

Canterbury City Council

Habitats Regulations Assessment of Draft Local Plan

Report to Inform Screening for Appropriate Assessment



AMEC Environment & Infrastructure UK Limited

May 2013

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Appropriate Assessment

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UK Limited

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Executive Summary

Canterbury City Council (CCC) has prepared a draft Local Plan setting the objectives and planning policies that will guide development in the district appropriate to local needs and longer-term aspirations. Prior to the Local Plan being adopted, CCC must comply with the requirements of the *Conservation of Habitats and Species Regulations 2010* (as amended) and *The Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007* (as amended) collectively referred to as the Habitats Regulations. AMEC Environment & Infrastructure UK Ltd (AMEC) was commissioned by CCC to produce this report in order to inform CCC's screening assessment of their draft Local Plan, which involves them determining whether the plan is likely to result in significant effects on any European Sites¹ and hence whether an Appropriate Assessment is required under the Habitats Regulations.

The following European Sites fall within the boundaries of Canterbury district and thus may be directly affected by its implementation:

- **Blean Complex SAC;**
- **Stodmarsh SAC;**
- **Stodmarsh SPA (also a Ramsar Site);**
- **Thanet Coast and Sandwich Bay SPA (also a Ramsar Site);**
- **North East Kent European Marine Site²;**
- **The Swale SPA (also a Ramsar Site);**
- **Swale and Medway European Marine site³;**
- **Thanet Coast SAC (2km);**
- **Wye and Crundale Downs SAC (750m);**

¹ Under the Habitats Regulations, European Sites are defined as Special Area of Conservation (SACs), candidate SACs, Sites of Community Importance, Special Protection Areas (SPAs) and Offshore Marine Sites. However, UK policy extends the requirements pertaining to European sites to include Ramsar sites and potential SPAs.

² This comprises the marine elements of the Thanet Coast and Sandwich Bay SPA, Thanet Coast SAC and Sandwich Bay SAC.

³ This comprises the marine elements of The Swale SPA and Medway Estuary and Marshes SPA. The Medway Estuary and Marshes SPA element of this marine site will not be affected by the draft Local Plan and so no further assessment of the relationship between it and the draft Local Plan are required.

- **Parkgate Down SAC (1.5km);**
- **Lydden and Temple Ewell Downs SAC (3km);**
- **Folkestone to Etchinghill Escarpment SAC (7.5km);**
- **Sandwich Bay SAC (9km); and**
- **Dover to Kingsdown Cliffs SAC (11.5km).**

The following is a list of the environmental changes that could potentially result from implementation of the draft Local Plan. These changes, which could occur during the construction and/or operation of new developments (and, where relevant, their decommissioning), have the potential to result in significant effects on the European Sites listed above. The likelihood of an environmental change arising and European Sites being significantly affected will be influenced by the policy wording in the draft Local Plan, which is assessed in Section 4 of this report.

1. Direct habitat loss, physical damage or habitat fragmentation as a result of new development on or adjacent to European Sites.
2. Disturbance caused by noise, light or visual impact as a result of new development on or adjacent to European Sites.
3. Changes in bird populations due to cat predation as a result of increased urbanisation on or adjacent to European Sites.
4. Physical damage or disturbance because of increased recreational activities (e.g. dog walking or watersports) on or adjacent to European Sites as a result of increased urbanisation or tourism activity.
5. Changes in air quality because of increased emissions to air associated with new development, as a result of increased vehicle use, demand for power generation, or industrial processes.
6. Changes in water quality (pH, thermal, toxic contamination, nutrient enrichment or reduction, siltation or turbidity) because of the discharge of contaminated or silt-laden surface water run-off, discharge of sewage effluent from new development or associated sewage treatment works, or increased abstraction resulting in reduced dilution capacity within a fluvial system.
7. Changes in water levels because of increased abstraction to serve new development.
8. Changes to coastal dynamics because of new development or associated coastal protection work causing changes in sedimentation (erosion or accretion) patterns in coastal units linked to the coast within Canterbury district.

9. Coastal squeeze⁴ as a result of new development or associated coastal protection work.

Based on the current policy wording, the draft Local Plan is likely to result in significant effects on European Sites and so an Appropriate Assessment will be required. However, Section 4 of this report also sets out the opportunities that have been identified to modify individual policies so that likely significant effects on European Sites can be avoided. If reading the Local Plan as a whole, it will not be necessary to modify every individual policy with the same policy text. Instead, any suggested policy text that is common to more than one policy can be incorporated into the upfront Vision and Planning Strategy section.

Based on the conclusions of the individual policy assessment, the following recommendations should be adopted.

- 1) The following wording should be included, either in the form of a new Sustainable Development policy or added to existing draft policies SP1 and SP3:-

“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, as it would not be in accordance with the aims and objectives of this Local Plan.”

- 2) It is suggested that additional Sustainable Development policy text be added, to enable the Local Plan to incorporate further details on how CCC will avoid the likelihood of significant effects on European Sites arising as a result of the quantum and location of development, alone or in combination. This additional policy text should reflect the recommendations set out for the draft SP policies and draft policies HD1, EMP11, TCL10, TV6, T8-9, T12-16, QL11-12, OS10-11, CC11 and CC13 in relation to water supply, sewage treatment capacity, water quality, air quality, recreational management, strategic alternative natural greenspace provision, noise, light and visual impact.
- 3) Given that policies TV6, LB14, LB15 and CC9 relate directly to development within SACs, SPAs or Ramsar Sites, it will be crucial to ensure that such development will not have an adverse effect on the sites' integrity. To this end, the wording set out in first recommendation should specifically be included in these draft policies along with the additional policy text recommended in Section 4 in relation to TV6 and CC9.
- 4) It is suggested that draft policies LB5-LB7 relating to designated nature conservation sites are clarified as set out in Section 4 to ensure there is no confusion as to the level of protection to be afforded to SAC, SPA or Ramsar sites from new development.

If all these recommendations are adopted it may be possible for CCC, when it screens the final version of the draft Local Plan, to conclude that an Appropriate Assessment is not required.

⁴ Coastal squeeze is the term used to describe what happens to coastal habitats that are trapped between a fixed landward boundary, such as a sea wall and rising sea levels and/or increased storminess. The habitat is effectively 'squeezed' between the two forces and diminishes in quantity and or quality.

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1. Introduction

1.1 Background and Purpose of this Report

Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (referred to as the Habitats Directive) provides the context for EU Member States to set in place regulations to protect habitats and species of European importance, through the establishment and conservation of an EU-wide network of European Sites, known as Natura 2000. This network comprises Special Areas of Conservation (SACs), Special Protection Areas (SPAs) (the latter designated under *Council Directive 79/409/EEC on the Conservation of Wild Birds*⁵) and Offshore Marine Sites. European Sites are designated for being of exceptional importance in respect of supporting natural habitats and species that are rare, endangered or vulnerable within a European context.

The *Conservation of Habitats and Species Regulations 2010* (as amended) and *The Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007* (as amended) (collectively referred to in this report as the Habitats Regulations) implement the Habitats Directive in England & Wales. The Habitats Regulations apply to SACs, candidate SACs, Sites of Community Importance (SCIs), SPAs and Offshore Marine Sites. Ramsar Sites (designated under the 1976 Ramsar Convention⁶) and potential SPAs (including proposed extensions or additions to existing SPAs) are not European Sites in the context of the Habitats Regulations, but under UK planning policy (National Planning Policy Framework - NPPF) receive a similar level of protection. For the purposes of this report, all these sites, including Ramsar Sites and potential SPAs, are referred to as European Sites.

The Habitats Regulations require “*competent authorities*” to determine whether any plans that they prepare are likely to have a significant (adverse)⁷ effect on European Sites, either alone or in combination with other plans and projects. If significant effects upon a European Site are anticipated then the plan must be subject to an Appropriate Assessment. In the light of the conclusions of any Appropriate Assessment, the draft plan can only be adopted after the competent authority has ascertained that the plan will not result in an adverse effect on the integrity of any European Site or, if it could have an adverse effect on integrity, that it can pass further tests relating to there being no alternatives and to imperative reasons of overriding public interest.

This *Report to Inform Screening for Appropriate Assessment* concerns Canterbury City Council’s (CCC’s) draft Local Plan, which sets out the objectives and planning policies that will guide development in the district in order to meet local needs and longer-term aspirations. The purpose of the report is to inform the implementation of the regulatory requirements on CCC relating to the first stage of what is generally referred to as the Habitats

⁵ Revised and updated as *EU Directive (2009/147/EC) on the Conservation of Wild Birds*

⁶ The Convention on Wetlands of International Importance especially as Waterfowl Habitat held in Ramsar, Iran in 1971 and ratified by the UK in 1976

⁷ Though beneficial effects may arise from the draft Local Plan, only adverse effects are considered to be of consequence in undertaking Habitats Regulations Assessment.

Regulations Assessment (HRA) process (see **Box 1.1**, which also describes the subsequent stages of the process, and **Figure 1.1** which provides a graphical representation of the stages in the HRA process). This report informs the process of finalising the wording of the policies in the draft Local Plan with a view to ensuring that, when the draft Local Plan has been finalised and is subject to a screening assessment, potentially significant effects on European sites will, wherever possible, have been avoided.

Box 1.1 Outline of the HRA process relating to plans or projects

Stage 1, Screening – for plans or projects that are not directly connected with or necessary for site management, this involves identifying the likely effects of the plan or project upon European Sites, either alone or in-combination with other projects or plans, and assessing whether these effects are likely to be significant. If likely significant adverse effects cannot be excluded on the basis of objective evidence (reflecting the Waddenzee judgement) it is necessary to undertake an Appropriate Assessment of the implications for the European Sites in view of the sites' conservation objectives.

Stage 2, Appropriate Assessment - where likely significant adverse effects cannot be avoided, this stage assesses the effects of the plan or project on the integrity of the relevant European Sites, either alone or in-combination with other projects or plans, with respect to the sites' structure and function, and its conservation objectives. Where it cannot be concluded that there will be no adverse effects on the integrity of any European Site, the Appropriate Assessment must also identify any potential mitigation for these effects and the implications for the assessment of effects on integrity. Following the Appropriate Assessment, permission can only be granted (without proceeding to Stage 3 below) if (again reflecting the Waddenzee judgement) there is no reasonable scientific doubt that there will be no adverse effect on the integrity of European Sites

Stage 3, Assessment of alternatives - if the Appropriate Assessment cannot conclude that there will be no adverse effect on the integrity of European Sites, there is a requirement to examine any alternatives to the plan (or part of the plan) or project (including sites or different approaches) with a view to determining whether there are any alternatives that will have no adverse effect or a lesser adverse effect on the integrity of European Sites. If alternatives exist, they should be subject to assessment under Stage 1 or 2 above, as appropriate, and if these have no (or a lesser effect) on European Sites then the plan or project cannot go ahead.

Stage 4, Assessment where no alternatives exist – if there are no alternative solutions that would have no (or a lesser effect) on European Sites then the plan or project can only proceed if there are imperative reasons of overriding public interest (IROPI). If this is the case, it will be necessary to implement measures to compensate for remaining adverse impacts.

1.2 CCC's Draft Local Plan

The preparation of CCC's draft Local Plan follows work undertaken in 2006-2007 when CCC commissioned work on a Futures Study⁸ for the district. Subsequently, CCC undertook a Development Requirements Study,⁹ Strategic Housing Market Assessment (SHMA),¹⁰ Strategic Housing Land Availability Assessment (SHLAA),¹¹ Employment Land Review,¹² Retail Needs Assessment Study,¹³ Strategic Flood Risk Assessment¹⁴ and transport

⁸ Experian (2006) At a Crossroads: Canterbury Futures Study / Experian (2011) Review of Canterbury Futures Study: At a Cross Roads

⁹ Nathaniel Lichfield & Partners (2012) Canterbury Development Requirements Study

¹⁰ ECOTEC (2009) SHMA for the East Kent Sub Region

¹¹ http://www.cartogold.co.uk/Canterbury/text/shlaa_sites.htm

¹² Savills (2008) Research Report in respect of an assessment of Employment Land in Canterbury District

¹³ Kent County Council (2009) Retail Need Assessment Study for the District of Canterbury

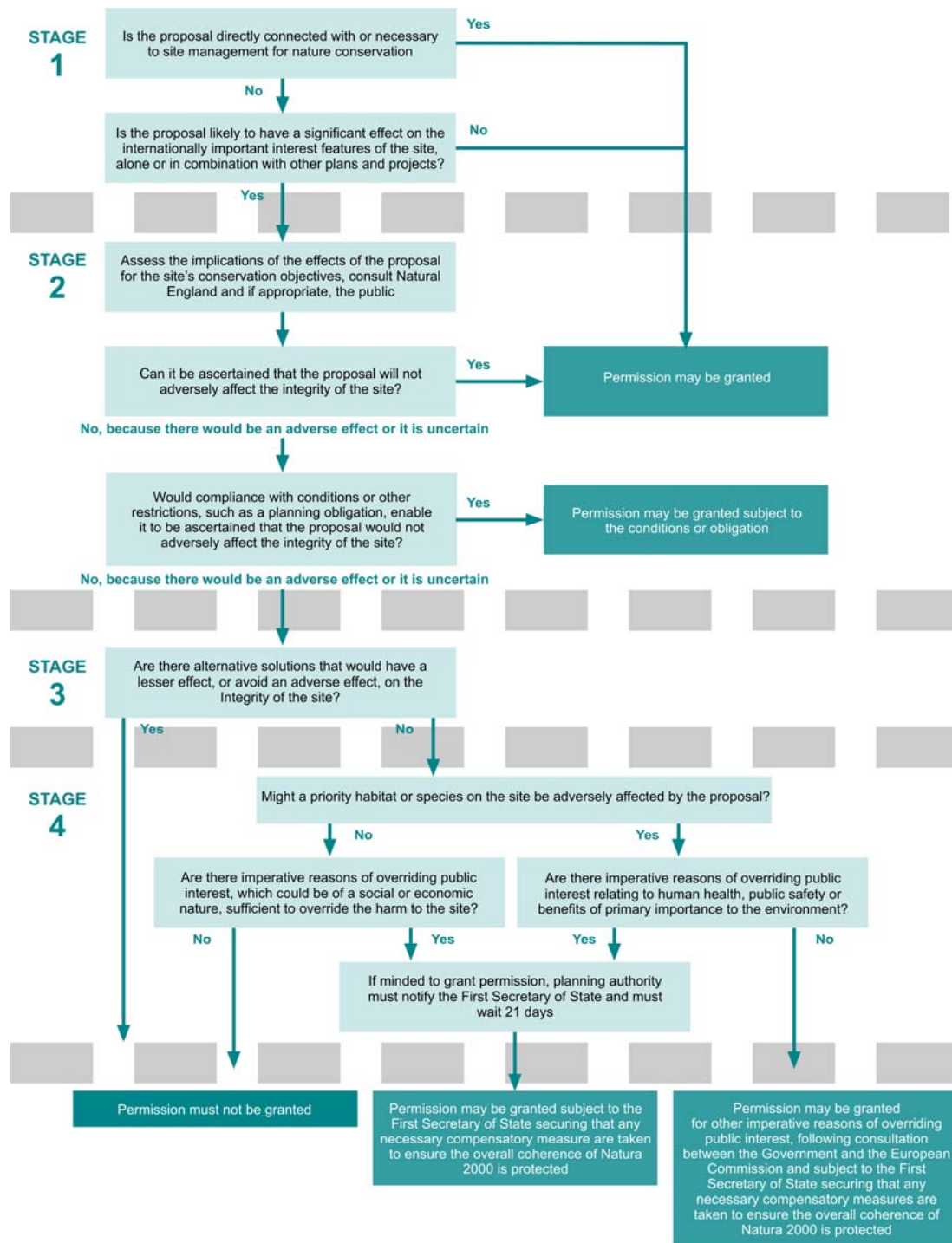
modelling amongst other studies to inform their spatial development strategy. Sustainability Appraisals (SAs) have been undertaken of the Futures work, development scenarios contained in the Development Requirements Study¹⁵ and the sites contained in the SHLAA. HRA has also been undertaken for the development scenarios;¹⁶ this identified the European Sites that could potentially be affected by the spatial development strategy and if the development scenarios were likely to have significant effects upon them.

¹⁴ <http://www.canterbury.gov.uk/assets/localplan/SFRA%20Non%20Tech%20Summary.pdf>

¹⁵ AMEC Environment & Infrastructure (2012) Sustainability Appraisal of Development Scenarios

¹⁶ Entec (2010) Habitats Regulations Assessment

Figure 1.1 Habitats Regulations Assessment Process¹⁷



¹⁷ Source: ODP (2005) *Circular 06/2005: Biodiversity And Geological Conservation – Statutory Obligations And Their Impact Within The Planning System*

Since commencing work on the draft Local Plan, there has been a considerable change in planning policy. In 2012, the Government replaced all Planning Policy Statements (PPSs), excepting PPS10, with the NPPF. This now provides the broad planning policy framework for local planning authorities (LPAs) and, consistent with the principles of localism, devolves greater responsibility to LPAs for policy making (e.g. targets for affordable housing and development on previous developed land are to be determined at a local level). Another substantial change is that the South East Plan was revoked on 25 March 2013. Revocation of this plan (and its 179 policies) means that local plans developed in the South-East now need to include policies that had been previously been addressed in the regional plan. This includes issues concerning housing, strategic development sites, transport, biodiversity, renewables, and, waste and minerals.

Canterbury's draft Local Plan draws together the work completed to date and reflects changes in planning policy to set out a vision for growth for the district to 2030. It contains chapters and policies that cover the following topics:

- Vision and planning strategy - 7 draft policies;
- Housing - 10 draft policies;
- Economic development - 15 draft policies;
- Town centres - 12 draft policies;
- Tourism and visitor economy - 8 draft policies;
- Transport infrastructure - 18 draft policies;
- Design and the built environment - 13 draft policies;
- Quality of life and access to facilities -13 draft policies;
- Open space - 14 draft policies;
- Landscape and biodiversity - 16 draft policies;
- Climate change, flooding and coastal change - 13 draft policies; and
- This historic environment - 13 draft policies.

1.3 Structure of this Report

The remainder of this report is structured as follows.

- **Section 2 Methodology:** This section explains the methodology employed in this report to inform the implementation of the regulatory requirements on CCC relating to Stage 1, Screening of the HRA process.

- **Section 3 Potentially Affected European Sites:** This section provides details of the European Sites that could potentially be affected by the draft Local Plan, the reasons why they have been designated and the environmental factors (conservation objectives) required to sustain the integrity of the sites.
- **Section 4 Policy Screening Assessment:** This section provides an assessment of whether the individual policies contained within the draft Local Plan are likely to have significant effects upon the European Sites identified, and details opportunities for finalising the wording of the policies to avoid, wherever possible, potentially significant effects on European sites.
- **Section 5 In-Combination Effects:** This section identifies those plans and projects that could have in-combination effects with CCC's draft Local Plan.
- **Section 6 Conclusions:** This section sets out recommendations for finalising the draft Local Plan with a view to ensuring that, when it has been finalised and is subject to a screening assessment, potentially significant effects on European sites will, wherever possible, have been avoided.

