

City of Bradford Metropolitan District Council Core Strategy

Review of Appropriate Assessment (December 2014) relating to recreational impacts and urban edge effects on the South Pennine Moorlands SPA and SAC

By

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1 Introduction

- 1.1 Andrew McCloy has over 20 years' experience as a consultant specialising in access, recreation and sustainable transport. He has worked as an associate for a number of leading consultancies, including TellTale Interpretation, the Access Company and Baker Consultants. Clients range from the public sector, such as City of York Council/Countryside Agency (Rights of Way Improvement Plan Exemplar Project: Whole Network Approach, 2003) and Cannock Chase Area of Outstanding Natural Beauty (Improving the Management of Access for Walkers with Dogs on Cannock Chase, 2009), through to third sector organisations such as the RSPB (Lower Aire Valley Public Rights of Way and Access Appraisal, 2011) and Community Transport Association (Enterprising approaches for rural community transport organisations – a toolkit, 2013). He is also the author of over 20 books on walking and outdoor recreation and contributes to a range of magazines and newspapers, including BBC Countryfile magazine and The Great Outdoors. Andrew is a past member of the Peak District Local Access Forum (six years as chair) and is currently an elected member and committee chair on the Peak District National Park Authority.
- 1.2 This report focuses on the Appropriate Assessment produced in December 2014 ('AA Dec 2014') and begins by demonstrating how recreational and urban edge impact pathways must be objectively assessed with and without the benefit of mitigation. It shows the fundamental importance of a robust local evidence base and the need to fully identify and assess all the available data, acknowledging any gaps or weaknesses.
- 1.3 The approach taken by Bradford Council in the AA Dec 2014 is then examined and it is shown how, from the outset, it was acknowledged that there were significant data gaps that needed to be addressed if recreational impact and urban edge effects are to be properly understood and assessed.
- 1.4 The evidence presented throughout the AA Dec 2014 is shown to be unsatisfactory and unreliable for a number of reasons. It is:
- Selective (findings from reports are often cherry picked to illustrate a pre-determined position, not objectively presented and assessed)
 - Incomplete (visitor survey data does not identify the required depth of behavioural or locational information, rendering effective analysis impossible)
 - Misrepresented (some data is not accurately reported)
 - Missing altogether (open access surveys are ignored; no reference is made to independent research into the impact of access and recreation on upland birds; other evidence such as cat predation simply does not exist)
 - Erroneous (too much reliance on data from elsewhere that draws dubious comparisons with the South Pennines)
 - Subject to significant alteration (excessive redaction of previous comments which fail to support the conclusions desired)

- 1.5 Despite Bradford Council commissioning a new visitor survey in summer 2013, the data which I have examined fails to adequately identify specific recreational behaviour and patterns, most notably whether visitors stay on moorland paths or roam at will, and thus the degree of impact that they will have.
- 1.6 The AA takes no account of the existing or future mitigation measures on the South Pennines Moors Special Protection Area (SPA) and Special Area of Conservation (SAC), including recent and extensive footpath restoration work undertaken on behalf of Bradford Council and others, and how this is likely to influence visitor activity both now and in the future. It does not acknowledge that through its support for voluntary groups, such as the Friends of Ilkley Moor, Bradford Council is actively seeking to influence positive recreational behaviour and already mitigating visitor impact.
- 1.7 There is no reference to the Council's existing approach to delivering mitigation and enhancement, and that Section 106 contributions from developments are already being used to mitigate recreational impact on the SPA/SAC.
- 1.8 Since the evidence base is incomplete and unreliable, the AA fails to provide a clear causal link between recreational disturbance/urban edge effects and its impact on the integrity of the South Pennine Moors SPA/SAC.
- 1.9 That being the case, the restrictive approach towards new development set out in draft policy SC8 is unjustified and unnecessary, particularly given the protection already afforded to the SPA through policy EN2. However, if SP8 is to be so considered the policy would need to be revised.
- 1.10 Furthermore, the AA's inability to provide a robust evidence base means that it also fails to provide a justification of the need to change the status of settlements or reduce or redistribute housing limits (proposed in policy HO3) on the basis of protection of the SPA/SAC from recreational and urban edge impact pathways. Targets that have been revised downwards should be reinstated or, as in the case of Burley in Wharfedale, increased to reflect its sustainable status.
- 1.11 Throughout AA Dec 2014 there is no account of the wider promotion of the South Pennine moorland by Bradford Council, amongst others, including walking trails and circular routes across the SPA/SAC publicised on the Council's own website.

