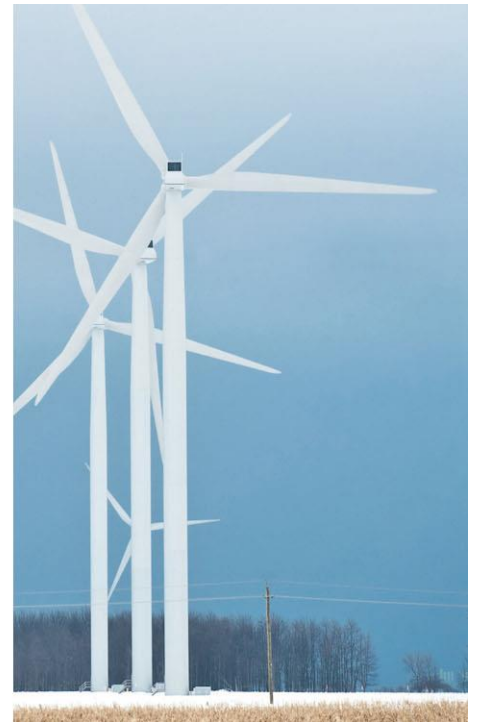


Canterbury City Council

Habitats Regulations Assessment (submission stage of the draft local plan)

Report to Inform Screening for Appropriate Assessment



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Canterbury City Council

Habitats Regulations Assessment (submission stage of the draft local plan)

Report to Inform Screening for
Appropriate Assessment

AMEC Environment & Infrastructure
UK Limited

November 2014

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 to Inform Screening for Appropriate Assessment, which will inform CCC in determining whether the draft Local Plan is likely to result in significant effects on any European Sites¹ and hence whether an Appropriate Assessment is required.

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

- **Blean Complex SAC;**
- **Dover to Kingsdown Cliffs SAC;**
- **Folkestone to Etchinghill Escarpment SAC;**
- **Lydden and Temple Ewell Downs SAC;**
- **Margate and Long Sands SAC;**
- **Parkgate Down SAC;**
- **Sandwich Bay SAC;**
- **Stodmarsh SAC;**
- **Tankerton Slopes and Swalecliffe cSAC;**
- **Thanet Coast SAC;**
- **Medway Estuary and Marshes SPA (also a Ramsar Site);**
- **Outer Thames Estuary SPA;**

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.

- **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;**
- **Wye and Crundale Downs SAC.**

European Sites could be affected by the following environmental changes related to new development proposed through the draft Local Plan. These changes could occur during the construction and/or operation of new developments (and where relevant their decommissioning).

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.

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.

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

Based on the current policy wording, the Local Plan is not likely to result in significant effects on European Sites. In respect of compliance of the Plan with the requirements of the Habitats Directive, no further amendments are deemed necessary. Should further iterations of the Plan result in changes to the current and screened policy wording, a further screening assessment of these changes should be undertaken and where necessary, mitigation measures and amendments may be required.

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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*⁴) 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 Convention⁵) 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)⁶ 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 address the regulatory requirements on CCC relating to the first stage of what is generally referred to as the Habitats 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). The purpose of the first ‘screening’ stage of the HRA process is to determine whether the plan is likely to have significant effects on European Sites.

⁴ Revised and updated as *EU Directive (2009/147/EC) on the Conservation of Wild Birds*

⁵ The Convention on Wetlands of International Importance especially as Waterfowl Habitat held in Ramsar, Iran in 1971 and ratified by the UK in 1976

⁶ Though beneficial effects may arise from the draft Local Plan, only adverse effects are considered to be of consequence in undertaking Habitats Regulations Assessment.

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 Study⁷ for the district. Subsequently, CCC undertook a Development Requirements Study,⁸ Strategic Housing Market Assessment (SHMA),⁹ Strategic Housing Land Availability Assessment (SHLAA),¹⁰ Employment Land Review,¹¹ Retail Needs Assessment Study,¹² Strategic Flood Risk Assessment¹³ and transport 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 Study¹⁴ and the sites contained in the SHLAA. HRA has also been undertaken for the development scenarios;¹⁵ 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.

