of the existing identified facility.		
INDP5	Allotments and Community Gardens	Existing allotments will be protected in the following locations: INDP5/1 - Bridge Lane INDP5/2 - Castle Road INDP5/3 - Leeds Road/River Wharfe INDP5/4 – St John's Community Garden The redevelopment of these and any future allotment provision will only be supported when: a) Replacement provision is provided, of at least equivalent quality, and in a location accessible for existing and future plot holders; or b) The allotments are no longer used; and their loss would not lead to an under-provision of allotments in the neighbourhood area. New allotment provision will be supported, including in the Green Belt, when it is in reasonable walking distance of residential areas and schools and such a use would not have a significant detrimental impact on residential amenity, the setting of the Conservation Areas, or the local landscape. In order to provide a better geographic spread of allotments within the neighbourhood area, new allotments will be identified and supported in the following locations: Land south of the River Wharfe by Ilkley Tennis Club. Former greenhouses, Beanlands Parade. Land off Wheatley Lane.	This policy protects existing allotments and includes the provision of new allotments within certain parameter and does therefore not lead to development. Therefore this would not lead to Likely Significant Effects to European Sites.	No Likely Significant Effects as there are no pathways present
Cultural Landscape				
INDP6	Encouraging High quality and Sustainable Design	Responding to the Ilkley Local Context New development should demonstrate a positive and engaging approach to design. Schemes should aim to enhance local visual interest and make a harmonious, positive, attractive contribution to the local street scene. Specifically designs should incorporate the following principles: a) Schemes should be of a scale, mass and built form which respond to and reinforce the characteristics of the site and local context. Proposals for new housing should not feature generic schemes, but demonstrate how they take account of a nd incorporate the best built and natural environmental features identified within the character of the area in which they are to be sited; b) Care should be taken to ensure that building(s) height, scale, and form, including the roofline, do not disrupt the visual amenities of the street scene and impact on any significant wider landscape views; c) New buildings should follow a consistent design approach in the use of materials, fenestration and the roofline to the building when assessed in relation to other buildings on the site and adjoining buildings surrounding the site; d) Materials should be chosen to complement the design of a development and add to the quality or character of the surrounding environment. Locally appropriate materials should be used such as Yorkshire Gritstone, traditional local brick, light coloured render and slate or stone slates for roofs; e) Innovative design, that can be demonstrated by the applicant, to be of a high design quality and that responds to local character and context will be supported when it enriches the town's architectural heritage; f) Where planning permission is required, extensions should be small in scale and subordinate to the original building; g) Proposals should minimise the impact on existing and future amenity of residents and businesses and give careful consideration to noise, odour and light emissions. Light pollution should be minimised, wherever possible, and street and security lighting designed to be appropriate, unobtrusive and energy efficient; h) Proposals that have an interface between the built area ofIlkley town and the existing Green Belt, or proposals that would create a new interface between the built area and Green Belt, should include measures (such as, but not limited to, landscaping, screening, suitable, building height) that minimise the visual impact of the development when viewed from the Green Belt; and i) In the wider rural area, redevelopment, alteration or extension of historic farm and agricultural buildings should be sensitive to the distinctive character, materials and form of Mid Wharfedale. Sustainable Design	This policy refers to design only and does not lead to development therefore there will be no Likely Significant Effects to European Sites.	

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Draft Policy Reference	Policy Title	Policy Detail	Likely Significant Effect- LSE (alone) plus reasoning	Likely Significant Effect- LSE (In-combination) plus reasoning
		New housing development is encouraged to incorporate sustainable design and energy efficiency measures, wherever possible, in order to minimise carbon dioxide emissions, which contribute to climate change. Good thermal performance of buildings is encouraged to help reduce fuel poverty, and ensure that local residents are able to live in warm, healthy homes which they can afford to heat. Where appropriate, new housing should be capable of being adapted to meet the changing needs of occupants over time.		
INDP7	General Principles for New Development in Conservation Areas in Ilkley	Proposals for new development and alterations to existing buildings in or adjacent to, and impacting on the setting of the three Conservation Areas of Ben Rhydding, Ilkley and Middleton will be required to demonstrate careful consideration of any potential impacts on the setting of the relevant conservation area and other nearby heritage assets above or underground, and to put in place measures to avoid or minimise impact or mitigate damage. Proposals will be required to describe the significance of any heritage assets affected, including any contribution made by their setting. Development proposals should protect, conserve, and where possible, enhance heritage assets and their settings in a manner appropriate to their significance. Overall, development should reflect the scale, mass, height and form of existing locally characteristic buildings, and design details and materials should be chosen to be harmonious with neighbouring properties.	This policy refers to principals of new development only and does not lead to development; therefore there will be no Likely Significant Effects to European Sites.	No Likely Significant Effects as there are no pathways present
INDP8	Policy New Development in Ben Rhydding Conservation Area	New development in Ben Rhydding Conservation Area should be designed sensitively to ensure the special characteristics of the area are conserved and enhanced. Traditional materials are encouraged such as stone, render, timber and brick for elevations, stone slate and red or blue slates for roofing materials, timber for windows, doors and shop fronts, and cast iron for railings and gates. Stone walls or hedgerows should be used for boundary treatments. Development should connect with existing pathways and alleyways to encourage walking and cycling and support permeable, accessible movement within the area. Long distance views out of the conservation area to the fields to the north and Ilkley moor to the south should be protected. In residential areas where houses are set within larger gardens any back land or infill development should be sited and designed to protect existing mature garden trees, and should not lead to a significant increase in density which would be unacceptable or inappropriate in relation to the local context. Contemporary and sustainable designs will be acceptable where they are of exceptional quality and where they clearly demonstrate that they are appropriate to their context.	This policy relates to development within a Conservation Area which is already has a set boundary. The southern boundary of the this Conservation Area is located over 360m north of the South Pennine Moors SPA/SAC and is separated by the remainder of the Ben Rhydding conurbation. Therefore there will be no Likely Significant Effects to South Pennine Moors SPA/SAC.	No Likely Significant Effects as there are no pathways present
INDP9	New Development in Ilkley Conservation Area	New development in Ilkley Conservation Area should be designed sensitively to ensure the area's special characteristics are conserved and enhanced. The Roman Core and Shopping Centre Any development within these sectors should be of high quality, retaining or restoring traditional features and open spaces, to enhance the setting of heritage assets including the Roman Fort and historic centre. For commercial properties, original shopfront details should be reinstated, or restored where surviving. New shop fronts should be designed in accordance with the principles set out in the Conservation Area Assessment, using traditional details, materials and appropriate colours and in accordance with policy in this plan. The Railway Town Existing original shopfronts to the Leeds Road frontages should be retained and repaired and replacement shopfronts should follow the guidelines for the town centre. New development should demonstrate rhythm and consistency with a regular pattern of doors and windows. The removal of chimney stacks on existing terraced properties will be resisted. Dormer windows should follow a consistent design approach and be located to the rear of terraced properties. Spa Town Identified key buildings, especially the landmark former Spa buildings and their grounds, mature trees both in grounds and the public realm, and the views out across the town and over to the moors should be retained and enhanced. The interlinking open spaces which provide a mature landscaped setting for the main buildings and a green thread running through the fabric of the Conservation Area are of paramount importance and should be protected. Victorian and Edwardian Suburbs and Residential Expansion	This policy relates to development within a Conservation Area which is already has a set boundary. The southern boundary (at its closest point) of this Conservation Area is adjacent to the South Pennine Moors SPA/SAC. Whilst these areas are in close proximity, any new development would be within the red line boundary of the Conservation Area and no land take would be needed. None of the land in the conservation area is suitable for birds listed within the SPA and is separated by the remainder of the Ben Rhydding conurbation. Therefore there will be no Likely Significant Effects to South Pennine Moors SPA/SAC.	No Likely Significant Effects as there are no pathways present