2. Methodology

2.1 European Site Identification

The first step has been to identify:

- European Sites situated within or adjacent to the boundaries of Canterbury district;
- European sites situated within a 15km radius of Canterbury district (in line with the precautionary approach required for undertaking HRA, but taking into account the potential impacts that could arise from the draft Local Plan).

2.2 Baseline Data Collection

Every European Site is made up of one or more component Sites of Scientific Interest (SSSIs), many of which support habitats and species of national value in addition to those of European interest. However, for the purpose of HRA it is only the European qualifying interest features that are considered. Therefore, for each European Site details of its qualifying interest features were collated.

- Qualifying interest features for SACs, candidate SACs and SCIs are those habitats and species listed in Annexes I and II of *Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora* for which the site was designated (as set out on the Standard Natura 2000 Data Form submitted to the European Commission at the time of site selection).
- Qualifying interest features for SPAs and potential SPAs are those species listed in Annex I (Article 4.1) and regularly occurring migratory species not listed in Annex I (Article 4.2) of *Council Directive 79/409/EEC on the Conservation of Wild Birds* for which the site was designated (as set out on the Standard Natura 2000 Data Form submitted to the European Commission at the time of site selection). However, following a review of the UK network of SPAs in 2001, the lists of qualifying species at some SPAs were revised. Not all SPA citations have been revised in the light of these changes but changes to qualifying species have been listed on Natural England's Conservation Objectives datasheets.¹⁸ If there was a mismatch between species listed in extant citations and those listed on Natural England's Conservation Objectives datasheets, the later was used as the latest source of information.
- Qualifying interest features for Ramsar sites are listed on site-specific 'Information Sheets on Ramsar Wetlands', which also list the criteria for identifying wetlands of international importance that are applicable to each site's designation and which criteria are relevant to each interest feature.

¹⁸ <http://www.naturalengland.org.uk/ourwork/conservation/designations/sac/londonandsoutheast.aspx>

For those sites that would potentially be affected by policies in the draft Local Plan, conservation objectives were obtained from Natural England.¹⁶ These objectives provide a framework for site management and a standard against which monitoring can take place to determine whether a site is being maintained at a favourable conservation status. However, some European sites do not have specific conservation objectives, although their component SSSIs do. In such cases, the SSSIs' conservation objectives which relate to the European interest features have been used for the purpose of this report.

Information on the condition and vulnerabilities of European sites was also collected, as small changes associated with the draft Local Plan could potentially act as a tipping point in cases where site integrity is already compromised. The condition of component SSSIs is monitored and assessed by Natural England and reported on its website. The vulnerability of each European Site is detailed on the Standard Natura 2000 Data Form submitted to the European Commission at the time of site selection.

The following resources were used to collate this information:

- Joint Nature Conservation Committee (JNCC) website (www.jncc.gov.uk);
- Natural England Website (www.naturalengland.org.uk);
- MAGIC Website (www.magic.gov.uk);
- Natural England – Angela Marlow;
- Regulation 33 Advice for the North East Kent European Marine Site (English Nature, 2000);
- Regulation 33 Advice for the Medway and Swale European Marine Site (English Nature, 2001); and
- North East Kent European Marine Sites Management Scheme.

2.3 High Level Screening Assessment

Following the collection of baseline data for the sites identified (Section 2.1) it became apparent that certain European Sites situated within 15km of Canterbury City would not be affected by implementation of the draft Local Plan. This was primarily due to the nature of their interest features or distance from Canterbury district. If a significant effect on any of the European Sites within 15km was considered unlikely to occur, these sites were not considered further in the assessment.

2.4 Policy Screening Assessment

Based on the current policy wording an assessment was made of the potential impacts of implementing each draft policy in isolation. For those policies that were likely to result in significant effects on European Sites, consideration was given to how the current policy wording could be modified so that likely significant effects on

European Sites could, wherever possible, be avoided. The potential for the Local Plan policies to result in likely significant effects was then coded according to the ‘traffic light’ system shown in **Table 2.1**. Those projects that would result in no significant effects were coded green; those for which significant effects could easily be avoided by rewording of the individual policy or other policies in the Local Plan prior to CCC undertaking their screening assessment were coded amber; and those that should be discounted outright were coded red.

The assessment was based on assessing the worst-case scenarios in line with the precautionary approach required for undertaking HRA.

Table 2.1 System adopted for denoting potentially significant effects on European Sites

Colour Code	Criteria
Green	The policy is considered unlikely to have a significant effect on a European Site and does not need to be subject to an Appropriate Assessment.
Amber	The policy is likely to have significant effect on one or more European Sites. In its current form the policy would need to be subject to an Appropriate Assessment. However, opportunities exist for rewording the individual policy or other policies in the Local Plan so that likely significant effects on European Sites can be avoided. However, it will be necessary to revisit the screening assessment once the final Local Plan is written to confirm this is the case.
Red	The project is likely to have a significant effect on a European Site, which can probably not be avoided by modifying the wording of the policy and an Appropriate Assessment will definitely be required.

2.5 In-Combination Effects

In line with Government advice,¹⁹ only those plans and projects most relevant to the European Sites identified during the baseline data collation exercise were considered in the assessment of in-combination effects. Taking into account the potential impacts of implementing the draft Canterbury local plan on its own, plans relating to development control, infrastructure provision or environmental protection within the adjacent districts or at county level were considered most relevant. Plans and projects that could result in in-combination effects with the draft Local Plan have been identified in Section 5 of this report.

¹⁹ Department for Communities and Local Government (DCLG) (2006). *Planning for the Protection of European Sites: Appropriate Assessment*. DCLG, London.

3. Potentially Affected European Sites

3.1 European Sites

The draft Local Plan is not directly connected or necessary for the management of any European Sites.

The following European Sites fall within the boundaries of Canterbury district (**Figure 3.1**) and thus may be affected by the implementation of the Local Plan:

- **Blean Complex SAC;**
- **Stodmarsh SAC;**
- **Stodmarsh SPA (also a Ramsar Site);**
- **Thanet Coast and Sandwich Bay SPA (also a Ramsar Site);**
- **North East Kent European Marine Site²⁰;**
- **The Swale SPA (also a Ramsar Site); and**
- **Swale and Medway European Marine site²¹.**

Other European Sites that lie within a 15km radius but outside the district may be indirectly affected by implementation of the plan. Taking into account the effects that may arise from the draft Local Plan, the following European Sites within a 15km radius have also been taken forward to the screening assessment (approximate distances to the boundary of Canterbury district are provided in brackets):

- **Thanet Coast SAC (2km);**
- **Wye and Crundale Downs SAC (750m);**
- **Parkgate Down SAC (1.5km);**
- **Lydden and Temple Ewell Downs SAC (3km);**

²⁰ This comprises the marine elements of the Thanet Coast and Sandwich Bay SPA, Thanet Coast SAC and Sandwich Bay SAC.

²¹ This comprises the marine elements of The Swale SPA and Medway Estuary and Marshes SPA. The Medway Estuary and Marshes SPA element of this marine site will not be affected by the draft Local Plan (see below) and so no further assessment of the relationship between it and the draft Local Plan are required.

- **Folkestone to Etchinghill Escarpment SAC (7.5km);**
- **Sandwich Bay SAC (9km); and**
- **Dover to Kingsdown Cliffs SAC (11.5km).**

Taking into account the potential effects that may arise from the draft Local Plan, there is only one European Site within 15km of Canterbury district that is not likely to be significantly affected as a result of implementing the draft Local Plan. This is **Medway Estuary and Marshes SPA (also a Ramsar Site) (13km)**. The qualifying interests of this site are that it supports:

- Populations of European importance of Annex 1 species under the Birds Directive;
- Populations of European importance of regularly occurring migratory species;
- An internationally important assemblage of birds during the breeding season; and
- An internationally important assemblage of waterfowl overwinter.

Given that the site is 13km from the boundaries of Canterbury district, the bird populations for which it qualifies are not likely to be directly disturbed by development within the district.

There is evidence of rapid erosion of intertidal habitat within the SPA due to natural processes and the effects of sea defences and clay extraction. However, the Medway and Swale Shoreline Management Plan²² considers the Medway estuary as separate coastal unit to the Swale estuary and so, in terms of hydrological connectivity, development on the open coast in Canterbury is unlikely to have an impact upon it.

The intertidal area within the SPA is also vulnerable to disturbance from waterborne recreation. Opportunities for water-based recreation including sailing, canoeing and angling and a diverse range of other pursuits including bird watching, wildfowling, walking and cycling are available in both the Medway and Swale estuaries.²⁰ However, the Medway and Swale Shoreline Management Plan notes that tourism is relatively low in this area compared to the remainder of Kent. Given that similar recreational resources are available on the Swale estuary and that it is located within 10km of Canterbury district, there is no reason to believe that residents inhabiting new development in Canterbury district would be likely to travel further afield to undertake similar activities on the Medway estuary.

Table 3.1 details environmental changes, which could result from the implementation of the draft Local Plan (see Section 3.2) and that have the potential to result in significant effects on European Sites. These effects have been scoped in as requiring further assessment.

²² Halcrow (2010) Medway Estuary and Swale Shoreline Management Plan

Table 3.1 Environmental Changes that have the Potential to Result in Significant Effects on European Sites

European Sites	Environmental Changes with the Potential to Result in Significant Effects (see Section 3.2 for details)								
	Direct habitat loss	Noise, light or visual impact	Cat predation	Recreation	Air quality	Water quality	Water levels	Coastal dynamics	Coastal squeeze
Blean Complex SAC	√	X	X	√	√	X	X	X	X
Stodmarsh SAC	√	X	X	X ²³	X	√	√ ²⁴	X	X
Stodmarsh SPA	√	√	√	√	X	√	√ ²²	X	X
Thanet Coast and Sandwich Bay SPA (also a Ramsar site and part of the North East Kent European Marine Site)	√	√	√	√	X	√	X	√	√
Thanet Coast SAC (also part of the North East Kent European Marine Site)	X	X	X	√	X	√	X	√	X
Sandwich Bay SAC (also part of the North East Kent European Marine Site)	X	X	X	√	X	√ ²⁵	X	X	X
The Swale SPA (also a Ramsar site and part of the Swale and Medway European Marine Site)	√	√	√	√	X	√	X	√	√
Wye and Crundale Downs SAC	X	X	X	X ²⁶	√	X	X	X	X
Lydden and Temple Ewell Downs SAC	X	X	X	X ²⁴	√	X	X	X	X

²³ The part of the site that supports *Vertigo moulinsiana* is inaccessible to the public

²⁴ Stodmarsh is vulnerable to over-abstraction from the River Stour

²⁵ In terms of hydrological connectivity as it is in a different coastal unit, development on the open coast in Canterbury is unlikely to have an impact on Sandwich Bay SAC. However, the River Stour that flows through Canterbury discharges into the Bay.

²⁶ Restrictions on public access and lack of car parking mean that recreational pressure will be limited. But acidification of chalk grassland due to changes in air quality could still occur. This is particularly relevant to the Lydden and Temple Ewell Downs SAC as this is adjacent to the A2 which provides access to Canterbury district.

European Sites	Environmental Changes with the Potential to Result in Significant Effects (see Section 3.2 for details)								
	Direct habitat loss	Noise, light or visual impact	Cat predation	Recreation	Air quality	Water quality	Water levels	Coastal dynamics	Coastal squeeze
Parkgate Down SAC	X	X	X	√	√	X	X	X	X
Folkestone to Etchinghill Escarpment SAC	X	X	X	√	√	X	X	X	X
Dover to Kingsdown Cliffs SAC	X	X	X	√	√	X	X	X ²⁷	X ²⁸
KEY									
X No likelihood of a significant effect									
√ Potential for a likely significant effect – dependent upon the amendments that are made to the draft Local Plan									

Further details of the qualifying interest features, conservation objectives, condition and vulnerabilities of the sites taken forward to the policy screening assessment are provided in **Table 3.2**.

3.2 Potential Effects

The following is a list of the environmental changes that could potentially result from implementation of the draft Local Plan. These changes could occur during the construction and/or operation of new developments (and, where relevant, their decommissioning) and have the potential to result in significant effects on the European Sites that have been scoped in as requiring further assessment. This is not a summary of the effects of the draft Local Plan; the likelihood of environmental change arising and European Sites being affected will depend on how new development is implemented through the draft Local Plan, as assessed in Section 4.

1. Direct habitat loss, physical damage or habitat fragmentation as a result of new development on or adjacent to European Sites.
2. Disturbance caused by noise, light or visual impact as a result of new development on or adjacent to European Sites.
3. Changes in bird populations due to cat predation²⁸ as a result of increased urbanisation on or adjacent to European Sites.

²⁷ In terms of hydrological connectivity as it is in a different coastal unit, development on the open coast in Canterbury is unlikely to have an impact on Dover to Kingsdown Cliffs SAC

²⁸ In line with Natural England advice to CCC cat predation effects are not likely to be significant if new development is located greater than 400m from an SPA

4. Physical damage or disturbance because of increased recreational activities (e.g. dog walking or watersports) on or adjacent to European Sites as a result of increased urbanisation or tourism activity.
5. Changes in air quality because of increased emissions to air associated with new development, as a result of increased vehicle use, demand for power generation, or industrial processes.
6. Changes in water quality (pH, thermal, toxic contamination, nutrient enrichment or reduction, siltation or turbidity) because of the discharge of contaminated or silt-laden surface water run-off, discharge of sewage effluent from new development or associated sewage treatment works, or increased abstraction resulting in reduced dilution capacity within a fluvial system.
7. Changes in water levels because of increased abstraction to serve new development.
8. Changes to coastal dynamics because of new development or associated coastal protection work causing changes in sedimentation (erosion or accretion) patterns in coastal units linked to the coast within Canterbury district.
9. Coastal squeeze²⁹ as a result of new development or associated coastal protection work.

²⁹ Coastal squeeze is the term used to describe what happens to coastal habitats that are trapped between a fixed landward boundary, such as a sea wall and rising sea levels and/or increased storminess. The habitat is effectively 'squeezed' between the two forces and diminishes in quantity and or quality.

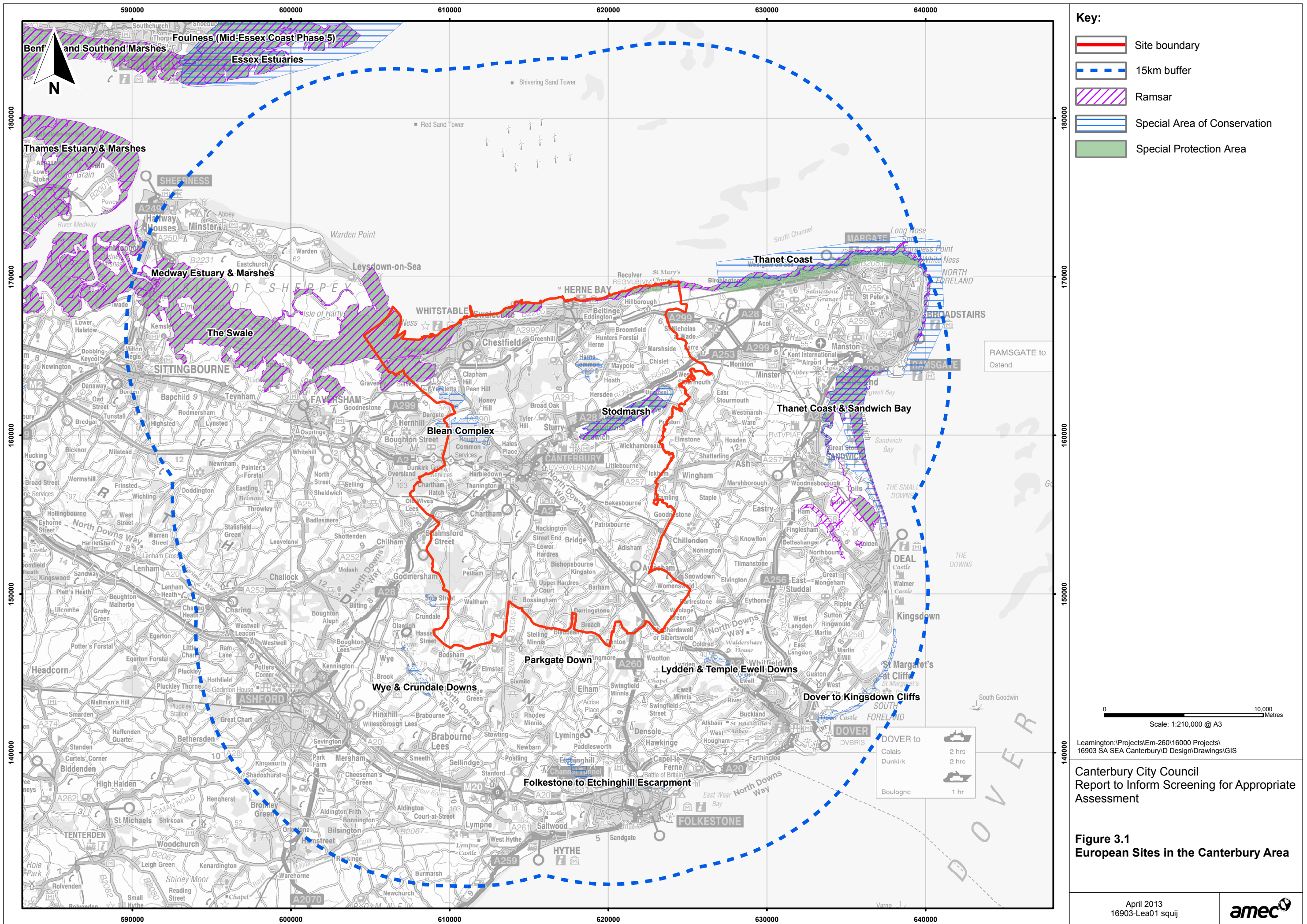


Table 3.2 Interest Features, Conservation Objectives, Condition and Vulnerability

European Site	Interest Features ³⁰	Conservation Objectives ³¹	Component SSSI within 15km	Condition Status and Reasons if Unfavourable ³²	Vulnerabilities ³³
Blean Complex SAC	Sub-Atlantic and medio-European oak or oak hornbeam forests of the <i>Carpinion betuli</i> – oak hornbeam forests	Subject to natural change, to maintain in favourable condition the Annex I habitat for which it is designated.	<p>Church Woods, Blean SSSI</p> <p>East Blean Woods SSSI</p> <p>West Blean And Thornden Woods SSSI</p>	<p>92.2% favourable 7.8% unfavourable recovering</p> <p>99.29% favourable 0.71% unfavourable recovering</p> <p>42.88% favourable 51.95% unfavourable recovering 3.05% unfavourable no change 2.12% unfavourable declining</p> <p>Presence of mature conifer plantation - felling licences are being obtained for some parts of the SSSI. Lack of structural diversity in places due to lack of management.</p>	There is a mixture of woodland habitat types at this site. Some require coppicing to maintain their features of interest (such as, heath fritillary butterfly), although this is not essential to maintain the <i>Stellario-Carpinetum</i> habitat type. Coppice management continues in areas of the site that are maintained as nature reserves by Natural England, Kent Wildlife Trust and the Royal Society for the Protection of Birds, but has been difficult to maintain elsewhere.