⁷ Experian (2006) At a Crossroads: Canterbury Futures Study / Experian (2011) Review of Canterbury Futures Study: At a Cross Roads

⁸ Nathaniel Lichfield & Partners (2012) Canterbury Development Requirements Study

⁹ ECOTEC (2009) SHMA for the East Kent Sub Region

¹⁰ http://www.cartogold.co.uk/Canterbury/text/shlaa_sites.htm

¹¹ Savills (2008) Research Report in respect of an assessment of Employment Land in Canterbury District

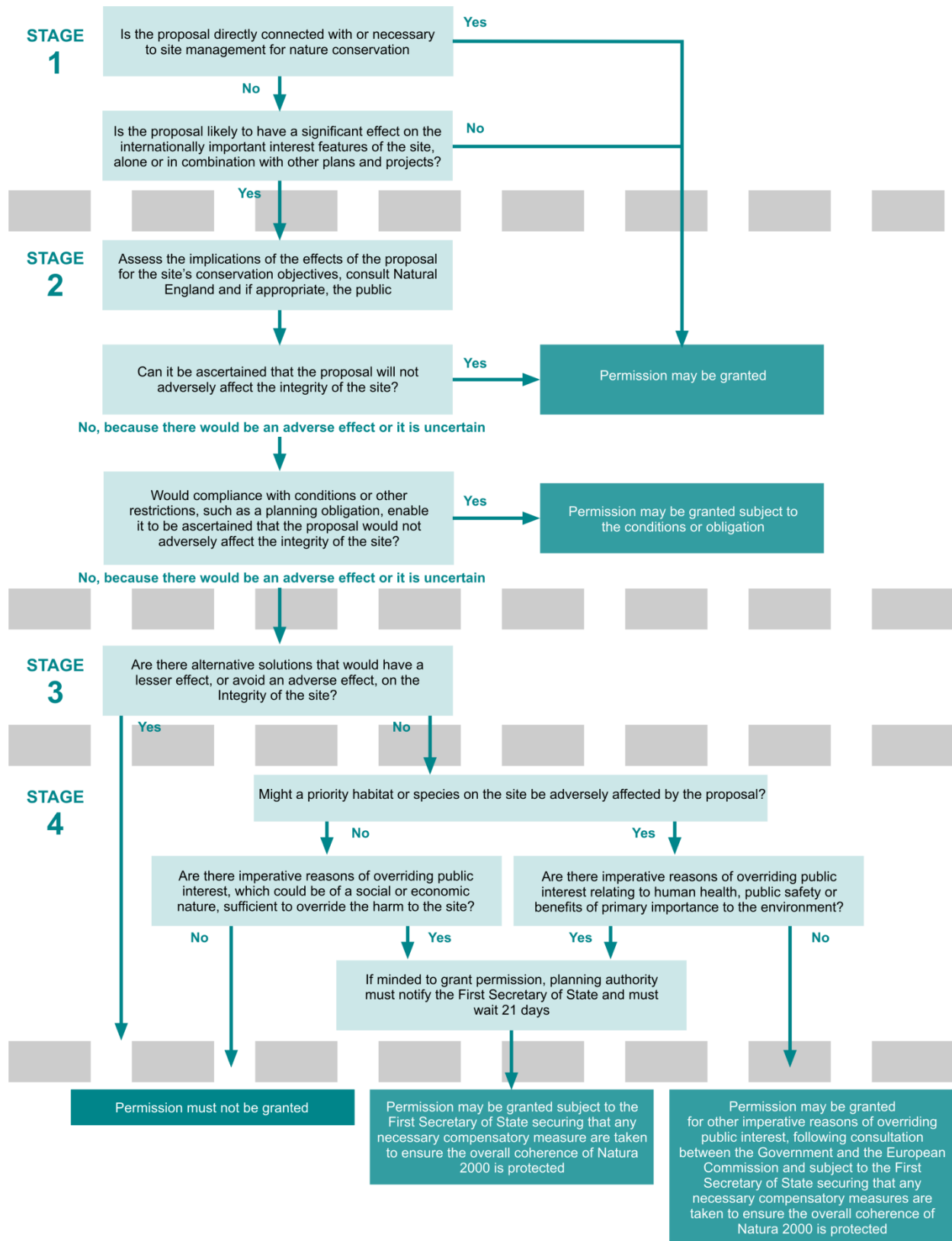
¹² Kent County Council (2009) Retail Need Assessment Study for the District of Canterbury