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Draft Policy Reference	Policy Title	Policy Detail	Likely Significant Effect- LSE (alone) plus reasoning	Likely Significant Effect- LSE (In-combination) plus reasoning
		Sensitive restoration of older properties of character is encouraged. Extensions, dormer windows and other alterations to dwellings should be designed to retain the essential character of the Victorian and Edwardian style of architecture. Designs for new buildings and extensions should take their architectural cues from the local context and where possible use appropriate local materials such as clay red roof tiles, gritstone and timbering. There will be a presumption against infilling of visually important gaps in the Conservation Area which provide a green break between terraced areas, and the mature gardens should be protected from inappropriate back land development. Loss of trees and boundary walls will be resisted. N.B. the character areas referred to in the policy are those identified in the Conservation Area Appraisal.		
INDP10	New Development in Middleton Conservation Area	New development in Middleton Conservation Area should be designed sensitively to ensure the area's special characteristics are conserved and enhanced. The significant views and vistas into, out of and through the conservation area should be respected in any development within the Conservation Area or affecting its setting. New development that will impact on the setting of the Conservation Area, for example being either immediately within the vicinity of, or clearly visible from within its confines, should respond to the principles of good design set out for new build as set out in Draft Policy INDP6. New development within the Conservation Area should reflect the predominant building form of the character of the area in which it is situated. This relates to height, scale and siting. It should not over dominate the existing fabric. Any new development should make use of quality materials that reflect the types of traditional materials used in the area and sit harmoniously with the existing fabric and respect the uniformity in the colour and texture of the built form of the Conservation Area. Existing boundary walls should be retained and restored. Boundary walls constructed of stone that matches the existing should be incorporated into the design of any new development within the Conservation Area. The street layout of the Conservation Area is important to its character and historic interest. Therefore, the width, direction and orientation of roads and paths through the area should be conserved. There should be a presumption against building in open areas that have been identified as contributing to the character of the conservation area and development should respect important areas of green space and woodland.	This policy relates to development within a Conservation Area which is already has a set boundary. The southern boundary of the this Conservation Area is located over 829m north of the South Pennine Moors SPA/SAC and is separated by the highly urbanised area of Ilkley.	No Likely Significant Effects as there are no pathways present
INDP11	Local Green Spaces	When designated Local Green Spaces will be protected from inappropriate development as defined in the NPPF. The possible sites for Local Green Spaces designation are: INDP11/1 - Memorial Gardens, Riverside INDP11/2 - East Holmes INDP11/3 - West Holmes INDP11/4 - Spence Garden including the War Memorial and Gardens INDP11/5 – Glen Wood Gardens INDP11/6 - Christchurch Gardens INDP11/7 – Sensory Garden, Parish Ghyll Road INDP11/8 - Riverbank north of river between Crum Wheel and Denton Bridge INDP11/9 - All Saints Church Yard INDP11/10 - Ben Rhydding School Field INDP11/11 - Wheatley Lane Recreation Ground INDP11/12 - Bolton Bridge Road INDP11/13 - St Margaret's Park and Panorama Stones INDP11/14 - Darwin Gardens Millennium Green INDP11/15 - Panorama Woods/ Hebers Ghyll Wood INDP11/16 - Wheatley Raikes INDP11/17 - Middleton Woods INDP11/18 - Nell Bank INDP11/19 - Back Wyvill Crescent playground INDP11/20 - Backstone Way playground INDP11/21 - Backstone Way open space INDP11/22 - Wheatley Lane garden INDP11/23 - Castle Road verge INDP11/24 - Crossbeck Road woodland INDP11/25 - Course of old railway, west Ilkley INDP11/26 - Beanlands Island INDP11/27 – Woodland Trust river bank INDP11/28 - Victoria Drive verge INDP11/29 - Mill Ghyll	The policy lists the possible sites which may be designated as Local Green Spaces. This policy does not lead to development and therefore no Likely Significant Effects would be caused through this policy.	No Likely Significant Effects as there are no pathways present