³⁰ Natura 2000 Data Forms and Natural England Conservation Objectives datasheets (see Section 2 for details)

³¹ Natural England's Conservation Objectives datasheets and Regulation 33 advice for the European Marine Sites (see Section 2 for details)

³² Natural England, Report on Condition of SSSI in Kent available at, <http://www.sssi.naturalengland.org.uk/Special/sssi/reportAction.cfm?Report=sdrt13&Category=C&Reference=1023>

³³ Natura 2000 Data Forms

European Site	Interest Features ³⁰	Conservation Objectives ³¹	Component SSSI within 15km	Condition Status and Reasons if Unfavourable ³²	Vulnerabilities ³³
Stodmarsh SAC	Desmoulin's whorl snail <i>Vertigo moulinsiana</i>	Subject to natural change, to maintain in favourable condition the population of Annex II species for which it is designated.	Stodmarsh SSSI	78.61% favourable 21.39% unfavourable recovering Scrub cover invading reedbed. Indications that the reedbed has dried out somewhat in parts, perhaps due to reduced water supply. Plans are being prepared to improve water supply by clearing blockages from the main ditches and putting improved water control facilities in place.	Approximately half of the site is managed as a National Nature Reserve. The remainder of the site is managed in a way that is compatible with nature conservation.
Stodmarsh SPA	Populations of European importance of the following Annex 1 species: <ul style="list-style-type: none"> Bittern <i>Botaurus stellaris</i> (overwinter) Hen Harrier <i>Circus cyaneus</i> (overwinter) Populations of European importance of the following regularly occurring migratory species: <ul style="list-style-type: none"> Shoveler <i>Anas clypeata</i> (overwinter) Gadwall <i>Anas strepera</i> (breeding & overwinter) 	Subject to natural change, maintain the habitats for the internationally important populations of the regularly occurring Annex 1 species in favourable condition. Subject to natural change, maintain in favourable condition the habitats for the internationally important population of regularly occurring migratory species.	Stodmarsh SSSI (see above)	(see above)	Much of Stodmarsh is a National Nature Reserve, and is therefore relatively secure and well managed. The area of habitat has recently been expanded, improving the situation for wetland birds by acquiring an area of turf fields adjacent to the SPA/Ramsar site for conversion to reedbed, open water and grazing marsh. Continued maintenance of the reedbeds is essential to control the invasion of scrub. Privately owned parts of the site are affected by disturbance. The western end of the SPA is used by wildfowling and fishermen, both of which cause disturbance to the birds. This is being addressed through Site Management Statements. The other significant problem relates to water supply, and in drought years abstraction for other water users can affect the supply of water to about 70% of the site. Abstraction licences will be reviewed under the relevant provisions of the Habitat Regulations.

European Site	Interest Features ³⁰	Conservation Objectives ³¹	Component SSSI within 15km	Condition Status and Reasons if Unfavourable ³²	Vulnerabilities ³³
	<p>The site also qualifies because it supports an internationally important assemblage of birds during the breeding season.</p> <p>The site also qualifies because it supports an internationally important assemblage of wetland birds during the overwintering season.</p>				<p>Management of parts of the site owned by private land owners is being addressed by the production of Site Management Statements which aim to encourage land managers to improve their management of wildlife habitats. Landowners are being encouraged to put land into the Environmental Stewardship Scheme in order to address problems arising from neglect of wetland habitats.</p>
<p>Thanet Coast and Sandwich Bay SPA (also a Ramsar site and part of the North East Kent European Marine Site)</p>	<p>Populations of European importance of the following Annex 1 species:</p> <ul style="list-style-type: none"> • Golden plover <i>Pluvialis apricaria</i> (over winter) • Little tern <i>Sterna albifrons</i> (breeding) <p>Populations of European importance of the following regularly occurring migratory species:</p> <ul style="list-style-type: none"> • Turnstone <i>Aemana interpres</i> (over winter) 	<p>Subject to natural change, maintain the habitats for the internationally important populations of the regularly occurring Annex 1 species in favourable condition, in particular:</p> <ul style="list-style-type: none"> • Shingle shores • Shallow coastal waters • Intertidal mud and sandflats. <p>Subject to natural change, maintain in favourable condition the habitats for the internationally important population of regularly occurring migratory species, in</p>	<p>Thanet Coast SSSI</p>	<p>77.15% favourable 21.9% unfavourable recovering</p> <p>Two lagoon features are present, Coldharbour to the west, fronted by a steep-sided shingle ridge which erodes frequently and needs regular recharge, and Plumpudding to the east, fronted by a broad accreting ridge. Both are directly backed by a sea wall built following the 1953 floods. The presence of the sea wall does not allow the natural roll-back to occur in response to coastal processes.</p> <p>Effects of dog walkers on feeding and roosting birds.</p>	<p>The land adjacent to this site is either urban, agricultural, or managed as golf course with parts of the coast being used for water sports such as personal water craft users, small boat users, wind surfing and bait digging. This leads to a high potential for disturbance both of wintering birds, especially of high tide roosts, and breeding colonies, especially of little tern. Recreational issues including watersports are being addressed through the management scheme for the European marine site.</p> <p>There is an active port at Ramsgate which requires development to its infrastructure. The current proposals for a new access road impinge marginally on the site, but should have a minimal impact on the birds that use the site. There is the potential for oil spills on the SPA, both from vessels using the English Channel, and Port Ramsgate. Oil spill contingency plans therefore need to be kept updated.</p> <p>Water diversion and pollution from domestic waste, fertilisers, pesticides and agricultural</p>

European Site	Interest Features ³⁰	Conservation Objectives ³¹	Component SSSI within 15km	Condition Status and Reasons if Unfavourable ³²	Vulnerabilities ³³
		particular: <ul style="list-style-type: none"> • Sand and shingle shores • Intertidal mudflats and sandflats • Chalk shores 			run-off offsite has lead to eutrophication within the SPA/Ramsar site. Where possible this is being addressed through the review of consents under the provisions of the Habitat Regulations and through Site Management Statements.
			Sandwich Bay to Hacklinge Marshes SSSI	50.34% favourable 39.38% unfavourable recovering 9.94% unfavourable no change 0.33% unfavourable declining Recreational and commercial activities including dog walking, walking without dogs, bait digging and kite surfing are having a detrimental impact on bird populations in Pegwell Bay. The most disturbing activity, particularly in the north section of the bay, is dog walkers with dogs off leads. Sward height and the amount of leaf litter present affecting supralittoral sediment. Lack of ditch management. Issue of water quality (North Stream and South Stream) being addressed through phosphate striping at Eastray Sewage Works.	Much of the coast has extensive sea defences, such as groynes and sea walls, which occasionally need to be repaired. These activities need to be carefully timed to avoid disturbance to birds. Observed build-up of shingle in front of the embryo dunes was thought to result from the beach-fed shingle used for sea defences along the Sandwich-Deal coastline but investigations undertaken by the Environment Agency have so far been inconclusive. The SPA overlaps with a marine cSAC. Together they are considered a single European marine site. The intertidal component of the SPA will be included in the management scheme which will address a number of these threats.
Thanet Coast SAC (also part of the North East Kent European Marine	<ul style="list-style-type: none"> • Reefs • Submerged or partially submerged sea caves 	Subject to natural change, maintain the submerged or partially submerged sea caves in favourable	Thanet Coast SSSI (see above)	(see above)	The soft upper chalk is vulnerable to erosion and natural physical destruction. The adjacent land is heavily built-up, with a resident population of 120,000. Levels of

European Site	Interest Features ³⁰	Conservation Objectives ³¹	Component SSSI within 15km	Condition Status and Reasons if Unfavourable ³²	Vulnerabilities ³³
Site)		condition, in particular: <ul style="list-style-type: none"> • Intertidal chalk cliff algal and lichen communities Subject to natural change, maintain the reefs in favourable condition, in particular: <ul style="list-style-type: none"> • Intertidal chalk cliff algal and lichen communities • Intertidal red algal turf communities • Kelp dominated communities on animal bored rock • Subtidal animal bored chalk communities 			<p>tourism and recreation activity are high, with 2 million visitors per year. To protect infrastructure, coastal protection works have been constructed along 75% of the cliff face.</p> <p>Some commercial fishing, including potting, occurs within the site. Harvesting of bait and shellfish occurs on the shores and has caused a small amount of physical damage to the reef. There is a commercial port and two small harbours.</p> <p>In preparing the management scheme, all human activities have been evaluated with stakeholders, and management agreed. Recreation and harvesting are to be managed with mutually agreed voluntary codes of conduct. A new wildlife project is to be established to draft the codes and interpret and promote the site.</p>
Sandwich Bay SAC (also part of the North East Kent European Marine Site)	<ul style="list-style-type: none"> • Embryonic shifting dunes • Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes") • Fixed dunes with herbaceous vegetation ("grey dunes") • Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>) • Humid dune slacks 	Subject to natural change, to maintain in favourable condition the Annex I habitat for which it is designated.	Sandwich Bay to Hacklinge Marshes SSSI (see above)	(see above)	Most of the site is unmanaged 'rough' on golf-courses. The damper areas are prone to invasion by willow/reed- tall-fen vegetation. Control of scrub is being undertaken through management agreements and as a consented operation.

European Site	Interest Features ³⁰	Conservation Objectives ³¹	Component SSSI within 15km	Condition Status and Reasons if Unfavourable ³²	Vulnerabilities ³³
<p>The Swale SPA (also a Ramsar site and part of the Swale and Medway European Marine Site)</p>	<p>Populations of European importance of the following regularly occurring migratory species:</p> <p>Dark-bellied Brent goose <i>Branta bernicla bernicla</i>(overwinter)</p> <p>Dunlin <i>Calidris alpina alpina</i>(overwinter)</p> <p>The following additional qualifying species were identified during the 2001 SPA review:</p> <p>Pintail <i>Anas acuta</i> (overwinter)</p> <p>Shoveler <i>Anas clypeata</i>; (overwinter)</p> <p>Marsh Harrier <i>Circus aeruginosus</i> (breeding)</p> <p>Hen Harrier <i>Circus cyaneus</i> (overwinter)</p> <p>Avocet <i>Recurvirostra avosetta</i> (breeding and overwintering)</p> <p>Ringed plover <i>Charadrius hiaticula</i> (overwinter)</p> <p>Golden plover <i>Pluvialis apricaria</i> (overwinter)</p> <p>Grey plover <i>Pluvialis squatarola</i> (overwinter)</p> <p>Knot <i>Calidris canutus</i> (overwinter)</p> <p>Black tailed godwit <i>Limosa</i></p>	<p>Subject to natural change, maintain in favourable condition the habitats for the internationally important population of regularly occurring migratory species, in particular:</p> <ul style="list-style-type: none"> • Mudflats • Saltmarsh 	<p>The Swale SSSI</p>	<p>97.83% favourable 2.17% unfavourable recovering</p> <p>Tall grassland due to lack of grazing and scrub development reducing the suitability of the grassland for wintering and breeding birds. Ditches dominated by tall growth of reed.</p>	<p>There is evidence of rapid erosion of intertidal habitat within the site due to natural processes and the effects of sea defences and clay extraction. Research on mudflat recharge using dredging spoil is being investigated as a means of countering the erosion.</p> <p>The intertidal area is also vulnerable to disturbance from waterborne recreation. This is being addressed as part of an estuary management plan.</p> <p>The terrestrial part of the site depends on appropriate grazing and management of water quality and quantity. The availability of livestock for grazing may be addressed through management agreements. The effects of abstraction on the availability of water for other land uses and drainage for arable cultivation will be addressed through the consent review process under the Habitats Regulations.</p>

European Site	Interest Features ³⁰	Conservation Objectives ³¹	Component SSSI within 15km	Condition Status and Reasons if Unfavourable ³²	Vulnerabilities ³³
	<p><i>limosa islandica</i> (overwinter)</p> <p>Bar tailed godwit <i>Limosa lapponica</i> (overwinter)</p> <p>Redshank <i>Tringa totanus</i> (overwinter)</p> <p>Mediterranean gull <i>Larus melanocephalus</i> (breeding)</p> <p>The site also qualifies because it supports an internationally important assemblage of birds during the breeding season.</p> <p>The site also qualifies because it supports an internationally important assemblage of wetland birds during the overwintering season.</p>				
Wye and Crundale Downs SAC	Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) (important orchid sites)	Subject to natural change, to maintain in favourable condition the Annex I habitat for which it is designated.	Wye and Crundale Downs SAC	74.71% favourable 25.29 unfavourable recovering Grazing and scrub control need to be maintained.	Continuous grazing management on this site is essential to maintain the interest. Grazing on some parts of the site has been intermittent in recent years, leading to some increase in scrub and rank grasses. Within the part of the site managed as a National Nature Reserve, a programme of scrub clearance and the reintroduction of grazing are addressing this problem. On other parts, discussion with private land managers is being used to encourage traditional management.
Lydden and Temple Ewell Downs SAC	Semi-natural dry grasslands and scrubland	Subject to natural change, to maintain in favourable	Lydden and Temple Ewell	85.96% favourable	Continuous grazing management on this site is essential to maintain the interest. Grant-aid

European Site	Interest Features ³⁰	Conservation Objectives ³¹	Component SSSI within 15km	Condition Status and Reasons if Unfavourable ³²	Vulnerabilities ³³
	facies: on calcareous substrates (<i>Festuco-Brometalia</i>)	condition the Annex I habitat for which it is designated.	Downs SSSI	14.04% unfavourable recovering No reason provided.	and discussion with land managers are being used to encourage traditional management.
Parkgate Down SAC	Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) (important orchid sites)	Subject to natural change, to maintain in favourable condition the Annex I habitat for which it is designated.	Parkgate Down SSSI	100% favourable	Continuous grazing management on this site is essential to maintain the interest. As the site is managed as a nature reserve it is not under any current threat, but is dependent on secure funding for the voluntary organisation managing it.
Folkestone to Etchinghill Escarpment SAC	Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) (important orchid sites)	Subject to natural change, to maintain in favourable condition the Annex I habitat for which it is designated.	Folkestone to Etchinghill Escarpment SSSI	70.19% favourable 25.2% unfavourable recovering 1.93% unfavourable no change 2.68% unfavourable declining Lack of management, grazing and scrub control.	Intensification of livestock grazing by improving the grassland is a threat that is currently managed by entering into management agreements with the owner.
Dover to Kingsdown Cliffs SAC	Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) (important orchid sites) Vegetated sea cliffs of the Atlantic and Baltic coasts	Subject to natural change, to maintain in favourable condition the Annex I habitat for which it is designated.	Dover to Kingsdown Cliffs SSSI	61.34% favourable 32.31% unfavourable recovering 6.35% unfavourable no change Need to control scrub growth and sward height.	This site is an 8 km stretch of undefended sea cliff subject to natural coastal erosion. The main pressure is on cliff-top grassland, which is being squeezed between the eroding cliff and arable land behind. However, erosion rates are such that the features of the site will be preserved, within the existing site boundary, for at least the next 25 years. The cliff-top grassland requires grazing, but where this is not feasible mowing is the preferred management. There are no immediate pressures on the vegetated sea cliff habitat.

4. Policy Screening Assessment

This section sets out an assessment of the individual policies in each of the 12 policy chapters of the draft Local Plan, as listed in Section 1.2. The first column of the tables in each of the 12 sections shows the traffic light colour that is relevant to each numbered policy as per the methodology set out in Section 2.4. The HRA screening assessment column details the potential impacts of implementing each draft policy in isolation, based on the current policy wording. If relevant, the recommendations column details how the current policy wording could be modified so that likely significant effects on European Sites could be avoided. If reading the Local Plan as a whole, it will not be necessary to modify every individual policy with the same policy text. Instead, any suggested policy text that is common to more than one policy can be incorporated into the upfront Vision and Planning Strategy section.

4.1 Vision and Planning Strategy

The Vision and Planning Strategy chapter of the draft Local Plan sets out a strategic vision relating to the provision of housing and economic development within the boundaries of Canterbury up to 2030, whilst also seeking protecting the natural environment. The only policies in this section that need to be assessed relate to Sustainable Development (see **Table 4.1**).

Table 4.1 Sustainable Development Policies Screening Assessment

Policy	HRA Screening Assessment	Recommendations
<p>SP1</p>	<p>This policy sets out that the Council will take a positive approach to considering development proposals that reflects the presumption in favour of sustainable development set out in the NPPF. Planning applications that accord with Local Plan policies will be approved.</p> <p>This policy is not locationally or scale specific but does promote development in accordance with the Local Plan policies which could directly or indirectly impact on SACs, SPAs or Ramsar Sites as set out in Section 3 and the other policy screening assessments in this section, alone or in combination with development in adjacent districts.</p> <p>If policy gaps exist, the policy notes that planning decisions will take account of the outcome of any Appropriate Assessment required. However, as it does not state how it will be taken into account, there remains the potential for a development that has adverse effect on integrity to be granted approval.</p>	<p>The recommendations in relation to other Local Plan policies set out in this section should be implemented. This will ensure that by virtue of approving planning applications that accord with the Local Plan policies no development will be permitted which may have an adverse effect on the integrity of an SAC, SPA or Ramsar site.</p> <p>For clarify, the following policy wording should be included in relation to taking into account Appropriate Assessment when policy gaps exist: <i>“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.”</i></p>

Policy	HRA Screening Assessment	Recommendations
<p>SP2</p>	<p>This policy sets out the amount of development land that needs to be allocated to meet identified development need in the district. This policy is not locationally specific but does require that land is allocated for 15,600 homes, 96,775 of employment development land and 53,250 m² of retail provision.</p> <p>In order to accommodate this amount of development, there could be direct or indirect impacts on SACs, SPAs or Ramsar Sites as set out in Section 3 and the other policy screening assessments in this section, alone or in combination with development in adjacent districts.</p> <p>Review of the South East River Basin Management Plan identifies that no measures are currently required in relation to water dependant SACs, SPAs or Ramsar Sites. However, the quantum of development proposed could place increased pressure on water resources and existing sewage treatment capacity resulting in indirect effects on SACs, SPAs or Ramsar Sites. There is already great demand for abstraction of the high quality water from the chalk aquifer that feeds the river system. South East Water and Southern Water are currently preparing a draft Water Resources Management Plan to deliver water supply requirements for the next 25 years from 2015-2040. The only new scheme envisaged to support this is the Broad Oak Reservoir on the River Stour. Effluent discharges enter the River Stour from Canterbury, Maystreet, Westbere, Minster, Weatherlees, and Pfizers sewage treatment works; other sewage treatment works outfalls are located on the open coast.</p> <p>The quantum of development could also increase the number of cars in the district with a resulting adverse impact on air quality in the vicinity of Blean SAC and Lydden and Temple Ewell Downs SAC in particular. Changes in emissions to air, because of changes in traffic volumes or speed on the highway network surrounding these sites, could be indirectly damaging to their favourable condition.</p> <p>Increased urbanisation will also increase recreational pressure on publically accessible SACs, SPAs or Ramsar Sites resulting in physical damage or disturbance of bird populations; particularly in respect of the Thanet Coast. Management plans to deal with existing recreational pressures are in place for the European Sites that currently have public access but these may need to be updated and measures implemented to address the additional number of visitors associated with the quantum of development.</p>	<p>The recommendations in relation to other Local Plan policies set out in this section should be implemented. This will ensure that by virtue of approving planning applications that accord with the Local Plan policies, no development will be permitted which may have an adverse effect on the integrity of an SAC, SPA or Ramsar site.</p> <p>The Council should continue to liaise with the water companies and Environment Agency to determine there is capacity in the water supply and sewage treatment network to deliver the required quantum of development without an adverse effect on the integrity of any SAC, SPA or Ramsar site.</p> <p>In due course, the draft Water Resources Management Plan as well as any new abstraction licences associated with it will be subject to HRA. Any new abstraction also needs to be in accordance with the River Stour Catchment Abstraction Management Strategy which itself has been subject to HRA. If there is a requirement to alter discharge consents at sewage treatment works to accommodate new development these too will be subject to HRA. This will ensure that any water supply and treatment measures that are required to deliver the water supply and treatment capacity associated with the quantum of development will not result in an adverse effect on the integrity of any SAC, SPA or Ramsar site.</p> <p>Prior to any planning permissions being granted, the water companies and the Environment Agency will need be consulted to confirm that sufficient water supply and sewage treatment capacity exists in the network. The following policy wording should be included in relation to the quantum of development.</p> <p><i>“Development will only be permitted where sufficient water supply and sewage treatment capacity exists such that there will be no adverse effect on the integrity of any SAC, SPA or Ramsar Site, alone, or in combination, with other plans or projects. If capacity does not exist, development will not be permitted until such time that measures to ensure compliance with the Habitats Regulations have been implemented by the water companies.”</i></p> <p>In relation to air quality emissions the Highways Agency DMRB air quality assessment method³⁴ identifies that, at a local level, only designated sites within 200m of a road, subject to certain changes in traffic volume or speed, have the potential to be significantly affected by air quality changes. The following policy wording should be included in relation to the quantum of development.</p>