2 Methodology for assessing potential impact pathways without mitigation

2.1 In summary:

- The evidence base should relate primarily to the South Pennine Moors SPA/SAC and not rely on examples from elsewhere that risks drawing erroneous conclusions
- Findings must be presented accurately and objectively, not selectively to prove a point

- All available evidence must be weighed up and gaps and inconsistencies acknowledged
 - Specific recreational behaviour on moorland without mitigation must be identified and understood if an accurate assessment of impact is to be made
 - An attempt must be made to quantify the additional number of visits generated by any new development alongside existing numbers in order to predict the percentage increase and hence its likely impact on the SPA
- 2.2 Any assessment of recreational impact and urban edge effects in the South Pennines should be based primarily on evidence related to the South Pennines, not examples or studies drawn from elsewhere in the country. To do otherwise risks drawing inaccurate conclusions that are not applicable to this distinct habitat.
- 2.3 Data should be presented accurately and not selectively chosen to support a pre-conceived point. Where the evidence is inconclusive or missing this should be acknowledged.
- 2.4 The evidence base should be considered in the round, so that all aspects of recreational impact and urban edge effect are properly weighed up, including the Council's own active promotion of the South Pennine Moors as a recreational destination (see chapter 7).
- 2.5 To accurately assess the likely effect of recreational use on the SPA/SAC it is also necessary to understand the precise nature of recreational behaviour and patterns of use without mitigation, for example whether users stay on paths or roam at will across open ground; the penetration distance of specific types of key user, such as dog-walkers; and the extent to which any perceived problems are localised or likely to be short/long term. It is not sufficient to merely identify how many people visit the moors and whether they walk or cycle, as the visitor surveys to date have done; it is necessary to establish whether, for example, they adhere to defined routes when they get there and the extent to which dog walkers stay within a certain distance of car parks and access points. This will then provide an informed assessment of the overall impact on the surrounding habitat.
- 2.6 This considered approach offers a more precise understanding of recreational behaviour on the upland moors of the South Pennines (as distinct from other habitats like lowland heath) and any likely future impact on the SPA and SAC.
- 2.7 An attempt must also be made to estimate the additional number of visitors generated by any new development and compare them to existing visitor numbers in order to predict the overall percentage increase - and hence its likely impact on the SPA. In this way a clearer picture can be drawn as to how any new development, and in particular variations in the agreed numbers of new homes, might or might not affect the SPA.

3 Bradford AA's approach to assessing potential impact pathways without mitigation

3.1 In summary:

- There is an over-reliance on studies from lowland heaths which do not provide reliable comparative data
- Evidence from various studies and reports is either inconclusive, misreported or selectively used
- Other relevant data is missing entirely, such as Natural England's work on recreational impact on open access land that included two survey points on the South Pennine Moors SPA/SAC
- Visitor survey work conducted by the Council in summer 2013 does not provide the level of detail required to adequately assess recreational impact on the SPA/SAC
- Newly-drawn buffer zones give no indication of recreational behaviour on the ground, such as the extent to which users stay on paths and so minimise their overall impact
- The evidence presented on the activity and likely impact of dog-walkers is contradictory, incomplete and unreliable
- There is no attempt to work out the additional number of visits generated by any new development in relation to existing visitor numbers and the extent to which this is likely to impact on the SPA

3.2 The approach taken in the AA Dec 2014 is to rely heavily on studies from outside the South Pennines SPA. The AA places considerable emphasis on previous research into recreational behaviour on southern England lowland heaths to demonstrate likely levels and patterns of activity in the South Pennines SPA (5.7.1). However, the dry and sandy soils of lowland heaths make it easier for visitors to create new paths and adopt a more open and indiscriminate approach to access. The wet and peat-based South Pennine Moors, on the other hand, are generally less easy to access and gradients more difficult to negotiate so that many users find it easier to stay on set paths and not roam at will across the rough heather moors (see evidence in 3.10).

3.3 The difference in scale between the two habitats also raises questions as to the relevance of the comparative data. For instance, the Thames Basin Heaths SPA is a dispersed archipelago European site of over 8,200 ha whereas the South Pennine Moors SPA is over 66,000 ha and the North Pennine Moors SPA is over 147,000 ha (see Table 1 below) - more than 18 times the size of the lowland heath example. This is likely to mean that the level of visitor penetration into the South Pennine Moors and North Pennine Moors SPAs is likely to be very small compared to their total area.

Table 1 Comparative areas of heathland sites.

European site	Area Ha
Thames Basin Heaths SPA	8,274.72
Dorset Heathlands SPA	8,168.79
Dorset Heaths SAC	5,730.73
North Pennine Moors SPA	147,248.41
North Pennine Moors SAC	103,109.42
South Pennine Moors SPA	66,207.01
South Pennine Moors SAC	64,983.13