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Draft Policy Reference	Policy Title	Policy Detail	Likely Significant Effect- LSE (alone) plus reasoning	Likely Significant Effect- LSE (In-combination) plus reasoning
		INDP11/30 - Belle Vue Gardens INDP11/31 – Bridgefield INDP11/32 – Denton Road islands INDP11/33 – Olicana Park Circle INDP11/34 – Wyvill Crescent Green INDP11/35 – Toll Bridge Field INDP11/36 – Daffodil Hill INDP11/37 - Stockeld Road INDP11/38 – Paradise INDP11/39 – Canker Well		
INDP12	Green Corridors	The network of Green Corridors as shown on the Policies Map will be protected as important local landscape features which perform multi-functional roles as part of Ilkley's Green Infrastructure network. Proposals will be encouraged which enhance and extend the existing network of Green Corridors to open spaces within the urban area and beyond to the wider rural area. New development is encouraged to incorporate new Green Corridors within landscaping and open space schemes and to establish links to the identified network of Green Corridors where possible.	This policy relates to the protection of existing green corridors and does not lead to development, therefore there will be no Likely Significant Effects to European Sites	No Likely Significant Effects as there are no pathways present
INDP13	Protecting Ilkley's Landscape Character	Development schemes within the town of Ilkley should demonstrate careful consideration of any potential impacts on the sensitive landscape character of the area around the settlement, and provide suitable measures for mitigation through siting, design and landscaping. In particular, designs should consider long range views towards the proposed development from publicly accessible sites and footpaths within the moorland shelf and Wharfedale, and views from the development towards the open countryside and key landmark features, such as the River Wharfe, Cow and Calf Rocks, and cairn viewpoint on the ridge above White Wells. Landscape Area 4 - Rombalds Moor The Gritstone moorland landscape area is very sensitive to development. Any extension to the existing few farmsteads on the moorland fringe should be small in scale and sensitively designed to minimise any negative visual impacts on this landscape. Landscape Area 8 - Wharfedale Development will be very restricted in the floodplain pastures of the river. Development proposals in areas of lower risk of flooding should protect and enhance the traditional built settlement pattern and hedge and field tree enclosure. In areas of enclosed pastures, settlement edges should be clearly defined and utilise a framework of tree planting using locally appropriate species. The visual impact of any proposals should be considered in detail and additional on-site and off-site planting is encouraged to absorb the development into the landscape. The associated infrastructure of access roads, lighting and signage, will also need to be carefully considered. N.B. The Landscape character areas referred to are those in the CBMDC Landscape Character Supplementary Planning Document (LCSPD) 2008	This policy relates to the protection of landscape character and does not lead to development, therefore no Likely Significant Effects to European Sites	No Likely Significant Effects as there are no pathways present
Biodiversity and Ecology				
INDP14	Protecting and Enhancing Biodiversity	Proposals for new development that impact on habitats and wildlife referred to in Bradford Core Strategy Strategic Core Policy SC8 and Policy EN2 should demonstrate how biodiversity will be protected and enhanced. New developments should identify and protect existing habitats on individual sites, and seek opportunities to reverse fragmentation. Landscaping schemes and building designs are encouraged to incorporate the following, where possible: In wooded incline areas: 1. Development should not fragment the woodland canopy. Regeneration and planting is encouraged, to help ensure the long-term continuity of the wooded character. 2. Walls and hedges should be conserved, strengthened and restored. 3. Additional woodland planting around the edges of new developments is encouraged. On the River Wharfe floodplain: New built development will be restricted due to flood risk. However, development sites may include areas of open space extending down to the River, and opportunities to enhance areas for wildlife should be taken wherever possible. For example: 4. Hedgerow gaps should be filled with a range of native species and hedgerow trees replanted. 5. Woodland blocks have an even-age mature nature and re-planting/ underplanting is encouraged to provide a more diverse age structure. 6. The river and bankside environments are important wildlife habitats. Landscaping schemes should conserve and enhance wetland habitats, such as wet meadows and marshy grasslands. The planting of willow, along with a coppice regime is particularly encouraged to support otters returning to this stretch of the Wharfe. Overall, designs for new buildings should aim to include ecological enhancements as part of landscaping and building design. Proposals could include enhancements such as sustainable drainage systems, re-naturalising	This policy relates to protecting and enhancing ecology and doesn't lead to development; therefore there will be no Likely Significant Effects to European Sites.	No Likely Significant Effects as there are no pathways present

