

Strategic Access Management and Monitoring Plan

In respect of the Canterbury section of the Thanet Coast and
Sandwich Bay SPA

Main Report

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Executive Summary

About this Plan

This Strategic Access Management and Monitoring Plan (SAMM) provides a strategy to mitigate the potential in-combination impacts of new housing development in the vicinity of the Thanet Coast and Sandwich Bay Special Protection Area (SPA) arising from the Canterbury District Local Plan. Canterbury City Council has allocated 15,600 new homes to be built by 2031.

Policy SP7 of the Canterbury District Local Plan relates to mitigation measures in respect of the Habitat Regulations¹ and states that mitigation measures will comprise wardening (funded in perpetuity), monitoring, access management and the provision of open space on new sites. This strategy provides further detail on the mitigation measures outlined in Policy SP7 so that Canterbury City Council meets its requirements under the Habitats Regulations 2010. Mitigation measures will also need to work in perpetuity, as long as the issue requiring mitigation remains.

Canterbury City Council is applying a strategic mitigation approach, developed in line with current government guidance. This strategic mitigation approach covers strategic housing allocations included in the Canterbury Local Plan (2014) plus likely windfall sites. Other development which may come forward may require separate assessment at the discretion of the Local Planning Authority. Canterbury City Council is also working with neighbouring Thanet District Council on a co-ordinated mitigation approach for the SPA, in order both to secure the best outcome for the SPA and meet requirements under the 'duty to co-operate'.

Thanet Coast and Sandwich Bay SPA and Recreational Impacts

The section of coast under consideration is between Whitstable Harbour and Minnis Bay. This is a busy coastline, bordered by the seaside towns of Whitstable and Herne Bay. Beyond the eastern extent of Herne Bay, there are no permanent coastal settlements until Birchington and Minnis Bay, in Thanet District. Reculver Country Park, to the east of Herne Bay is an important access point to the coast, receiving around 200,000 visitors annually.²

The Thanet Coast and Sandwich Bay SPA is used by large numbers of migratory birds. The site qualifies under Article 4.2 of the Birds Directive through supporting populations of European importance over-wintering Turnstone (*Arenaria interpres*) and European Golden Plover (*Pluvialis apricaria*).

The entire coast is accessible for walking and, for much of this length, for cycling. There is a promenade along most of this stretch of coast, bringing the Turnstones very close to users and potential disturbance stimuli.

The SPA is not continuous between Whitstable and the Canterbury City Council boundary, but Turnstones are present along the entirety of this coastline and are not solely confined to discrete roost sites. The whole of this coastline is, therefore, covered in this strategy.

¹ These Regulations replace the previous Conservation (Natural Habitats &c.) Regulations 1994 normally referred to as the 'Habitats Regulations.' The original Habitats Regulations have had numerous amendments between 1994 and 2012.

² Canterbury City Council; Reculver Country Park Management Plan 2013-2018.

Between 2001 and 2010 Turnstone numbers were relatively stable. However, the 2013 survey recorded a 50% drop in Turnstone numbers compared with previous surveys. The survey was repeated in 2014, reporting that “*the apparent decrease has been genuine.*”³

There is a body of evidence that recreational activity can cause the disturbance of birds. In particular walking with dogs, predominantly in the intertidal area, close to roosts at high tide and with dogs off leads, are the most common disturbance stimuli. It is also this recreational activity which occurs in the highest volume and which is most likely to increase with increased housing. It is this recreational activity which is, therefore, considered as the primary activity for mitigation within this strategy.

A recent survey report⁴ concluded that the disturbance of Turnstones by dogs would need to be addressed in any disturbance avoidance measures. The report went on to recommend signage and interpretation as a means of informing beach users about the Turnstones and helping to reduce disturbance incidents, backed-up by frequent contact with on-site personnel in order to minimise future disturbance.

In 2014 a visitor survey was carried out to provide an evidence base for this SAMM.⁵ This recorded that over half of all visitors surveyed were accompanied a dog and over half cited dog walking as the main reason for their visit; 84% of regular visits are made to walk the dog and 17% of dog walking visits included walking on the beach.

Zone of Influence

The zone of influence is the geographical area within which an impact on European site interest can be identified and where potential impacts need to be avoided or mitigation provided. The 2014 visitor survey has provided evidence on the number of visitors, how far they have travelled to the site, how regularly they visited and whether they were accompanied by a dog. This evidence base has been used to determine at this zone of influence.

The visitor survey shows the origin of regular⁶ visitors to four different survey points along the coast. The survey showed that 90% of all regular visitors lived within 7.2km of the SPA.

In taking a precautionary approach, it is concluded that 7.2km is the most appropriate zone of influence. However, it will be important to keep this zone under review, in particular within the next five to ten years as new housing developments are built.

The Mitigation Package

There are a range of potential measures which could be employed to mitigate negative impacts from recreational disturbance. These can include habitat interventions, access management, engagement with or enforcement action of on site visitors and on and off-site measures.

³ Hodgson, I., (2014), Thanet Coast Turnstone (*Arenaria interpres*) Monitoring, Sandwich Bay Bird Observatory Trust.

⁴ Hodgson, I., (2013), Thanet Coast Turnstone (*Arenaria interpres*) Monitoring, Sandwich Bay Bird Observatory Trust.

⁵ Fearnley, H, Liley, D and Floyd L. (2014). Thanet Coast and Sandwich Bay SPA Visitor Survey. Unpublished report for Canterbury City Council.

⁶ Regular = more than one visit per week.

Potential mitigation measures have been considered in relation to the specific issues and species relevant to this section coastline, alongside the principles of mitigation in order to comply with the Habitats Regulations, to arrive at the most suitable mitigation package.

- A **wardening service** is required in order to provide an on-site presence throughout the SPA within Canterbury District for the period of the year when Turnstones and Golden Plover numbers are at their peak i.e. between October and April. The wardening presence is the key mitigation action and it is essential that this is as effective as possible, with an enforcement role. This will be supported by education to ensure longer-term compliance;
- A **co-ordination role** will be required to manage the wardening presence and to co-ordinate activities throughout the year;
- There are some, limited, **access-management** possibilities;
- Regular monitoring of birds and visitors will be required.

The SAMM will be reviewed after a period of no greater than ten years or if the results of the visitor or bird surveys highlight issues which are not being addressed by the SAMM.

Tariff

A tariff has been developed that will be levied to new housing according to the number of dwellings built within the zone of influence. The mitigation strategy will be monitored and kept under review and some adjustments to the tariff may be made to ensure that it remains effective.

The tariff will be funded by developer contributions and comprises of two elements. The first will fund annual expenditure to operate the mitigation actions and the second will fund the capital investment required in order to fund the mitigation strategy in perpetuity.

A proportional or differentiated tariff, based on occupancy rates will be applied, as shown below.

Tariff per dwelling – including requirement for in-perpetuity funding	Tariff per dwelling
1 bedroom flat	£355
2 bedroom house or 2 bedroom flat	£498
3 bedroom house	£670
4+ bedroom house	£848

I: Introduction

About this Strategy

This Strategic Access Management and Monitoring Plan (SAMM) provides a strategy to mitigate the potential in-combination impacts of new housing development in the vicinity of the Thanet Coast and Sandwich Bay SPA arising from the Canterbury District Local Plan.

The mitigation plan draws on the existing evidence base for the SPA and has referenced other similar work across the UK. The report sets out:

- Evidence relating to the SPA features and potential impacts on these arising from increased housing in Canterbury District ;
- An evaluation of possible mitigation measures to address these impacts;
- A zone of influence within which new development will be required to pay a tariff contribution to mitigating the potential in-combination effects on the SPA;
- Details of the specific measures which will comprise the mitigation package;
- Details of the tariff, differentiated in respect of housing size.

This document is the Main Report of the SAMM. Further detail is contained in a separate Appendix document.

Legal and Policy Requirements

Part 6 of the Habitats Regulations 2010⁷ relates to the assessment of plans and projects for their effects upon European sites, their interest features and conservation objectives, and provides a process by which the consideration of potential effects and the decisions made with regard to whether plans and projects can proceed. Local planning authorities are 'competent authorities' to which the requirements of the Habitats Regulations apply.

Before undertaking a project, giving permission for a project, or giving effect to a plan, which includes the production of Local Plans and other Development Plan Documents, Regulation 61(1)⁸ requires competent authorities, including local planning authorities, to consider whether such a plan or project is likely to have a significant effect upon a European site.

The 'likely significant effect' is a judgement made in relation to the features for which the European site was designated and its conservation objectives. It needs to consider the nature of effect, its timing, duration and reversibility. Regulation 61(5) advises that a competent authority can only agree to the plan or project if it will not adversely affect the integrity of any European site, taking into account any conditions or restrictions that could be put in place.

⁷ These Regulations replace the previous Conservation (Natural Habitats &c.) Regulations 1994 normally referred to as the 'Habitats Regulations.' The original Habitats Regulations have had numerous amendments between 1994 and 2012.

⁸ '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

(b) (either alone or in combination with other plans or projects), and

(c) is not directly connected with or necessary to the management of that site must make an appropriate assessment of the implications for that site in view of that site's conservation objectives.

Ensuring that the integrity of the site is maintained or restored⁹ is achieved 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.¹⁰

The Habitats Regulations apply the precautionary principle, i.e. consent cannot be given unless it is ascertained that there will be no adverse effect on the integrity of the site. A precautionary approach should be taken when there is the lack of information to rule out significant effects, coupled with sound justification for assuming that an impact could potentially occur, i.e. the impact is capable of having an effect because there is a logical pathway between impact and receptor. The precautionary approach should not, however, be so over-precautionary that it is not based on sound judgement.

Any plan or project, if shown to adversely affect the integrity of a European site, must include measures to mitigate this affect.

In 2012, regulation 9A was added to the Conservation of Habitats and Species Regulations 2010 which, in summary, requires the local planning authorities to take steps they consider appropriate to secure the objective of the preservation, maintenance and re-establishment of a sufficient diversity and area of habitat for wild birds in the UK, for example by means of the upkeep, management or creation of such habitat, whether in or outside a SPA.¹¹

Requirement for this Strategy

In a letter submitted in response to the consultation on the Publication Draft Local Plan (2014), Natural England advised as part of their representation that:

“We advise that we are not satisfied with the HRA as there is insufficient information to allow a conclusion of no likely significant effect on internationally designated sites (N2K sites) to be drawn.

We also consider that the plan is not currently sound, on the grounds that it is not consistent with national policy, as it is not fully compliant with the National Planning Policy framework. Our concerns about the plan focus on the lack of policy detail on protection of N2K sites and mitigation. [...]

Habitats Regulations Assessment – lack of information in relation to air quality, water quality and recreational disturbance impacts on internationally designated sites (N2K).

⁹ And in the case of Special Protection Areas that it contributes to achieving the aims of the Wild Birds Directive.

¹⁰ Natural England guidance: European Site Conservation Objectives for SPA's.

¹¹ 9A.—(1) Without prejudice to regulation 9(1), the appropriate authority, the nature conservation bodies and, in relation to the marine area, a competent authority must take such steps in the exercise of their functions as they consider appropriate to secure the objective in paragraph (3), so far as lies within their powers. (3) The objective is the preservation, maintenance and re-establishment of a sufficient diversity and area of habitat for wild birds in the United Kingdom, including by means of the upkeep, management and creation of such habitat, as appropriate, having regard to the requirements of Article 2 of the new Wild Birds Directive.

We advise that the current HRA of the draft local plan does not assess adequately the potential impacts that may arise from the plan and therefore does not comply with the Habitats Regulations. This potentially leaves the plan unsound with regard to ensuring that the quantum of housing set out in the plan can be delivered. [...]

We note that the mitigation measures currently suggested by policy SP7 in the local plan would address recreational pressures but would not be appropriate for issues of air quality or water quality”.

Policy SP7 of the Draft Local Plan relates to mitigation measures in respect of the Habitat Regulations:

No development will be permitted which may have an adverse effect on the integrity of an SAC, SPA or Ramsar Site, alone, or in combination with other plans or projects, and where it cannot be demonstrated that there would be no adverse effect on the integrity of the sites. The strategic development sites identified in the Plan would therefore be required to fund, in perpetuity, the following mitigation measures:

- (1) Wardening of sensitive international wildlife sites, and increased education, to be funded by the development in perpetuity;*
- (2) Ongoing monitoring and surveys of sensitive sites in the district to be funded via the wardening programme;*
- (3) Consideration of other measures as required; for example, access management; and*
- (4) The provision of open space on new sites, as set out in the Council’s Development Contributions SPD.*

Contributions will be made in accordance with the guidance prepared by the Council.

This strategy provides further detail on the mitigation measures outlined in Policy SP7.

Principles of Mitigation

Mitigation is required when the effects of development, when considered in combination with other plans and projects, cannot be ruled as insignificant under the Habitats Regulations 2010.

Mitigation must address the issue or issues which is causing the significant effect. In terms of assessing development impact, the purpose of mitigation is to avoid potential impacts brought about by the development and not to ameliorate pre-existing impacts.¹²

It must provide confidence that there will be no adverse effect on the integrity of the European site(s) either from a single development or from the cumulative effects of new development. It must address the adverse effect which will arise. Therefore if the adverse effect is disturbance from recreation, mitigation measures should ensure that disturbance levels do not increase. This is different, albeit perhaps subtly, from ensuring that levels of access do not increase.

¹² Although a mitigation strategy may also have coincidental beneficial effects on pre-existing impacts.