Source JNCC

- 3.4 Also cited in the AA Dec 2014 is a review of the effects of trampling and erosion on moorland heath and blanket bog (Anderson ed., 2001), suggesting off-path use can be as high as 30% *"where adjacent vegetation is amenable to walking"* (5.7.21). However, once more this is a site specific study conducted outside the South Pennines SPA (in the Peak District National Park). The AA Dec 2014 could equally have quoted from a study by the Sustainable Uplands and Moors for the Future projects (which also covered the Peak District as well as other UK uplands) and which found that 97% of people who visit countryside designated as Access Land stay on footpaths and do not venture across open access land (*Tourism and recreation - Opportunities and threats to the visitor economy*, Research Note No. 16, 2007). Neither provide a conclusive or reliable indication on what impact trampling and erosion has had or will have on the South Pennines SPA, although I consider the findings of the latter more pertinent to the specific nature of Rombalds Moor.
- 3.5 Similarly, the chapter on urban edge effects is introduced by reference to a study of lowland heaths in East Hampshire (5.8.2), the general findings of which appear to be drawn simply from a discussion by a single focus group and meetings with landowners. The data presented in Table 5.9 do not even relate to a defined period.
- 3.6 Although there are some reports quoted in the AA Dec 2014 with a specific focus on the South Pennines, their findings are not always accurately presented. For instance, the *South Pennine Moors Integrated Management Strategy and Conservation Action Programme* (1998) does indeed identify the likelihood of short term and localised effects of recreation on the South Pennine Moors (5.7.3); but the AA's brief summary of it does not reflect the report's wider observations: *"Most walking, horseriding and cycling (including mountain biking) takes place along linear routes, even over open country, and in many cases there is evidence that valuable bird habitats have matured around established patterns of use. Rombalds Moor, particularly Ilkley Moor, is one example of important bird habitats **co-existing** with open access and a range of recreational use, for over 100 years"* (p45).
- 3.7 The AA Dec 2014 presents a more recent report, Natural England's *Monitor of Engagement with the Natural Environment Survey (2009-12): Visit taking in the*

South Pennines (Burt et al, 2014), which purports to show, amongst other things, that 68% of visits in the South Pennines are made with a dog (5.7.4). However it is in fact a largely socio-economic study with a focus on the South Pennines Catchment Area; it contains no site specific data nor any mention of the SPA/SAC; only 4% of interviewees actually say they visit mountain, hill or moorland; and 68% of visits with a dog are in fact to any "*natural place*" in the South Pennines which also includes country parks, farmland, canal towpaths and recreation grounds.

- 3.8 In 5.8.4, the AA Dec 2014 makes reference to the evidence of urban edge effects in the South Pennines in 2012. The findings come from the www.moorwatch.com website, run by Pennine Prospects, a rural regeneration company created in 2005 as a champion for the wider South Pennines. However, what the AA fails to mention is that the data is simply derived from unverified reports submitted by members of the public drawn from across the rural and urban South Pennines (stretching from Ilkley in the north to Oldham/Rochdale in the south and from west of Halifax to east of Chorley). There is no specific focus on the South Pennines SPA or SAC; the reports are not corroborated, analysed or necessarily investigated; and the majority of complaints appear to relate to incidents of off-road driving (a problem not exclusive to urban edges) and which may or may not have been on legal routes anyway.
- 3.9 This selective use of evidence in the AA Dec 2014 is also repeated in the reporting and analysis of a survey into nesting golden plover near the Pennine Way in the Peak District (Finney et al, 2005), a location 50km south of the SPA (5.7.13). The AA suggests that around well-used moorland paths there is likely to be an avoidance of up to 200m by breeding golden plovers and other wading birds. However, the AA omits to mention how the zone of disturbance was in fact reduced from 200m to 50m once the eroded path was resurfaced, which encouraged walkers to stay on the route; and how the report's authors concluded that "*...despite the clear behavioural responses of the golden plovers to the presence of visitors, there was no detectable impact of disturbance on reproductive performance*".
- 3.10 Not only is there insufficient and selective evidence from the reports cited in the AA Dec 2014, but some useful data into recreational behaviour on the South Pennine Moors has been overlooked altogether. In its national *Open Access Visitor Survey* (2006-08) conducted after the implementation of the Countryside and Rights of Way (CROW) Act (2000), Natural England surveyed Ilkley Moor and Bingley Moor, both part of the South Pennine Moors SPA. Among the findings were that walkers with dogs from Ilkley tended to restrict their walks to the core area adjacent to the town's edge; public rights of way exert "*a strong pull*" on moorland users; and where users did exercise their right to wander off paths and tracks it tended to be around popular access points. It found that "*...a large majority of the walkers with dogs have been using the site for several years. The most significant reasons given for not leaving the PROW [public right of way] is that it was easier and safer. Others stated that the PROW took the user where they wanted to go, so there was no reason to leave it*" (Johnson et al, 2009, Countryside and Rights of Way (CROW) Act 2000 (Part 1): National Open Access Visitor Survey (2006-2008) - Access Management Report, Natural England, p79).