³⁴ Highways Agency (2007) Design Manual for Roads and Bridges (DRMB) Volume 11 Environmental Assessment, Section 3 Environmental Assessment Techniques, Part 1 Air Quality

Policy	HRA Screening Assessment	Recommendations
		<p><i>“Development will only be permitted where a transport assessment, undertaken with reference to the DMRB air quality assessment method, demonstrates there will be no adverse effect on the integrity of any SAC, SPA or Ramsar Site, alone, or in combination, with other plans or projects. If adverse effects are predicted, development will not be permitted until such time that highways improvements to ensure compliance with the Habitats Regulations have been implemented by the highways authorities.”</i></p> <p>In relation to recreation, to avoid increasing recreational pressure on European Sites, potentially resulting in increased disturbance of bird populations, for new residential development within 5-10km of any European Site³⁵ Suitable Alternative Natural Greenspace (SANG) should be provided. The level of SANG to be provided should be determined in consultation with Natural England with reference to Natural England’s accessible natural greenspace standards³⁶ and approaches to SANG adopted elsewhere (e.g. Thames Basin Heaths) and will vary depending on the European site in question. Provision of SANG may be achieved through securing funding from developers of strategic development sites for the creation of new strategic greenspaces. It could also be achieved by developers providing access to existing greenspace away from the European Sites (e.g. links to the Public Right of Way network), or by creating new green space within the development itself, which will be needed anyway as the provision of public open space is a requirement of the draft Local Plan.</p> <p><i>“Residential development within the district will only be permitted within 5-10km of an SAC, SPA or Ramsar site where Natural England considers an appropriate level of Suitable Alternative Natural Greenspace has been provided. All new residential developments to either provide a financial contribution (appropriate to the scale of development in question) towards the creation of new strategic greenspace or to demonstrate, to the satisfaction of Natural England, that sufficient access to Suitable Alternative Natural Greenspace is available to residents of the development.”</i></p> <p>It is anticipated that the presence of management plans for those European sites impacted by recreational activities should help mitigate the potential adverse effect of increased numbers of recreational visitors associated with the proposed new residential development; if necessary this could involve restricting public access to sensitive areas of the sites or at sensitive times of year. To help manage</p>

³⁵ Given that most of Canterbury is within at least 10km of either the Kent Downs or the coast there is no reason to believe that residents inhabiting new development in the district would be likely to travel further afield than this to participate in day to day recreation. Taking this and evidence of recreational zones of influence from other Local Plans into account, the zone of influence for the European Sites considered in this assessment is likely to be in the range of 10-5km. However, the exact buffer applied to each European Site will need to be agreed through further consultation with Natural England to reflect its visitor accessibility and attraction.

³⁶ <http://publications.naturalengland.org.uk/publication/40004?category=47004>

Policy	HRA Screening Assessment	Recommendations
		<p>recreational pressure on SACs, SPAs and Ramsar sites, all new residential developments within 5-10km of a European site³⁵ should provide a financial contribution (appropriate to the scale of development in question and distance from the European site) towards on-going access management in accordance with the adopted management plan. The following policy wording should be included in relation to the quantum of development:</p> <p><i>“Residential development within the district will only be permitted within 5-10km of an SAC, SPA or Ramsar site where Natural England considers an appropriate recreational management plan is in place for that European Site to deal with any recreational pressures as a result of new development. All new residential developments to provide a financial contribution (appropriate to the scale of development in question and distance from the designated sites) towards on-going access management in accordance with the adopted management plan”</i></p>
<p>SP3</p>	<p>This policy is locationally and scale-specific in that it sets out the strategic development sites that will be permitted. The strategic sites are identified as follows with details of the nearest SAC/SPA:</p> <p>South Canterbury (4000 dwellings) located 3.1km southwest of Stodmarsh SAC and SPA</p> <p>Land at Sturry/Broad Oak (1000 dwellings) located 0.7km northwest of Stodmarsh SAC and SPA</p> <p>Hillborough Site, Herne Bay (1000 dwellings) located 0.6km south of Thanet Coast and Sandwich Bay SPA</p> <p>Herne Bay Golf Club (400 dwellings) located 1.7km southeast of Thanet Coast and Sandwich Bay SPA and 1.7km north of Blean SAC</p> <p>Strode Farm, Herne Bay (800 dwellings) located 1.4km north of Blean SAC</p> <p>Land at Greenhill, Herne Bay (600 dwellings) located 1.3km south of Thanet Coast and Sandwich Bay SPA</p> <p>Thanet Way Site, Whitstable (400 dwellings) located 1.3km southeast of The Swale SPA</p> <p>Land North of Hersden (800 dwellings) located 0.5km north of Stodmarsh SAC and SPA and 1.2km southeast of Blean SAC</p> <p>Employment, retail, community facilities and public open space requirements are identified for each strategic site with further details to be provided in a development brief. It is also specified that development should meet the requirements of other policies in the Local Plan.</p> <p>The off-site infrastructure requirements associated with these strategic sites, which will need to be provided before development is permitted, are identified as:</p>	<p>The recommendations in relation to other Local Plan policies set out in this section should be implemented. This will ensure that by virtue of approving planning applications that accord with the Local Plan policies, no development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site.</p> <p>Given the scale of development proposed and proximity to SACs and SPAs, all these projects should be subject to HRA prior to determining planning permission. The following policy wording should be included in relation to the strategic development sites/off-site infrastructure requirements in order to ensure that project specific mitigation measures are developed.</p> <p><i>“Development will only be permitted on the strategic development sites where a HRA has demonstrated there will be no adverse effect on the integrity of any SAC, SPA or Ramsar site, alone, or in combination, with other plans or projects, in consultation with Natural England.”</i></p> <p>The following measures could be included in the development briefs for individual development projects.</p> <p>Water quality: In implementing the projects, the council will need to ensure that sustainable drainage measures are incorporated to ensure there is no increase in surface water run-off (accounting for climate change) and there is no increase in diffuse pollution entering the river system from the built-up area or highways.</p> <p>New bridge crossing at Sturry: Development should only be permitted if it can be demonstrated the current flow regime of the river will be maintained.</p>

Policy	HRA Screening Assessment	Recommendations
	<p>New and modified junction on the A2 located 3.1km from Stodmarsh SAC and SPA</p> <p>New bridge crossing at Sturry located 0.7km from Stodmarsh SAC and SPA, involving a crossing of the Great Stour River</p> <p>New car park for Sturry station located 0.7km from Stodmarsh SAC and SPA</p> <p>Herne Relief Road located 0.8km from Blean SAC</p> <p>None of the strategic sites or off-site infrastructure proposals are located within an SAC, SPA or Ramsar site, so no direct impacts will result. However, there could be indirect impacts on SACs, SPAs or Ramsar Sites, alone or in combination with development in adjacent districts, as set out in Section 3 and the other policy screening assessments in this section.</p>	<p>Recreation: To avoid increasing recreational pressure on European Sites, potentially resulting in increased disturbance of bird populations, for new residential development within 5-10km of any European Site³⁵ Suitable Alternative Natural Greenspace (SANG) should be provided. The level of SANG to be provided should be determined in consultation with Natural England with reference to Natural England's accessible natural greenspace standards³⁶ and approaches to SANG adopted elsewhere (e.g. Thames Basin Heaths). Provision of SANG may be achieved through securing funding from developers of strategic development sites for the creation of new strategic greenspaces. It could also be achieved by developers providing access to existing greenspace away from the European Sites (e.g. links to the Public Right of Way network), or by developers creating new green space within the development itself, which will be needed anyway as the provision of public open space is a policy requirement.</p> <p>Changes in noise, light or visual impact: To avoid effects caused by these changes, development within 1km of any SAC, SPA or Ramsar site should be required, unless exempted by Natural England, to demonstrate how impacts upon European sites will be mitigated both during construction and operation. Specific consideration will need to be given to pollution prevention, avoiding disturbance of birds during construction, avoiding disturbance of birds during operation as a result of lighting provision, and monitoring requirements during and post-construction.</p>
SP4	<p>This policy is locationally specific in that it sets out the settlement hierarchy to be considered when determining applications for development on unallocated sites.</p> <p>The urban areas of Canterbury, Herne Bay and Whitstable will be the principal focus for development, with small-scale provision in the rural service centres of Barham, Blean, Bridge, Chartham, Hersden, Littlebourne and Sturry. It states that housing development in urban areas will be supported where it is acceptable in terms of environmental factors; development in rural service centres will be supported provided it is not in conflict with other Local Plan policies including those relation to the environment.</p> <p>It is anticipated that this will include policies relating to the requirement for HRA, and that no development that would have an adverse effect on integrity would therefore be permitted. However, this is not made explicit.</p>	<p>The recommendations in relation to other Local Plan policies set out in this section should be implemented. This will ensure that, by virtue of approving planning applications that accord with the Local Plan policies, no development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site.</p> <p>For clarity, the following policy wording should be included in relation to permitting development on sites other than the strategic development sites: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i></p>
SP5	<p>This policy sets out the existing Local Plan transport policy measures, including seeking the construction of new roads and junctions, but is not locationally specific. New roads and junctions could directly or indirectly impact on SACs, SPAs or Ramsar Sites, alone or in combination with development in adjacent districts, as set out in Section 3 and the other policy screening assessments in this section. This is because there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.</p>	<p>The recommendations in relation to other Local Plan policies set out in this section in the Transport Infrastructure policy section should be implemented. This will ensure that, by virtue of approving planning applications that accord with the Local Plan policies, no development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site.</p>

Policy	HRA Screening Assessment	Recommendations
		For clarity, the following policy wording should be included in relation to permitting new roads and junctions: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
SP6	<p>This policy sets out that the Council will prepare a Green Infrastructure strategy and that new development should make provision for Green Infrastructure as an integral part of the design.</p> <p>This policy could have a positive impact on biodiversity protection and enhancement. It will also assist the Council in mitigating the indirect recreational impact on SACs, SPAs or Ramsar Sites associated with the housing development allocations in Policy SP2 and SP3 and tourism provision, alone or in combination with development in adjacent districts.</p> <p>However, the policy could also have a negative impact by providing increased access to SACs, SPAs or Ramsar Sites if inadequate consideration is given to the impact the strategy could have on them. For example, creating links to the Public Right of Way network could increase public access and thus recreational impact, or links via green corridors to important bird habitat could increase the risk of cat predation.</p>	<p>The recommendations in relation to other Local Plan policies set out in this section should be implemented. It is suggested that this policy could be expanded to incorporate the recommendations under SP2 and SP3 in relation to suitable alternative natural greenspace creation to mitigate for recreational impact.</p> <p>It is recommended that the impact of the strategy on SACs, SPAs or Ramsar Sites be considered prior to strategy adoption. For clarity, the following policy wording should be included in relation to preparing the Green Infrastructure Strategy: <i>"In developing the strategy the Council will not promote any green infrastructure improvements which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i></p>
SP7	<p>This policy relates to the provision of an Implementation Plan related to provision of infrastructure related to the development allocations in Policy SP2 and SP3 and how this can be delivered.</p> <p>It does not promote development in itself, but might be a useful mechanism for ensuring the phasing of infrastructure in relation to development as set out in the recommendations for Policy SP2.</p>	N/A

4.2 Housing Development

The Housing Development policies from the draft Local Plan are screened in **Table 4.2**.

Table 4.2 Housing Development Policies Screening Assessment

Policy	HRA Screening Assessment	Recommendations
HD1	<p>This policy states that the Council will safeguard sites for residential development. However, this in itself does not mean that development will take place on them.</p> <p>It also identifies opportunity sites for new housing development, that would help fund a new link road from Chaucer Road to the A257 Littlebourne Road, Canterbury. It is anticipated that the opportunity sites would be located within the Canterbury built-up area. However, development could indirectly impact on SACs and SPAs, alone or in combination with development in adjacent districts, as set out in Section 3 and the other policy screening assessments in this section. This is because there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.</p>	<p>For clarity, the following policy wording should be included in relation to permitting development on sites other than the strategic development sites: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i></p> <p>In relation to water quality in implementing the new link road the Council will need to ensure that sustainable drainage measures are incorporated that avoid any increase in surface water run-off (accounting for climate change) and that there is no increase in diffuse pollution entering the river system from the built-up area or highways.</p>
HD2	<p>This policy relates to the provision of affordable housing within development. It does not promote development in itself so is not likely to have a significant effect on European sites.</p>	N/A
HD3	<p>This policy relates to the provision of small scale affordable housing to meet local needs on exceptions sites; these are unallocated sites outside the boundaries of a settlement. It states that permission will be subject to criteria, including there being no conflict with environmental protection policies. It is anticipated that this will include policies relating to the requirement for HRA and that no development which may have an adverse effect on integrity would therefore be permitted. However, this is not made explicit.</p>	<p>For clarity, the following policy wording should be included in relation to permitting development on exception sites: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i></p>
HD4	<p>This policy relates to the provision of housing in the countryside, which will only be granted consent in certain circumstances. Housing could directly or indirectly impact on SACs and SPAs, alone or in combination with development in adjacent districts, as set out in Section 3 and the other policy screening assessments in this section. This is because there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.</p>	<p>For clarity, the following policy wording should be included in relation to permitting development in the countryside: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i></p>
HD5	<p>This policy relates to converting existing agricultural or rural buildings in the countryside to residential uses. It states that permission will be subject to criteria, including no overriding conflict with other policies in the Local Plan. It is anticipated that this will include the policies in the Landscape and Biodiversity section relating to the requirement for HRA and that no development which may have an adverse effect on integrity would therefore be permitted. However, this is not made explicit.</p>	<p>For clarity the following policy wording should be included in relation to permitting conversions: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i></p>
HD6	<p>This policy relates to maintaining an appropriate housing mix within: the urban area of Canterbury; the wards of Sturry North, Sturry South, Barton, Wincheap and Blean Forest; and the parish of Harbledown and part of Lower Hardres Parish north of the A2. It does not promote development in itself so is not likely to have a significant effect on European sites.</p>	N/A

Policy	HRA Screening Assessment	Recommendations
HD7	This policy relates to new build managed student accommodation. Permission will only be granted subject to criteria. However, this accommodation could directly or indirectly impact on SACs and SPAs, alone or in combination with development in adjacent district, as set out in Section 3 and the other policy screening assessments in this section. This is because there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.	For clarity the following policy wording should be included in relation to permitting student accommodation: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
HD8	This policy relates to the loss of housing accommodation (change of use) in certain circumstances; existing housing development could be converted to employment, community or tourism use. Conversion to different uses could change the influence of the development on an SAC, SPA or Ramsar site. For example, tourism use could result in increased recreational pressure, as there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.	For clarity the following policy wording should be included in relation to permitting change of use: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
HD9	This policy relates to bringing empty residential property back into use subject to there being no conflict with other Local Plan policies. It is anticipated that this will include policies in the Landscape and Biodiversity section relating to the requirement for HRA and that no development which had an adverse effect on integrity would therefore be permitted. However, this is not made explicit.	For clarity the following policy wording should be included in relation to permitting reuse: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
HD10	This policy relates to applications for use of land by gypsies and travellers, which will be permitted in locations outside an existing settlement if the essential qualities of a SSSI, national or local nature reserve are not adversely affected. Indirectly this gives protection to SAC, SPA and Ramsar Sites, but the policy wording could be strengthened.	The designations of SAC, SPA and Ramsar site have been omitted from the list of areas that may be impacted by development outside a settlement. The following policy wording should therefore be included in relation to permitting development: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>

4.3 Economic Development and Employment

The Employment policies from the draft Local Plan are screened in **Table 4.3**.

