



**envirotech**

Ecological Consultants  
Environmental and Rural Chartered Surveyors

Your Ref:  
Our Ref: AWG/GEN

[Redacted] Coffey BA(Hons) MCD PgCert NRTPI

Thursday, 27 March 2014

Skipton

BD23 [Redacted]

Dear MS Coffey

**RE: HABITAT REGULATIONS ASSESSMENT AND LAND ALLOCATIONS CITY OF BRADFORD**

Further to our recent correspondence in respect of the above I would confirm that I am a full professional member of the Chartered Institute of Ecology and Environmental Management, Royal Institution of Chartered Surveyors and am a Chartered Environmentalist.

I have reviewed the document "Habitats Regulations Assessment for the City of Bradford District Core Strategy Appropriate Assessment Report for the Publication Draft Document (February 2014)"

I note that surveys relating to visitor numbers, breeding bird status and habitat suitability have been undertaken in order to try to gauge the level of use of both the European Protected Sites and the buffer areas adjacent which are not within but may support the breeding bird assemblages of the protected sites.

The recommendations of the report are that the core strategy re-distributes development and provides alternative recreational sites whilst mitigating residual impacts through access and habitat management.

This approach has also been taken by several other councils nationally. Typically the approach has been that each development site brought forward for housing allocation is subject to a site specific review to establish the likelihood of direct impacts resulting from habitat loss. These can only be undertaken on a site by site basis following specific site assessment.



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Directors:

[Redacted] Gardner  
[Redacted] Gardner

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Where development sites are in proximity to a European Protected Site and direct habitat loss is unlikely to occur, other councils request that sufficient provision of Public Open Space is made within the development, along with Commuted Sums for the off-site provision of recreational facilities and the better management of those which are pre-existing.

This approach ensures land allocation for development is available on greenfield sites away from urban centres, whilst also ensuring that they have negligible direct impacts on habitats supporting the species assemblages of the European Sites. On and off site provision of green space negates or minimises indirect recreational impacts.

This approach is recommend in the concluding chapter of the Habitats Regulations Assessment (a) and (b)

(a) Delivery and funding mechanisms are established to ensure that additional recreational sites are brought forward to divert recreational pressures away from the European sites and important areas of supporting habitat

(b) Greenfield sites to be released for development do not include areas of important supporting habitat, and that a sufficiently robust network of offsite foraging habitats continues to exist

A reduction in housing numbers and allocations centred on brownfield or urban centres, as a way of minimising impacts on European Protected sites is potentially a viable alternative to the recommendations above but would significantly reduce the potential for delivering functional and appropriate housing which addresses needs outside the larger urban centres.

We consider such an approach is not in alignment with the recommendations of the Habitats Regulations Assessment.

Yours Sincerely

[Redacted Signature]

[Redacted] Gardner [Redacted]  
Director Envirotech