- 3.11 The AA Dec 2014 contends that there is a *"long tradition of fell or hill walking involving direction finding and off-path use, especially in the South Pennines"* (5.7.22). However, there is no evidence to back up this assertion and indeed a number of reports (such as Natural England's own visitor survey quoted in 3.10) appear to show that most users prefer to stay on defined routes - whether out of choice or necessity. Furthermore, the proliferation of promoted walking trails across Rombalds/Ilkley Moor, such as the Bradford Millennium Way and Dales High Way (see 7.2) and the Stanza Stones Poetry Trail (7.4), plus the Council's self-guided walks and organised ranger led-outings, all encourage visitors to stay on established paths and not wander randomly across the moorland. This is also likely to help users get a better understanding of conservation issues and so encourage more respect for the SPA/SAC.
- 3.12 An important part of the AA Dec 2014 evidence base for assessing future recreational impact on the SPA is its own survey of visitors to the South Pennines moorland conducted in 2000 and again in 2013. The first version of the AA in May 2013 deemed the 2000 survey as insufficient to fully inform the AA, so the focus has been on the more recent visitor survey carried out in summer 2013.
- 3.13 Although it presents some interesting information in terms of numbers of visitors and the origins of their journeys, there are also some significant flaws, omissions and unsupported conclusions. The key flaws and omissions are:
- an over-estimation of annual visitor numbers and a general lack of clarity on assumptions and methodology
 - the 'penetration distances' of visitors on the moors do not indicate whether users stay on paths or roam at will
 - the penetration distances provide no indication of the overall volume of use or differentiate between types of user
 - there is no account of how different moorland habitats might affect recreational activity
 - figures on dog-walkers do not indicate localised variations or specific patterns of use
- 3.14 There is little detail on the methodology and assumptions used in the survey, without which it is difficult to verify the reliability of the figures. It appears that the hours collected during this summer survey have simply been multiplied up into annual figures, which means that there is likely to be a significant overestimation for the winter months (and hence the total annual numbers). This is important as the estimate of visitor numbers is used in conjunction with the distances travelled by visitors to the SPA/SAC to calculate the suggested 7km zone of influence in relation to recreational impacts (5.7.31).
- 3.15 The AA Dec 2014 shows penetration distances of visitors on to the SPA/SAC moorland of Rombalds/Ilkley Moor and around Haworth, indicated by buffer zones drawn from access points (5.7.16). However, they do not indicate the extent to which users stay on defined paths and tracks and hence minimise potential disturbance to

wildlife. Instead, they appear to suggest that visitors cover a wide and indiscriminate area of the moor - which other evidence contradicts (see 3.4 and 3.6 of this report).

- 3.16 The buffer zones do not portray the type or volume of user in a specific location, for instance whether a route is primarily used by walkers or mountain bikers, or a location is popular with dog-walkers. Each group is likely to have its own pattern of use and degree of impact.
- 3.17 The buffer zones take no account of the precise nature of moorland habitat. For instance, wet or boggy ground is unlikely to promote off-path exploration, however close to an access point, encouraging users to stay on defined routes and so minimise their impact. This incentive is likely to be even stronger where footpath restoration has taken place.
- 3.18 The 2013 survey results also indicate that 49% of respondents visited the moors with a dog and that 77% of those let their dog off the lead (5.7.19). However, the survey appears to have simply recorded visits to the moor with or without a dog and did not record how far dog walkers (as a specific user group) actually penetrated the moors during their visit. Because of this it is impossible to accurately assess the extent of their impact and whether, for example, they confined their visit to areas immediately around access points (as suggested by Natural England's *Open Access Visitor Survey*, see 3.10). Instead, the AA Dec 2014 once more relies on visitor data from southern England lowland heaths and attempts to transpose it on to the South Pennines in an attempt to justify the suggested buffer zones and likely zones of disturbance.
- 3.19 The analysis claims that the number of visits made to the northern part of the SPA/SAC (principally Rombalds/Ilkley Moor) is high, but this appears to be only in comparison to the number made in the more remote south (around Haworth). The inference that a relatively high level of visitor numbers equates to a relatively high level of disturbance does not necessarily follow, since other factors must be taken into consideration (such as type of user, patterns of use and the effectiveness of any ongoing access management, including available paths and trails).
- 3.20 There is also an acknowledgement in the AA that certain key evidence is inconclusive or even missing entirely. Reference is made to lowland heath research into predation by cats (as part of urban edge effects) and rather oddly studies are cited showing the home range for male cats in Australia and New Zealand (5.8.14). However, the AA then goes on to acknowledge that there is no data whatsoever on predation by cats of moorland birds in the UK and their potential impact on moorland wildlife in general is simply a matter of conjecture (5.8.15).
- 3.21 The AA Dec 2014 makes no attempt to predict the additional number of people brought into the area by new development, how this compares with existing visitor numbers and what the overall percentage increase might be, nor the likely impact on the SPA. There is no indication what effect changes in housing numbers might bring.

4 Methodology for assessing potential impact pathways with existing mitigation

4.1 In summary:

- Existing mitigation measures on the SPA and SAC must be identified and their effectiveness assessed
- Ongoing footpath restoration work and access management on the South Pennine moorland carried out by local voluntary groups and other partnerships must be taken into account
- An assessment must be made as to whether this active visitor management is likely to prove effective in mitigating future recreational impact on the SPA and SAC
- Planned recreational improvements bordering the SPA/SAC must also be assessed for their potential to mitigate overall impact
- The Council's existing approach to delivering mitigation and enhancement must be identified and assessed, for instance where Section 106 contributions are already being used to mitigate recreational impact on the SPA/SAC

4.2 A proper assessment of the effects of visitor activity on the SPA and SAC moorland must take into account the fact that significant work to mitigate recreational impact on the South Pennines is already taking place. In particular, the assessment must ask some key questions: what does the mitigation currently consist of and is it effective in addressing current impact? And what is the likelihood that it will provide effective mitigation in the future?