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Draft Policy Reference	Policy Title	Policy Detail	Likely Significant Effect- LSE (alone) plus reasoning	Likely Significant Effect- LSE (In-combination) plus reasoning
		watercourses, woodland planting, roosting opportunities for bats, the installation of bird nest boxes and the use of native species in the landscape planting.		
Traffic and transport				
INDP15	Traffic and Transport	To support the development of sustainable multi-modal transport and reduce vehicle emissions; development will, where relevant, be expected to show how measures that reduce the need to travel by private car and promote the use of non-car modes of transport have been incorporated. In particular, proposals should seek to incorporate sustainable multi-modal transport solutions which focus on emissions reduction.	This policy relates to supporting the development of sustainable multi-modal transport and to reduce vehicle emissions. This policy does not lead to development, therefore there will be no Likely Significant Effects to European Sites	No Likely Significant Effects as there are no pathways present
Sustainable Access				
INDP16	Walking and Cycling	Where appropriate all new development should include facilities for walking and cycling that are of good design and accessible to all. In assessing this, proposals will be assessed against the following: a) Ease and directness of new connections to the existing footpath and cycle path network; b) Permeability and legibility of the footpath and cycle path network within the development site; c) Use of sustainable materials and design that ensures access for all users; d) Where necessary, signage that is of good design, appropriate to the local context and avoids clutter; e) Designed in such a way to be safe, appropriately lit and minimise opportunities for crime; and f) Include native tree and shrub planting that is easily maintained and suitable to the route and its local context. When new routes have to be provided, these should be of good design and provide direct access to local facilities and employment opportunities.	This policy relates to the provision and good design and accessibility of facilities for walking and cycling. This policy provides requirements but does not lead to development, therefore there will be no Likely Significant Effects to European Sites.	No Likely Significant Effects as there are no pathways present
Leisure and Tourism				
INDP17	Leisure and Tourism	Development of existing and new tourism and leisure facilities will be supported where such development will not have a significant adverse impact on existing facilities; and, in addition, in the Green Belt, where it meets national Green Belt planning policy. All new facilities should have good access by walking, cycling and public transport. Support will be given to proposals for dedicated cycleways where these can be provided without detriment to other means of travel and within planning guidance.	This policy provides details relating to requirements of future leisure and tourism development facilities. This policy, however, does not lead to development and therefore there will be no Likely Significant Effects to European Sites.	No Likely Significant Effects as there are no pathways present
Sustainable Economic Development				
INDP18	Ilkley Town Centre	To support the Core Strategy and to ensure that the vitality and viability of Ilkley Town Centre is maintained and enhanced development of retail, office, leisure, and cultural facilities will be supported unless they would have a significant adverse impact. Retail proposals over 1,000 sq. m. must be supported by an appropriate impact assessment. Within the Primary Shopping Area development for retail (A1) uses will be supported. Proposals for use classes A2 (professional services, A3 (cafes and restaurants) and A4 (drinking establishments will be supported when they meet one of the following: a) They would not lead to the loss of an existing A1 retail use and for A2, A3 and A4 uses they retain or re-introduce a shopfront in line with Draft Policy INDP20 of this plan; or b) Where the proposal would result in the loss of ground floor A1 retail use the proposal does not lead to an over-concentration of non-A1 retail uses on the shopping street within which the proposal is situated. Proposals to re-use upper floors within the town centre for retail, office, leisure, cultural facilities, business and residential uses will be supported. Temporary uses particularly those that bring back into use vacant units will be supported.	This policy relates to the maintenance and enhancement of the town centre. The town centre is located in a suburban setting, just under 0.5km from the South Pennine Moors SAC and South Pennine Moors (Phase II) SPA, separated by housing and therefore there will be no Likely Significant Effects to European Sites.	No Likely Significant Effects as there are no pathways present
INDP19	Public Realm and Public Art	Proposals that include new, or replacement, public realm features such as open spaces, paving, seating, lighting, street furniture, planting areas and signage should be of good quality and distinctive design that makes a positive contribution to the local and wider environment of the town by using suitable designs, materials, colours, vernacular features, seeking to use the prevailing local style for such features and avoiding clutter. Where heritage features (telephone boxes, grilles, grates, nameplates etc.) are already to be found within an area proposed for new, or replacement, public realm every effort should be made to retain such features in situ. Where this is not possible such features should be conserved, and, wherever possible re-used elsewhere within the town.	This policy relates to public realm and art and does not lead to development therefore there will be no Likely Significant Effects to European Sites.	No Likely Significant Effects as there are no pathways present
INDP20	Shopfronts	To maintain the quality and distinctiveness of the local built environment, new shopfronts should meet the following: a) Shopfronts should be of traditional construction, retaining existing traditional and period features and style, where possible. Where such features are to be removed they should be replaced with suitable contemporary alternatives; b) The incorporation of blinds and canopies, complementary to the building, and surrounding properties, is encouraged; c) Signage should preferably be painted timber and where projecting signs are used these should be positioned in line with the fascia board and top hung. Internally illuminated signs will not be supported. External illumination of	This policy relates to shopfronts and art and does not lead to development therefore there will be no Likely Significant Effects to European Sites.	No Likely Significant Effects as there are no pathways present

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Draft Policy Reference	Policy Title	Policy Detail	Likely Significant Effect- LSE (alone) plus reasoning	Likely Significant Effect- LSE (In-combination) plus reasoning
		signs should be discreet and not mask architectural details; d) Shopfront fascia signs should be of appropriate to the other elements and proportion the shop front and should not have a negative impact on the frontage of upper floors; e) Within Conservation Areas careful selection of colour is important. Applicants will be encouraged to use restrained shades of maroon, dark green, black, blue, green and grey as lighter colours appear more intrusive. Garish or fluorescent colours should be avoided.; and f) Security grilles should be internal and allow views of internal space and lighting in order to avoid dead frontages		
INDP21	Ilkley Town Centre Traffic and Car Parking	To reduce congestion and improve traffic flow within and around Ilkley Town Centre the following measures will be pursued: a) New, or substantially altered, developments should provide adequate off-street car parking provision to avoid further on-street congestion generated by occupiers and visitors; b) The Parish Council will encourage CBMDC to maximise the use of available off and on-street space to facilitate short-stay parking by shoppers and visitors; c) Discouragement of all-day parking in the central areas by people commuting into and out of the town; d) Protection of the interests of residents in central areas who have a need to park near their property; e) Measures to require a comprehensive review of waiting times on streets already subject to a Traffic Regulation Order as well as in the central car park; f) Management of parking could be by a revised charging scheme or by use of a disc zone or zones; g) Provision should be made for commercial unloading/loading for retail premises and h) Promoting the use of the hopper bus service and seeking to have this operating throughout the day and during the peak commuter hours.	This policy relates to vehicle parking in the town centre which will not lead to LSE on any European Sites	No Likely Significant Effects as there are no pathways present
INDP22	Economy and Employment	The following site (also shown on the Policies Map) is allocated for business (B1), general industrial (B2) and warehousing (B8) uses: INDP22/1 – Ilkley Water Treatment Works The following existing employment areas will also be protected for business (B1), general industrial (B2) and warehousing (B8) uses: INDP22/2 – Cemetery Offices INDP22/3 - Golden Butts Road INDP22/4 - Little Lane/Lower Wellington Road INDP22/5 - East Parade INDP22/6 - Valley Drive INDP22/7 - Brewery Road INDP22/8 - Nile Road (Booths Yard) INDP22/9 - Valley Drive (IDC Valley Ltd/Optident) INDP22/10 - Coutances Way (Wharfeside Park) INDP22/11 - Blackburn Business Park & Riverside Business Park INDP22/12 - Ashlands Road/Leeds Road INDP22/13 - Chantry Drive INDP22/14 - Sefton Drive INDP22/15 -Springs Lane	**Likely Significant Effects.** In relation only to INDP22/1 as this area is allocated for business etc. and this parcel (which is within 2.5km of the SPA) it contains potential habitat for non-breeding SPA birds Potential impact pathways include: • Loss of functionally linked land for non-breeding SPA birds. There are no Likely Significant Effects for the remainder of the sites (INDP22/2- INDP22/15) as these do not comprise potential habitat for non-breeding SPA birds. This is therefore explored further in the following table dedicated to site allocations.	**Likely Significant Effects–In-combination due to :** Other employment developments/increased economic growth in neighbouring districts. Potential impact pathways include: • Loss of functionally linked land for non-breeding SPA birds No Likely Significant Effect In-combination for sites INDP22/2-INDP22/15 as there are no pathways present.
Social Inclusion				
INDP23	Meeting the Needs of All	To ensure that development proposals meet the needs of all groups and sections of the community they should include, where appropriate: a) Provision of suitable access for all users of the development; b) Be in a location that can be accessed by all users by walking, cycling, public transport and motor vehicles; c) Provision of spaces and places for people of all ages and backgrounds to meet; d) Incorporation of measures and features to ensure that any routes (e.g. footpaths, streets, roads etc.) through a site are welcoming, overlooked and safe; e) Incorporation of measures and features that allow buildings and spaces to adapt and change over time, so they can meet the needs of a changing population and changing technologies; and f) Where appropriate, inclusion of spaces and features that support healthy and active lifestyles.	This policy relates to ensuring any development proposals meet the needs of all groups and sections of the community. This policy does not lead to development, therefore there will be no Likely Significant Effects to European Sites	No Likely Significant Effects as there are no pathways present