Table 4.3 Employment Policies Screening Assessment

Policy	HRA Screening Assessment	Recommendations
EMP1	<p>This policy allocates the following sites for business use classes B1 and B8:</p> <p>CANTERBURY</p> <ul style="list-style-type: none"> • Innovation Centre, University of Kent (3.45ha, B1 only) • Broad Oak Road/Vauxhall Road 1.6ha • Canterbury West Station 0.4ha • Office Connection Site, St Andrews Close 0.2ha • HERNE BAY • Eddington Lane 7.9ha • Altira Park 10ha • Metric Site 0.5ha • WHITSTABLE • Land at Wraik Hill 3.4ha • RURAL • Canterbury Business Park (Highland Court) 3ha <p>These developments could indirectly affect SACs and SPAs, alone or in combination with development in adjacent districts, as set out in Section 3 and the other policy screening assessments in this section. This is because there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.</p>	<p>For clarity, the following policy wording should be included in relation to permitting development on allocated business sites: <i>“No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects.”</i></p>
EMP2	<p>This policy states that the Council will support development of premises for non-class B uses (including hotels and leisure use) and other uses subject to certain criteria. Other uses (including on allocated business sites) will be permitted subject to them not being located in area of national or international wildlife significance and there not being significant transport impacts that cannot be mitigated. However, tourism related development could still indirectly affect SAC and SPA, alone or in combination with development in adjacent districts, particularly due to increasing recreational pressure on nearby European Sites as set out in Section 3 and the other policy screening assessments in this section. This is because there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.</p>	<p>For clarity, the following policy wording should be included in relation to permitting the developments covered by this policy: <i>“No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects.”</i></p>
EMP3	<p>This policy relates to the use of upper floors of retail and commercial premises in town centres for office uses in Classes B1 and A2, subject to environmental considerations being assessed as acceptable. It would not be likely to result in significant effects on European sites.</p>	N/A

Policy	HRA Screening Assessment	Recommendations
EMP4	<p>This policy states that the Council will not permit the loss of existing or allocated employment sites or office accommodation except in certain circumstances relating to the economy and community need.</p> <p>It states that the Council will support in-situ expansion and extension of existing businesses on adjoining land, unless there is a significant environmental reason why the expansion should not be supported. It is anticipated that this will include policies relating to the requirement for HRA and that no development which had an adverse effect on integrity would therefore be permitted. However, this is not made explicit.</p>	<p>For clarity, the following policy wording should be included in relation to permitting in-situ expansion and extension of existing businesses: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i></p>
EMP5	<p>This policy relates to home-based working provision within a dwelling or outbuilding within the residential curtilage where the residential amenity of an area is maintained. It would not be likely to result in significant effects on European sites.</p>	N/A
EMP6	<p>This policy relates to digital infrastructure installation on allocated sites and the retro-fitting of existing settlements. It is anticipated that these installations will take place within the built-up area. However, development could indirectly impact on SACs and SPAs, alone or in combination with development in adjacent districts, as set out in Section 3 and the other policy screening assessments in this section. This is because there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.</p>	<p>For clarity, the following policy wording should be included in relation to permitting the developments covered by this policy: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i></p>
EMP7	<p>This policy relates to development on the University of Kent campus, it states that any significant development proposals will need to only be considered following preparation of a masterplan for the campus. It is anticipated the campus is located within the Canterbury built-up area. However, development could indirectly impact on SACs and SPAs, alone or in combination with development in adjacent districts, as set out in Section 3 and the other policy screening assessments in this section. This is because there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.</p>	<p>For clarity, the following policy wording should be included in relation to permitting the developments covered by this policy: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i></p>
EMP8	<p>This policy relates to land at North Holmes Road being used for the intensification or redevelopment of the main Canterbury Christchurch University site. The Council will also support the development of new facilities for Canterbury Christchurch University in suitable locations within the urban area. However, development could indirectly impact on SACs and SPAs, alone or in combination with development in adjacent districts, as set out in Section 3 and the other policy screening assessments in this section. This is because there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.</p>	<p>For clarity, the following policy wording should be included in relation to the developments covered by this policy: <i>"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."</i></p>
EMP9	<p>This policy relates to ensuring provision for educational needs arising from new development. However, such educational provision could directly or indirectly impact on SACs and SPAs, alone or in combination with development in adjacent districts, as set out in Section 3 and the other policy screening assessments in this section. This is because there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.</p>	<p>For clarity, the following policy wording should be included in relation to the developments covered by this policy: <i>"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."</i></p>

Policy	HRA Screening Assessment	Recommendations
EMP10	This policy allocates land at Langton Lane, Canterbury, for a new secondary school. It also states that land at Hadlow College, Canterbury should be retained for college related development. This development will be located within the Canterbury built-up area. However, such educational provision could directly or indirectly impact on SACs and SPAs, alone or in combination with development in adjacent districts, as set out in Section 3 and the other policy screening assessments in this section. This is because there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.	For clarity, the following policy wording should be included in relation to the developments covered by this policy: <i>"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."</i>
EMP11	This policy relates to developments within the Whitstable Harbour area being granted permission, provided that they conform to the Whitstable Harbour Strategic Plan which seeks to sustain a working harbour. Development could directly or indirectly impact on the Swale SPA as set out in Section 3 and the other policy screening assessments in this section, as there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.	For clarity, the following policy wording should be included in relation to permitting development in Whitstable Harbour: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i> To avoid indirect effects on the Swale SPA due to water pollution, noise, light or visual impact, development at Whitstable Harbour should be required, unless exempted by Natural England, to demonstrate how impacts upon European sites will be mitigated both during construction and operation. Specific consideration will need to be given to pollution prevention, avoiding disturbance of birds during construction, avoiding disturbance of birds during operation as a result of lighting provision, and, where appropriate, undertaking ecological monitoring during and post-construction.
EMP12	This policy relates to the protection of agricultural land from development. If development is demonstrated to be necessary, planning consent will only be granted where a suitable site on poorer quality agricultural land (in terms of the Agricultural Land Classification) cannot be identified. It does not promote development in itself so is not likely to have a significant effect on European sites.	N/A
EMP13	This policy states that permission will be granted for agricultural related buildings or other development subject to certain criteria being met, including there being no detrimental impact on protected species, sites or features of nature conservation interest. Indirectly this gives protection to SAC, SPA and Ramsar sites, but the policy wording could be strengthened.	The following policy wording should be included in relation to permitting development of agricultural buildings: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
EMP14	This policy relates to the conversion of existing rural buildings, and well designed new buildings, that support the development and expansion of businesses in suitable locations in the rural area. Suitable locations include those where there is no detrimental impact on protected species, sites or features of nature conservation interest. Indirectly this gives protection to SACs and SPAs, but the policy wording could be strengthened.	The following policy wording should be included in relation to permitting development of rural buildings: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
EMP15	This policy concerns horse-related development. This will be granted permission subject to certain criteria. This includes there being no detrimental impact on protected species, sites or features of nature conservation interest. Lighting should be kept to the minimum necessary to serve the unit and should be designed so as not to impact on the wider countryside. Indirectly this policy gives protection to SACs and SPAs, but the policy wording could be strengthened.	The following policy wording should be included in relation to the developments covered by this policy: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>

4.4 Town Centres

The Town Centre policies from the draft Local Plan are screened in **Table 4.4**.

Table 4.4 Town Centre Policies Screening Assessment

Policy	HRA Screening Assessment	Recommendations
TCL1	This policy relates to the granting of planning permission for development within town centres for town centre uses. The designated town centres are Canterbury, Whitstable and Herne Bay. Development will be granted except where it is in conflict with other policies or environmental objectives. It is anticipated that this will include policies relating to the requirement for HRA and that no development which had an adverse effect on integrity would therefore be permitted. However, this is not made explicit.	For clarity the following policy wording should be included in relation to permitting development: <i>"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."</i>
TCL2	This policy relates to change of use from Class A1 shops to other uses in the Primary Shopping Areas of Canterbury, Whitstable and Herne Bay town centres. It is anticipated that these developments will take place within the town centre. However, development could indirectly impact on SACs and SPAs as set out in Section 3 and the other policy screening assessments in this section, as there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.	For clarity the following policy wording should be included in relation to permitting development: <i>"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."</i>
TCL3	This policy relates to change of use from Class A to other uses in the Mixed Shopping Frontages of Canterbury, Whitstable and Herne Bay town centres. It is anticipated that these developments will take place within the town centre. However, development could indirectly impact on SACs and SPAs as set out in Section 3 and the other policy screening assessments in this section, as there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.	For clarity the following policy wording should be included in relation to permitting development: <i>"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."</i>
TCL4	This policy relates to the granting of permission for 'active' town centre uses within the Cultural Enhancement Area in Canterbury town centre. It is anticipated that these developments will take place within the town centre. However, development could indirectly impact on SACs and SPAs as set out in Section 3 and the other policy screening assessments in this section, as there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.	For clarity the following policy wording should be included in relation to permitting development: <i>"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."</i>

Policy	HRA Screening Assessment	Recommendations
TCL5	This policy relates to protecting and improving the provision of retail and other uses that meet local needs in the designated local centres and Canterbury City areas of Wincheap, St Dunstons and Northgate. Planning permission will only be granted for changes of use from a retail shop or other community use in certain circumstances. Proposals for new shopping or community provision within or adjacent to local centres will be permitted if they meet local needs. It is anticipated these developments will take place within the built-up area. However, development could indirectly impact on SACs and SPAs as set out in Section 3 and the other policy screening assessments in this section, as there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.	For clarity the following policy wording should be included in relation to permitting development: <i>"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."</i>
TCL6	This policy relates to permission for retail development or other town centre uses in out-of-town locations, which will only be granted subject to criteria being met. It is anticipated that these developments will take place within the built-up area. However, development could indirectly impact on SACs and SPAs as set out in Section 3 and the other policy screening assessments in this section, as there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.	For clarity, the following policy wording should be included in relation to permitting development: <i>"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."</i>
TCL7	This policy relates to the Wincheap Retail Area which will be developed as a satellite retail centre to Canterbury City focused on retail and leisure provision. If a scheme comes forward it will need to contribute towards a package of transport improvements. The designated Wincheap Retail Area is sufficiently distant from SACs and SPAs that development would not have a direct effect. However, given the link to transport improvements in particular, development could indirectly impact on SACs and SPAs as set out in Section 3 and the other policy screening assessments in this section. This is because there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.	For clarity, the following policy wording should be included in relation to permitting development: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
TCL8	This policy relates to development in Herne Bay and Whitstable Town Centres needing to be of an appropriate scale and character. It does not promote development in itself so is not likely to have a significant effect on European sites.	N/A
TCL9	This policy requires the Council to identify Environmental Improvement Areas within the district, in which environmental improvements will be sought including signage and lighting improvements. It is anticipated these developments will take place within the town centre/built-up area. However, since once of the Environmental Improvement Areas is Whitstable Harbour development could indirectly impact on The Swale SPA. This is because there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.	For clarity, the following policy wording should be included in relation to permitting development: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>

Policy	HRA Screening Assessment	Recommendations
TCL10	<p>This policy relates to new large development or development within commercial frontages within and around town centres incorporating a mix of uses to make more efficient use of land. The following sites are allocated for mixed use development, to be developed in accordance with an adopted development brief:</p> <p>CANTERBURY</p> <ul style="list-style-type: none"> • White Horse Land • Roger Britton Carpets • Kingsmead • Peugeot Garage • HERNE BAY • Central Development Area • Beach Street • Bus Depot • WHITSTABLE • The Warehouse, Sea Street • Whitstable Harbour <p>Development could indirectly impact on SACs and SPAs (with development on Sea Street and Whitstable Harbour having potential direct effects on the Swale SPA) as set out in Section 3 and the other policy screening assessments in this section, as there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.</p>	<p>For clarity, the following policy wording should be included in relation to permitting development in Whitstable Harbour: <i>“No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects.”</i></p> <p>To avoid indirect effects on the Swale SPA due to water pollution, noise, light or visual impact, development at Whitstable Harbour should be required, unless exempted by Natural England, to demonstrate how impacts upon European sites will be mitigated both during construction and operation. Specific consideration will need to be given to pollution prevention, avoiding disturbance of birds during construction, avoiding disturbance of birds during operation as a result of lighting provision, and, where appropriate, undertaking ecological monitoring during and post-construction.</p>
TCL11	<p>This policy relates to granting permission for new leisure and cultural activities and replacing and enhancing existing facilities on allocated sites in areas where there is a shortfall or where facilities are provided as part of joint use community proposals. It states that major commercial leisure and cultural facilities should be located within or close to town centres or other locations within the urban area that are accessible. Permission for change of use involving the loss of existing indoor sport, leisure and cultural facilities will only be granted where there is no longer a need for these facilities.</p> <p>It is anticipated that these developments will take place within the town centre/built-up area. However, development could indirectly impact on SACs and SPAs as set out in Section 3 and the other policy screening assessments in this section, as there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.</p>	<p>For clarity, the following policy wording should be included in relation to permitting development: <i>“No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects.”</i></p>
TCL12	<p>This policy relates to granting permission for development within town centres that could lead to significant evening and night time activity subject to certain criteria being met.</p> <p>It is anticipated that these developments will take place within the town centre/built-up area. However, development could indirectly impact on SACs and SPAs as set out in Section 3 and the other policy screening assessments in this section, as there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.</p>	<p>For clarity, the following policy wording should be included in relation to permitting development: <i>“No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects.”</i></p>

4.5 Tourism and Visitor Economy

The Tourism and Visitor Policies from the draft Local Plan are screened in **Table 4.5**.

Table 4.5 Tourism and Visitor Policies Screening Assessment

Policy	HRA Screening Assessment	Recommendations
TV1	This policy relates to proposals for cultural or arts facilities, which will be encouraged particularly within or close to town centres or public transport nodes or where new public places are created. Consideration will be given to the environmental implications of proposals. It is anticipated these developments will take place within the built-up area. However, development could indirectly impact on SACs and SPAs as set out in Section 3 and the other policy screening assessments in this section, as there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.	For clarity, the following policy wording should be included in relation to permitting development: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
TV2	This policy relates to granting permission in or on the edge of town centres for proposals to provide new tourism development including accommodation and new visitor attractions. Criteria to be considered include the anticipated traffic generation and environmental considerations. It is anticipated these developments will take place within the built-up area. However, development could indirectly impact on SACs and SPAs as set out in Section 3 and the other policy screening assessments in this section, as there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.	For clarity, the following policy wording should be included in relation to permitting development: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
TV3	This policy relates to protecting existing visitor accommodation from change of use unless there is clear evidence that it is no longer needed and there is no other appropriate cultural, tourism, economic or community use for it. It does not promote development in itself so is not likely to have a significant effect.	N/A
TV4	This policy relates to granting permission for caravan touring sites within the district or the refurbishment/expansion of existing sites. The loss of existing caravan touring sites will not be permitted unless it can be demonstrated that their use does not make any positive contribution to the local economy. Development could directly or indirectly impact on SAC, SPA or Ramsar sites as set out in Section 3 and the other policy screening assessments in this section, as there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.	For clarity, the following policy wording should be included in relation to permitting development: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>

Policy	HRA Screening Assessment	Recommendations
<p>TV5</p>	<p>This policy relates to the provision of a marina and associated facilities, reflecting evidence at the South East regional level that there is a shortfall along the North Kent coast. However, given that firm proposals exist for Queenborough and Rushmede, and Sheerness there appears to be no specific requirement for marina provision in Canterbury district. If a proposal came forward it, subject to other criteria also being addressed, the marina and associated facilities will be permitted:</p> <p>if a full and detailed HRA has been carried out to establish the impact on the surrounding internationally important sites for wildlife, such as SPA, SAC and Ramsar.</p> <p>if development which would materially harm the scientific and nature conservation interests, either directly, indirectly or cumulatively of the SSSI and areas of known nature conservation interest is mitigated and any impacts can be adequately compensated.</p> <p>Indirectly this gives protection to SACs and SPAs, but the policy wording could be strengthened.</p>	<p>The following policy wording should be included in relation to permitting development: <i>“No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects.”</i></p>
<p>TV6</p>	<p>This policy states that proposals to further enhance the attraction of Reculver and develop Reculver Country Park as a quality attraction for visitors, in particular open air recreation proposals, will be permitted.</p> <p>Proposals would be subject to an assessment of design, visual and environmental impacts, including meeting Habitats Regulations requirements and ensuring suitable access arrangements. Future development at Reculver will need to meet the aims of the Reculver Masterplan SPD 2009 which was subject to HRA.</p> <p>Part of the Thanet Coast and Sandwich Bay SPA (also a Ramsar site and part of the North East Kent European Marine Site) falls within the master plan area and could be directly or indirectly impacted upon by development which is promoted by it.</p> <p>Potential changes that could affect European sites include:</p> <ul style="list-style-type: none"> Recreational pressure Noise disturbance Obstruction of sight lines Light pollution Marine pollution Changes to coastal processes <p>The latter two bullet points could also indirectly impact upon the Thanet Coast SAC and Swale SPA.</p>	<p>The following list comprises generic mitigation measures that are applicable to the Reculver Masterplan, which are equally applicable to this policy, and should be incorporated into the policy wording.</p> <p><i>“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 enhance visitors’ understanding of the need for a Code of Conduct.</i></p> <p><i>Detailed visitor access proposals will avoid directing the public towards coastal reaches favoured by 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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.”</i></p>

Policy	HRA Screening Assessment	Recommendations
TV7	This policy encourages developments that promote tourism and recreation-based rural diversification. Environmentally focused tourism initiatives with a primary focus on experiencing natural areas that foster environmental and cultural understanding, appreciation and conservation will be encouraged. Although not the purpose of the policy there is the potential that rural diversification could directly or indirectly impact on SACs and SPAs as set out in Section 3 and the other policy screening assessments in this section, as there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.	For clarity, the following policy wording should be included in relation to permitting development: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
TV8	This policy states that the Council will permit new development, change of use, conversion or extension of existing buildings in the countryside and villages in order to provide tourist accommodation, tourist attractions or other facilities for tourists; on the proviso there are no detrimental impacts on protected species, sites or features of nature conservation interest. Indirectly this gives protection to SACs and SPAs, but the policy wording could be strengthened.	The following policy wording should be included in relation to permitting development: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>

4.6 Transport Infrastructure

The Transport policies from the draft Local Plan are screened in **Table 4.6**.