4.3 Access management is already being carried out on the SPA at popular locations such as Ilkley Moor, with long stretches of well-used paths being repaired. At least 12 of the main routes on Rombalds Moor have either been surfaced with sandstone aggregate or laid with flagstones. For example, in Autumn 2014 contractors commissioned by Bradford Council Countryside Service restored a popular moorland path from the Wooden Bridge at Backstone Beck, on the edge of Ilkley Moor, installing new steps and laying a 350m path to the Lower Tarn (See Appendix 1). Elsewhere, the Pennine Watershed Project has funded similar footpath restoration work on the South Pennine moors above Heptonstall in Calderdale. The Moors for the Future project continues to restore the moorland of the Peak District and South Pennines, including paving stretches of the Pennine Way long distance footpath. All this work is designed to make the South Pennine moorland habitat more resilient to visitor pressure and accommodate and encourage recreational use, and any assessment must take this into account. In particular, there is clear evidence to show that improving path surfaces across moorland habitats encourages users to adhere to routes and so reduces erosion and minimises disturbance to wildlife (see 3.9).

4.4 Further evidence that impact should be considered alongside mitigation is provided by Bradford Council's ongoing support for and close working with the Friends of Ilkley Moor. This voluntary organisation actively seeks to mitigate visitor impact by promoting responsible recreation on the SPA and also funding footpath restoration work. It runs a popular events programme and its code of conduct for users includes

the following advice: *"Staying on defined footpaths helps to protect the adjacent habitats and the species which depend on it."* Bradford Council also collaborates with the Friends of Baildon Moor (Council-owned common land which fringes Rombalds Moor and the SPA/SAC). This group also promotes recreational use, but as on Ilkley Moor seeks to mitigate impact by encouraging responsible behaviour such as keeping to paths, not widening routes, avoiding wet and eroded patches, and so on.

- 4.5 Plans for improving and extending recreational facilities bordering the SPA/SAC must be identified and assessed in terms of their likely influence on future recreational patterns, and hence their contribution towards overall mitigation on the SPA. For example, the sustainability credentials of settlements such as Burley in Wharfedale will be significantly boosted with the creation of the proposed 'Wharfedale Greenway', a traffic-free walking and cycling route that is intended to link Burley in Wharfedale, Otley, Pool in Wharfedale and Menston. If it goes ahead it will provide sustainable transport links throughout Wharfedale and encourage walking and cycling journeys away from the SPA/SAC, so its likely impact should be assessed.
- 4.6 It should also be acknowledged that Bradford Council's planning service has already demonstrated its practical approach by agreeing developers' contributions towards mitigating recreational and urban edge impact from planned development. For example, in December 2013 Bradford Council agreed a Habitat Mitigation Contribution of £23,287 via a Section 106 agreement in respect of a development at Scalebor Park, Moor Lane, Burley in Wharfedale. In the Council's Committee report the sum was described as contributing *"...to the provision of appropriate mitigation measures within the Special Protection Area (for instance, footpath measures and moorland management)"*.
- 4.7 Another proposed development (February 2015) at Main Road, Denholme, suggested a developer contribution of £10,000. The Committee report described its intention: *"To mitigate impacts on sensitive habitats by bringing forward the improvements on routes leading to and at the SPAs. On these routes, erosion of adjacent habitat caused by widening footpaths is an issue and this can be addressed through a suitable contribution. It is also intended to provide information panels at access points to inform visitors about the SPA and especially dog behaviour whilst on the moors."*

5 Bradford AA's approach to assessing potential impact pathways with existing mitigation

- No reference to any mitigation already taking place on the SPA/SAC, nor any assessment of its current or future effectiveness
- No mention of ongoing access management measures, such as Council-initiated footpath restoration work, nor any possible long term strategic approach
- No account of how planned new infrastructure and facilities, such as the Wharfedale Greenway, might affect local recreational impact and behaviour

- No acknowledgement of developers' contributions already agreed with the Council towards mitigating recreational impact on the SPA/SAC

- 5.1 The AA does not refer to any current mitigation taking place on the South Pennine Moors SPA/SAC in relation to recreational impact or urban edge effects. For instance, there is no mention of the recent and extensive footpath restoration work in the SPA on the Council-owned and promoted Ilkley Moor and which the Council itself commissioned. There is no assessment of whether this action is likely to prove effective in mitigating recreational impact in the long term and whether the Council and its partners have plans for carrying out further work.
- 5.2 Similarly, there is no reference at all to the ongoing promotion of the South Pennine moorland as a recreational destination and how this relates to a long-term strategic approach to access management on the SPA/SAC and wider moorlands.
- 5.3 There is no assessment of whether messages from the Council and its partners encouraging responsible behaviour (such as keeping to paths, dogs on lead, etc.) are effective and whether new initiatives are planned. Instead, the AA Dec 2014 adopts a wholly restrictive approach towards recreational impact that fails to weigh up the extent to which mitigation could ameliorate impact.
- 5.4 No account is taken of plans for new recreational facilities, such as the Wharfedale Greenway (see 4.5), and how this will affect local recreational patterns and contribute towards mitigating visitor impact on the SPA/SAC from local service centres.
- 5.5 There is no acknowledgement that Bradford Council is already using developer contributions through Section 106 agreements to mitigate recreational impact on the SPA/SAC (see 4.6 and 4.7).