Appendix D Screening Assessment of the Plan Site Allocations

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Screening Assessment of the Plan Site Allocations

Policies identified in green in the "Likely Significant Effect- LSE (alone) plus reasoning" column do not provide for impact pathways that could link to a European designated site. Policies identified in green in the "Likely Significant Effect- LSE (In-combination) plus reasoning" column do not provide for impact pathways that could link to a European designated site in-combination with any other policies, Plans or Projects.

Policies identified in orange in the "Likely Significant Effect- LSE (alone) plus reasoning" column have potential to provide for impact pathways that could link to a European designated site. Policies identified in orange in the "Likely Significant Effect- LSE (In-combination) plus reasoning" column have potential to provide for impact pathways that could link to a European designated site 'in-combination' with any other policies, Plans or Projects. In both cases the policy/policies is/are taken forward to the next stage of assessment – Appropriate Assessment and discussed within this document.

Site allocation number and name	**Type of development**	**Distance from closest European Site**	**Likely Significant Effect- LSE (alone) plus reasoning**	**Likely Significant Effect LSE (in-combination)**
INDP 2 Housing Site Allocations	INDP2/1 – Leeds Road, estimate 72 units I	Approximately 925m north of South Pennine Moors Phase (II) Special Protection Area (SPA), and South Pennine Moors Special Area of Conservation (SAC). This housing allocation is separated from the European Sites by residential development	***Recreational Pressure and Disturbance-*** *South Pennine Moors (Phase II) SPA and South Pennine Moors SAC* This housing allocation is small and is over 900m from the SPA/SAC and disturbance impacts relating to noise and vibration during construction will not causes Likely Significant Effects to either European Site. Impacts relating to recreation pressure and disturbance cannot be ruled out. The Bradford Core Strategy HRA (2015) states "*results of visitor survey analysis show that 75% of all visitors come from within approximately 10.5km of the SAC/SPA, while 75% of Bradford residents travelled around 5km to reach the site*." This site allocation is located less than 1km from the SPA and SAC and so there is the possibility of this site allocation causing an increase in visitor numbers at the SPA/SAC. Therefore there is are Likely Significant Effects and this impact pathway for this site allocation will need to be taken to the next stage of assessment- Appropriate Assessment	***Recreational Pressure and Disturbance-*** *South Pennine Moors (Phase II) SPA and South Pennine Moors SAC* N/A going to Appropriate Assessment where this allocation will be assessed in-combination

			Loss of functionally linked land for SPA birds INDP2/1 is a large area of amenity grassland located adjacent to primary schools on the west and on the south-east, residential housing to the south, and north-east , with the Leeds Road (A65) located to the north of the site. To the east of the site is a tree lined watercourse (Backstone Beck) This allocation is over 900m north of the SPA so will not require land-take from the SPA. In relation to South Pennine Moors Phase (II) SPA and loss of functionally link land for SPA birds, this site allocation is a large area of managed amenity grassland surrounded by infrastructure (schools, residential housing and an 'A' road) and line of dense trees. Due to the location of the site allocation it would be subject to noise, disturbance and reduced sight lines. The qualifying features of the SPA: breeding short eared-owl *Asio flammeus*, merlin *Falco columbarius*, or European golden plover *Pluvialis apricaria* species breed and forage/feed in moorland/heathland habitat. Whilst these species may also forage/ feed away from the moorland during the breeding season, short-eared owl will feed over pastoral land, and both merlin and golden plover feed upon farmland or in-bye land (meadows rich in invertebrates) on the edge of the moors that is outside of the SPA boundary. Therefore loss of this site allocation will not cause Likely Significant Effects to these qualifying features as the allocation is unsuitable for them. The South Pennine Moors (Phase II) SPA also supports a breeding bird assemblage including the following species all of which breed and forage/feed in the moorland/heathland habitat: These species may also forage/feed away from the SPA. Details of the feeding habitats of each species within the breeding assemblage follows: ▪ Dunlin *Calidris alpina schinzii,* Adults forage on boggy areas or areas with standing water with a high abundance of insect prey. Suitable areas for foraging are therefore, likely to occur on areas of moorland or bog and not managed pastoral land. ▪ Twite *Carduelis flavirostris*, Feeds on small seeds and invertebrates during the breeding season. Forages low to the ground, often in small groups, in open areas of pasture and cultivation (Snow & Perrin, 1998). ▪ Snipe *Gallinago gallinago,* Adults feed predominantly on wet ground at the edge of water or wet areas, taking items from below the surface through probing. Foraging areas, therefore, need to be sufficiently wet to enable birds to feed on invertebrate prey just below the surface by probing. ▪ Curlew *Numenius arquata,* Feeds on a wide range of invertebrates using several techniques. Open habitats supporting good populations of invertebrates, typically extensive areas of damp grassland and rough pasture,are favoured (Snow & Perrins, 2008). ▪ Wheatear *Oenanthe oenanthe*, Primarily feeds on spiders and other small invertebrates, locating prey visually, chiefly on the ground or in low vegetation (Snow & Perrin, 1998). ▪ Whinchat *Saxicola rubetra*, Foraging distances tend to relate to the availability of invertebrate prey but tend to be greater in intensively managed farmland (Britschgi, 2005). ▪ Redshank *Tringa totanus,* When breeding, the diet consists of insects, spiders and annelid worms (del Hoyo et al., 1996[1]). Areas which are rich in these food items are therefore sought for foraging and include areas with a mosaic of vegetation structure. Lapwing *Vanellus vanellus* Adults forage in short swards are the most profitable foraging habitat for this species (Devereux et al. 2004) .Species like lapwing will typically use large open fields where they avoid foraging/loafing near hedges/trees. They will more often than not be in the middle of the open field where they have good 360° views of their surroundings. This is likely a reflection of lapwing (and other waders) being sensitive to predators that may be hiding within boundary vegetation. The habitat requirements for the breeding bird assemblage species vary, however, the site allocation which is amenity grassland surrounded by infrastructure is unlikely to support any of these species. This conclusion is strengthened by the Bradford Core Strategy HRA which states that this site was subject to bird surveys in 2013 and 2014 which found that this site was not used by SPA birds and nor was it within 200m of a site used by SPA bird species. N.B. In reference to the Bradford Core Strategy and its HRA INDP2/1 is referenced as a SHLAA site IL/001 that is classed as a green SHLAA trajectory site which is within 2.5km zone of the South Pennines Moors (Phase II) SPA. .Therefore in relation to housing allocation INDP2/1 and South Pennine Moors (Phase II) SPA and loss of functionally linked land for SPA bird species there will be no Likely Significant Effects alone.	*Loss of functionally linked land for SPA birds* No Likely Significant Effects. There are no pathways present.