There are some key principles which underpin mitigation. Approaches should:

- **Be evidence based:** Measures should be based on evidence to justify need, appropriateness and effectiveness. Assumptions used, for example the effect of a project a particular distance from a European site, must be based on robust evidence. However, evidence-gathering should be proportionate to the level of detail required;
- **Be necessary:** Measures should be required to enable planning permission to be granted;
- **Be effective:** A mitigation strategy must provide certainty that development can proceed without adverse effects on the European sites. Measures must avoid impacts or reduce them to levels which will not detrimentally affect the conservation interest of the site(s);
- **Last in perpetuity:** Any avoidance measures are required to be provided for in perpetuity;
- **Be adaptive:**¹³ Demographic changes, changes in the distribution of birds, changes in access and the implementation of the mitigation strategy itself can result in changes. A mitigation strategy needs to be able to respond to these changing circumstances. Monitoring is, therefore, a fundamental component of any package;
- **Be specific to the situation:**¹⁴ Although approaches used elsewhere can be useful comparators, a mitigation approach should be tailored to the specific situation;
- **Be proportionate:** Mitigation needs to work and be sufficient to protect the site and satisfy legal requirements but should not go further than this. Developers should not be required to pay to rectify existing impacts for which they are not responsible, but their mitigation measures can include proposals to avoid or reduce existing impacts to ensure that the net effect of new plus existing impacts means there is no significant effect on a European site. They should not include measure to meet duties relating to the maintenance and restoration of European sites outside of new development.¹⁵ Approaches should also be fair in respect of, in this case, the sources of recreational activity;
- **Be compliant:** with planning law and policy, including the Habitats Regulations, European Directives, the NPPF, the Community Infrastructure Levy Regulations and the planning legislation and policy relating to the use of Section 106 Planning Obligations.

Strategic Mitigation

Strategic approaches to mitigation seek to address issues affecting sites across all developments or a wider area in a combined approach, rather than dealing with effects on a case by case basis. Such approaches can incorporate or complement any case by case specific mitigation which also needs to be carried out.

The scale of the strategic approach which is of greatest benefit needs to be determined. Depending on the specific issues and impacts on any given site, strategic mitigation could operate at a sub-district level through to sub-regional scale involving several district areas.

¹³ In accordance with paragraphs 19, 190 and 205 of the NPPF.

¹⁴ In accordance with the Community Infrastructure Levy Regulations and paragraph 204 of the NPPF.

¹⁵ As required by Article 6(2) of the Habitats Directive or Article 4(4) of the Birds Directive.

A strategic approach potentially has several advantages:

- Ideally it could mitigate against any in combination significant effect and potentially therefore avoid the need for case by case appropriate assessment;
- Can operate over several sites which is more effective for mobile species such as birds;
- It can achieve multiple objectives;
- It can operate cross-boundary in a collaborative manner;
- Can be an integrated approach, which avoids moving the issue elsewhere;
- Cost effective as money spent on mitigation and avoidance not assessment;
- Sets a transparent approach for developers;
- Should minimise disruption or costs to developers in complying with law;
- Monitoring operates at an appropriate scale.

In addition to the principles applied to mitigation approaches previously outlined, strategic approaches must also: ¹⁶

- Have a degree of **flexibility**: A strategic approach may also be able to deal with a-typical projects, however, a strategic approach for a plan will be based on assumptions about the projects likely to make up the plan, so if individual projects don't conform to these assumptions they will require separate assessment;
- Offer **certainty**: Needs to be underpinned by secure financial and legal mechanisms.

Cross-Boundary Approaches

Planning Policy Statement 9 relating to biodiversity has been repealed, but Circular 06/5: Biodiversity and Geological Conservation¹⁷ provides administrative guidance. The National Planning Policy Framework (NPPF) sets out streamlined policy guidance with respect to biodiversity conservation.

Paragraph 117 is of particular relevance. It sets out that local authorities should work at a landscape-scale and across local authority boundaries in order that planning policies should minimise impacts on biodiversity. Local authorities should:

- *Plan for biodiversity at a landscape-scale across local authority boundaries;*
- *Identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;*
- *Promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan;*

¹⁶ <http://guidanceanddata.defra.gov.uk/strategicapproachshra/deciding-whether-to-develop-a-strategic-approach/>

¹⁷ Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within the Planning System, ODPM 06/2005

Moreover, paragraph 114 states that local planning authorities should:

- *Set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure; and*
- *Maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as Heritage Coast, and improve public access to and enjoyment of the coast.*

The Localism Act 2011 also introduces the Duty to Cooperate in relation to sustainable development,¹⁸ which is designed to ensure that all bodies involved in planning work together on issues which are of more than local significance. Local authorities must demonstrate how they have complied with the duty at the independent examination of their Local Plans. The cooperation should produce effective and deliverable policies on strategic cross boundary matters.

The Natural Environment and Rural Communities Act (2006) places a duty on local authorities to consider biodiversity in its functions.

¹⁸ Localism Act 2011, Section 110.

Thanet Coast and Sandwich Bay Special Protection Area

The Thanet Coast and Sandwich Bay Special Protection Area (SPA)¹⁹ (see Plan 1) was designated in 1994. The site is used by large numbers of migratory birds. The site qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance over-wintering Turnstone (*Arenaria interpres*).²⁰

European Golden Plover (*Pluvialis apricaria*) is also listed as a qualifying species on the citation. Breeding Little Tern (*Sterna albifrons*) is also listed in the original citation and in a recent Natural England Conservation Objectives information note,²¹ although these have not bred since the 1990's.

The site is also a Ramsar, also designated in 1994.

Scope of this Strategy

Geographical Area

This strategy relates to the interest features of the Thanet Coast and Sandwich Bay SPA. The measures contained within this strategy will not necessarily be confined to within the boundaries of the SPA, or to within Canterbury City Council local authority area. The qualifying features of interest may occur outside the SPA site boundaries and some of the measures may need to be applied beyond the SPA boundary to ensure effectiveness.

This mitigation strategy does not include The Swale SPA, which is included in the Thames, Medway and Swale Estuaries Strategic Access Management and Monitoring Strategy.²²

Relevant Impacts

This strategy considers the impacts of recreational activity on the interest features of the Thanet Coast and Sandwich Bay SPA. It does not consider other impacts which may arise from increases in housing. It is confined to the impacts on the qualifying features of the SPA and not to other potential impacts on species and habitats which may be present in the SPA.

¹⁹ UK9012071.

²⁰ 940 individuals representing at least 1.3% of the wintering Western Palearctic - wintering population (5 year peak mean 1991/2 - 1995/6).

²¹ European Site Conservation Objectives for Thanet Coast and Sandwich Bay Special Protection Area, dated June 2014.

²² Liley, D. & Underhill-Day, J. (2013). Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy. Unpublished report by Footprint Ecology.

CANTERBURY CITY COUNCIL - STRATEGIC ACCESS MANAGEMENT AND MONITORING PLAN
 MAIN REPORT

Plan I: International Designations East Kent



2: New Housing in Canterbury City Council Local Authority Area and zone of influence

Strategic Allocations

Canterbury City Council has allocated 15,600 new homes to be built by 2031.²³ The new homes are to be located in large, strategic sites (i.e. more than 20 dwellings), plus smaller developments across the district.

The strategic sites are distributed across the district, at varying distances from the boundary of the SPA. Of particular note, the proposed strategic sites within 2.5km of the SPA are all located at Herne Bay and Whitstable and comprise:

- Site 3, Hillborough (Herne Bay) – 1,300 homes, 1.2km;
- Site 4, Herne Bay Golf Course – 600 homes, 1.8km;
- Site 5, Land at Strode Farm (Herne Bay) – 800 homes, 2.3km;
- Site 6, Land at Greenhill (Herne Bay) – 300 homes, 1.8 km;
- Site 7, Thanet Way Whitstable – 400 homes, 1.8km.

Sites 2, Sturry/Broad Oak (1,000 homes) and Site 8, Land N of Hersden (500 homes) to the north east of Canterbury City are within 7.2km of the SPA.

Strategic sites to the south of the City are at a distance of over 10km from the SPA boundary, and comprise:

- Site 1, South Canterbury – 4,000 homes, 10.8km;
- Site 9, Howe Barracks – 400 homes, 10km;
- Site 10, Kent and Canterbury Hospital – 810 dwellings, 10.9km.

The strategic allocation sites are shown in Plan 2.

Zone of Influence

A zone of influence needs to be established in developing a strategic approach to mitigation for the Thanet Coast and Sandwich Bay SPA. The zone of influence is the geographical area within which the majority of new housing is located that would, when considered in combination, potentially have a significant impact on the interest features of a Natura 2000 site. Within this zone potential impacts need to be avoided or mitigation provided. Outside of this zone it is considered that significant effects on the European site are unlikely.

In drawing up the zone of influence it is necessary to define how far people travel to visit the Thanet and Sandwich Bay SPA and in which catchment area new housing is likely to result in an increase in visitor pressure on the SPA.

In order to inform this strategy, a survey of visitors was carried out, focusing on a number of key visitor sites in the Canterbury District coastal section of the Thanet Coast and Sandwich Bay SPA.²⁴

²³ Canterbury District Local Plan Publication draft (2014) at para 2.18.

This work has provided information on the number of visitors, how far they have travelled to the site, and other information such as the time of year they visited, how regularly they visited and whether they were accompanied by a dog.

There is no standardised method to determine a 'zone of influence', as each site and their surrounding physical features differ greatly. However, in developing the zone it is necessary to identify a boundary, which is representative of visitor patterns to the site, the physical features of the site, infrastructure, current housing distribution and the nature of the surrounding area.

In considering the particular local factors in this area, its geography and the distribution of settlements are of relevance. The main settlements closest to the SPA are along the coast, but beyond the SPA and within Canterbury District there are few settlements of significant size between Canterbury City and the coastal towns; Canterbury itself is the largest settlement in the area.

In reviewing the visitor survey data it appears that while the coast has a definite local draw, some visitors at the survey locations do also originate from Canterbury City and from further afield.

The results of the visitor survey show the origin of regular²⁵ visitors to four different survey points along the coast from Hampton Pier in the west to Minnis Bay in the east.²⁶ The visitor distribution indicates that regular visitors live as far away as Canterbury and Faversham; although visitors from these locations visited the western sites of the SPA. Visitors living further east and within Thanet were the main regular visitors to the eastern site (Minnis Bay).

Regular visitors make up half of all the visitors to the sites and they travel to the sites on foot and by car. Of particular note, the survey found that 90% of all regular visitors lived within 7.2km of the SPA.

The survey also found that the main influencing factor determining visitors' choice of site visit was that it was close to home. This was particularly prevalent amongst dog walkers, the majority of whom cited this as the main factor determining their choice of site to visit.

Visitors with dogs made up 76% of all regular visitors to the SPA, making them significant users of the sites. In addition the report notes that during interviews with dog-walking visitors, off-lead dogs were observed in 74% of the visitor groups.²⁷

Another factor influencing visitor patterns may be the road network. The eastern section of the SPA in Canterbury (and just into Thanet district) is more difficult and time-consuming to access by road from the south and west due to the road network. This may be borne out by the pattern of visitor origins of those visitors who travel to the site by vehicle, as detailed in the visitor survey.

²⁴ Fearnley, H, Liley, D and Floyd L. (2014). Thanet Coast and Sandwich Bay SPA Visitor Survey. Unpublished report for Canterbury City Council.

²⁵ Regular = one visit or more per week.

²⁶ Fearnley, H, Liley, D and Floyd L. (2014). Thanet Coast and Sandwich Bay SPA Visitor Survey. Unpublished report for Canterbury City Council; Map 9.

²⁷ Fearnley, H, Liley, D and Floyd L. (2014). Thanet Coast and Sandwich Bay SPA Visitor Survey. Unpublished report for Canterbury City Council, p19.

Other Examples

In drawing up a zone of influence other examples from around the UK have been referenced.

Pagham Harbour SPA is located across two district council areas. The zone of influence was derived from approaches by both Chichester and Arun Councils to their respective sections of SPA, with differing conclusions. Chichester District Council took an approach of interrogating the percentages of all visitors and, in particular, from specific Chichester district settlements from where most of the SPA visitors in that district area derived, to arrive at a 3.5km zone of influence. This conclusion was different to Arun Council's for the same SPA, where their decision on a 5km zone of influence was derived from the area with the largest contribution to visits to the SPA from the Arun district area. In each case the local authority approach was based on the one most suited to the local situation.

For the Ashdown Forest SPA & SAC the zone of influence was set at 7km, based on the area within which the majority (83%) of regular visitors originated.

At the Thames Basin Heaths and Dorset Heaths, where similar strategies have been put in place, the zone of influence is 5km. The selection of 5km has been based on visitor data,²⁸ which shows that around 75% of visits originate from within this distance. The 5km zone therefore encompasses the origin of the majority of visitors.²⁹

For the Solent SPA, the zone of influence of 5.6km was based on the origin of the nearest 75% of visitors, excluding holidaymakers.

A 6km zone of influence has been recommended in the neighbouring Thames, Medway and Swale Estuaries SARMP likely,³⁰ derived through an approach that identified a 'drop-off' in visitors beyond 6km.

²⁸ Liley, D., Clarke, R., Tyldesley, D., Underhill-Day, J. & Lowen, J. (2006). Evidence to support Appropriate Assessment of development plans and projects in south-east Dorset. Unpublished report, Footprint Ecology Underhill-Day, J.C. & Liley, D. (2006b) Visitor patterns on southern heaths: A review of visitor access patterns to heathlands in the UK and the relevance to Annex I bird species. Footprint Ecology.

²⁹ Liley, D., Underhill-Day, J., White, J. & Sharp, J. (2009) Evidence Base relating to Cannock Chase SAC and the Appropriate Assessment of Local Authority Core Strategies. Footprint Ecology.

³⁰ Liley, D. & Underhill-Day, J. (2013). Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy. Unpublished report by Footprint Ecology.

Discussion

In terms of selecting criteria to define a zone of influence for Canterbury District, there are a number of possible options.

European site strategic mitigation schemes for recreational pressure have tended to use visitor surveys to define a zone of influence based on 75% of visitors, or a similar approach, to identify the core area from which visitors originate.³¹

In the Canterbury Coast visitor survey:³²

- 75% of all visitors lived within 9.8km of the coastal site;
- 90% of all regular visitors lived within 7.2km.