6 Significant changes in approach between AA versions May 2013, February 2014 and December 2014

- 6.1 The Appropriate Assessment was first produced in May 2013 ('AA May 2013'), then revised in February 2014 ('AA Feb 2014') and finally December 2014 ('AA Dec 2014'). By the time of the final version there were a number of changes to chapters 5.7 (recreational impact) and 5.8 (urban edge effects), including considerable redaction of text.
- 6.2 In the AA May 2013 it was acknowledged that significant amounts of evidence relating to recreational impact were entirely absent: *"Visitor surveys are needed to fulfil a number of data gaps including: the proportion of residents living around the moors that visit on a regular basis; how frequently they visit; from where and by what mode do they travel; what activities they undertake while visiting; and how far they penetrate into the designated sites. These data and related information are needed to enable impacts to be predicted more precisely"* (8.2.2).

- 6.3 This comment echoed the conclusions of an earlier key document, the *South Pennine Moors Integrated Management Strategy and Conservation Action Programme* (1998) which called for further research and monitoring. *"Research and evidence to date is inconclusive as to whether or not recreation and access at current levels are having a major impact on bird conservation in the South Pennine Moors"* (p.44). This is reported in both the AA May 2013 (5.7.3) and the AA Feb 2014 (5.7.3) but then largely disregarded in the AA Dec 2014 (5.7.3).
- 6.4 The AA May 2013 and AA Feb 2014 both refer to the need to "plug data gaps" and in this context look forward to the findings of on-going research by a PhD student into moorland birds and recreation. *"The resulting dataset should help to build a picture of how the moors are used as a local recreational resource, and whether changes in management could be explored to reduce the impact of visitor activity. For the time being, the assessment can only draw on pre-existing data which is not sufficiently comprehensive to fully inform an avoidance and mitigation strategy"* (5.7.5 in the AA Feb 2014). However, all mention of this work is dropped in the AA Dec 2014, demonstrating that, even in the authors' view, the evidence base remains incomplete.
- 6.5 This is compounded by references in the AA May 2013 and the AA Feb 2014 to the Council's own visitor survey in 2000 which is described as *"not sufficiently comprehensive to fully inform the Appropriate Assessment"* (5.7.11). It goes on to say: *"The assessment that follows identifies known relationships between recreational visitors and effects on wildlife sites, but cannot identify specific housing number thresholds or quantify the scale and type of mitigation measures that might be required, without a more detailed understanding of visitor activity"* (5.7.12). In the AA Dec 2014 the 2000 visitor survey merits only two short paragraphs (5.7.6 and 5.7.7).
- 6.6 In an effort to address this shortfall of data, the AA Dec 2014 provides new analysis of the Council's visitor survey conducted in summer 2013, despite the fact that the AA Feb 2014 (published after the visitor survey in 2013) had already acknowledged that *"...it was not possible to predict impacts of recreation on bird distribution and populations in the absence of visitor survey data"* (5.7.21). In other words, no new visitor data was referred to between the AA Feb 2014 and AA Dec 2014 versions.
- 6.7 Regardless of this, new illustrations in the AA Dec 2014 (Figures 5.5 and 5.6) attempt to predict buffer zones of penetration by recreational users on to the SPA moorland, based on the 2013 visitor survey. This spatial representation replaces a diagram in the AA Feb 2014 that instead shows a linear zone of impact along defined paths and tracks (based on the findings of Finney et al, 2005), demonstrating a lack of detailed evidence on specific recreational behaviour and an unwillingness to assess the extent to which users stay on paths. This knowledge gap is a serious flaw in the AA.
- 6.8 Similarly, in the AA Feb 2014 the section on trampling and erosion includes the statement: *"Where the adjacent ground is rough, the vegetation tall and woody (heather in its mature and senescent states), or where very wet areas are present, visitors to mountain and moorland tend to keep to paths"* (5.7.31). This has been

deleted from the AA Dec 2014 and again suggests a deliberate lack of understanding of recreational behaviour on the South Pennine moorlands.