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			Air pollution In relation to the South Pennine Moors Special Area of Conservation (SAC) local air pollution is not considered to cause likely significant effects due to the distance between the SAC and the site allocation (over 900m). According to the Department of Transport's Transport Analysis Guidance, "*Beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant".* Also taken into consideration are any significant 'journey to work' routes within 200m of SAC. However, it is considered that all roads within 200m of the SAC are local residential roads or minor lanes and are unlikely to form significant journey to work routes for the Ilkley residents. Therefore it is considered that there a no Likely Significant Effects from air pollution to the SAC through significant journey to work routes from this allocation. Therefore in relation to housing allocation INDP2/1 and South Pennine Moors SAC and air pollution there will be no Likely Significant Effects alone..	***Air Pollution*** No Likely Significant Effects. There are no pathways present
			Human induced changes in hydraulic conditions The housing allocation site is over 900m from the SAC and therefore would not change the hydraulic conditions of the SAC/SPA through land take. There is the potential that additional water resources are required for the housing allocation and this may require additional abstraction from the reservoirs within the SAC There are Likely Significant Effects alone to the South Pennine Moors SAC in relation to human induced changes in hydraulic conditions,	***Human induced changes in hydraulic conditions*** Potential Likely Significant Effects in-combination effect due to the water abstraction requirement from within the SAC (reservoirs) due to an increase in housing/ number of residents within in Ilkley itself and the surrounding areas/districts.
	INDP2/2 – Ashlands Road/Leeds Road, estimate 18 units	Approximately 1,044m north of South Pennine Moors Phase (II) Special Protection Area (SPA), and South Pennine Moors Special Area of Conservation (SAC). This housing allocation is separated from the European Sites by residential development	***Recreational Pressure and Disturbance-*** *South Pennine Moors (Phase II) SPA and South Pennine Moors SAC* This housing allocation is small and is over 1km from the SPA/SAC and disturbance impacts relating to noise and vibration during construction will not causes Likely Significant Effects to either European Site. Impacts relating to recreation pressure and disturbance cannot be ruled out. The Bradford Core Strategy (2015) states "*results of visitor* survey analysis show that 75% of all visitors come from within approximately 10.5km of the SAC/SPA, while 75% of Bradford residents travelled around 5km to reach the site." This site allocation is located less than 1km from the SPA and SAC and so there is the possibility of this site allocation causing an increase in visitor numbers at the SPA/SAC. Therefore there is are Likely Significant Effects and this impact pathway for this site allocation will need to be taken to the next stage of assessment- Appropriate Assessment	***Recreational Pressure and Disturbance-*** *South Pennine Moors (Phase II) SPA and South Pennine Moors SAC* N/A going to Appropriate Assessment where this allocation will be assessed in-combination
			Loss of functionally linked land for SPA birds ▪ INDP2/2 is a small area amenity grassland with parkland trees located adjacent to the Leeds Road (A65) to the south, residential housing, commercial buildings and Ashlands Road to the west, commercial buildings and allotments to the east and commercial buildings and parkland trees to the north (and a sewage treatment works further north). In reference to South Pennine Moors Phase (II) SPA and loss of functionally linked land for SPA birds, this site allocation is a small area of managed amenity grassland surrounded by infrastructure with parkland trees. Due to the location of the site allocation it would be subject to noise, disturbance and reduced sight lines. In relation to South Pennine Moors Phase (II) SPA the details of the habitat requirements for the SPA qualifying species and breeding bird assemblage is detailed in INDP2/1 above. The habitat at INDP 2/2 (amenity grassland with parkland trees) is not considered suitable to support any of these bird species. This allocation is over 1km north of the SPA so will not require land-take from the SPA. Therefore in relation to housing allocation INDP2/2 and South Pennine Moors (Phase II) SPA there will be no Likely Significant Effects.	***Loss of functionally linked land for SPA birds*** No Likely Significant Effects. There are no pathways present