It would be reasonable to accept the zone within which the majority of visitors reside and from which the majority of visitors will travel to the sites. In taking a precautionary approach, therefore, it is concluded that 7.2km is the most appropriate zone of influence. However, it will be important to keep this zone under review, in particular within the next five to ten years as new housing developments are built.

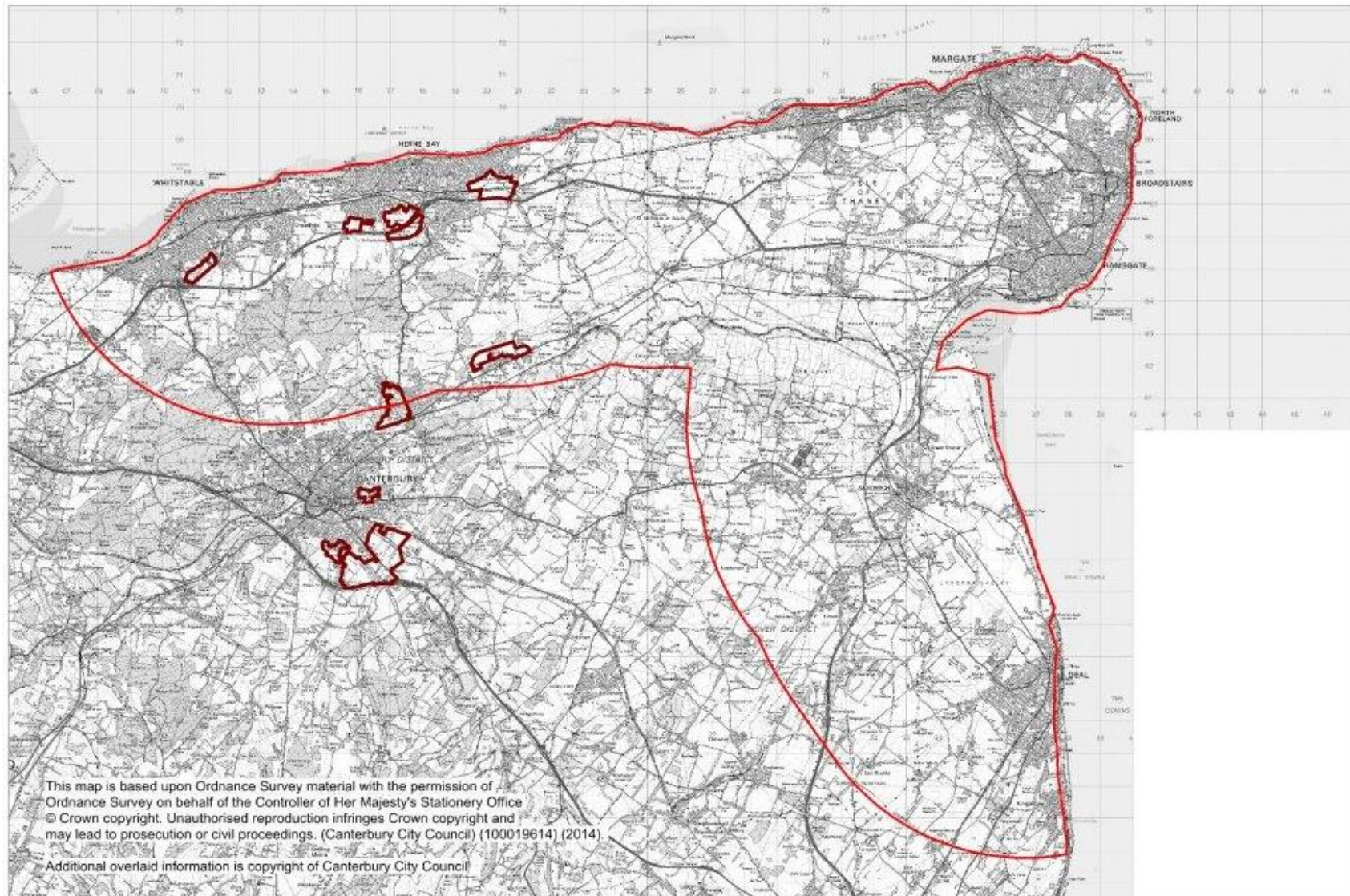
It is noted that although the 7.2km zone of influence does not extend as far as the City of Canterbury, which is a source of some visitors to the SPA, see Plan 2. Analysis of the data shows that only 11 visitor groups originated from Canterbury city itself.

³¹ Fearnley, H, Liley, D and Floyd L. (2014). Thanet Coast and Sandwich Bay SPA Visitor Survey. Unpublished report for Canterbury City Council.

³² Ibid.

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Plan 2: Strategic Allocation Sites and 7.2km zone of influence



Development Exclusion Zones

In some areas development exclusion zones have been established to prevent development in close proximity to SPA or SAC sites in order to avoid the impacts relating to new development. In respect of the Dorset Heaths,³³ the Ashdown Forest SPA and Thames Basin Heaths SPA, for example, a 400m development exclusion zone around the SPA has been adopted by local planning authorities. Within such a zone, new residential development is avoided. The 400m distance has been selected on the basis that at such short distances it is difficult to provide alternative sites for people to visit and the SPA is likely to be the nearest space for residents to use for their local recreational needs, such as the daily dog walk.

Setting up such a zone in respect of coastal protected sites is more problematic, however, as visitor surveys indicate that regular visitors to the coast originate from further distances. The 2014 visitor survey indicated that 75% of regular visitors to the Canterbury coast travelled 4.9km; whereas 90% of regular visitors travelled 7.2km. Any exclusion zone would therefore preclude development within a considerable distance and encompass the entirety of Whitstable and Herne Bay. Such an approach is clearly not practical and does not therefore warrant further consideration.

Strategic Allocations within the Zone of Influence

Using latest estimates from the City Council, the land area within a 7.2km zone of influence around the Thanet Coast and Sandwich Bay SPA would include 6638 of the total allocation of new homes in Canterbury District within the Local Plan period (i.e. up to 2031).³⁴ These homes are distributed across 7 strategic sites plus a number of smaller sites. Strategic sites in relation to the zone of influence are shown in Plan 2.

Exclusions from this Strategy and Other Development

Only new housing development is considered in this strategy. Any new development of one house or above, which falls within the zone of influence, will be required to pay a tariff.

The strategic allocations which fall within the 7.2km zone of influence are:

- Site 2, Sturry/Broad Oak;
- Site 3, Hillborough (Herne Bay);
- Site 4, Herne Bay Golf Course;
- Site 5, Land at Strode Farm (Herne Bay);
- Site 6, Land at Greenhill (Herne Bay);
- Site 7, Thanet Way Whitstable;
- Site 8, Land N of Hersden.

The remaining strategic allocations are more than 10km from the coast and are therefore outside the zone of influence and are also beyond the 9.8km zone in which 75% of all visitors reside.

It is possible, however, that other development will come forward which may have an effect, alone or in combination, on the protected sites and which is not covered by this tariff. Such development could include, but is not restricted to, those shown in the list below:

³³ Dorset Heaths SAC and Dorset Heathlands SPA.

³⁴ Local Plan allocations totalling 5308 plus estimated 'windfall' sites totalling 1330; Total 6638.

- A development of sufficient scale, which could be located within the zone of influence or outside it, to generate additional significant effects, alone or in combination;
- A development of sufficient proximity to the protected site to generate additional significant effects, alone or in combination;
- Increases in holiday accommodation close to the coast;
- Extension of the period of residency at caravan parks close to the coast;
- Conversion of business use to residential in proximity to the coast;
- Conversion of business or residential, or beach huts, to holiday accommodation.

Canterbury City Council as the competent authority will be required to consider such applications in the above cases (and in others which it considers may also have an effect on the issues outlined in this strategy) and require assessment and mitigation as appropriate.

Cross Boundary Issues

The recreational impacts from housing development do not necessarily stop at the boundary with the adjacent local authority. Proposed housing developments within Thanet and Swale districts could potentially have an impact on the SPA within Canterbury. In Thanet in particular there may be a need to address the potential cross-boundary impacts from development. Canterbury City Council and Thanet District Council are therefore proposing a co-ordinated approach to mitigation.

3: Access Mitigation and Monitoring – Background Information

The Coast under Consideration in this Strategy

The section of coast under consideration is between Whitstable Harbour and Minnis Bay, a distance of approximately 19km. The SPA is not continuous throughout this length, but Turnstones are present along the entirety of this coastline and, therefore, the whole of this coastline is covered by this strategy.

Relevant Studies and Surveys

There is limited data on visitors or qualifying species for this specific section of the coast. Two sources of information are of primary importance: the 2014 visitor survey and the Turnstone monitoring which has been carried out since 2001.

However, studies and data from other parts of the Thanet Coast and Sandwich Bay SPA are also useful in increasing understanding for this section of the coast.

Visitor Survey 2014

In 2014 a visitor survey was carried out at four sites of relevance to Canterbury City Council local authority area, within the Thanet Coast and Sandwich Bay SPA.³⁵ These sites were Hampton Slipway (Pier), Reculver (2 sites – Reculver East and West) and Minnis Bay (in Thanet District).

Specific findings of relevance to formulating the mitigation approach are included throughout this report as necessary, but key findings were:

- Most (90%) of interviewed groups were making a visit from home;
- 41% of interviewed groups made their visit either most days or daily;
- 65% of visitors arrived by car and 32% on foot;
- 58% of interviewed groups were accompanied by a dog;
- 62% of groups stated they visited to site equally all year;
- 42% of visitor groups made their visit to the survey location mainly because the site was 'close to home';
- 170 visitor routes were mapped with an average route length of 3.7km;
- 20% of all visitor routes crossed onto the beach;
- 15% of visitors groups stated they would exercise their dog at a new inland site that was closer to their home, 22% stated they wouldn't and the remaining 63% were unsure.

³⁵ Fearnley, H, Liley, D and Floyd L. (2014). Thanet Coast and Sandwich Bay SPA Visitor Survey. Unpublished report for Canterbury City Council.

Turnstone Monitoring

Monitoring of Turnstones has been carried out within the Thanet and Sandwich Bay SPA between 2001 and 2013 by the Sandwich Bay Bird Observatory Trust (SBBOT).³⁶ The survey records Turnstone in 21 sectors between Pegwell Bay and Whitstable. As well as recording roost sites, the survey records disturbance responses and source of disturbance.

Between 2001 and 2010 Turnstone numbers were relatively stable. However, the 2013 survey recorded lower numbers of Turnstones than in previous surveys; 620 versus an average of 1,227 between 2001 and 2010. It is unclear whether this reduced number indicates the beginning of a sustained reduction in Turnstone numbers. The report states:

“Seven surveys have now been conducted since 2001 and results from this year’s survey are of particular concern. The apparent serious decline in Turnstone numbers does not seem to be matched by increased numbers elsewhere around the Kent coast, so it does not appear that the missing birds have moved to other sites away from the Thanet and Sandwich Bay SPA.”³⁷

The survey was repeated in 2014, reporting that:

“Despite concerns that some birds may have been missed in the 2013 survey, results from two co-ordinated counts in 2014, supported by a programme of roost site monitoring, confirmed that the apparent decrease has been genuine.”

The report states that it is not possible to conclude the reasons for the decline.

The report notes the increased willingness of Turnstones to tolerate human activity, but also notes a high number of dogs off leads, speculating that this is likely to be a significant factor in the decline of the wintering Turnstone population.

Pegwell Bay Bird Disturbance Study

No specific bird disturbance study has been carried out for the stretch of coastline under consideration in this strategy, but a study of bird disturbance at Pegwell Bay, which is part of the Thanet Coast and Sandwich Bay SPA, was carried out in a two year period between January 2010 and December 2011 by the Kent Wildlife Trust.³⁸ This study had the aim of assessing the impact of recreation activities on bird populations. The key conclusions of the study of relevance to this strategy were:

- The ‘No Bait Digging Zone’ affords a degree of protection for large numbers of lapwing and Golden Plover;
- The most frequent source of disturbance to birds was ‘walkers with dogs off leads’, with other significant sources of disturbance being avian predators (13%), walkers (12%), bait digging (7%) and kite surfers (7%);
- The activities which produced the highest levels of disturbance response from birds were motorcycling, motorboats, bait digging, yachts and kite surfing;

³⁶ In 2001, 2002, 2003, 2006, 2008, 2010, 2013 and 2014.

³⁷ Hodgson, I., (2013), Thanet Coast Turnstone (*Arenaria interpres*) Monitoring, Sandwich Bay Bird Observatory Trust, p 8.

³⁸ Swandale, T., Waite, A. (October 2012), Pegwell Bay, Kent: Bird Disturbance Study 2010-2011.

- The presence of kite surfers in the recording area had a significant impact on the numbers of water birds counted.

The report provides a useful survey of bird disturbance events during the two year study period at Pegwell Bay and as such is a useful baseline survey. However, definitively making the link between disturbance events and the population size of birds was beyond the scope of the report.

Other Studies

2001 Turnstone Study

A report into the effects of human activity on Turnstones in the Thanet Coast and Sandwich Bay SPA was published in 2002.³⁹ This report found that of all the activities recorded, dogs in the intertidal zone invoked the highest level of disturbance response. Disturbance was greatest at high tide. The report also highlighted that the distribution of the birds varies during the winter, with the birds congregating in larger roosts in December and new year and more dispersed roosts in the autumn.

Reculver Visitor Surveys

Visitor satisfaction surveys were carried out at Reculver Country Park between July and September in 2008 and between July and December in 2013.

In the 2013 survey, the origin of visitors by town was recorded. The survey shows that the catchment of the country park is wide. The largest grouping of visitors, 37%, came from within 7.2km. An additional 14% derived from between 7.2km and 9.8km. A third (33%) came from the rest of Kent, with only one of these visitor groups from within Canterbury District and 17% from outside of Kent. The previous survey (2008) recorded only a third of visitors from within Canterbury District.⁴⁰

Pegwell and Sandwich Bay Visitor Surveys

Several visitor surveys have been carried out at Pegwell Bay and Sandwich Bay. The surveys were specific to Pegwell and Sandwich Bay and therefore caution is needed before extrapolating the results to the Canterbury. A summary of key points from these surveys is included in Appendix I.