Table 4.6 Transport Policies Screening Assessment

Policy	HRA Screening Assessment	Recommendations
T1	This policy addresses transport considerations relating to the location of new development or the relocation of existing activities. This includes controlling the level and environmental impact of vehicular traffic including air quality and providing alternative modes of transport to the car. It also includes seeking the construction of new roads and/or junction improvements which will improve environmental conditions and/or contribute towards the economic wellbeing of the district. New roads and junctions could directly or indirectly impact on SACs and SPAs as set out in Section 3 and the other policy screening assessments in this section, as there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.	For clarity, the following policy wording should be included in relation to permitting new roads and junctions: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
T2	This policy relates to safeguarding land for proposed pedestrian and cycle routes. It does not promote development in itself so is considered unlikely to have a significant effect.	N/A
T3	This policy states permission will not be granted for proposals that prejudice effective implementation of bus improvement measures and fast bus links. It does not promote development in itself so is not likely to have a significant effect on European sites.	N/A

Policy	HRA Screening Assessment	Recommendations
T4	This policy states permission will not be granted for proposals that prejudice effective implementation of rail improvements. It does not promote development in itself so is not likely to have a significant effect on European sites.	N/A
T5	This policy safeguards land at Faulkener's Lane, Harbledown for a Park & Ride site but it does not promote development in itself so is not likely to have a significant effect on European sites.	
T6	This policy safeguards land adjacent to the existing Wincheap Park & Ride site but it does not promote development in itself so is not likely to have a significant effect on European sites.	
T7	This policy safeguards land adjacent to the existing Sturry Park & Ride site but it does not promote development in itself so is not likely to have a significant effect on European sites.	
T8	This policy makes provision adjacent to the new A2 interchange near Bridge for the relocation and expansion of New Dover Road Park & Ride. This development is approximately 3.1km from Stodmarsh. Indirectly surface water run-off from the park and ride could change current flow regimes in the river system to which drainage is connected or increase the amount of diffuse pollution entering it.	<p>For clarity, the following policy wording should be included in relation to permitting new roads and junctions: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i></p> <p>In relation to water quality, in implementing the project the Council will need to ensure that sustainable drainage measures are incorporated to ensure there is no increase in surface water run-off (including allowance for climate change as required by Environment Agency guidance) and there is no increase in diffuse pollution from the built-up area or highways entering the river system. The following policy wording should be included in relation these issues:</p> <p><i>"Development will only be permitted where a Flood Risk and Drainage Impact Assessment have demonstrated that there will be no increase in surface water run-off."</i></p> <p><i>"Development will only be permitted where adequate pollution prevention measures have been incorporated into the design to ensure there will be no increase in diffuse pollution entering the river system upstream of any European Site."</i></p>

Policy	HRA Screening Assessment	Recommendations
T9	<p>This policy sets out the requirements for any future park & ride facility at Whitstable including that <i>“development which would materially harm scientific or nature conservation interests, either directly, indirectly or cumulatively is mitigated and any impacts can be adequately compensated.”</i> Indirectly this appears to be giving protection to SACs and SPAs, but the policy wording could be strengthened.</p>	<p>For clarity, the following policy wording should be included in relation to permitting park and rides: <i>“No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects.”</i></p> <p>In relation to water quality, in implementing the project the Council will need to ensure that sustainable drainage measures are incorporated to ensure there is no increase in surface water run-off (including allowance for climate change as required by Environment Agency guidance) and there is no increase in diffuse pollution from the built-up area or highways entering the river system. The following policy wording should be included in relation these issues:</p> <p><i>“Development will only be permitted where a Flood Risk and Drainage Impact Assessment have demonstrated that there will be no increase in surface water run-off.”</i></p> <p><i>“Development will only be permitted where adequate pollution prevention measures have been incorporated into the design to ensure there will be no increase in diffuse pollution entering the river system upstream of any European Site.”</i></p>
T10	<p>This policy sets out parking standards for developments. It does not promote development in itself so is not likely to have a significant effect on European sites. .</p>	N/A
T11	<p>This policy sets out parking standards for developments within the historic core of Canterbury City, Canterbury West Station Conservation Area, Herne Bay town centre and Whitstable town centre. It does not promote development in itself so is not likely to have a significant effect on European sites. .</p>	N/A

Policy	HRA Screening Assessment	Recommendations
T12	<p>This policy states that the Council will seek to implement the A2 off-slip road at Wincheap, an A28 relief road through the industrial estate and improvements at Wincheap Green. Development proposals that might prejudice these improvements will be resisted and contributions towards them sought.</p> <p>Indirectly surface water run-off from highways could change current flow regimes in the river system to which drainage is connected or increase the amount of diffuse pollution entering it. This would have a negative impact on water dependent SAC, SPA and Ramsar sites. This development is approximately 2km from Blean SAC. Indirectly however it could change traffic volumes or speeds on the road network in the vicinity of the SAC.</p>	<p>For clarity, the following policy wording should be included in relation to permitting new roads and junctions: <i>“No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects.”</i></p> <p>In relation to water quality, in implementing the project the Council will need to ensure that sustainable drainage measures are incorporated to ensure there is no increase in surface water run-off (including allowance for climate change as required by Environment Agency guidance) and there is no increase in diffuse pollution from the built-up area or highways entering the river system. The following policy wording should be included in relation these issues:</p> <p><i>“Highways development will only be permitted where a Flood Risk and Drainage Impact Assessment have demonstrated that there will be no increase in surface water run-off.”</i></p> <p><i>“Highways development will only be permitted where adequate pollution prevention measures have been incorporated into the design to ensure there will be no increase in diffuse pollution entering the river system upstream of any European Site.”</i></p> <p>In relation to air quality emissions the Highways Agency DMRB air quality assessment method identifies that, at a local level, only designated sites within 200m of a road, subject to certain changes in traffic volume or speed, have the potential to be significantly affected by air quality changes. The following policy wording should be included to ensure that the highways improvements promoted by this policy do not increase air quality effects on European Sites.</p> <p><i>“Highways development will only be permitted where a transport assessment, undertaken with reference to the DMRB air quality assessment method, demonstrates there will be no adverse effect on the integrity of any SAC, SPA or Ramsar Site, alone, or in combination, with other plans or projects.”</i></p>

Policy	HRA Screening Assessment	Recommendations
<p>T13</p>	<p>This policy states that the Council requires the provision of a new A2 interchange near Bridge as an integral part of development proposals. Development proposals that might prejudice these improvements will be resisted and contributions towards them sought.</p> <p>This development is approximately 3.1km from Stodmarsh. Indirectly surface water run-off from highways could change current flow regimes in the river system to which drainage is connected or increase the amount of diffuse pollution entering it. This would have a negative impact on water dependent SAC, SPA and Ramsar sites. Indirectly it could change traffic volumes or speeds on the road network in the vicinity of SAC sensitive to air quality changes.</p>	<p>For clarity, the following policy wording should be included in relation to permitting new roads and junctions: <i>“No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects.”</i></p> <p>In relation to water quality, in implementing the project the Council will need to ensure that sustainable drainage measures are incorporated to ensure there is no increase in surface water run-off (including allowance for climate change as required by Environment Agency guidance) and there is no increase in diffuse pollution from the built-up area or highways entering the river system. The following policy wording should be included in relation these issues:</p> <p><i>“Highways development will only be permitted where a Flood Risk and Drainage Impact Assessment have demonstrated that there will be no increase in surface water run-off.”</i></p> <p><i>“Highways development will only be permitted where adequate pollution prevention measures have been incorporated into the design to ensure there will be no increase in diffuse pollution entering the river system upstream of any European Site.”</i></p> <p>In relation to air quality emissions the Highways Agency DMRB air quality assessment method identifies that, at a local level, only designated sites within 200m of a road, subject to certain changes in traffic volume or speed, have the potential to be significantly affected by air quality changes. The following policy wording should be included to ensure that the highways improvements promoted by this policy do not increase air quality effects on European Sites.</p> <p><i>“Highways development will only be permitted where a transport assessment, undertaken with reference to the DMRB air quality assessment method, demonstrates there will be no adverse effect on the integrity of any SAC, SPA or Ramsar Site, alone, or in combination, with other plans or projects.”</i></p>

Policy	HRA Screening Assessment	Recommendations
<p>T14</p>	<p>This policy states that the Council requires the provision of an A291 Herne Relief Road as an integral part of development proposals. Development proposals that might prejudice these improvements will be resisted and contributions towards them sought.</p> <p>Indirectly surface water run-off from highways could change current flow regimes in the river system to which drainage is connected or increase the amount of diffuse pollution entering it. This would have a negative impact on water dependent SAC, SPA and Ramsar sites. This development is approximately 0.8km from Blean SAC. Indirectly however it could change traffic volumes or speeds on the road network in the vicinity of the SAC.</p>	<p>For clarity, the following policy wording should be included in relation to permitting new roads and junctions: <i>“No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects.”</i></p> <p>In relation to water quality, in implementing the project the Council will need to ensure that sustainable drainage measures are incorporated to ensure there is no increase in surface water run-off (including allowance for climate change as required by Environment Agency guidance) and there is no increase in diffuse pollution from the built-up area or highways entering the river system. The following policy wording should be included in relation these issues:</p> <p><i>“Highways development will only be permitted where a Flood Risk and Drainage Impact Assessment have demonstrated that there will be no increase in surface water run-off.”</i></p> <p><i>“Highways development will only be permitted where adequate pollution prevention measures have been incorporated into the design to ensure there will be no increase in diffuse pollution entering the river system upstream of any European Site.”</i></p> <p>In relation to air quality emissions the Highways Agency DMRB air quality assessment method identifies that, at a local level, only designated sites within 200m of a road, subject to certain changes in traffic volume or speed, have the potential to be significantly affected by air quality changes. The following policy wording should be included to ensure that the highways improvements promoted by this policy do not increase air quality effects on European Sites.</p> <p><i>“Highways development will only be permitted where a transport assessment, undertaken with reference to the DMRB air quality assessment method, demonstrates there will be no adverse effect on the integrity of any SAC, SPA or Ramsar Site, alone, or in combination, with other plans or projects.”</i></p> <p>To avoid indirect effects due to pollution, noise, light or visual impact, development of the Herne Relief Road should be required, unless exempted by Natural England, to demonstrate how impacts upon Blean SAC and other European Sites will be mitigated both during construction and operation. Specific consideration will need to be given to pollution prevention, avoiding disturbance of birds during construction, avoiding disturbance of birds during operation as a result of lighting provision, avoiding increasing access to Blean SAC, and monitoring requirements during and post-construction.</p>

Policy	HRA Screening Assessment	Recommendations
<p>T15</p>	<p>This policy states that the Council requires the provision of a Sturry Crossing as an integral part of development proposals. Development proposals that might prejudice these improvements will be resisted and contributions towards them sought.</p> <p>This development is approximately 0.7km from Stodmarsh involving a crossing of the Great River Stour. Indirectly surface water run-off from highways could change current flow regimes in the river system to which drainage is connected or increase the amount of diffuse pollution entering it. This would have a negative impact on water dependent SAC, SPA and Ramsar sites. Indirectly it could also change traffic volumes or speeds on the road network in the vicinity of the SAC that are sensitive to air quality changes.</p>	<p>For clarity, the following policy wording should be included in relation to permitting new roads and junctions: <i>“No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects.”</i></p> <p>In relation to water quality, in implementing the project the Council will need to ensure that sustainable drainage measures are incorporated to ensure there is no increase in surface water run-off (including allowance for climate change as required by Environment Agency guidance) and there is no increase in diffuse pollution from the built-up area or highways entering the river system. The following policy wording should be included in relation these issues:</p> <p><i>“Highways development will only be permitted where a Flood Risk and Drainage Impact Assessment have demonstrated that there will be no increase in surface water run-off.”</i></p> <p>In relation to the New Sturry bridge crossing development should only be permitted if it can be demonstrated the natural flow regime of the river will be maintained.</p> <p><i>“Highways development will only be permitted where adequate pollution prevention measures have been incorporated into the design to ensure there will be no increase in diffuse pollution entering the river system upstream of any European Site.”</i></p> <p>In relation to air quality emissions the Highways Agency DMRB air quality assessment method identifies that, at a local level, only designated sites within 200m of a road, subject to certain changes in traffic volume or speed, have the potential to be significantly affected by air quality changes. The following policy wording should be included to ensure that the highways improvements promoted by this policy do not increase air quality effects on European Sites.</p> <p><i>“Highways development will only be permitted where a transport assessment, undertaken with reference to the DMRB air quality assessment method, demonstrates there will be no adverse effect on the integrity of any SAC, SPA or Ramsar Site, alone, or in combination, with other plans or projects.”</i></p> <p>To avoid indirect effects due to pollution, noise, light or visual impact, development of the Sturry Bridge should be required, unless exempted by Natural England, to demonstrate how impacts upon Stodmarsh and other European Sites will be mitigated both during construction and operation. Specific consideration will need to be given to pollution prevention, avoiding disturbance of birds during construction, avoiding disturbance of birds during operation as a result of lighting provision, avoiding increasing access to Stodmarsh, and monitoring requirements during and post-construction.</p>

Policy	HRA Screening Assessment	Recommendations
T16	<p>This policy states that the Council will seek to implement a local distributor road between Chaucer Road and the A257 – Barracks Link funded by development of opportunity sites the Council has identified. Development proposals that might prejudice these improvements will be resisted. For the purposes of this assessment it is anticipated that the link road is to be located within the Canterbury built-up area, although the proposals map has yet to be developed.</p> <p>Indirectly surface water run-off from highways could change current flow regimes in the river system to which drainage is connected or increase the amount of diffuse pollution entering it. This would have a negative impact on water dependent SAC, SPA and Ramsar sites. Indirectly it could also change traffic volumes or speeds on the road network in the vicinity of the SAC that are sensitive to air quality changes.</p>	<p>For clarity, the following policy wording should be included in relation to permitting new roads and junctions: <i>“No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects.”</i></p> <p>In relation to water quality, in implementing the project the Council will need to ensure that sustainable drainage measures are incorporated to ensure there is no increase in surface water run-off (including allowance for climate change as required by Environment Agency guidance) and there is no increase in diffuse pollution from the built-up area or highways entering the river system. The following policy wording should be included in relation these issues:</p> <p><i>“Highways development will only be permitted where a Flood Risk and Drainage Impact Assessment have demonstrated that there will be no increase in surface water run-off.”</i></p> <p><i>“Highways development will only be permitted where adequate pollution prevention measures have been incorporated into the design to ensure there will be no increase in diffuse pollution entering the river system upstream of any European Site.”</i></p> <p>In relation to air quality emissions the Highways Agency DMRB air quality assessment method identifies that, at a local level, only designated sites within 200m of a road, subject to certain changes in traffic volume or speed, have the potential to be significantly affected by air quality changes. The following policy wording should be included to ensure that the highways improvements promoted by this policy do not increase air quality effects on European Sites.</p> <p><i>“Highways development will only be permitted where a transport assessment, undertaken with reference to the DMRB air quality assessment method, demonstrates there will be no adverse effect on the integrity of any SAC, SPA or Ramsar Site, alone, or in combination, with other plans or projects.”</i></p>
T17	<p>This policy protects rural lanes which are of nature conservation importance from changes and management practices that would damage their character. This will have a positive impact on biodiversity protection and enhancement.</p>	N/A
T18	<p>This policy requires development proposals that have significant transport implications to be supported by a Transport Assessment and Travel Plan; it does not promote development in itself so is not likely to have a significant effect on European sites. However, it might be a useful mechanism for implementing the recommendations in relation to demonstrating changes in traffic flows and speeds will not have an adverse effect on the integrity of any SAC, SPA or Ramsar site.</p>	N/A

4.7 Design and the Built Environment

The Design and Built Environment policies from the draft Local Plan are screened in **Table 4.7**.

Table 4.7 Design and Built Environment Screening Assessment

Policy	HRA Screening Assessment	Recommendations
DBE1	This policy requires that all development should respond to the objectives of sustainable development, conserve energy resources and reflect the need to protect and enhance the environment. It requires new development to install energy and water efficiency measures and measures to reduce air pollution. This will have a positive impact on biodiversity protection and enhancement.	N/A
DBE2	This policy states that in determining applications for renewable or micro-generation equipment the Council will expect applicants to avoid any adverse (cumulative) impact. However, the current policy wording relates this more to visual, aural and olfactory impact and no specific mention is made of biodiversity impact. Renewable equipment could include the installation of wind turbines in close proximity to SPAs or on flight lines for the qualifying species.	The following policy wording should be included in relation to permitting renewable energy development: <i>"No renewable energy development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
DBE3	This policy relates to high quality design for development proposals, including the conservation and integration of existing natural features into development to strengthen local biodiversity and consideration of noise, dust and vibration. This will have a positive impact on biodiversity protection and enhancement.	N/A
DBE4	This policy relates to new modern design. It does not promote development in itself so is not likely to have a significant effect on European sites. .	N/A
DBE5	This policy relates to the requirement for design and access statements to be submitted with planning applications. It does not promote development in itself so is not likely to have a significant effect on European sites. .	N/A
DBE6	This policy relates to the requirement for sustainability statements to be submitted with planning applications. It does not promote development in itself so is not likely to have a significant effect on European sites. .	N/A
DBE7	This policy relates to the design requirements for residential accommodation. It does not promote development in itself so is not likely to have a significant effect on European sites. .	N/A
DBE8	This policy relates to accessibility and inclusion standards. It does not promote development in itself so is not likely to have a significant effect on European sites. .	N/A
DBE9	This policy relates to residential intensification, which will only be permitted for existing residential uses and on sites allocated for housing development. It will only be considered if the development would not conflict with other policies in the Local Plan. It is anticipated that this will include policies relating to the requirement for HRA and that no development which may have an adverse effect on integrity would therefore be permitted. However, this is not made explicit.	For clarity, the following policy wording should be included in relation to permitting development: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>

Policy	HRA Screening Assessment	Recommendations
DBE10	This policy relates to alterations and extensions to buildings being permitted subject to certain criteria. Development could indirectly impact on SACs and SPAs as set out in Section 3 and the other policy screening assessments in this section, as there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.	For clarity, the following policy wording should be included in relation to permitting development: <i>“No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects.”</i>
DBE11	This policy relates to the achievement of a high quality design of the public realm. This includes integrating development with existing path, circulation networks and patterns of activity and permeability. This policy is primarily design-related. However, it could have a negative impact by providing increased access to SACs, SPAs or Ramsar Sites if inadequate consideration is given to how integration will affect them. For example, creating links to the Public Right of Way network could increase public access and thus recreational impact, or links via green corridors to important bird habitat could increase the risk of cat predation.	<p>It is recommended that the impact of integrating development with existing path, circulation networks and patterns of activity and permeability on SACs, SPAs or Ramsar Sites be considered by the Council prior to permission being granted.</p> <p>For clarity, the following policy wording should be included in relation to permitting development: <i>“No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects.”</i></p>
DBE12	This policy relates to creating a functional, visually successful public open space with a strong sense of place as part of new development. This will require the creation of connected open space and public art provision. This policy is design-related and so is not likely to have a significant effect on European sites.	N/A
DBE13	This policy relates to proposals for outdoor lighting only being permitted in relation to certain criteria. It requires that outdoor lighting does not adversely affect sites of nature conservation interest and/or protected and other vulnerable species. For those developments in or adjacent to sensitive locations the Council may require a lighting strategy to be submitted. Indirectly this gives protection to SACs and SPAs, but the policy wording could be strengthened.	The following policy wording should be included in relation to permitting lighting development: <i>“No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects.”</i>

4.8 Quality of Life and Access to Facilities

The Quality of Life policies from the draft Local Plan are screened in **Table 4.8**.