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			Air pollution In relation to the South Pennine Moors Special Area of Conservation (SAC) local air pollutions is not considered to cause likely significant effects due to the distance between the SAC and the site allocation (over 1km). According to the Department of Transport's Transport Analysis Guidance, "*Beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant*". Also taken into consideration are any significant 'journey to work' routes within 200m of SAC. However, it is considered that all roads within 200m of the SAC are local residential roads or minor lanes and are unlikely to form significant journey to work routes for the Ilkley residents. Therefore it is considered that there are no Likely Significant Effects from air pollution to the SAC through significant journey to work routes from this allocation. Therefore in relation to housing allocation INDP2/2 and South Pennine Moors SAC and air pollution there will be no Likely Significant Effects alone.	***Air Pollution*** No Likely Significant Effects. There are no pathways present
			Human induced changes in hydraulic conditions The housing allocation site is over 1km from the SAC/SPA and therefore would not change the hydraulic conditions of the SAC/SPA through land take. There is the potential that additional water resources are required for the housing allocation and this may require additional abstraction from the reservoirs within the SAC There are Likely Significant Effects alone to the South Pennine Moors SAC in relation to human induced changes in hydraulic conditions,	***Human induced changes in hydraulic conditions*** Potential Likely Significant Effects in-combination effect due to the water abstraction requirement from within the SAC (reservoirs) due to an increase in housing/ number of residents within in Ilkley itself and the surrounding areas/districts.
	INDP2/3 – Stockeld Road, estimate 11 units	Approximately 1,045m north of South Pennine Moors Phase (II) Special Protection Area (SPA), and South Pennine Moors Special Area of Conservation (SAC). This housing allocation is separated from the European Sites by residential development	***Recreational Pressure and Disturbance****- South Pennine Moors (Phase II) SPA and South Pennine Moors SAC* This housing allocation is small and is over 1km from the SPA/SAC and disturbance impacts relating to noise and vibration during construction will not causes Likely Significant Effects to either European Site. Impacts relating to recreation pressure and disturbance cannot be ruled out. The Bradford Core Strategy HRA (2015) states "*results of visitor* survey analysis show that 75% of all visitors come from within approximately 10.5km of the SAC/SPA, while 75% of Bradford residents travelled around 5km to reach the site." This site allocation is located less than 1km from the SPA and SAC and so there is the possibility of this site allocation causing an increase in visitor numbers at the SPA/SAC. Therefore there is are Likely Significant Effects and this impact pathway for this site allocation will need to be taken to the next stage of assessment- Appropriate Assessment	***Recreational Pressure and Disturbance*** N/A going to Appropriate Assessment where this allocation will be assessed in-combination

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			Loss of functionally linked land for SPA birds ▪ INDP2/3 very small area of amenity grassland located adjacent to a car park, surrounded by infrastructure on all sides (roads, and residential housing) and is enclosed by a stone wall. In reference to South Pennine Moors Phase (II) SPA and loss of functionally linked land for SPA birds, this site allocation is a very small area of managed amenity grassland surrounded by infrastructure so it would be subject to noise, disturbance and reduced sight lines/visibility. The site is enclosed and surrounded by a wall and therefore visibility for any bird using the site would be limited, making it suboptimal for waders like lapwing. In relation to South Pennine Moors Phase (II) SPA the details of the habitat requirements for the SPA qualifying species and breeding bird assemblage is detailed in INDP2/1 above. The habitat at INDP 2/3 (amenity grassland surrounded by infrastructure, enclosed and surrounded by a wall) is unlikley to support any of these bird species. This conclusion is strengthened by the Bradford Core Strategy HRA which states that this site was subject to bird surveys in 2013 and 2014 which found that this site was not used by SPA birds and nor was it within 200m of a site used by SPA bird species. N.B. In reference to the Bradford Core Strategy and its HRA INDP2/3 is referenced as a SHLAA site IL/0033 that is classed as a green SHLAA trajectory site which is within 2.5km zone of the South Pennines Moors (Phase II) SPA. .Therefore in relation to housing allocation INDP2/3 and South Pennine Moors (Phase II) SPA and loss of functionally linked land for SPA bird species there will be no Likely Significant Effects alone. This allocation is over 1km north of the SPA so will not require land-take from the SPA. Therefore in relation to housing allocation INDP2/3 and South Pennine Moors (Phase II) SPA there will be no Likely Significant Effects.	***Loss of functionally linked land for SPA birds*** No Likely Significant Effects. There are no pathways present
			Air pollution In relation to the South Pennine Moors Special Area of Conservation (SAC) local air pollutions is not considered to cause likely significant effects due to the distance between the SAC and the site allocation (over 1km). According to the Department of Transport's Transport Analysis Guidance, "*Beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant".* Also taken into consideration are any significant 'journey to work' routes within 200m of SAC. However, it is considered that all roads within 200m of the SAC are local residential roads or minor lanes and are unlikely to form significant journey to work routes for the Ilkley residents. Therefore it is considered that there are no Likely Significant Effects from air pollution to the SAC through significant journey to work routes from this allocation. Therefore in relation to housing allocation INDP2/3 and South Pennine Moors SAC and air pollution there will be no Likely Significant Effects alone.	***Air Pollution*** No Likely Significant Effects. There are no pathways present
			Human induced changes in hydraulic conditions The housing site is over 1km from the SAC/SPA and not require land take from the SPA/SAC There is the potential that additional water resources are required for the housing allocation and this may require additional abstraction from the reservoirs within the SAC There are Likely Significant Effects alone to the South Pennine Moors SAC in relation to human induced changes in hydraulic conditions,	***Human induced changes in hydraulic conditions*** Potential Likely Significant Effects in-combination effect due to the water abstraction requirement from within the SAC (reservoirs) due to an increase in housing/ number of residents within in Ilkley itself and the surrounding areas/districts. .