Qualifying Species

Turnstones

The overwintering population of Turnstones arrive in the UK in the early autumn (around October) and leave again in spring, with the majority having left by April/May; although some individuals may remain through the summer. Alongside the core population of over-wintering residents are visitors and some passage birds and in later spring the Thanet and Canterbury coastline can be a staging post for migrating birds.⁴¹

³⁹ Webb, K; The effects of human activity on Turnstones and other wading birds within the Thanet and Sandwich Bay Special Protection Area (SPA), published in Proceedings of the North East Kent Coastal Research Workshop, English Nature Reports R570.

⁴⁰ Canterbury City Council; Reculver Country Park Management Plan 2013-2018.

⁴¹ Note 39.

Turnstones have been reported as being less mobile than other shorebirds, with over-wintering populations of generally stable numbers and a relatively high level of roost fidelity.⁴² However, while studies have shown that individuals do return year on year to previous roost sites, the birds will move distances of a few kilometres during the winter period and sometimes far greater distances.⁴³ This is also supported from evidence from the Thanet Turnstone survey of 2010, when 927 (75%) of the total 1247 birds were recorded in Pegwell Bay. This evidence of movement around the SPA further supports an integrated approach to mitigation across the Thanet Coast and Sandwich Bay SPA.

A high degree of roost fidelity, i.e. the birds do not readily move, may mean that disturbance is potentially more serious and that such species are more greatly affected by habitat loss, whether this is due to absolute loss of habitat or loss of habitat capacity due to reduced ability to feed.⁴⁴

The 2002 study into Turnstone disturbance on the Thanet Coast SPA recorded that dogs in the inter-tidal zone elicited the greatest disturbance response. Other activities which disturbed the birds were (in order of severity), shellfish harvesting, walking in the intertidal zone (no dog) and dog walking above the intertidal zone. The activities which scored the highest level of disturbance of complete movement of the flock were cart-boarding and dogs actively chasing birds.

Anecdotal reporting from the Thanet SPA Turnstones survey has inferred that Turnstones may be becoming more tolerant of disturbance and feeding regularly in proximity to human activity especially around Whitstable harbour and fishermen. This may indeed be the case but does need to be treated with some caution, as a 2004 study showed that disturbance responses were greater in those birds which were well-fed.⁴⁵ Those which had restricted food did not show as great a flushing response to disturbance stimuli. Turnstones are at maximum stress in mid-winter when energy demands are greatest and there is the shortest daylight foraging time.⁴⁶

Golden Plover

Golden Plover (*Pluvialis apricaria*) also overwinters on the Thanet Coast, utilising inland grassland and intertidal areas.

There is less data available for Golden Plover on the Thanet Coast and Sandwich Bay SPA in comparison to that for Turnstones, but a report on Golden Plover was published in 2003.⁴⁷ This study reported that the birds use various inland and intertidal sites. At the time of the report, only two intertidal sites were recorded and only one of these, Long Rock, was in Canterbury local authority area. The 2002 Turnstone survey also record a roost site between Long Rock and Hampton Pier. Inland roosts have been recorded to the south of Reculver and inland behind the Swalecliffe caravan park.

⁴² Including N. B. Metcalfe & R. W. Furness (1985) Survival, winter population stability and site fidelity in the Turnstone *Arenaria interpres*, *Bird Study*, 32:3, 207-214; Rehfisch M.M., H. Insley & B. Swann 2003. Fidelity of overwintering shorebirds to roosts on the Moray Basin, Scotland: implications for predicting impacts of habitat loss. *Ardea* 91(1): 53-70; N.H.K. Burton & P.R. Evans (1997) Survival and winter site-fidelity of Turnstones *Arenaria interpres* and Purple Sandpipers *Calidris maritima* in northeast England, *Bird Study*, 44:1, 35-44.

⁴³ Burton (1997) recorded occasional moves of 20-30km.

⁴⁴ Rehfisch, Burton and Evans, note 42.

⁴⁵ C.M. Beale & P. Monaghan (2004), Behavioural responses to human disturbance: a matter of choice? *Animal Behaviour*, 68, 1065-1069.

⁴⁶ Metcalfe and Furness (1985).

⁴⁷ M. Griffiths (2003), Numbers and distribution of the wintering golden plover population in and around the Thanet Coast and Sandwich Bay SPA 2002/2003, English Nature Research Report 569.

Turnstone Survey Sectors

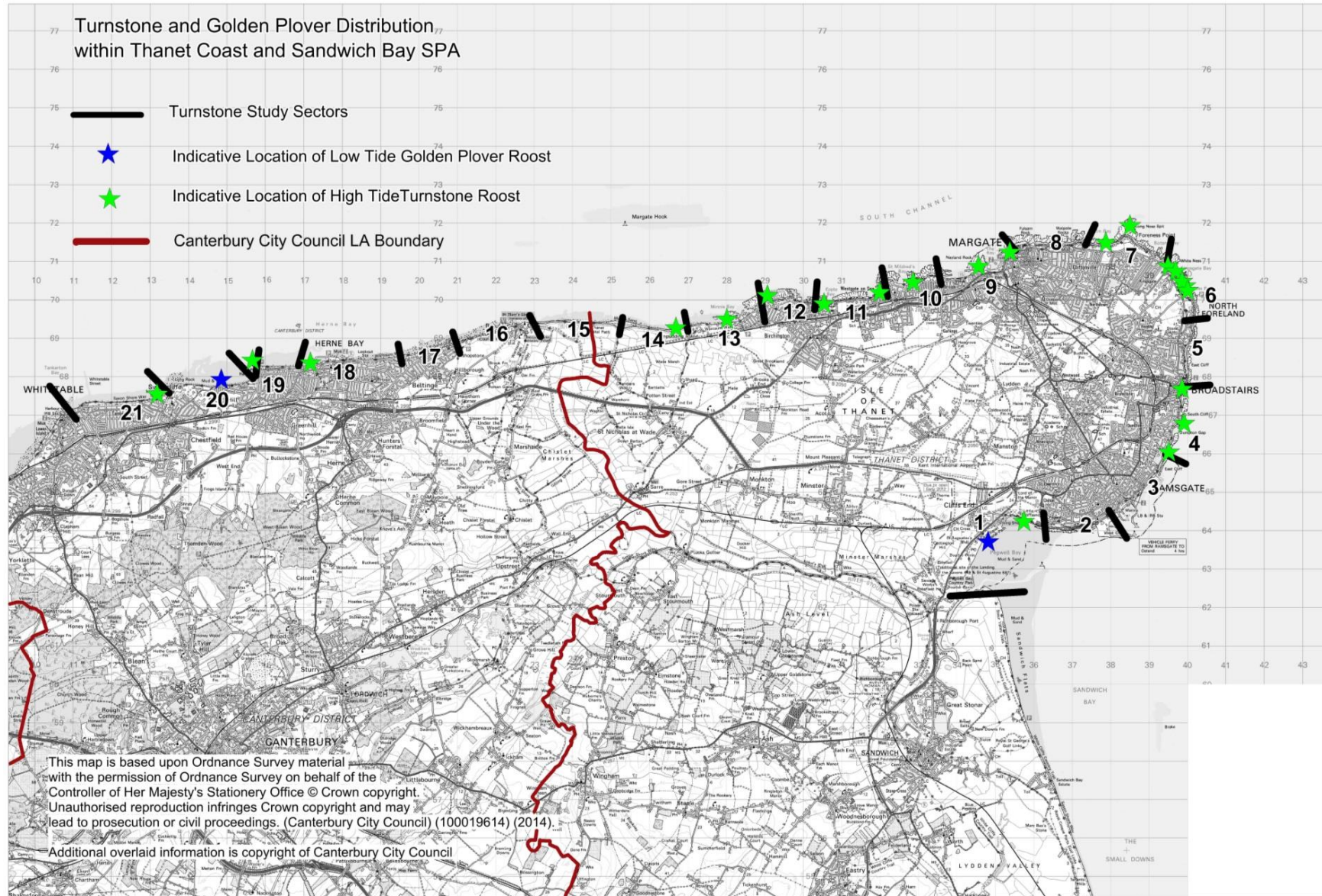
For ease of description and to link with the existing evidence base, the coastline is considered in the sectors used for the Turnstone monitoring. There are nine sectors along this stretch of coast; 21 (Whitstable Harbour) to 13 (Birchington/Minnis Bay), see Table 1 and Plan 3. Each sector is approximately 2km in length.

Table 1: Turnstone Survey Sectors

Sector	Name	Grid ref (western extent of sector)	Grid ref (eastern extent of sector)
21	Whitstable/ Tankerton	TR 108 670	TR 137 678
20	Long Rock/ Hampton	TR 137 678	TR 157 679
19	Hampton/ Hampton Pier	TR 157 679	TR 172 683
18	Herne Bay	TR 172 683	TR 191 685
17	Herne Bay East	TR 191 685	TR 211 687
16	Reculver West	TR 211 687	TR 230 694
15	Coldharbour/ Reculver East	TR 230 694	TR 252 694
14	Plum pudding Island	TR 252 694	TR 273 694
13	Minnis Bay	TR 273 694	TR 291 701

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Plan 3: Turnstone Study Sectors Thanet Coast SPA (Based on 2001-2 Turnstone Survey)



Thanet Coast and Sandwich Bay SPA

Commentary at time of Natura 2000 designation (compiled 1994, updated 1999) records (alongside others) the following potential vulnerabilities:

- High potential for disturbance of wintering birds due to recreational use on and off water;
- Particular disturbance potential for high tide roosts and breeding colonies, especially Little Tern.

Commentary for the Thanet Coast and Sandwich Bay Ramsar (compiled 1994) records (alongside others) the following vulnerabilities:

- Recreational/tourism disturbance: Disturbance of Turnstones *Arenaria interpres*, especially by dog walking and kite surfing/boarding, which can result in loss of condition to birds if unmanaged;
- Urban use;
- Kite surfing causes bird disturbance.

All units of the Thanet Coast SSSI in Canterbury City Council Local Authority area were recorded as being in favourable condition in 2009. However, units 11, 12, 14, 16, 18, 20 (all in Thanet District) are recorded as being in unfavourable recovering condition, with the commentary for all: "Unit remains unfavourable recovering due to effects of dog walkers on birds feeding and roosting."⁴⁸

WeBS Alerts

Thanet Coast and Sandwich Bay SPA, winter 09/10:

Medium alert for Turnstone							
Species	First winter	Ref Winter	Short term % change	Medium Term % change	Long term % change	All time % change	% change since classification
Turnstone	84/85	09/10	-49%	-38%	-38%	-	-46%

Summary of commentary from WeBS:

- Numbers of over-wintering Turnstone have shown short-term decrease having previously been stable;
- The trend does not appear to be tracking British or regional trend;
- The decline is likely to be due to site specific pressures.

⁴⁸ Views about management (2005): The birds that use mud and sandflats for feeding and roosting are vulnerable to disturbance from human activities, for example, bait digging, dog walking and wildfowling. These activities can lead to reduced time spent feeding, or individuals being restricted to areas with a poor food supply. Disturbance should therefore be minimised, especially at times when bird populations may be stressed, such as during severe winter weather.

Description of the Coastline

Much of the coastline covered by this SAMM is part of the seafront of the seaside towns of Whitstable and Herne Bay. These towns are busy coastal attractions, with access to the seafront, promenade and beach central to their appeal to visitors. Beyond the eastern extent of Herne Bay, there are no permanent coastal settlements until Birchington and Minnis Bay, in Thanet District.

There is public access along the entire length of the coastline. There is a promenade from east of Whitstable Harbour through to Bishopstone (east of Herne Bay), except for a short section across Long Rock which is an unmade footpath. Between Bishopstone and Reculver Country Park there is no promenade, but access to the beach is permitted. From Reculver Towers to Minnis Bay is a surfaced access track close to the beach.

Cycling as well as walking is permitted, and promoted, along the entirety of this route, except for a section along Herne Bay which is pedestrian only. From Bishopstone to Reculver the cycle route leaves the seafront and takes a route along the cliff top.

The number of visitors this coastline receives is not recorded, but Reculver Country Park is a major countryside attraction, receiving around 200,000 annual visitors.⁴⁹

Despite visitor numbers not being available, it is clear that this is a popular and busy seafront, both with local and tourist visitors, with excellent and easy access on the promenade for most of the length. This continuous access has the result that there are few places where Turnstone can seek refuge. If, for example, a group are disturbed sufficiently to take flight, they may move from one 'groyne bay' to another, but the next bay will also be close to the promenade with the potential that they are disturbed again.

There are only two places on this length of coast where the promenade is some distance from the beach and where Turnstone could potentially gain a degree of refuge; at Long Rock and under Reculver cliffs.

The sloping land adjacent to much of the promenade between Whitstable and Herne Bay also reduces the opportunity to create alternative routes further from the beach.

There are several slip ways, watersports centres and beach huts along the length of the coast.

There are existing seasonal restrictions on dog access on some parts of the coast. At Tankerton Beach and Herne Bay Central Beach dogs are not permitted on the beach between 1st May and 30th September and dogs must also be kept on a lead on the sections of promenade adjacent to these beaches; see Figure 1. Canterbury City Council on its website currently promotes 98% of its beaches outside of these areas as 'dog friendly'.⁵⁰

The sectors of the coast are described in further detail from page 32 and in the Appendix.

⁴⁹ Canterbury City Council; Reculver Country Park Management Plan 2013-2018.