Table 4.8 Quality of Life Policies Screening Assessment

Policy	HRA Screening Assessment	Recommendations
QL1	This policy relates to proposals for new buildings or uses for local communities to provide social infrastructure, and community facilities being encouraged and granted permission provided any new building is appropriately designed and located. New community facilities could directly or indirectly impact on SACs and SPAs as set out in Section 3 and the other policy screening assessments in this section, as there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.	For clarity, the following policy wording should be included in relation to permitting development of community facilities: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
QL2	This policy states that, within the villages, the Council will permit the use of extensions to existing residential properties or other buildings to provide convenience shops or other local services unless there is an overriding conflict with other policies in the Local Plan. Indirectly this gives protection to SACs and SPAs, but the policy wording could be strengthened.	For clarity, the following policy wording should be included in relation to permitting development: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
QL3	This policy states the Council will not permit the loss of village and community facilities in parishes unless the use is no longer viable and there is no continuing demand. As a development control policy, that does not in itself promote development, it is not likely to have a significant effect.	N/A
QL4	This policy states that permission will be granted for farm shops if there is no overriding conflict with other policies in the Local Plan. Indirectly this gives protection to SACs and SPAs, but the policy wording could be strengthened.	For clarity, the following policy wording should be included in relation to permitting development: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
QL5	This policy states that provision will be made to accommodate local community services within new residential development and mixed use development. New community services will be located where they are accessible by non-car modes and whenever practical located within urban or local centres. Residential development will not be permitted until the required funding for community services has been identified and agreed. New community facilities could directly or indirectly impact on SACs and SPAs as set out in Section 3 and the other policy screening assessments in this section, as there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.	For clarity, the following policy wording should be included in relation to permitting development of community facilities: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
QL6	This policy states that permission will not be granted for development involving the loss of public or privately operated community buildings or sites, or uses for community purposes, unless there is no demonstrable need and other uses to serve the community could not operate from the building or land. It does not promote development in itself so is not likely to have a significant effect on European sites.	N/A

Policy	HRA Screening Assessment	Recommendations
QL7	<p>This policy allocates the following sites for community purposes: Land south of Greenhill, Herne Bay Land at end of Vauxhall Avenue, Canterbury</p> <p>It is anticipated that development of community facilities will take place within the built-up area. However, development could indirectly impact on SACs and SPAs as set out in Section 3 and the other policy screening assessments in this section, as there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.</p>	<p>For clarity, the following policy wording should be included in relation to permitting development: <i>“No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects.”</i></p>
QL8	<p>This policy states that the Council will ensure that adequate provision is made for health facilities arising from the impact of new development, and that appropriate mechanisms are secured to deliver them. However, health provision could directly or indirectly (due to construction, drainage, industrial emissions to air, and traffic generation) impact on SACs and SPAs as set out in Section 3 and the other policy screening assessments in this section, as there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.</p>	<p>For clarity, the following policy wording should be included in relation to permitting development: <i>“No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects.”</i></p>
QL9	<p>This policy allocates the following sites for health related development: Kent and Canterbury Hospital</p> <p>It is anticipated this development will be located within the Canterbury built-up area. However, development could indirectly impact on SACs and SPAs as set out in Section 3 and the other policy screening assessments in this section, as there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.</p>	<p>For clarity, the following policy wording should be included in relation to permitting development: <i>“No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects.”</i></p>
QL10	<p>This policy states that the Council will support the provision of new medical and health facilities. However, health provision could directly or indirectly (due to construction, drainage, industrial emissions to air, and traffic generation) impact on SACs and SPAs as set out in Section 3 and the other policy screening assessments in this section, as there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.</p>	<p>For clarity, the following policy wording should be included in relation to permitting development: <i>“No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects.”</i></p>
QL11	<p>This policy states that development that could directly or indirectly result in material additional air pollutants and worsening levels of air quality within the area surrounding the development site will not be permitted unless acceptable measures have been taken as part of the proposal. Sensitive development (such as housing) will not normally be permitted in an AQMA.</p> <p>As a development control policy it does not promote development and is likely not to have a significant effect, but the wording of this policy is important as it mitigates for the effects of Policy SP2 and other policies that promote development.</p>	<p>In relation to air quality emissions impacting on SAC, SPA or Ramsar sites this policy could be improved to state:</p> <p><i>“Development will only be permitted where a transport assessment, undertaken with reference to the DMRB air quality assessment method, demonstrates there will be no adverse effect on the integrity of any SAC, SPA or Ramsar Site, alone, or in combination, with other plans or projects.”</i></p> <p><i>“Development involving industrial emissions to air will only be permitted where an air quality assessment demonstrates there will be no adverse effect on the integrity of any SAC, SPA or Ramsar Site, alone, or in combination, with other plans or projects.”</i></p>

Policy	HRA Screening Assessment	Recommendations
<p>QL12</p>	<p>This policy states that in granting permission for development that could potentially result in pollution, the Council will impose conditions or seek agreements to ensure mitigation is undertaken.</p> <p>As a development control policy it does not promote development and is likely not to have a significant effect, but the wording of this policy is important as it mitigates for the effects of Policy SP2 and other policies that promote development.</p>	<p>In relation to pollution impacting on SAC, SPA or Ramsar sites this policy could be improved to state:</p> <p><i>“Development will only be permitted where adequate pollution prevention measures have been incorporated into the design to ensure there will be no adverse effect on the integrity of any SAC, SPA or Ramsar Site, alone, or in combination, with other plans or projects.”</i></p> <p>To avoid indirect effects due to pollution, noise, light or visual impact, development within 1km of an SAC, SPA or Ramsar site should be required, unless exempted by Natural England, to demonstrate how impacts upon European sites will be mitigated for both during construction and operation. Specific consideration will need to be given to pollution prevention, avoiding disturbance of birds during construction, avoiding disturbance of birds during operation as a result of lighting provision, and monitoring requirements during and post-construction.</p>
<p>QL13</p>	<p>This policy states that any major proposal for waste disposal, waste incineration, energy generation from waste or other waste related products will need to address issues that include:</p> <ul style="list-style-type: none"> Need for the proposal Consideration of alternative sites Air quality and the impact on public health Geology, hydrology and ground conditions Ecology and nature conservation interests Noise impact Traffic generation and alternative methods of transportation of waste by means other than road <p>However, Kent County Council is the waste planning authority for the district and therefore determines proposals relating to waste in accordance with the Kent Minerals and Waste Local Plan and the Council is only a consultee. Therefore, this policy will not result in the implementation of any new development.</p>	<p>N/A</p>

4.9 **Open Space**

The Open Space policies from the draft Local Plan are screened in **Table 4.9**.

Table 4.9 Open Space Policies Screening Assessment

Policy	HRA Screening Assessment	Recommendations
OS1	This policy states that proposals for development which would result in the loss of playing fields will only be permitted subject to certain criteria. This includes the provision of alternative open space of equivalent amenity standard that does not generate significant additional trips by car. As a development control policy, that does not in itself promote development, it is not likely to have a significant effect.	N/A
OS2	This policy allocates land at Greenhill, Herne Bay for new public playing fields. Increased traffic generation, noise and lighting could indirectly affect SACs and SPAs as set out in Section 3 and the other policy screening assessments in this section. This is because there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.	For clarity, the following policy wording should be included in relation to permitting the developments covered by this policy: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
OS3	This policy allocates land adjacent to St Augustine's Business Park, Swalecliffe for new junior football pitches. Increased traffic generation, noise and lighting could indirectly affect SACs and SPAs as set out in Section 3 and the other policy screening assessments in this section. This is because there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.	For clarity, the following policy wording should be included in relation to permitting the developments covered by this policy: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
OS4	This policy allocates land at Ridlands Farm, Canterbury for Canterbury City Council Football Club and informal public recreational uses including public playing fields. Increased traffic generation, noise and lighting could indirectly affect SACs and SPAs as set out in Section 3 and the other policy screening assessments in this section. This is because there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.	For clarity, the following policy wording should be included in relation to permitting development: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
OS5	This policy states that, within the identified Green Gaps, development will only be permitted where it does not significantly alter the Gaps' open character or result in new isolated or obtrusive development within it. Proposals for open sports and recreational uses will be permitted subject to there being no overriding conflict with other policies and the wider objectives of the Local Plan. It is anticipated that this will include policies in the Landscape and Biodiversity section relating to the requirement for HRA and that no development which had an adverse effect on integrity would therefore be permitted, but this is not made explicit.	For clarity, the following policy wording should be included in relation to permitting development: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
OS6	This policy states that, in the Herne Bay and Whitstable Green Gap, development will only be permitted where it does not result in a material expansion of the built-up confines of the urban areas, it does not significantly alter its open character or result in new isolated or obtrusive development within it. Development of the Green Gap could indirectly impact on the Thanet Coast and Sandwich Bay SPA as set out in Section 3 and the other policy screening assessments in this section, as there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.	For clarity, the following policy wording should be included in relation to permitting development: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>

Policy	HRA Screening Assessment	Recommendations
OS7	This policy relates to sports and recreation facilities in the open countryside being permitted only under certain circumstances. This includes there being no detrimental impact on protected species, sites or features of nature conservation interest. Indirectly this gives protection to SACs and SPAs, but the policy wording could be strengthened.	For clarity, the following policy wording should be included in relation to permitting development: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
OS8	This policy relates to the loss of open spaces and play areas on residential estates that contribute to the visual or recreational amenity of the area being refused. As a development control policy it does not promote development in itself so is not likely to have a significant effect on European sites.	N/A
OS9	This policy relates to the loss of protected existing open spaces only being permitted under certain circumstances. The sites include Herne Bay coastal park, Tankerton slopes in Whitstable, Mariner's View in Whitstable, Hollow Lane in Canterbury and Cherry Orchard in Herne. Development of the sites in Herne and Whitstable could indirectly impact on the Thanet Coast and Sandwich Bay SPA as set out in Section 3 and the other policy screening assessments in this section, as there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.	For clarity, the following policy wording should be included in relation to permitting development: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>

Policy	HRA Screening Assessment	Recommendations
<p>OS10</p>	<p>This policy requires new housing development to provide for appropriate outdoor space, allotments and/or community garden areas proportionate to the number of residents. If development does not allow for open space, developers will be required to make a financial contribution towards the provision or improvement of open space or recreational facilities elsewhere. The level of open space provision will be based on the existing Development Contributions SPD until such time as it is superseded.</p> <p>As a development control policy it does not promote development and is likely not to have a significant effect, but the wording of this policy is important as it mitigates for the effects of Policy SP2 and other policies that promote development.</p>	<p>In relation to recreation, to avoid increasing recreational pressure on European Sites, potentially resulting in increased disturbance of bird populations, for new residential development within 5-10km of any European Site³⁵ Suitable Alternative Natural Greenspace (SANG) should be provided. The level of SANG to be provided should be determined in consultation with Natural England with reference to Natural England's accessible natural greenspace standards³⁶ and approaches to SANG adopted elsewhere (e.g. Thames Basin Heaths). Provision of SANG may be achieved through securing funding from developers of strategic development sites for the creation of new strategic greenspaces. It could also be achieved by developers providing access to existing greenspace away from the European Sites (e.g. links to the Public Right of Way network), or by developers creating new green space within the development itself, which will be needed anyway as the provision of public open space is a requirement of the draft Local Plan.</p> <p>It is anticipated that the presence of management plans for those European sites impacted by recreational activities should help mitigate the potential adverse effect of increased numbers of recreational visitors associated with the proposed new residential development; if necessary this could involve restricting public access to sensitive areas of the sites or at sensitive times of year. To help manage recreational pressure on SACs, SPAs and Ramsar sites, all new residential developments within 5-10km of a European site³⁵ should provide a financial contribution (appropriate to the scale of development in question and distance from the European site) towards on-going access management in accordance with the adopted management plan. The following policy wording should be included in relation to the quantum of development:</p> <p><i>"Residential development within the district will only be permitted within 5-10km of an SAC, SPA or Ramsar site where Natural England considers an appropriate recreational management plan is in place for that European Site to deal with any recreational pressures as a result of new development. All new residential developments to provide a financial contribution (appropriate to the scale of development in question and distance from the designated sites) towards on-going access management in accordance with the adopted management plan"</i></p>

Policy	HRA Screening Assessment	Recommendations
OS11	<p>This policy relates to incorporating green infrastructure into proposals for new development. If feasible this includes establishing and extending green space networks as havens for wildlife and natural habitats. Existing open space will be protected and improved as part of these networks. New open space created through developments will automatically be protected and subject to Policy OS9.</p> <p>The policy could also have a negative impact by providing increased access to SACs, SPAs or Ramsar Sites if inadequate consideration is given to the impact creating new green infrastructure could have on them. For example, creating links to the Public Right of Way network could increase public access and thus recreational impact, or links via green corridors to important bird habitat could increase the risk of cat predation.</p>	<p>The recommendations in relation to other Local Plan policies set out in this section should be implemented.</p> <p>It is suggested that this policy could potentially be expanded to incorporate the recommendations under SP2 and SP3 in relation to greenspace creation to mitigate for recreational impact.</p> <p>It is recommended that the impact of the strategy on SACs, SPAs or Ramsar Sites be considered prior to strategy adoption. For clarity, the following policy wording should be included in relation to preparing the Green Infrastructure Strategy: <i>“In developing the strategy the Council will not promote any green infrastructure improvements which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects.”</i></p>
OS12	<p>This policy states that land along the River Stour corridor in Canterbury City will be protected from development to enable its future use and contribution towards the riverside corridor. The River Stour within Canterbury is not part of a European Site. However, downstream it is part of Stodmarsh. So encouraging use of the riverside corridor could increase recreational pressure on the SPA.</p>	<p>For clarity, the following policy wording should be included in relation to use of the riverside corridor: <i>“No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects.”</i></p>
OS13	<p>This policy allocates land at Lime Kiln Road for future allotments/community garden site. Increased traffic generation, noise and lighting could indirectly affect SACs and SPAs as set out in Section 3 and the other policy screening assessments in this section. This is because there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan.</p>	<p>For clarity, the following policy wording should be included in relation to permitting the developments covered by this policy: <i>“No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects.”</i></p>
OS14	<p>This policy states that permission will only be granted for development that involves the loss of allotments and community garden land if criteria relating to demand and suitability are met. As a development control policy, that does not in itself promote development, it is not likely to have a significant effect.</p>	<p>N/A</p>

4.10 Landscape and Biodiversity

The Landscape and Biodiversity policies from the draft Local Plan are screened in **Table 4.10**.

Table 4.10 Landscape and Biodiversity Policies Screening Assessment

Policy	HRA Screening Assessment	Recommendations
LB1	This policy protects the Kent Downs Area of Outstanding Natural Beauty in relation to development proposals being granted permission. As a development control policy, that does not in itself promote development and seeks to protect the natural environment, it is not likely to have a significant effect.	N/A
LB2	<p>This policy designates and protects Areas of High Landscape Value in relation to development proposals being granted permission. This Areas of High Landscape Value include:</p> <ul style="list-style-type: none"> • North Kent Marshes • North Downs • Blean Woods • Wantsum Channel • Canterbury (Valley of the River Stour) <p>Development proposals which would cause unacceptable harm to their nature conservation interest will not be permitted. As a development control policy, that does not in itself promote development and seeks to protect the natural environment, it is not likely to have a significant effect.</p>	N/A
LB3	This policy states that development will not be permitted if it detracts from the unspoilt scenic quality or scientific value of the undeveloped coast. As a development control policy, that does not in itself promote development and seeks to protect the natural environment, it is not likely to have a significant effect.	N/A
LB4	This policy states that proposals for development, and associated land use change or land management, must demonstrate they are informed by and sympathetic to the landscape character of the locality. Development will only be permitted if certain criteria can be satisfied, including that development will promote maintenance, enhancement, and restoration of biodiversity as appropriate in accordance with Policy LB9. The development should appropriately address the findings of the Landscape Character and Biodiversity Appraisal condition and sensitivity guidelines of the particular landscape policy zone/zones affected. As a development control policy, that does not in itself promote development and seeks to protect the natural environment, it is not likely to have a significant effect.	N/A
LB5	This policy states that sites of international nature conservation importance must receive the highest levels of protection. Where a likely significant effect of a plan or project on a European Site cannot be excluded, an Appropriate Assessment in line with the Habitats Directive and associated regulations will be required. In the event that the Council is unable to conclude that there will be no adverse effect on the integrity of any European sites, the plan or project will be refused. There is no allowance for developments to be permitted on the basis of the IROPI test.	N/A, this policy helps implement the Habitats Regulations. It provides the mitigation for other policies in the Local Plan that do not specify a location or quantum of development. So long as it is made explicit that development promoted by the other policies in the Local Plan will need to accord with Policy LB5 this will ensure that no plan or project is approved that has an adverse effect on the integrity of a European site. This will address the recommendation associated with many of the draft Local Plan policies to clarify that, <i>"no development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>

Policy	HRA Screening Assessment	Recommendations
LB6	<p>This policy states that permission will not be granted for development that would materially harm the scientific or nature conservation interest, either directly, indirectly or cumulatively, of sites designated for their nature conservation, geological or geomorphological value. Support will be given to their enhancement.</p> <p>Development that affects a SSSI or associated NNR will only be permitted where an appraisal has demonstrated.</p> <p>The objectives of the designated area and overall integrity of the area would not be compromised, or</p> <p>Any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social or economic benefits of national importance and a substitute site of at least equal value can be proposed.</p> <p>As a development control policy, that does not in itself promote development and seeks to protect the natural environment, it is not likely to have a significant effect.</p>	<p>N/A, however, it should be made explicit that this policy only applies to SSSI that are not designated as SAC, SPA or Ramsar sites since for these sites the policy test must be: <i>"no development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i></p>
LB7	<p>This policy states that development or land use change likely to have an adverse effect either directly or indirectly on Local Wildlife Sites, Local Nature Reserves or Regionally Important Geological/Geomorphological Sites will only be permitted if the justification for the proposals clearly outweighs any harm to the intrinsic nature conservation and/or scientific value of the site. Where development is permitted, impacts on valued natural features and wildlife must be mitigated to their fullest practical extent. Where mitigation is not sufficient adequate compensatory habitat enhancement or creation schemes will be required.</p> <p>As a development control policy, that does not in itself promote development and seeks to protect the natural environment, it is not likely to have a significant effect.</p>	<p>N/A, however, it should be made explicit that this policy only applies to Local Wildlife Sites that are not designated as SAC, SPA or Ramsar sites since for these sites the policy test must be: <i>"no development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i></p>
LB8	<p>This policy requires new development to avoid habitat fragmentation, support the creation of coherent ecological networks and retain, protect and enhance notable ecological features of conservation value such as habitats that offer breeding or feeding sites of local importance to populations of protected or targeted species. Strategic opportunities for biodiversity improvement will be actively pursued within the Biodiversity Opportunity Areas. Development which significantly damages opportunities for improving connectivity of habitats in these areas will be refused.</p> <p>As a development control policy, that does not in itself promote development and seeks to protect the natural environment, it is not likely to have a significant effect.</p>	<p>N/A</p>

Policy	HRA Screening Assessment	Recommendations
LB9	<p>This policy states that, where possible, sites supporting priority wildlife habitats not otherwise protected by policies will be protected from development proposals that would result in the loss of or damage to their nature conservation value, particularly where the site forms a link between or buffer to designated wildlife sites.</p> <p>Adequate compensatory habitat enhancement or creation schemes will be required and/or measures taken to ensure that the impacts of the development on valued natural features and wildlife have been mitigated to their fullest practical extent.</p> <p>As a development control policy, that does not in itself promote development and seeks to protect the natural environment, it is not likely to have a significant effect.</p>	N/A
LB10	<p>This policy requires that development proposals on a site known or likely to support protected or Kent BAP species will need to be subjected to an ecological survey with proposals for mitigation presented. It notes that in some cases it may be necessary to find an alternative location for the development. Compensation to offset significant harm may also be needed. For European protected species, permission will only be granted where the three tests set out in the Habitats Regulations are satisfied.</p> <p>As a development control policy, that does not in itself promote development and seeks to protect the natural environment, it is not likely to have a significant effect.</p>	N/A, this policy helps implement the Habitats Regulations
LB11	<p>This policy states that all development should avoid the net loss of biodiversity and actively pursue opportunities to achieve a net gain. Site evaluation will be undertaken to establish the nature conservation value of a site and land for nature conservation will be identified, safeguarded and managed as part of the development. Development that may harm (either directly or indirectly) habitats or species of principal importance for the purpose of conserving biodiversity will only be permitted if there are not reasonable alternatives and there are demonstrable social or economic benefits that clearly outweigh the need to safeguard the site or species, and adequate compensation and mitigation.</p> <p>As a development control policy, that does not in itself promote development and seeks to protect the natural environment, it is not likely to have a significant effect.</p>	N/A
LB12	<p>This policy states that the value and character of woodland and the hedgerow network should be maintained and enhanced particularly where this would improve the biodiversity or link existing woodland habitats.</p> <p>As a development control policy, that does not in itself promote development and seeks to protect the natural environment, it is not likely to have a significant effect.</p>	N/A

Policy	HRA Screening Assessment	Recommendations
LB13	<p>This policy states that development should be designed to retain trees, hedgerows and woodland that make an important contribution to the amenity of the site and surrounding area which are important to wild flora and fauna. The Council will refuse permission for proposals that would threaten the future retention of trees, hedgerows, woodland or other landscape features of importance to the site's character, an area's amenity or the movement of wildlife. New development should incorporate tree planting where appropriate.</p> <p>As a development control policy, that does not in itself promote development and seeks to protect the natural environment, it is not likely to have a significant effect.</p>	N/A
LB14	<p>This policy states that the Council will support projects that restore, enhance and connect the valued woodland habitat complex of Blean. The Council will give particularly support to projects that benefit the landscape through sensitive and traditional woodland practices and which support the timber market and local economy.</p> <p>Although this policy is intended to project biodiversity given the SAC designation it should be strengthened to ensure that the conservation objectives of the site are given taken into account.</p>	For clarity, the following policy wording should be included in relation to permitting development at Blean: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
LB15	<p>This policy states the Seasalter marshes, designated of national and international conservation importance within the Swale SSSI, are the largest area in unfavourable ecological condition in the North Kent Marshes. The Council will strongly support projects to restore, enhance and extend the ecological value of this area.</p> <p>Although this policy is intended to project biodiversity given the SPA designation it should be strengthened to ensure that the conservation objectives of the site are given taken into account.</p>	For clarity, the following policy wording should be included in relation to permitting development at Seasalter Marshes: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
LB16	<p>This policy states that the environment within river corridors and river catchments, including the water environment and wildlife habitats, will be conserved and enhanced. Supply of water, treatment and disposal of wastewater and flood risk management should be sustainable and deliver environmental benefits.</p> <p>As a development control policy, that does not in itself promote development and seeks to protect the natural environment, it is not likely to have a significant effect.</p>	N/A

4.11 Climate Change, Flooding and Coastal Change

The Climate Change policies from the draft Local Plan are screened in **Table 4.11**.