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	INDP2/4 – Beanlands Parade, estimate 12 units	Approximately 1,085m north of South Pennine Moors Phase (II) Special Protection Area (SPA), and South Pennine Moors Special Area of Conservation (SAC)	***Recreational Pressure and Disturbance-*** *South Pennine Moors (Phase II) SPA and South Pennine Moors SAC* This housing allocation is small and is over 1km from the SPA/SAC and disturbance impacts relating to noise and vibration during construction will not causes Likely Significant Effects to either European Site.. Impacts relating to recreation pressure and disturbance cannot be ruled out. The Bradford Core Strategy HRA (2015) states "*results of visitor* survey analysis show that 75% of all visitors come from within approximately 10.5km of the SAC/SPA, while 75% of Bradford residents travelled around 5km to reach the site." This site allocation is located less than 1km from the SPA and SAC and so there is the possibility of this site allocation causing an increase in visitor numbers at the SPA/SAC. Therefore there is are Likely Significant Effects and this impact pathway for this site allocation will need to be taken to the next stage of assessment- Appropriate Assessment	***Recreational Pressure and Disturbance*** N/A going to Appropriate Assessment where this allocation will be assessed in-combination
			Loss of functionally linked land for SPA birds ▪ INDP2/4 strip of amenity grassland with a tree line with dense understorey to the north and beyond this is a cemetery. To the south of the site are a number of scattered trees and infrastructure such as residential housing and roads. This allocation is over 1km north of the SPA so will not require land-take from the SPA. In reference to South Pennine Moors Phase (II) SPA and loss of functionally linked land for SPA birds, this site allocation is a very small strip of managed amenity grassland with large trees and a dense understory to the northern boundary with some scattered trees to the south and west. The site is located in very close proximity to residential housing (less than 10m and separated by a road) making this site very enclosed and subject to disturbance and noise. The enclosed nature, shape and size of the making visibility for any bird using the site to be limited, **and sub optimal** for waders like lapwing. In relation to South Pennine Moors Phase (II) SPA the details of the habitat requirements for the SPA qualifying species and breeding bird assemblage is detailed in INDP2/1 above. The habitat at INDP 2/4 as described in the paragraph above is unlikely to support any of these bird species. This conclusion is strengthened by the Bradford Core Strategy HRA which states that this site was subject to bird surveys in 2013 and 2014 which found that this site was not used by SPA birds and nor was it within 200m of a site used by SPA bird species. N.B. In reference to the Bradford Core Strategy and its HRA INDP2/3 is referenced as a SHLAA site IL/0034 that is classed as a green SHLAA trajectory site which is within 2.5km zone of the South Pennines Moors (Phase II) SPA. Therefore in relation to housing allocation INDP2/4 and South Pennine Moors (Phase II) SPA and loss of functionally linked land for SPA bird species there will be no Likely Significant Effects alone.	***Loss of functionally linked land for SPA birds*** No Likely Significant Effects. There are no pathways present
			Air pollution In relation to the South Pennine Moors Special Area of Conservation (SAC) local air pollutions is not considered to cause likely significant effects due to the distance between the SAC and the site allocation (over 1km). According to the Department of Transport's Transport Analysis Guidance, "*Beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant"*. Also taken into consideration are any significant 'journey to work' routes within 200m of SAC. However, it is considered that all roads within 200m of the SAC are local residential roads or minor lanes and are unlikely to form significant journey to work routes for the Ilkley residents. Therefore it is considered that there are no Likely Significant Effects from air pollution to the SAC through significant journey to work routes from this allocation. Therefore in relation to housing allocation INDP2/4 and South Pennine Moors SAC and air pollution there will be no Likely Significant Effects.	. ***Air Pollution*** No Likely Significant Effects. There are no pathways present
			Human induced changes in hydraulic conditions The housing site is over 1km from the SAC/SPA and not require land take from the SPA/SAC There is the potential that additional water resources are required for the housing allocation and this may require additional abstraction from the reservoirs within the SAC There are Likely Significant Effects alone to the South Pennine Moors SAC in relation to human induced changes in hydraulic conditions, ▪	***Human induced changes in hydraulic conditions*** Potential Likely Significant Effects in-combination effect due to the water abstraction requirement from within the SAC (reservoirs) due to an increase in housing/ number of residents within in Ilkley itself and the surrounding areas/districts.

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INDP22 Economy and Employment	INDP22/1 Ilkley Water Treatment Works	Approximately 1,140m north of South Pennine Moors Phase (II) Special Protection Area (SPA), and South Pennine Moors Special Area of Conservation (SAC)	***Loss of functionally linked land for SPA birds*** ▪ INDP22/1 is a large parcel comprising the working Ilkley Water Treatment Works (WTW) in the centre of the site with areas of well-maintained amenity grassland surrounding. To the south and east of the parcel are areas of grassland with scrub surrounded by dense areas of trees with some scattered trees within. There are residential gardens adjacent to the south-eastern section of this parcel. There is an enclosed area in the north-west of the parcel which comprises grassland/scrub and is surrounded on all four sides with trees. This allocation is over 1km north of the SPA so will not require land-take from the SPA. In reference to South Pennine Moors Phase (II) SPA and loss of functionally linked land for SPA birds, this site, whilst large is not open as the WTW is located in the centre, there is a section of the parcel which surround on all sides with trees, and the more open areas of grassland contain scrub and scattered trees and again are bounded by trees. Part of the site is located adjacent residential gardens, the north-west section is accessible by the public and contains a number of paths, and with the presence of the WTW, making this large site compartmentalised, enclosed and subject to some disturbance and noise. The enclosed nature, and layout of this site makes visibility for any bird using the site to be limited, **and sub optimal** for waders like lapwing. In relation to South Pennine Moors Phase (II) SPA the details of the habitat requirements for the SPA qualifying species and breeding bird assemblage is detailed in INDP2/1 above. The habitat at INDP 22/1 as described in the paragraph above is unlikely to support any of these bird species. This conclusion is strengthened by the Bradford Core Strategy HRA which states that this parcel was subject to bird surveys in 2013 and 2014 which found that this site was not used by SPA birds and nor was it within 200m of a site used by SPA bird species. N.B. In reference to the Bradford Core Strategy and its HRA INDP22/1 is referenced as a SHLAA site IL/031 that is classed as a green SHLAA trajectory site which is within 2.5km zone of the South Pennines Moors (Phase II) SPA. Therefore in relation to housing allocation INDP22/1 and South Pennine Moors (Phase II) SPA and loss of functionally linked land for SPA bird species there will be no Likely Significant Effects alone.	***Loss of functionally linked land for SPA birds*** No Likely Significant Effects in-combination. There are no pathways present.

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