⁵⁰ <https://www.canterbury.gov.uk/leisure-countryside/foreshore-services/dog-friendly-beaches/>

Figure 1: Dog Control Orders in Force 2014

Tankerton Beach Dog Ban Area



Herne Bay Central Dog Ban Area



Turnstone Distribution and Numbers

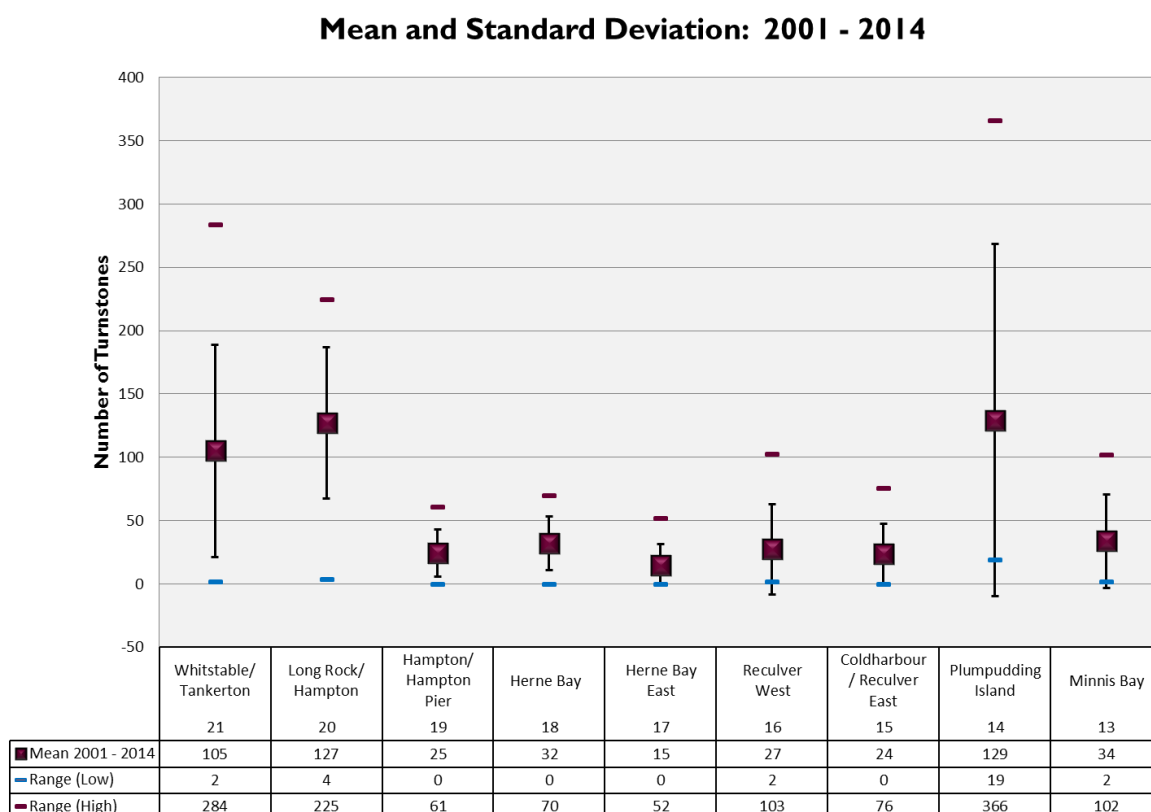
The Turnstone survey of 2001-2002 recorded the indicative location of several Turnstone roost sites, as shown previously in Plan 3. The survey highlighted five roosts within the length of coast under consideration:

- Long Rock at the eastern end of sector 21;
- Hampton Pier at the eastern extent of sector 19;
- To the west of Herne Bay harbour in sector 18;
- Plumpudding Island in sector 14;
- Minnis Bay in sector 13.

While this roost map provides an indication of roosting sites Turnstone are not, however, confined to these roost sites. The surveys of subsequent years has provided further information on the distribution of Turnstones within the sectors and it is apparent that the birds occur along the length of the coast, either in larger roosts or smaller groups.

The mean number of Turnstone recorded in the surveys between 2001 and 2014 is shown in Figure 2.

Figure 2: Turnstone Survey Results 2001-2014



The commentary of the 2014 reveals how the numbers recorded in the latest count compare to the average since 2001, see Table 2. It is noted that although the numbers recorded in 2014 were below average for several sectors, this is in the context of a general decrease.

Table 2: Commentary on 2014 Turnstone Numbers

Sector	Name	Commentary 2014 Turnstone Survey
21	Whitstable/ Tankerton	Well above average
20	Long Rock/ Hampton	Below average
19	Hampton/ Hampton Pier	Fairly typical/slightly above average
18	Herne Bay	Slightly below average
17	Herne Bay East	Slightly above average
16	Reculver West	Well below average but in line with last four counts
15	Coldharbour/ Reculver East	Significantly below average but numbers have steadily decreased since 2001
14	Plumpudding Island	Significantly below average although numbers have steadily decreased since 2001
13	Minnis Bay	Well below average

Although the data on numbers of Turnstone for the sectors are highly variable, sectors 21 (Whitstable/Tankerton) and 20 (Long Rock/Hampton) are consistently important sectors, with a mean count of over 100 birds. Commentary for sector 21 in the 2014 Turnstone survey notes that the harbour itself is important for feeding and that:

“Numbers were well above average for this section, which remains one of the most significant for Turnstones around the Thanet SPA.”

For sector 20, the survey notes:

“the majority of birds (73% over the two visits) were found to be feeding along the tide line. The numbers found in this sector were below average.”

Numbers recorded are lower along the seafront between Hampton Pier and Herne Bay east, with sectors 19, 18 and 17 covering the urban seafront of Herne Bay.

Significant numbers of birds are often recorded in sector 14 (Plumpudding Island), although the number recorded shows high variation.

In addition, a low tide Golden Plover roost was identified in sector 20 (Tankerton Slopes). There is no further data available on the number of Golden Plover.

Coastal Visits

Reculver Country Park

This popular country park is an important access point to the coast, receiving around 200,000 annual visitors.⁵¹ Reculver Country Park is therefore not only a key attraction in itself, it is an ideal centre to use to inform and educate visitors.

The park itself stretches from Reculver Towers in the east to Bishopstone Glen in the west. The country park itself is located on the cliff top, with access to the beach to the west of the visitor centre and at Bishopstone Glen. There is a visitor and education centre, three car parks and footpaths as well the Oyster Bay Trail cycle route which follows the cliff top.

A masterplan for the country park was developed in 2008 and adopted as a Supplementary Planning Document in 2009.⁵² This aims to encourage a co-ordinated approach for the Reculver area. Numerous projects are planned in the next 5 to 25 years, from smaller interpretation and access projects to more ambitious projects involving re-siting the car park, development of a 'village green', the creation of a new wetland and extending the country park onto what is currently adjacent farmland.⁵³

The Habitats Regulations Assessment (HRA) for the masterplan⁵⁴ recognises that an increase in visitors, which may arise from the implementation of the masterplan, could have a negative effect on the protected sites. It details 'Generic Mitigation' measures which are considered appropriate as it considers that all the projects listed in the masterplan have the potential to affect the protected sites in the same way.⁵⁵ Of particular relevance are:⁵⁶

- The Thanet Coastal Codes for minimising disturbance to European Site features and information concerning the sensitivity of the coastal area to disturbance and its value and status as a European Site will be displayed in the visitor centre, with leaflets and signboards provided at strategic locations within the Country Park. These will also include information on the ecology of the site to provide visitor understanding of the need for a Code of Conduct;
- Detailed visitor access proposals will avoid directing the public towards coastal reaches favoured over-wintering bird populations of European importance and any walks and trails promoted will ensure a suitable buffer is maintained between the public and sensitive areas to minimise disturbance.

⁵¹ Canterbury City Council; Reculver Country Park Management Plan 2013-2018.

⁵² Reculver Masterplan Volumes 1 and 2 (2008). <https://www.canterbury.gov.uk/3451.aspx>

⁵³ Dependant on the Shoreline Management Plan and adjacent landowners.

⁵⁴ Entec UK Ltd (2009); Reculver Masterplan, Information in Support of Habitats Regulations Assessment.

⁵⁵ Ibid, para 4.2.1.

⁵⁶ Also three additional measures: Natural England will be consulted on all detailed proposals, including visitor access, interpretation and accommodation, to ensure any potential disturbance to sensitive areas is considered and minimised with the design and construction stages; Construction works in proximity to areas used by over-wintering bird populations of European importance will be timed for the summer months, in order to avoid the over-wintering period, unless otherwise agreed with Natural England; Detailed proposals involving new lighting should be carefully considered in conjunction with Natural England such that increased light pollution to areas utilised by roosting Turnstones is avoided.

Several points are listed in the HRA which will be addressed as projects in the Masterplan come forward for implementation:

- The Thanet Coastal Codes for minimising disturbance to European Site features and information on the ecological value of the area should be accessible from the dedicated visitor-orientated Reculver website (Project 03: Perception and Promotion);
- Interpretation Strategy is to manage visitors away from sensitive areas of the Thanet Coast and Sandwich Bay SPA (Project 04: Interpretation Strategy);
- This project seeks to provide walking and cycling leaflets for the Reculver area. The incorporation of the generic mitigation measures is sufficient to mitigate for possible disturbance effects on the SPA. In particular, the Thanet Coastal Codes for minimising disturbance to European Site features and information on the ecological value of the area should be included in these leaflets (Project 05: Reculver Leaflets).

The HRA was undertaken based on the 2006 Local Plan and the increase in housing planned in the replacement plan could increase visitors to the country park.

The visitor survey of 2014 interviewed visitors at two locations around Reculver and the routes taken by visitors were plotted. Although visitors sometimes have difficulty in accurately identifying where they walk, it would appear that more routes were plotted on the cliff top than on the beach. However, there were a number of routes plotted on the beach from Reculver Towers west to Bishopstone Glen.

Possible Increase in Visitors to the Coast

It would be useful to be able to predict the likely increase in visitor numbers to the SPA as a result of new housing developments. However, it is generally very difficult to predict changes in visitor numbers and the reasons for any increase or decrease may vary.

Although there may be increases in the local population as a result of new housing, other factors may also affect visitor numbers to the SPA, such as demographic changes across a wider area, or changes in the leisure and tourism markets.

The visitor survey⁵⁷ provides valuable data on visitors to the SPA, but it will not be possible to use the survey data with any accuracy to extract and interpret visitor numbers from the areas of proposed housing development.

However, measures proposed in this mitigation strategy will be introduced to avoid effects on the SPA in the future. This package of measures will include provision for on-going visitor surveys at intervals over the Local Plan period in order to assess and keep under review any changes in visitor numbers. The surveys will supplement other actions including legal enforcement and activities designed to change visitor behaviour.

⁵⁷ Fearnley, H, Liley, D and Floyd L. (2014). Thanet Coast and Sandwich Bay SPA Visitor Survey. Unpublished report for Canterbury City Council.

Description of Sectors

Whitstable/Tankerton (sector 21)

Summary:

- A busy section close to Whitstable main beach and below Tankerton Slopes (SAC);⁵⁸
- Promenade with walking and cycling along entire length;
- Tankerton Bay Sailing Club and slipway and three groups of beach huts;
- Important for Turnstones, especially around the harbour;
- No consistent data on disturbance, but high numbers of dogs recorded in 2014.



Close to Whitstable Harbour



Below Tankerton Slopes

Long Rock/Hampton (sector 20)

Summary

- Consistently significant sector for Turnstone, mean of 127 individuals;
- Long Rock at the western end of the sector (Swalecliffe) is popular with visitors, with greenspace area adjacent to the sea. There are no other such greenspaces that give an equivalent space for dog exercise between Whitstable and Herne Bay;
- Promenade along sector between Long Rock and Hampton Pier. High tide brings Turnstone very close to the promenade;
- Disturbance by dogs recorded in Turnstone surveys.



Long Rock



Promenade between Long Rock and Hampton

⁵⁸ Part of Tankerton Slopes and Swalecliffe SAC.

Hampton/Hampton Pier (sector 19)

Summary:

- Fairly consistent and low numbers of Turnstones distributed along sector in smaller groups;
Disturbance by dogs recorded in Turnstone surveys;
- Dog control order in place at eastern end of sector to the west of Herne Bay pier;
- Promenade along beach.



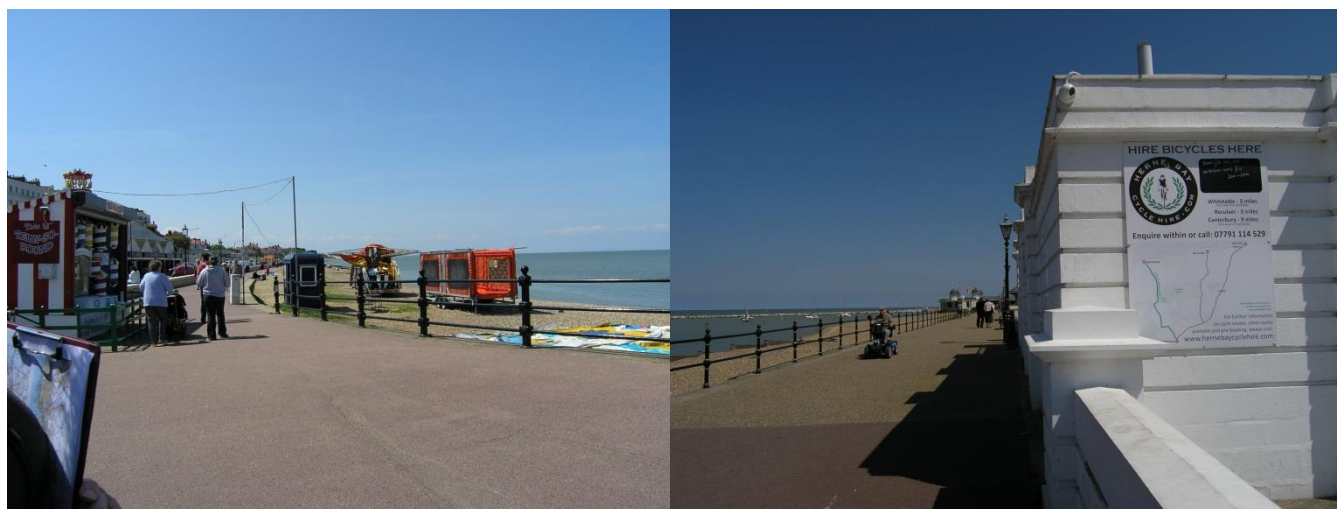
Hampton Pier

West of Herne Bay Pier

Herne Bay (sector 18)

Summary:

- Fairly consistent and low numbers of Turnstones;
- Roost indicated at Herne Bay Harbour;
- This section runs from Herne Bay Pier through the main Herne Bay seafront and harbour and is therefore a busy section.