Table 4.11 Climate Change Policies Screening Assessment

Policy	HRA Screening Assessment	Recommendations
CC1	This policy states that proposals for the utilisation, distribution and development of renewable and low-carbon sources of energy, including freestanding installations, will be encouraged. This could potentially include wind turbines that could adversely impact on SPA bird populations due to collision risk etc. In considering such proposals, the Council will give significant weight to environmental, community and economic benefits, alongside consideration of impacts on biodiversity. Indirectly this gives protection to SACs and SPAs, but the policy wording could be strengthened.	The following policy wording should be included in relation to permitting renewable energy development: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
CC2	This policy requires development to include measures to reduce carbon dioxide emissions from energy use. It includes within a hierarchy of measures to reduce emissions the incorporation of renewable energy. Development will be expected to provide sufficient renewable energy generation to reduce carbon dioxide emissions from residual energy use in the buildings by at least 20%. Where it is not feasible or viable to achieve this on-site the Council will accept contributions towards investment in carbon reduction elsewhere in the district. An SPD on Sustainable Construction and Renewable Energy will provide further guidance. Since one of the measures to reduce emissions is stated to be the incorporation of renewable energy development, indirectly this policy could promote the development of wind turbines that could adversely impact on SPA bird populations due to collision risk etc.	The following policy wording should be included in relation to permitting renewable energy development: <i>"No renewable energy development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
CC3	Within the Strategic Development Areas and within other development over 200 units, this policy states that a site wide renewable or gas-fired Combined Heat and Power (CHP) Plant or a connection to an existing distribution network will need to be provided. An exception will only be made where it is demonstrated that the provision will not be viable or feasible or an alternative carbon reduction strategy would be more appropriate. This could potentially result in emissions to air that could adversely impact on SAC, SPA or Ramsar sites.	The following policy wording should be included in relation to permitting renewable energy development: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
CC4	This policy requires that all development within the area at risk of flooding or increased surface water runoff shall be subject to Flood Risk Assessment or Drainage Impact Assessment. This will be in accordance with Council guidance including the requirement for a contribution towards new flood defence or mitigation. New flood defences could adverse impacts on SACs or SPAs by changing the flow regime or resulting in coastal squeeze.	The following policy wording should be included in relation to permitting development that requires flood defences or a contribution to them: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i> No flood defences should be permitted that are contrary to the Catchment Flood Management Plan or Shoreline Management Plan which will have been subject to HRA.
CC5	This policy states that on sites that have not previously been developed in Flood Zones 2 and 3, no development will be permitted unless exceptional justification can be demonstrated. As a development control policy, that does not in itself promote development and seeks to protect the water environment, it is not likely to have a significant effect.	N/A

Policy	HRA Screening Assessment	Recommendations
CC6	This policy states that minor infill and development on previously developed land in Flood Zones 2 and 3 will be permitted subject to the provisions of other local plan policies. Each case shall be treated on its own merits. As a development control policy, that does not in itself promote development and seeks to protect the water environment, it is not likely to have a significant effect.	N/A
CC7	This policy states that, in overtopping hazard zones, no development will be permitted unless exceptional justification can be demonstrated. As a development control policy, that does not in itself promote development and seeks to protect the coastal environment, it is not likely to have a significant effect.	N/A
CC8	This policy states that replacement dwellings outside the urban boundary at Faversham Road, Seasalter will not be permitted. Extensions will only be permitted where this is exceptional justification. As a development control policy, that does not in itself promote development and seeks to protect the coastal environment, it is not likely to have a significant effect.	N/A
CC9	<p>This policy states that the Council will work with partners including Natural England to investigate and define a Coastal Change Management Area at Reculver, to include the likely extent of coastal retreat. The policy states that any development or management proposals in this area must be developed with reference to possible coastal change, flood risk, the impact on future wetland habitat enhancements and public safety but management proposals could directly or indirectly affects SACs and SPAs as set out in Section 3.</p> <p>The existing Coldharbour lagoon near Reculver is protected by a shingle bank which requires regular replenishment. The Environment Agency is currently examining the feasibility of creating new saline lagoons in the West Wansum area to enable shingle replenishment of the bank to cease so that the existing Coldharbour lagoon is inundated by the sea. If the project is brought forward, permission for the new saline lagoons will only be granted where the tests set out in the Habitats Regulations are satisfied. The saline lagoons project has the potential to impact on European coastal sites unless carefully managed.</p>	The following policy wording should be included: <i>“Proposals for managed realignment will be supported, provided that, during construction or operation, they will not result in any impact on the integrity of a European Site either alone or acting in combination. In developing an appropriate scheme, particular consideration will need to be given to the effects of managed realignment on coastal processes and the risk of a pollution incident affecting the marine environment.”</i>
CC10	This policy states that planning permission for new development in the Coastal Protection Zone will be refused. As a development control policy, that does not in itself promote development and seeks to protect the coastal environment, it is not likely to have a significant effect.	N/A

Policy	HRA Screening Assessment	Recommendations
CC11	<p>This policy states that new developments should utilise SuDS unless there are practical reasons for not doing so. All developments should aim to achieve greenfield runoff rates and ensure that surface water runoff is managed as close to its source as possible using the following hierarchy:</p> <ul style="list-style-type: none"> Discharge to ground Discharge to surface water body Discharge to surface water sewer Discharge to combined sewer <p>SuDS should ensure that there is adequate treatment of surface water flows, such that there is no diminution in quality of any receiving watercourse and provide or enhance wetland habitat biodiversity where possible.</p> <p>Generally this should have a positive effect on the natural environment. However, inappropriately designed SuDs could have an indirect effect on water dependent SACs or SPAs by virtue of altering flow regimes or increasing diffuse pollution.</p>	<p>For clarity, the following policy wording should be included in relation to permitting SuDS or other drainage measures: <i>“No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects.”</i></p> <p>In relation to water quality, in implementing projects the Council will need to ensure that sustainable drainage measures are incorporated to ensure there is no increase in surface water run-off (accounting for climate change) and there is no increase in diffuse pollution from the built-up area or highways entering the river system. The following policy wording should be included in relation these issues:</p> <p><i>“Development will only be permitted where a Flood Risk and Drainage Impact Assessment have demonstrated that there will be no increase in surface water run-off.”</i></p> <p><i>“Development will only be permitted where adequate pollution prevention measures have been incorporated into the design to ensure there will be no increase in diffuse pollution entering the river system upstream of any European Site.”</i></p>
CC12	<p>This policy states that the Council will require new development to incorporate well designed mitigation measures to ensure that there is no adverse effect on water quality during construction and for the lifetime of development. Furthermore, the Council will seek to ensure that every opportunity is taken to enhance existing aquatic environments and ecosystems. This policy will have a positive effect on biodiversity protection.</p>	<p>N/A</p>

Policy	HRA Screening Assessment	Recommendations
<p>CC13</p>	<p>This policy states that the Council will ensure that development is phased using appropriate timescales for construction of any necessary major water and/or wastewater infrastructure associated with development proposals e.g. new sewage treatment works or reservoirs. The Council will consult in detail with the water companies and Environment Agency to ensure the need for new water services is understood and planned for.</p> <p>Review of the South East River Basin Management Plan identifies that no measures are currently required in relation to water dependant SACs, SPAs or Ramsar Sites. However, the quantum of development proposed elsewhere in the Local Plan could place increased pressure on water resources and existing sewage treatment capacity resulting in indirect effects on SACs, SPAs or Ramsar Sites. There is already great demand for abstraction of the high quality water from the chalk aquifer that feeds the river system. South East Water and Southern Water are currently preparing a draft Water Resources Management Plan to deliver water supply requirements for the next 25 years from 2015-2040. The only new scheme envisaged to support this is the Broad Oak Reservoir on the River Stour. Effluent discharges enter the River Stour from Canterbury, Maystreet, Westbere, Minster, Weatherlees, and Pfizers sewage treatment works; other sewage treatment works outfalls are located on the open coast.</p> <p>In due course, the draft Water Resources Management Plan as well as any new abstraction licences associated with it will be subject to HRA. Any new abstraction also needs to be in accordance with the River Stour Catchment Abstraction Management Strategy, which itself has been subject to HRA. If there is a requirement to alter discharge consents at sewage treatment works to accommodate new development these too will be subject to HRA. This will ensure any water supply and treatment measures required to deliver the water supply and treatment capacity associated with the quantum of development will not result in an adverse effect on the integrity of the SAC, SPA or Ramsar site.</p> <p>However, it is not clear from the policy whether the Council would permit development to take place if insufficient water supply and sewage treatment capacity exists. If this is not the case, development could have an adverse effect on the integrity of water dependant SAC, SPA or Ramsar sites, alone or in combination with development in adjacent districts.</p>	<p>The Council should continue to liaise with the water companies and Environment Agency to ensure that there is capacity in the water supply and sewage treatment network to deliver the required quantum of development without an adverse effect on the integrity of any SACs, SPAs or Ramsar sites. To strengthen this policy and mitigate for the quantum of development set out in Policy SP2 the following policy wording should be included:</p> <p><i>“Development will only be permitted where sufficient water supply and sewage treatment capacity exists such that there will be no adverse effect on the integrity of any SAC, SPA or Ramsar site, alone, or in combination, with other plans or projects. Prior to planning permission being granted the water companies will be consulted to confirm that sufficient water supply and sewage treatment capacity exists in the network. If capacity does not exist then development will not be permitted until such time that measures to ensure compliance have been implemented by the water companies.”</i></p>

4.12 **The Historic Environment**

The Historic Environment policies from the draft Local Plan are screened in **Table 4.12**.

Table 4.12 Historic Environment Policies Screening Assessment

Policy	HRA Screening Assessment	Recommendations
HE1	This policy states that the Council will support proposals that protect, conserve and, where appropriate, enhance the historic environment. Proposals that make sensitive use of historic assets through regeneration will be encouraged. Other than in exceptional circumstances development will not be permitted where it is likely to cause harm to the significance of heritage assets or their setting. Heritage related projects could directly or indirectly impact on SACs and SPAs as set out in Section 3 and the other policy screening assessments in this section, as there is no mention of projects being refused if they are not in accordance with other environmental policies in the Local Plan.	For clarity, the following policy wording should be included in relation to permitting heritage related projects: <i>"No development will be permitted which may have an adverse effect on the integrity of any SAC, SPA or Ramsar site alone, or in combination, with other plans or projects."</i>
HE2	This policy states that the Council will protect and enhance the outstanding universal value of the Canterbury World Heritage Site. Development within the buffer zone and setting should not have an adverse impact on those values including views to and from the site. As a development control policy, that does not in itself promote development and seeks to protect the historic environment, it is not likely to have a significant effect.	N/A
HE3	This policy states that the Council will seek to protect significant views of the city from both within and from outside the city. Through careful siting and design of buildings and appropriate landscaping developers should demonstrate how their proposals will respect or enhance the landscape and topographical features which contribute to the outstanding universal value of the Canterbury World Heritage Site. As a development control policy, that does not in itself promote development and seeks to protect the historic environment, it is not likely to have a significant effect.	N/A
HE4	This policy relates to alterations, extensions and reuse of listed buildings and developments which affect the setting of listed buildings including locally listed buildings. Development that would have an adverse impact on their special historic or architectural interest, or their setting, will not be permitted. As a development control policy, that does not in itself promote development and seeks to protect the historic environment, it is not likely to have a significant effect.	N/A
HE5	This policy relates to proposals for external and internal alterations to listed buildings and external alterations to locally listed buildings. As a development control policy, that does not in itself promote development and seeks to protect the historic environment, it is not likely to have a significant effect.	N/A
HE6	This policy relates to development within Conservation Areas which should preserve or enhance the special architectural or historic character or appearance. Development in and adjoining a Conservation Area that would harm its character or appearance will not be permitted. Particular consideration will be given to the need to protect trees and landscape. As a development control policy, that does not in itself promote development and seeks to protect the historic environment, it is not likely to have a significant effect.	N/A

Policy	HRA Screening Assessment	Recommendations
HE7	This policy states that in carrying its highway work or traffic schemes the Council will seek to encourage protection of the historic environment without prejudicing road safety. As a development control policy, that does not in itself promote development and seeks to protect the historic environment, it is not likely to have a significant effect.	N/A
HE8	The policy states the Council has a presumption in favour of the conservation of heritage assets. Proposals involving substantial harm to heritage assets within a conservation area will normally be refused unless it can be shown that the harm or loss is necessary to achieve substantial public benefits. As a development control policy, that does not in itself promote development and seeks to protect the historic environment, it is not likely to have a significant effect.	N/A
HE9	This policy relates to advertisements in Conservation Areas affecting listed buildings. As a development control policy, that does not in itself promote development and seeks to protect the historic environment, it is not likely to have a significant effect.	N/A
HE10	This policy relates to shop fronts that are of architectural or historic interest being retained. New and altered shop fronts will be expected to achieve a high standard of design. As a development control policy, that does not in itself promote development and seeks to protect the historic environment, it is not likely to have a significant effect.	N/A
HE11	This policy relates to the protection and enhancement of designated heritage assets. Development that would adversely affect these assets will not be permitted. As a development control policy, that does not in itself promote development and seeks to protect the historic environment, it is not likely to have a significant effect.	N/A
HE12	This policy relates to the Canterbury Area of Archaeological Importance and areas of recognised archaeological potential elsewhere in the district. The Council will not determine applications involving works below ground level unless an evaluation of archaeological importance and an assessment of the archaeological implications has been undertaken. As a development control policy, that does not in itself promote development and seeks to protect the historic environment, it is not likely to have a significant effect.	N/A
HE13	This policy relates to the historic landscape, including ancient woodlands, being preserved and enhanced. Within historic landscapes the conservation of their landscape and architectural elements will be encouraged. As a development control policy, that does not in itself promote development and seeks to protect the historic environment, it is not likely to have a significant effect.	N/A

5. In-combination Effects

Natural England guidance (2009) states that to be relevant to the in-combination assessment, the residual effects of other plans or projects will need to either make the unlikely effects of the development likely or the insignificant adverse effects of the development significant. For example, a discharge from one sewage treatment works may not result in a significant effect but the incremental effect of many sewage treatment work discharges into the same river might.

The following is a list of plans and projects related to development control that could result in in-combination effects:

- Dover Core Strategy
- Thanet Core Strategy
- Swale Core Strategy
- Ashford Core Strategy
- Kent and Medway Structure Plan
- Reculver Masterplan

The main in-combination effect of these plans is that growth in the adjacent districts will place additional demands on existing infrastructure and increase recreational pressure on the sites taken forward to the screening assessment. These potential in-combination effects have been taken into account when undertaking the policy screening assessment set out in Section 4.

The following is a list of plans and projects related to infrastructure provision and environmental protection that could result in in-combination effects:

- Kent Local Transport Plan 3
- River Stour Catchment Abstraction Management Plan
- South East Water Resources Management Plan (draft, not yet available)
- River Stour Catchment Flood Risk Management Plan
- North East Kent European Marine Site Management Plan
- Swale and Medway European Marine Site Management Plan

- Medway Estuary and Swale Shoreline Management Plan
- Isle of Grain to South Foreland Shoreline Management Plan

The main in-combination effect of these plans is that they help to deliver the additional infrastructure needed to support growth in the district whilst ensuring that adverse effects on the integrity of European Sites are avoided. These potential in-combination effects have been taken into account when undertaking the policy screening assessment set out in Section 4.

6. Conclusions and Recommendations

Based on the current policy wording, the draft Local Plan is likely to result in significant effects on European Sites and so an Appropriate Assessment will be required. However, Section 4 of this report sets out the opportunities that have been identified to modify the individual policies so that likely significant effects on European Sites can be avoided. If reading the Local Plan as a whole, it will not be necessary to modify every individual policy with the same policy text. Instead, any suggested policy text that is common to more than one policy can be incorporated into the upfront Vision and Planning Strategy section.

Based on the conclusions of the individual policy assessment, the following recommendations should be adopted.

- 1) The following wording should be included, either in the form of a new policy or added to existing draft policies SP1 and SP3:-

“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, as it would not be in accordance with the aims and objectives of this Local Plan.”

- 2) It is suggested that additional Sustainable Development policy text be added, to enable the Local Plan to incorporate further details on how CCC will avoid the likelihood of significant effects on European Sites arising as a result of the quantum and location of development, alone or in combination. This additional policy text should reflect the recommendations set out for the draft SP policies and draft policies HD1, EMP11, TCL10, TV6, T8-9, T12-16, QL11-12, OS10-11, CC11 and CC13 in relation to water supply, sewage treatment capacity, water quality, air quality, recreational management, strategic alternative natural greenspace provision, noise, light and visual impact.
- 3) Given that policies TV6, LB14, LB15 and CC9 relate directly to development within SACs, SPAs or Ramsar Sites, it will be crucial to ensure that such development will not have an adverse effect on the sites' integrity. To this end, the wording set out in first recommendation should specifically be included in these draft policies along with the additional policy text recommended in Section 4 in relation to TV6 and CC9.
- 4) It is suggested that draft policies LB5-LB7 relating to designated nature conservation sites are clarified as set out in Section 4 to ensure there is no confusion as to the level of protection to be afforded to SAC, SPA or Ramsar sites from new development.

If all these recommendations are adopted it may be possible for CCC, when it screens the final version of the draft Local Plan, to conclude that an Appropriate Assessment is not required.