- 6.9 The results of the summer 2013 survey are also used to stress the high number of visits to the SPA/SAC moorland made by people with dogs. However, as noted previously it does not provide the required level of information and in any event the analysis is contradicted by the findings of the Council's own survey in 2000, which indicated that dog-walking was the prime reason for just 20% of visits (this was included in the AA May 2013 and the AA Feb 2014 but omitted from the AA Dec 2014).
- 6.10 The robustness of this evidence is further called into question via the presentation of new visitor data, published in 2014, in the AA Dec 2014, which purports to show that 68% of visits to the wider South Pennines are by dog walkers (Natural England's *Monitor of Engagement with the Natural Environment Survey (2009-12): Visit taking in the South Pennines*). However, the results are misrepresented (see 3.7) since the figures refer to visits with a dog to any "natural place" in the South Pennines - which in this context also includes country parks, farmland, canal towpaths and recreation grounds. The inevitable conclusion is that the evidence base set out in the AA Dec 2014 for understanding the behaviour of dog-walkers on the SPA/SAC moorland and predicting their likely impact is incomplete and unreliable.
- 6.11 The AA Dec 2014 makes a new and specific reference to the potential impact of mountain bikes, particularly on Rombalds Moor, but no evidence is presented in support of this assertion and there is a clear and obvious data gap.
- 6.12 The presentation of the results and analysis of the golden plover survey on the Pennine Way (Finney et al, 2005) in the AA Dec 2014 has been significantly edited from the previous two versions to omit any mention of how the zone of disturbance was reduced from 200m to 50m once the path was flagged. In the AA May 2013 and AA Feb 2014 considerable space is given to reporting the headline findings, including how more breeding birds were found closer to the newly-restored path even though visitor numbers actually increased twofold during this time. The AA Dec 2014 instead suggests that the study indicates that "*well-used unsurfaced access routes across the Pennine moors*" are likely to be avoided by breeding golden plovers and other waders (5.7.14), choosing to ignore the evidence suggesting that recreational impact can be successfully mitigated by targeted intervention.
- 6.13 Both the AA May 2013 and AA Feb 2014 include a reference to a study into moorland fires in the Peak District (McMorrow & Lindley, 2006) that appears to suggest that fires are most common on blanket peat and around the Pennine Way, rather than urban edge or the managed heather moors in the east where prescribed burning manages the fuel load (5.8.9). This is omitted from the AA Dec 2014, as is a previous reference to a successful initiative in the south of England that tackled fires in urban edge wildlife sites through extra wardening, new fire fighting equipment and a public education programme. Although the AA Dec 2014 is keen to establish the relationship between urban development and moorland fires, the evidence here

appears to be contradictory, incomplete and ignores an example of effective mitigation.

7 Current promotion of recreational activity on the South Pennine Moors SPA/SAC

- 7.1 Although the AA Dec 2014 has a clear focus on the potentially negative impact of visitor activity on the SPA/SAC, it does not acknowledge that in fact Bradford Council actively promotes recreational use of the South Pennine Moors at the same time. The impact assessment must consider the interplay of these two seemingly contradictory positions if it is to arrive at a logical and informed conclusion.
- 7.2 Evidence of this positive promotion of the moorland not cited in the AA includes Bradford Council's collaboration with and support for the Friends of Ilkley Moor and Friends of Baildon Moor voluntary organisations; and its promotion of the Bradford Millennium Way and the Dales High Way long distance footpaths across the district's moorland. Indeed, the Council's own website features a number of self-guided trails to moorland locations that are freely available to download and print off, including a 7-mile circular route called 'The Length and Breadth of Ilkley Moor' that encompasses the SPA (www.visitbradford.com/explore/Walking.aspx). It includes the footnote "*We hope you enjoyed your walk. If so tell your friends.*" Bradford Council also participates in the annual South Pennines Walk and Ride Festival, which in 2014 featured among its led walks an outing through the SPA to the Puddle Stones in the centre of Rombalds Moor.
- 7.3 Both Ilkley and Burley in Wharfedale are official 'Walkers are Welcome' towns, part of a UK-wide network of settlements that actively encourage outdoors tourism, with the SPA moorland of Ilkley Moor, in particular, promoted as a key local destination (see Appendix 2).
- 7.4 Ilkley Moor also hosts the widely publicised 'Stanza Stones Poetry Trail', a new 47-mile moorland walking route from Ilkley to Marsden broken down into 'short family walks'. Developed as part of the popular annual Ilkley Literature Festival, it features a series of stones inscribed with poems specially written for the project by Simon Armitage. "*Whether you're a keen walker ready to tackle full day walks incorporating two or more stones in one go or just fancy a short family outing there's something for everyone. Each walk includes snippets of information about the stones, full directions, maps, and information about parking, toilets and nearby pubs, tea rooms and cafes*" (from www.ilkleyliteraturefestival.org.uk/test/stanza-stones-trail-guide). Natural England advised on the installation of the stones on the moors and Bradford Council is a named sponsor of Ilkley Literature Festival.
- 7.5 It would appear that despite the concerns over recreational impacts expressed in the AA Dec 2014, in fact a wide range of local residents and visitors are actively encouraged by Bradford Council to enjoy open air recreation on the SPA- and SAC-designated moorland.

8 Conclusions

8.1 At the outset, the AA May 2013 acknowledged that there were significant data gaps that needed to be "plugged" if recreational impact and urban edge effects were to be satisfactorily identified and assessed.

8.2 In response, Bradford Council commissioned a new visitor survey in summer 2013, but although the AA Dec 2014 relies heavily on this new evidence its findings are not sufficiently comprehensive or robust to inform the AA. The key issues are:

- It does not follow that a likely rise in visitor numbers to an already accessible outdoors location will simply result in higher levels of disturbance
- It depends on where different types of visitor go and what they do when they get there
- The AA takes no account of the wider and ongoing promotion of the South Pennine moorland by Bradford Council, amongst others
- The AA takes no account of the existing or future mitigation measures on the SPA and how this is likely to influence visitor activity and deal effectively with its impact
- There is no account of the existing approach to mitigation taken by Bradford Council's planning department

8.3 In summary, the recreational and urban edge evidence presented in the AA Dec 2014 is:

- Selective (findings from reports are often cherry picked to illustrate a pre-determined position, not objectively presented and assessed)
- Incomplete (visitor survey data does not identify the required depth of behavioural or locational information, rendering effective analysis impossible)
- Misrepresented (some data is not accurately reported)
- Missing altogether (open access surveys are ignored; no reference is made to independent research into the impact of access and recreation on upland birds; other evidence such as cat predation simply does not exist)
- Erroneous (too much reliance on data from elsewhere that draws dubious comparisons with the South Pennines)
- Subject to significant alteration (excessive redaction of previous comments which fail to support the conclusions desired)

8.4 Since the evidence base is incomplete and unreliable, the AA Dec 2014 fails to establish a clear causal link between recreational disturbance/urban edge effects and its impact on the SPA/SAC moorland.