Herne Bay Seafront

Herne Bay East (sector 17)

Summary:

- Turnstone distributed along sector;
- Lowest mean number of Turnstone recorded in this sector;
- High disturbance from dogs noted in 2014 survey;
- Access on sea front on promenade.



Close to Herne Bay Sailing Club

Reculver West (sector 16)

Summary:

- Promenade continues to Bishopstone Glen with access on beach between Bishopstone Glen and Reculver Country Park/Towers;
- High numbers of visitors at Reculver Country Park;
- Extremely high disturbance by dogs of leads recorded in 2014 survey;
- Mean of 27 Turnstone, but numbers in some years have been as high as 103.



Coldharbour/Reculver East (sector 15)

Summary:

- Numbers of Turnstones have steadily decreased since 2001;
- Disturbance by dogs recorded in all surveys;
- No houses in proximity but busy due to access from Reculver.

Plumpudding Island (sector 14)

Summary:

- Has one of the highest numbers of Turnstone recorded, but numbers are highly variable;
- Roost recorded at Plumpudding Island;
- Numbers in 2014 well below average.
- No houses in proximity but busy due to access from Reculver;
- Cycling permitted, popular link between Minnis Bay and Reculver.



Sectors 15 and 14

Minnis Bay (sector 13)

Summary:

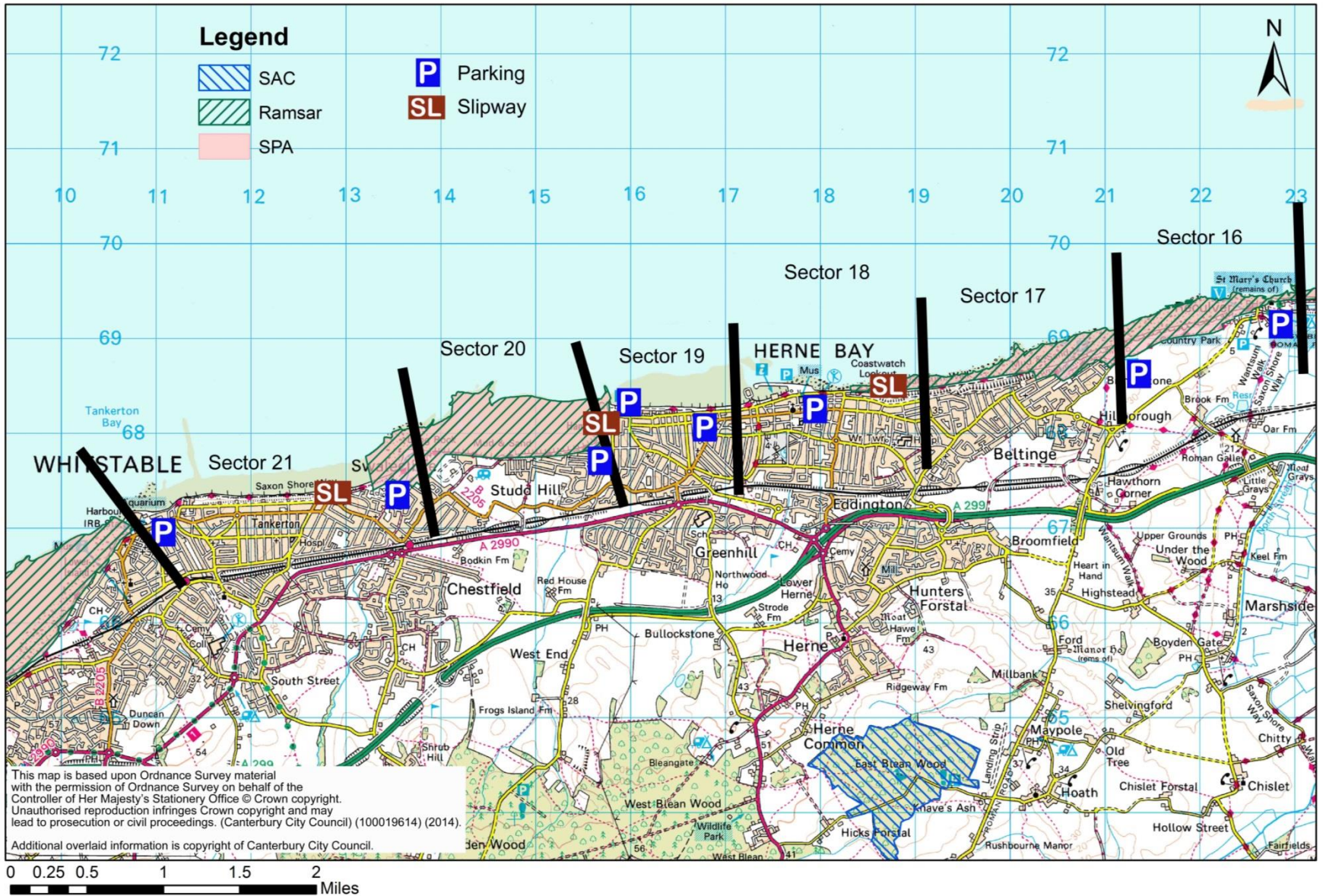
- Minnis Bay popular seaside location;
- Numbers of Turnstone below average in 2014 survey;
- Disturbance by dogs recorded in all surveys.



Minnis Bay

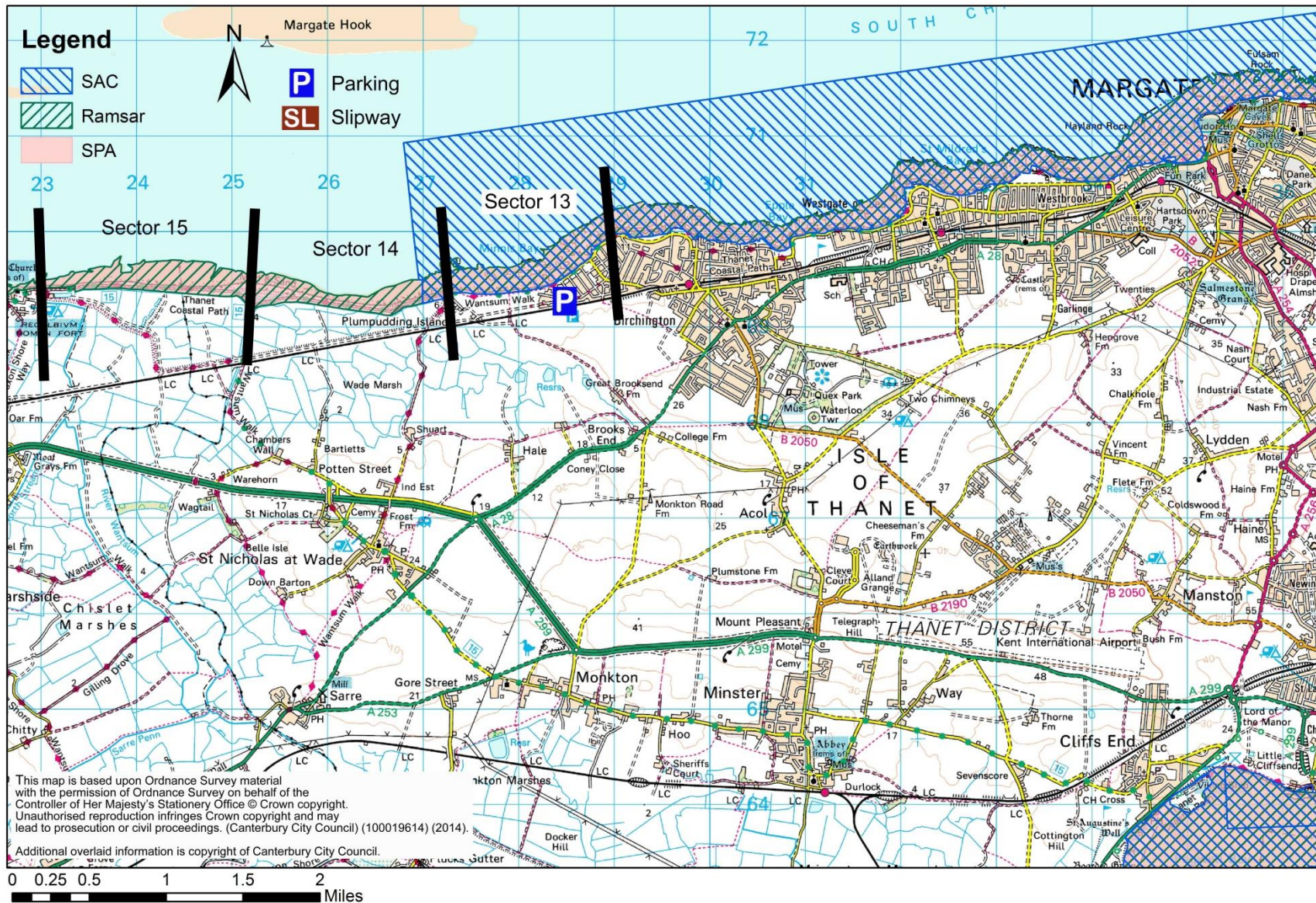
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Plan 4: Sectors 21 – 16



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Plan 5: Sectors 15 - 13



4: Evaluation of Access Management and Mitigation Approaches

Summary of Site Specific Issues in Formulating the Strategy

Access to the countryside and coast is important and brings many benefits to health and well-being. Mitigation measures may reduce or limit access to certain area, but the overall aim is to maintain a recreation experience and not to put recreation and wildlife into conflict.

A range of measures may be employed to mitigate negative impacts from recreational disturbance. These can include habitat interventions, access management, engagement with or enforcement action of site visitors and both on and off-site measures. Not all of these measures will be suitable, effective and therefore applicable in all scenarios. A range of measures have been considered in relation to the specific issues of the section of the coastline of Thanet Coast and Sandwich Bay SPA covered by this strategy.

The available evidence base and visitor surveys were reviewed and site visits carried out to observe activity at the sites. From this, the key issues that are of particular relevance to this coastline and strategy are:

- Turnstone disturbance including:
 - Distribution of Turnstone over-wintering feeding sites and roosts;
 - The proximity of visitors and disturbance to Turnstone areas;
 - The availability of 'refuge' areas for Turnstones;
- Visits with dogs;
- Visitor awareness and behaviour;
- Visitor access;
- Visitor 'honey-pot' sites;
- Cross-boundary issues;
- Sustainability.

Disturbance of Qualifying Species

There is a body of evidence, detailed in Section 3, that walking with dogs, particularly in the intertidal area, close to roosts at high tide and with dogs off leads are the most common disturbance stimuli. It is also this recreational activity which occurs in the highest volume and which is most likely to increase with increased housing. It is this recreational activity which is, therefore, considered as the primary activity for mitigation within this strategy.

The factors listed are of particular importance in relation to Turnstone as data for this species, both for population characteristics and disturbance, are more readily available and this species occurs along the entire length of the coastline. It is considered that Golden Plover will also be adequately protected through the mitigation measures outlined as they also over-winter on the coast and will be disturbed by the same activities.

Important factors to consider:

Distribution of Turnstone over-wintering feeding sites and roosts: Although several important roost sites have been identified, Turnstones are not solely confined to these discrete areas. The roosts are also liable to change and the surveys have shown that the numbers both at previously identified roost sites and in any given sector can vary considerably.⁵⁹ Therefore a mitigation approach is required to reflect this variable distribution, being flexible to adapt to the locations of the Turnstone in any given year and due to varying conditions

The proximity of visitors and disturbance to Turnstone areas: The promenade is, quite obviously, close to the beach, but at high tide the sea is virtually at the promenade in some sectors. This brings Turnstones very close to users and potential disturbance stimuli.

The availability of 'refuge' areas for Turnstones: The entire coast is accessible, with a promenade along most of its length, offering few areas of refuge. Any areas where there is not a promenade are areas where refuge could potentially be sought, but are limited to Long Rock and Reculver cliffs.

The disturbance factors and mitigation measures are outlined with particular reference to the Turnstone population although, as has been previously stated, the mitigation measures will also be applicable for Golden Plover.

Visits with Dogs

In the 2014 visitor survey, over half of all visitors surveyed were accompanied a dog and over half cited dog walking as the main reason for their visit. Of the latter group, over half stated that 'close to home' was the most influential factor in their choice of location, followed with the 'ability to let the dog off the lead.'⁶⁰ Over 80% of regular visits,⁶¹ i.e. at least once per week, are made to walk the dog. Further, 17% of dog walking visits included walking on the beach.

A recent report of a survey of Turnstones⁶² concluded that the disturbance of Turnstone roosts by dogs would need to be addressed in any disturbance avoidance measures implemented in future. The report went on to recommended signage and interpretation as a means of informing beach users about the Turnstones and helping to reduce disturbance incidents, backed-up by frequent contact with on-site personnel in order to minimise future disturbance.

Visitor Awareness and Behaviour

More than half of all those surveyed were unaware or unsure of the designations or environmental protection that applies to this coast.

From site visits it was observed that the Dog Control Order signage and 'poop-scoop' area signage currently in place was small and not very visible and did not adequately convey the locations. On several occasions dogs were witnessed off leads in the 'on-leads' area (including chasing Turnstones).

⁵⁹ Also demonstrating the need for a cross-boundary approach.

⁶⁰ Although this was the main choice for only 13% of this group.

⁶¹ 83.5%.

