

**From:** [REDACTED]  
**To:** [Local Dev. Framework](#)  
**Subject:** Draft Local Plan - RSPB representations  
**Date:** 12 February 2018 11:26:07  
**Attachments:** [image001.gif](#)  
[image002.gif](#)  
[RSPB representations - Craven Draft Local Plan.pdf](#)  
**Importance:** High

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Dear Sir or Madam,

Please find attached our written representations in relation to the Craven Draft Local Plan.

Many thanks.

[REDACTED]  
Conservation Officer (Yorkshire, Humber & Peak District - Uplands)

**RSPB Northern England** Westleigh Mews, Wakefield Road, Denby Dale, Huddersfield, HD8 8QD

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[rspb.org.uk](http://rspb.org.uk)



The RSPB is the UK's largest nature conservation charity, inspiring everyone to give nature a home. Together with our partners, we protect threatened birds and wildlife so our towns, coast and countryside will teem with life once again. We play a leading role in BirdLife International, a worldwide partnership of nature conservation organisations.

The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654

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**By email only**

08/02/17

Dear Sir or Madam

**Re: Craven District Council Publication Draft Local Plan Consultation**

Thank you for the opportunity to provide representations on the Publication Draft Craven Local Plan. The RSPB has a wealth of experience of working with local authorities on Local Plans across the country. We consider that spatial planning offers an important opportunity to take a strategic and sustainable approach to protecting our most important wildlife sites, identifying and creating opportunities for local wildlife and biodiversity gain, whilst meeting wider social and economic needs.

We would like to take this opportunity to specifically draw attention to the potential impacts to foraging wading birds using potentially functionally linked land associated with the North Pennine Moors Special Protection Area (SPA) and the South Pennine Moors (Phase 2) SPA respectively that have correctly been highlighted in the Plan. Our representation relates specifically to a number of preferred development sites that are detailed as 'Housing sites' in the Plan.

**North Pennine Moors SPA**

We welcome the acknowledgement in the Habitat Regulations Assessment – Appropriate Assessment Report (December 2017) of the potential loss of important foraging sites to development. We also welcome the recommendation for preferred development sites in the Skipton area to undergo review in relation to potential foraging areas for Golden plover (a qualifying SPA citation species) and Curlew (a species that meets the qualifying criteria but is not formally notified as an SPA citation species).

Golden plovers nest on the moors and blanket bogs of the North Pennine Moors SPA but do most of their feeding on surrounding pastures. They do not nest on the pastures but will sometimes take their chicks up to 2 kilometres (km) to feed on farmland. They occupy the pastures (and the moors) from late February to late July, but **mid-March to June** is when they are used most. Females feed on pastures during the daytime while males incubate or brood young chicks. Males then feed on pastures at night-time while females are on nest duty. Research has found that females can fly up to 7.4km from the nest to feed, while males flew 2.4 to 2.7km (means of the minimum and maximum

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The RSPB is part of BirdLife International,  
a partnership of conservation organisations  
working to give nature a home around the world.

Patron: [REDACTED] Chairman of Council: [REDACTED] FIEEM Chief Executive: [REDACTED]

distances each individual was recorded from its nest). The research found that 10.7km was the maximum distance recorded away from the nest to feed. Fields were surveyed for foraging females between 09:00 and 18:00 when flocks were most stable. Males left for the pastures about 22:30 and returned to the moors about 04:00.

SPA-nesting Curlew will often feed on nearby pastures before settling to breed on moorland. Once their chicks have hatched they are more likely to remain on moorland, but will accompany them to the nearest suitable farmland for foraging.

We welcome the acknowledgement in the Plan to conduct Biodiversity Appraisals as part of the key Development Principles associated with a number of the Policies. Specifically, Biodiversity Appraisals for Policies SK081, 082, 108a (incorporating SK080a), 87, 88, 89, 94, 114 and 124 will be of particular importance due to these preferred development sites being the closest in Craven District to the North Pennine Moors SPA. Whilst it could be suggested that all of the aforementioned preferred development sites may appear to be less likely to support foraging Golden plover and Curlew, due to all lying adjacent to residential areas, an assessment of whether foraging birds could be present will still be required

### **South Pennine Moors (Phase 2) SPA**

We welcome the commitment to conduct a full Ecological Impact Assessment (EclA) in relation to Policy SC085 at Glusburn, due to the close proximity of this preferred development site to the South Pennine Moors (Phase 2) SPA boundary. Golden plover are a qualifying SPA citation species and Curlew qualifies as part of the Breeding Bird Assemblage. As above it could be suggested that the preferred development site is less likely to support foraging Golden plover and Curlew, due to the relative proximity to a residential area, however an assessment of this will still be required as part of the EclA.

### **Survey and Mitigation**

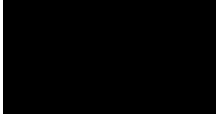
We recommend that for all preferred development detailed above, a reconnaissance visit is made to assess their likely suitability to support Golden plover and Curlew, i.e. whether or not they are pasture fields. If the sites are deemed to be potentially suitable, a daytime search of the fields for species presence should be conducted from mid-March onwards. We note that the local RSPB Group were consulted on whether they held any records of Golden plover in the Skipton area. It should be noted that RSPB Local Groups do not hold bird records and that any mention of species records may be anecdotal, unless a formal survey was completed. If birds likely to be associated with the SPAs are located on the preferred development sites, then formal surveys will be required to be undertaken to accurately ascertain the numbers of foraging birds using the land. For Golden plover, this will also need to include night-time surveys to account for foraging males. We would be happy to be consulted on the methodology required for such a survey if required.

If foraging SPA species are found to be using the preferred development sites mentioned above, there will also be a requirement to appropriately identify and acquire suitable land elsewhere within the area as part of the Biodiversity Mitigation Plans, in order to mitigate against the loss of important functionally linked foraging land.

Please note that we do not feel it is necessary for us to participate at the oral part of the examination. We would though like to be kept informed of the progress of the Craven Local Plan through to adoption.

Please do not hesitate to contact me if any of the above requires clarification.

Yours sincerely,

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Conservation Officer (Yorkshire, Humber and Peak District - Uplands)

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