8.5 This conclusion is corroborated by the findings of ecologists Baker Consultants (see Appendix A of the Submission) which includes a brief literature review of the impacts of recreation on moorland birds.

- 8.6 The restrictive approach towards new development set out in draft policy SC8 is therefore considered unjustified and unnecessary, particularly given the protection that policy EN2 already affords the SPA. However, if it is to be so considered the policy would need to be amended.
- 8.7 Bradford Council's practical approach to delivering mitigation and enhancement has already been demonstrated through Section 106 agreements in respect of planned development at Scalebor Park in Burley in Wharfedale and at Denholme, where developer contributions have been agreed that specifically seek to mitigate recreational impact on the nearby SPA.
- 8.8 Furthermore, the AA's failure to establish a clear causal connection between recreation or urban edge effects and their impacts on the SPA/SAC fails to support any supposed need to change settlement status or reduce or redistribute housing limits (proposed in policy HO3) on the basis of protection of the SPA/SAC from recreational or urban edge effects.
- 8.9 There is thus no "recreational or urban edge impacts" reason for the proposed reduction or redistribution of housing numbers set out in policy HO3 for local service centres bordering the SPA/SAC. Targets revised downwards should be reinstated. Settlements such as Burley should be returned to their original status to reflect their sustainability (a Local Growth Centre) and the housing targets increased from those originally set to reflect the sustainability credentials of such a settlement.

Appendix 1: Footpath Restoration Work on Ilkley Moor

From www.ilkleymoer.org/path-restoration-work-on-ilkley-moor/



Major path restoration work has been completed on Ilkley Moor. Starting from the Wooden Bridge at Backstone Beck, new steps have been made on the first steep part of the path, the sandstone path continues for 350 metres to the lower Tarn.

The work, carried out by contractors Matthew Robinson of Steeton, was commissioned by Bradford Council Countryside Service. 80 tons of sandstone was used and it took four days to complete, at a cost of £4800 to be paid for by The Friends of Ilkley Moor.

Richard Perham from the Council Countryside Service said “ I am very pleased with the standard of the work which repairs a path that was very wet and slippery in places. We will, during the winter months, do more repairs to paths and thin out trees and gorse in certain areas of the Moor. I have contracted some mowing to tidy up the paddling pool before the winter sets in. Work will also be done on drainage to keep paths from becoming boggy while maintaining other wet areas.”

Picture shows workmen finishing off the path towards the Tarn. Photograph by Barry Wilkinson/Friends of Ilkley Moor.

30th October 2014

Appendix 2: Walkers are Welcome - Burley in Wharfedale

From www.waw-burleyinwharfedale.org/index.html



Who we are

Walkers are Welcome was launched in 2007 as a national movement to raise the profile of great places to walk in Britain, with Hebden Bridge becoming the first town to achieve accreditation. Local accreditation of towns and villages is designed to attract more walkers to the area and to encourage local residents to get to know the wealth of open spaces in and around their community. Benefits of Walkers are Welcome status include health improvements, additional trade for local businesses, encouragement of public transport use, and a raised profile for the area as a tourist destination.

The Burley-in-Wharfedale Walkers are Welcome group was formed by local walking enthusiasts in 2013. With the support of local businesses, 475 residents signed a petition in support of the application for accreditation during August and September. The application was endorsed by Burley Parish Council and Bradford Metropolitan District Council, and membership of the network was approved in March 2014 with Burley joining over a hundred other towns and villages. The group was officially launched on 16 August 2014 as part of the Summer Festival with guest speaker Colin Speakman.

Our village

Burley-in-Wharfedale is superbly situated for walking and also for those who prefer to run! Surrounded by fields and meadows and with the River Wharfe passing close to the village centre, the area is rich in wildlife. The village has ancient origins and was mentioned in both the Saxon Chronicles of 972 and the Yorkshire Charters of 1030. There are many interesting buildings within the historic core of the village, designated as a conservation area, and these are described in a History Trail booklet available from the library.

A number of becks and streams draining from the adjacent Burley Moor pass through the village on their way to the River Wharfe, and these along with many ginnels and rights of way are a distinctive feature of our community.

The surrounding countryside is wonderful walking territory, with numerous footpaths accessing Burley and Baildon Moors to the south, Ilkley and Addingham Moors to the West, the Chevin Country Park to the East, and the Nidderdale Area of Outstanding Natural Beauty to the North.

The Sun Lane nature reserve is only one of three Local Nature Reserves within Bradford district and provides a uniquely rich habitat for wildlife adjacent to the village, with over 400 species of plants recorded.