⁶² Hodgson, I., (2013), Thanet Coast Turnstone (*Arenaria interpres*) Monitoring, Sandwich Bay Bird Observatory Trust.

There was good visitor information signage along the coast (see right), but signage relating to the importance of the sites and appropriate visitor behaviours was absent, apart from one sign at Long Rock. This signing did not draw attention to the sensitivities of the wildlife in the area and at particular times of year.

Although interpretive signing alone is unlikely to be effective in producing significant behaviour change, especially in regular visitors, such signing has an important role in supporting the enforcement and education elements of a mitigation approach.

Visitor Access

The results of the visitor survey 2014 indicate that a significant proportion of regular visitors who arrived on foot lived close to their destination in the SPA; 90% lived within 1.8km and half lived within 0.5km. A large proportion of all regular visitors were walking a dog. Dog walkers in particular selected locations based on their proximity to home.

Almost half the visitors indicated that proximity to home was the factor that had the most influence over their choice of site to visit. Only 17% of visitors identified 'quality of the area/scenery' as the main factor in their choice of site to visit, suggesting that there may be merit in considering the development of other areas for access in the local area, away from the SPA. The responses from dog-walking visitors, when asked if they would consider using an alternative open space inland from the coast, indicate that a new dog walking site could draw somewhere between 15% and 78% of local dog walkers. To be successful the site would need to be safe for the dog, where the dog can be off the lead and be considered by dog-owners to be safe and attractive for their dogs.

A review of greenspace near to the coast shows limited availability of such spaces for recreational use. Of the greenspace adjacent to the promenade and coast, much of it is difficult to access due to terrain, is largely inaccessible farmland with few rights of way or, for example Tankerton and Swalecliffe SAC, is designated for its nature conservation value.

The Canterbury District public open space standards⁶³ recommend the provision of informal recreation spaces and green spaces at a distance of no more than 1000 metres from home. The draft standards also identify gaps in open space, including amenity green spaces in the coastal wards of Reculver, Heron, West Bay, Swalecliffe, Tankerton, Harbour and Seasalter as it is considered that beaches do not fulfil all the requirements of amenity open space.

To help support and compliment the specific mitigation measures new developments must also include sufficient and appropriate on site green infrastructure to meet development contributions needs. Although it is unlikely that the coastal experience can be replaced by open space provision on development sites, some pressure relief maybe provided by provision of onsite locally accessible recreation and dog walking space. It is therefore important to ensure that new open space is provided for residents in close proximity to homes at the strategic Local Plan sites within the zone of influence. Such open space should provide multiple benefits delivering biodiversity gain, contributing to sustainable development and quality of life and to seek to create new links to the non-designated countryside via the public rights of way network.



⁶³ Draft Open Space Strategy for the Canterbury District 2014 to 2019.

In addition it may be necessary to consider measures that help to deflect access away from the coast, such as increased parking charges, or requiring dogs to be kept on leads at certain locations.

Cross Boundary Issues

The Thanet Coast and Sandwich Bay SPA also includes most of the Thanet District coastline and continues into Dover District at Sandwich Bay. There are similar issues arising from recreational use in many parts of the SPA.

A mitigation approach for Canterbury District developed in isolation could have the potential to place additional recreational stress on the adjoining parts of the SPA in Thanet or Dover district, or even to the Swale SPA to the west. In particular, as a result of proposals that may affect visitor access there is a risk that visitors may be displaced from one part of the SPA to another. A mitigation plan for the SPA ideally requires strategic joint working by both the affected Local Authorities and working with Dover District Council and others on a Green Infrastructure Strategy for East Kent as a whole.

It is therefore proposed that the project be coordinated strategically across local authority boundaries. Canterbury City Council is also working with the neighbouring local authorities on the development and implementation of the Thames, Medway and Swale Estuaries Strategic Access Management and Monitoring Strategy.

Sustainability

Mitigation measures will need to work in perpetuity, as long as the issue requiring mitigation remains and, therefore, there is a need to take a sustainable approach to the funding of mitigation measures.

It is difficult to be confident of how the coastline, the number and distribution of birds, access patterns and other factors may change over time. To address this, any mitigation package needs to monitor and evaluate changes and be flexible and adaptive in responding to these changes. Accordingly surveys of visitors and bird populations will be carried out at regular intervals to provide baseline information and to help measure the benefits of mitigation actions.

This SAMM has determined the level of financial contribution required from new residential development, based on the current information. In order to ensure it remains effective, it is proposed that this SAMM is reviewed after a period of no more than ten years or if monitoring of bird and visitor numbers highlights issues that are not being addressed by the current SAMM.

Evaluation of Potential Mitigation Approaches

Table 3: Potential Mitigation Approaches and Suitability

Key to Suitability/Actions (see table)

Not suitable – not to be taken forward.		Likely to make a positive and complementary contribution to overall aims, but evidence or effectiveness insufficient or not a proportionate response, therefore not a mitigation measure within this strategy.	Recommended to be taken forward as a mitigation measure.
Mitigation Approach	Examples of Measures	Commentary	Suitability/ Actions
Habitat management/ creation	Artificial roost sites, creation of feeding areas.	Not suitable for these species.	Not suitable.
Planning Measures	Locate development away from sensitive sites through a development exclusion zone.	Not practicable in this case for reasons outlined previously.	Not suitable.
	Provision of Suitable Alternative Natural Greenspace (SANG) to draw visitors away from sensitive sites.	Effectiveness in displacing coastal visits is unproven, however the results of the visitor survey indicated there may be willingness for some dog walkers to visit alternative sites if provided. ⁶⁴ Provision of SANG alone unlikely to be proven to be sufficiently effective as a mitigation measure, but provision of greenspace in and around new development could in reality deflect a proportion of coastal visits.	Ensure greenspace of sufficient size and quality to attract users is provided for in new development, following best practice. ⁶⁵ Consider provision of new sites as part of green infrastructure strategy.
Management / deflection of visitors off-site	Management of visitors on adjacent land.	There is limited opportunity to manage visitors on adjacent land. For most of this coastline the adjacent land is urban and where there is greenspace, this is on steep slopes which are not suitable for increasing access. Some of these adjoining areas are also SAC sites (Tankerton Slopes and Long Rock). Other areas are farmland and offer limited opportunity for increasing access in the short term. However, the 'Green Gap' between Herne Bay and Whitstable and the farmland around Reculver Country Park (identified in the Masterplan to be included in the long term) offer longer-term possibilities.	Adjacent land is not suitable for increasing access or is urban, but some longer-term opportunities in the 'Green Gap' and at Reculver Country Park, see following.

⁶⁴ 16% would exercise their dog at an alternative inland site, with an additional 68% responding they would perhaps/sometimes/maybe choose an alternative inland site.

⁶⁵ E.g. Hampshire County Council (2013), Planning for Dog Ownership in New Developments.

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Mitigation Approach	Examples of Measures	Commentary	Suitability/ Actions
	Improvement of access provision on other sites in the area.	See points above for 'SANG' and in row above on increasing access on adjacent farmland. Evidence insufficient to be considered as mitigation and delivery is long-term.	Consider provision of new sites and improvement of existing sites as part of green infrastructure strategy. Potential for improvement of access in the 'Green Gap' ⁶⁶ between Herne Bay and Whitstable, which could help to relieve pressure on the coast.
	Management of car parking (price/location).	This may have an effect on the sites visitors use. A high proportion of overall visitors visited by car (65%) and therefore visitor patterns may be sensitive to changes in parking regimes. However, if not considered strategically such measures could lead to displacement to other parts of the SPA (in Canterbury or in Thanet). Further evidence required on sensitivity of visitors and likelihood of changing patterns, plus the development of a car-parking plan. Monitoring required.	Investigate likely visitor sensitivity further in future visitor surveys and as part of a strategic approach with Thanet District Council.
	Limiting visitor numbers.	The only site where visitors could be restricted is Reculver Country Park. Existing rights of access. Impossible to restrict access along the seafront.	Not suitable.
Management of visitors on-site	Restricting access in some areas.	There is limited opportunity to restrict access along the seafront as access to most of this coastline access is on an open access promenade. However, there are some limited possibilities, for example to prevent access to the beach at Long Rock. Access restrictions during the October to April period may need to be considered, for example restricting dogs being off-lead or being permitted on the beach in certain areas. It is likely that this will need to be enforceable.	Limited but access management should be implemented at Long Rock. Restrictions on dog access between October and April; either on-leads or prohibition.
	Routing and design of paths.	As previously outlined, limited opportunity to re-route or create new paths due to narrow coastal strip and limited access possibilities on adjoining land. May be possible to improve right of way links inland from Reculver; unlikely to be sufficient to be effective mitigation, but may help in practical terms to provide an alternative route for regular dog walkers to avoid users accessing the beach. Would have a supporting role in mitigation if access to the beach is restricted. This was also highlighted as an action to address impacts identified in the Reculver Masterplan Habitat Regulations Assessment, but is yet to be implemented.	Consider provision and improvement of routes inland from Reculver Country Park.
	Zoning.	Zoning is most usually considered in relation to watersports. The zoning of degrees of dog 'freedom' may be required, with the greatest restrictions in the most important and/or sensitive areas.	Develop a hierarchy of restriction approaches.

⁶⁶ Policy OS6, paragraph 11.49 recognises that the 'Green Gap' serves an anti-coalescence role but could provide additional benefits.

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Mitigation Approach	Examples of Measures	Commentary	Suitability/ Actions
Education and Enforcement	Wardening (enforcement).	Wardening with an enforcement role is likely to be more effective in eliciting behaviour change than a purely educational/ community role alone (although both aspects are important to ensure success). Due to the limited availability of other mitigation measures, a wardening presence will need to be as effective as possible and, therefore, an element of enforcement role will be required.	Key element of the mitigation approach.
	Wardening (education).	An important element of any wardening scheme and essential to ensure compliance. Unlikely in itself to be sufficiently effective as mitigation without a supporting enforcement role.	
	Signs, interpretation, leaflets.	There is currently only one sign on the entire route which is unlikely to be sufficient to change behaviour but is an essential component of ensuring a wardening scheme is successful.	Essential to support the wardening and education programmes.
	Community and user group engagement.	A wider outreach project raising awareness of the sensitivity of the coast and the need for visitors to alter behaviour would support other measures. This would aim to alter attitudes and behaviour in the longer term but is unlikely on its own to produce the shorter term changes required. A 'Dog Project' specifically aimed at dog walkers would support the mitigation package, but this is best developed strategically across the whole Thanet Coast in conjunction with Thanet and Dover Councils and Natural England in the development of the England Coastal Path.	Part of the wardening role should be to carry out engagement with users and the local community. Develop a community engagement and awareness programme and progress a 'Dog Project' with neighbouring authorities.
	Voluntary Code of Conduct.	Voluntary codes of conduct help to convey clear messages and have a supporting role, although they are not enforceable. Voluntary codes of conduct for a range of recreational uses have been drawn up by (the former) Thanet Coast Project. ⁶⁷ These codes may need to be strengthened.	Further develop voluntary codes of conduct to support the mitigation approaches.
	Byelaws, Dog Control Orders (legal enforcement).	Dog control orders provide a range of options, for example limiting dog access to on-lead only, through to prohibition. These may, however, take time to put in place, but are considered necessary to maximise the likelihood of compliance.	Extend Dog Control Orders to specific sections of the coastline.

⁶⁷ Now the North East Kent European Marine Sites Management Scheme.

Monitoring

Visitor Monitoring

Surveys of visitors to the SPA will be required to help understand and assess the effectiveness of the mitigation strategy and determine if there is any increase in recreational pressure on the SPA as a result of the increase in population from new housing development within the agreed zone of influence.

It is proposed that visitor surveys are carried out at regular intervals during the Local Plan period⁶⁸ and in particular after the strategic sites begin to be built out. This activity should be funded from developer contributions.

On-going visitor surveys at regular intervals will provide essential baseline data, and to monitor trends in visitor usage and visitor origins.

Bird Surveys

Annual surveys of the qualifying species of over-wintering birds at the SPA are an essential part of the mitigation plan, as they provide information and trends on bird numbers and evident disturbance. Bi-annual surveys have been carried out across the entirety of the SPA for a number of years, moving to annual surveys following the decline in population in 2013. It is important to ensure that these surveys are carried out consistently (i.e. year-on-year).

This essential element of the mitigation plan will help provide information that can be used to assess the impacts of an increase in visitors as well as the effects of the mitigation plan activities. The bird surveys are a key element of the mitigation plan, and one which requires certainty in delivery and a consistent approach. It is considered that this activity should be funded from developer contributions.

A more rigorous approach to recording bird disturbance events in the annual Turnstone survey should be developed and adopted across the entire SPA.

Summary of Mitigation and Monitoring

From the preceding analysis of the specific features and issues of this coastline, in order to mitigate for increased recreational disturbance to the qualifying species the following elements will be taken forward in:

- Wardening presence and co-ordination roles;
- Enforcement and education: to include legal enforcement, interpretation, on-site signing and web presence;
- Access management;
- Monitoring of visitors and qualifying species.

These elements are considered in further detail in section 5.

⁶⁸ At least years 2 (2016/17), year five (2019/20), year ten (2024/25) and year fifteen (2029/30).

5: The Access Management and Monitoring Strategy

Table 3 in Section 4 provided an assessment of the suitability of various mitigation options. The following section examines these mitigation actions in more detail.

Wardening

The wardening service is required in order to provide an on-site presence throughout the SPA within Canterbury District for the period of the year when Turnstones and Golden Plover numbers are at their peak i.e. between October and April. As other mitigation options are limited (see Table 3), the wardening presence is the key mitigation action. It is therefore essential that this is as effective as possible, with an enforcement role supported by education to ensure longer-term compliance. The wardening will provide a positive, friendly presence, to educate and inform visitors, but also to provide an enforcement role in terms of local byelaws and legal orders in relation to the protection of the SPA.

Winter roost and feeding sites will be a priority for the warden, but it is important that they also cover the entire coastal area within Canterbury District in their enforcement and educational roles, as the qualifying species are neither confined to these roosts or to the SPA.

The wardening service can be established quickly either directly by the local authority or through a partner organisation. Any partner organisation should have the legal authority to enforce the local byelaws or Dog Control Orders.

Note: Although October to April are considered the peak months for Turnstone numbers and in terms of mitigation this is the period through which there will be wardening presence, the birds are evident on site earlier than October. All year round wardening would help to protect these smaller populations and to reinforce key messages and behaviour. This is particularly important as around half of all visits to the SPA are made regularly and, of these, the greatest majority are made by visitors with dogs. An all year round presence would help to build up a positive relationship with regular site users, and provide a consistent approach to the enforcement of the Dog Control Orders. An all year round educational role would help to help change the behaviours of other activity users and reinforce the message consistently through the year. This will also help to reduce the risk of disturbance, as well as promoting local voluntary codes of conduct and improving local signage and interpretation.

Project Coordination

Management and supervision of the warden(s) will be required, including directing the warden to priority locations and co-ordinating activities throughout the year. In considering the range of activities required from the mitigation plan it is clear that a coordinating role or organisation is also required. This role would not only manage the warden's activities but also support the delivery of the other elements of the mitigation plan.

Enforcement and Education

It is apparent that dogs off the lead can cause disturbance to birds. In addition there are stretches of the coastline where there are few options for the Turnstones in terms of protection or escape from disturbance and where there are no alternative route options to offer dog walkers. Therefore, in order to reduce the levels of disturbance at critical periods of the year, it is essential that there is a means of restricting access to dogs in the areas where the birds are present.

Dog Control Orders provide a range of options, for example limiting dog access to on-lead only, through to outright prohibition. Canterbury City Council already has legal restrictions on the actions of visitors with dogs in various places along the coast. These Dog Control Orders extend across stretches of the coast within the SPA, although there are some gaps in coverage. In addition the signage to inform site users of these legal restrictions is often small and poorly sited. The strengthening and enforcement of the existing byelaws/legal orders relating to the control of dogs, together with the extension of legal orders to specific sections of the coastline are key elements of the mitigation plan. These may, however, take time to put in place, but are considered necessary to maximise the likelihood of compliance. Other enforcement options should also be explored.

The enforcement actions will not be effective unless they are accompanied by efforts to change visitor behaviour. It is essential to provide a pro-active approach to informing and engaging both occasional and regular visitors in order to provide a coherent, consistent set of messages in relation to the sensitivity and responsible use of the SPA. This will include a programme of interpretation and signage, promotional leaflets and flyers, and activities to engage site users and the local community.

A further aim of this work will be to encourage responsible dog ownership. Experience from other parts of the UK supports the development of a Dog Project; preferably a project that applies to the whole Thanet Coast and Sandwich Bay SPA. Although this proposal is not suggested as part of this mitigation strategy, it is recommended in order to support and strengthen other actions. It is considered that a Dog Project would be more effective if developed for the whole SPA (i.e. alongside Thanet District) and accordingly the project could be considered at a later date if this joint approach takes effect.

Alongside the strengthening of legal orders, voluntary codes of conduct would provide guidance for a range of activities in order to convey clear messages and have a supporting role, although they are not enforceable. Voluntary codes of conduct for a range of recreational uses have been drawn up by (the former) Thanet Coast Project. These codes may need to be amended and strengthened as required, and they could be developed and delivered as part of the education programme in order to present a consistent approach and message to site users.

Access Management and Zoning

As has been outlined previously recreational activity, and consequently degrees of disturbance, takes place along the entire coastal strip. Zoning or access management would help provide some protection and some refuge from disturbance activities.

There is limited opportunity to restrict access along the seafront as access to most of this coastline is on an open access promenade. However, there are some limited possibilities where adjustments to on-site access may be effective. Accordingly it is proposed that as part of this mitigation plan access management should be implemented to prevent access to the beach at Long Rock.

The only other area where there is not a promenade is at Reculver beach and some form of restriction may need to be considered here. Restrictions on dog access during the October to April period may need to be considered, for example restricting dogs being off-lead or being permitted on the beach only in certain areas. It is likely that this will need to be enforceable as this is a highly visited area.

As previously outlined, there are limited opportunities to re-route or create new paths due to the narrowness of the coastal strip, together with limited access possibilities on adjoining land. However, it may be possible to improve public rights of way links inland from Reculver, and in particular from Reculver Country Park. This is unlikely to be sufficient to be effective mitigation, but may help in practical terms to provide an alternative route for regular dog walkers to avoid users accessing the beach; and it could have a supporting role in mitigation should access to the beach need to be restricted. This opportunity was highlighted as an action to address impacts identified in the Reculver Masterplan Habitat Regulations Assessment, but is yet to be implemented.

Zoning of degrees of dog 'freedom' may be required, with the greatest restrictions in the most important and/or sensitive areas. The zoning work will develop a hierarchy of restriction approaches as appropriate.

6: Elements of the Scheme and Tariff

Elements of the Scheme and Outline Costs

Elements of this proposal that relate directly to the mitigation of recreational impacts as a result of new housing development within the zone of influence, should be funded through developer contributions, and are listed in Table 3.

In drawing up the costs for a mitigation package it is clear that an approach that included both Canterbury and Thanet districts would benefit from economies of scale; in particular for those elements of the mitigation plan that require the input of personnel (i.e. the warden and the co-ordinating role) as staff costs form a large proportion of the mitigation costs.

Assumptions:

- Costs are assumed over a 16 year period from 2015/16 to 2030/31 (the end of the plan period);
- For the purposes of demonstrating the costs of the package, a rate of 2% inflationary increase per annum is applied to all staff costs and 2.5% to goods and services.

Wardening Service

A proposed model for taking forward wardening, enforcement, education and engagement comprises:

(a) Warden

- A warden post employed by a local authority or other organisation with experience in the sector and the authority to enforce legal orders and local byelaws;
- Responsible to a co-ordinating role/organisation;
- Required for the peak period of time when Turnstones are present i.e. October to April;
- The full-time presence during the winter months will enable the role to cover the Canterbury coastline within the SPA.

Responsibilities will include:

- Enforcement of legal orders and byelaws relating to the SPA;
- Development and management of Volunteer Scheme;
- Management of bird survey counts;
- Education and awareness role, to reduce the risk of disturbance, promote Voluntary codes of conduct, improve signage and interpretation, and oversee access management and other minor works relating to the protection of the SPA;
- The warden will be required to work in liaison with the relevant local authority(ies), other relevant organisations (e.g. SBBOT, TCP, KWT, NE, RSPB), visitors and the local community.

Costs: To include salary and related costs, and capital costs of items including PC plus other equipment.

(b) Co-ordination role

- Based in the same organisation as the warden(s);
- Responsible to the client local authority (and a small steering group comprising CCC, NE and others);
- Activities, preparation of plans and operating the Volunteer Scheme are all year round tasks need to operate the mitigation scheme, so this role is required to a greater or lesser extent all year round to manage staff, volunteers and activities, and act as main liaison point for the mitigation scheme;
- Half-time for October to April and quarter-time for May to September.

Responsibilities include:

- Management of warden;
- Planning, developing, resourcing and co-ordinating all mitigation activities and works relating to the SPA e.g. the Coastal Dogs Project;
- Development and management of education and engagement activities;
- Liaison role at a senior level with the client;
- Management of Volunteer Scheme when warden not in post;
- Continuity of project from May to September.

Costs: To include salary and related costs, and capital costs of items including PC plus other equipment, plus costs of running a Volunteer Scheme and community engagement.

Education and Enforcement

- Interpretation programme - to include interpretive signage at intervals throughout the period;
- Review of all information signage along the coastal strip;
- Leaflets and web presence;
- Interpretive display at focal points e.g. Reculver visitor centre, plus mobile displays;
- Amendments/extensions to existing Dog Control Order sites and associated (and improved) signage; legal costs and advertising.

Costs: To include capital costs and charges for legal orders.

Monitoring

(a) Bird surveys

The mitigation model assumes that annual bird surveys will take place.

There are 21 survey sectors of 2km length for the whole SPA (i.e. Thanet included). The Canterbury section of the SPA comprises 9 survey sectors x 4 visits each. The tariff calculations assume the staff are hosted by one of local authorities, and includes the use of volunteers i.e. it also assumes the development of the volunteer scheme.

(b) Visitor Surveys

The mitigation model assumes that visitor surveys of the Canterbury section of the SPA will be necessary in order to monitor the effects of the impact of new development. Surveys will take place in year two of the Local Plan period and the Mitigation Strategy (2016/17), year six (2020/21), year eleven (2025/26) and year sixteen (2031/31) in order to assess the change in visitor numbers. This will comprise surveys at 4 survey sites x 2 visits to each site.

Management of visitors – on-site

- Minor works to modify access and path routing throughout the period;
- Zoning - to comprise physical works and signage;
- Minor works to protect and/or provide Turnstone refuges.

Total Costs of Mitigation Package

The total cost of operating the mitigation strategy over a 16 year period from 2015 to 2031 (the Plan period) is estimated at £1,019,866. This equates to an annual average of £57,947 over the Local Plan period.

Table 4 provides the breakdown of the cost elements of the mitigation plan proposal.

Table 4: Summary of Tariff

Total revenue cost of mitigation over Local Plan period	£1,019,866
Tariff per dwelling – including requirement for in-perpetuity funding	
1 bedroom flat	£355
2 bedroom house or 2 bedroom flat	£498
3 bedroom house	£670
4+ bedroom house	£848

Development of Tariff

In order to fund the mitigation strategy a tariff has been developed that will be levied to housing developers according to the number of dwellings built within the zone of influence.

The mitigation strategy will be monitored and kept under review. It is likely that there will be some adjustments to the tariff to ensure that it remains relevant and up-to-date.

The tariff will be funded by developer contributions, comprising two elements; the first will fund annual expenditure to operate the mitigation actions and the second will fund the capital investment required in order to fund the mitigation strategy in perpetuity.

A proportional or differentiated tariff, based on occupancy rates is being applied. This follows guidance developed by Natural England for the Thames Basin Heaths SPA (see Appendix).⁶⁹ In that example, legal opinion sought as part of the development of the guidance stated that a tariff which included the number of bedrooms and/or distance would be proportionate and acceptable; and further that the tariff can be established by reference to the overall sum needed to deliver the required mitigation.

The methodology used for this mitigation strategy tariff has been based on examples from other parts of the UK, and from guidance produced by Natural England to inform the tariff developed at the Thames Basin Heaths (see Appendix).

The Canterbury CC Mitigation Strategy tariff payable uses the occupancy rate⁷⁰ of dwellings to arrive at a cost per dwelling. A differentiated tariff is proposed, based on varying local occupancy rates for different types of dwelling, calculated for the period 2014 to 2031 for Canterbury District. This provides a scale of tariff that proportionate to the number of bedrooms in a dwelling.

The list of dwelling types and occupancy rates is shown in Table 5.

Table 5: Occupancy by Dwelling Size

	Occupancy per household type	Average
All categories: No of bedrooms		2.34
1 bedroom	1.33	
2 bedrooms	1.87	
3 bedrooms	2.52	
4 bedrooms	3.01	3.19
5 or more bedrooms	3.66	

In line with some other UK examples it is proposed that the payment of such contributions should normally be required on commencement of the development (e.g. Surrey Heaths – see Appendix).

⁶⁹ Thames Basin Heaths Strategic Access Management and Monitoring Project - Tariff Guidance: Natural England.

⁷⁰ Data supplied by Research & Evaluation, Kent County Council, and further information derived from the 2011 UK Census.

This approach will ensure that funds are available at an early stage, enabling the high priority elements of the Mitigation Plan to start immediately, and providing cash flow to cover on-going revenue costs.

Contributions may be updated on an annual basis to reflect increased costs or works.

Mechanism for Calculating the Tariff

The tariff is based on the cost of operating the mitigation strategy for the Local Plan period, plus the cost of building a capital investment fund that will finance the mitigation plan in perpetuity thereafter.

In calculating the costs of the mitigation strategy and the tariff the best available figures have been used throughout, together with estimates based on realistic comparator costs.

The annual figure for the operation of the mitigation plan has been assessed for the whole Local Plan period. This figure is used to calculate the average tariff per dwelling (see Table 6 below).

Table 6: Summary of Tariff

Item	Cost £	Notes
Mitigation Strategy	£927,150	Total implementation cost estimated for the Local Plan period (16 years) (excludes in-perpetuity)
Contingency @ 10%	£92,715	10% contingency
Overall Implementation Cost over Plan period	£1,019,866	Overall Total Implementation Cost
Revenue Funding per dwelling	£154	Overall Total Cost (£1,019,866) divided by expected development total (6638 dwellings) [27% of tariff contribution]
Capital Investment per dwelling	£415	Amount of capital investment required to fund the mitigation strategy in perpetuity divided by expected development total (6638 dwellings) [73% of tariff contribution]
Total Average Tariff per dwelling	£569	Revenue funding per dwelling + Capital investment per dwelling [100% of tariff contribution]
Total Required over Plan Period	£3,774,636	Total revenue and total invested for in-perpetuity fund over whole Plan period.

The combined costs of the Mitigation Strategy (overall total cost) together with the cost of the capital investment fund are divided by the number of dwellings to be built, to arrive at an average tariff cost per dwelling (see table above).

The average tariff is then used together with the average occupancy figure to calculate the standard cost i.e. the cost of the tariff per person, based on the number of dwellings to be built. This is shown in Table 7.

Table 7: Differentiated Tariff

Item	Cost	Notes
Total required over Plan period	£3,774,636	Total revenue and total invested for in-perpetuity fund over whole Plan period.
Total number of residents	14202	Number of dwellings multiplied by occupancy for each of the dwelling sizes.
Standard Tariff per person	£266	Original total divided by Total number of residents = Tariff per person

The Standard Tariff per person is then multiplied by the occupancy rates for each type of development to calculate the tariff per dwelling type (see Table 4).