¹³ <http://www.canterbury.gov.uk/assets/localplan/SFRA%20Non%20Tech%20Summary.pdf>

¹⁴ AMEC Environment & Infrastructure (2012) Sustainability Appraisal of Development Scenarios

¹⁵ Entec (2010) Habitats Regulations Assessment

Figure 1.1 Habitats Regulations Assessment Process



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;
- Transport infrastructure - 17 draft policies;
- Tourism and visitor economy - 8 draft policies;
- Climate change, flooding and coastal change - 13 draft policies
- Design and the built environment - 13 draft policies;
- Historic environment - 13 draft policies
- Landscape and biodiversity - 13 draft policies;
- Open space - 15 draft policies;
- Quality of life and access to facilities - 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 during Stage 1, Screening of the HRA process.
- **Section 3 Potentially Affected European Sites:** This section provides details of the European Sites that could 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:** Taking into account the provision of mitigation, this section provides an assessment of whether the policies contained within the draft Local Plan are likely to have significant effects upon the European Sites identified.
- **Section 5 In-Combination Effects:** This section assesses the likelihood of significant effects resulting from implementation of CCC's draft Local Plan in-combination with others plan or projects.
- **Section 6 Conclusions:** This section provides our conclusions as to whether an Appropriate Assessment is required for the draft Local Plan (on the basis that the revised policy wording that is set out in Section 4 is incorporated into the final version).



2. Methodology

2.1 European Site Identification

The first step in the screening process is 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.¹⁶ 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.

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

¹⁶ <http://www.naturalengland.org.uk/ourwork/conservation/designations/sac/londonandsoutheast.aspx>

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 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 policies 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 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,¹⁷ 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.

¹⁷ 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

3.1.1 Designations

The sites and interest features considered during the screening of the draft Local Plan are summarised in **Table 3.1**, and detailed in **Appendices A** and **B**.

Table 3.1 European Sites and Interest Features within 15km of Canterbury District (including those within the district) (see also Appendix A)

Site	Summary of Interest Features [†]	Approx. distance from CCC boundary
Blean Complex SAC	Annex I features: Oak-hornbeam forests*	Within CCC boundary
Dover to Kingsdown Cliffs SAC	Annex I features: Calcareous dry grassland and scrub; Vegetated sea cliffs*	11.0km
Folkestone to Etchinghill Escarpment SAC	Annex I features: Calcareous dry grassland and scrub*	7.3km
Lydden and Temple Ewell Downs SAC	Annex I features: Calcareous dry grassland and scrub*	3.2km
Margate and Long Sands SAC	Annex I features: Sub-tidal sandbanks*	1.1km
Parkgate Down SAC	Annex I features: Calcareous dry grassland and scrub*	1.5km
Sandwich Bay SAC	Annex I features: Dunes with creeping willow*; White dunes*; Grey dunes*; Embryonic shifting dunes*; Humid dune slacks	7.3km
Stodmarsh SAC	Annex II features: Desmoulin's whorl snail*	Within CCC boundary
Tankerton Slopes and Swalecliffe cSAC	Annex II features: Fisher's estuarine moth*	Within CCC boundary
Thanet Coast SAC	Annex I features: Sea caves*; Reefs*	Within CCC boundary
Wye and Crundale Downs SAC	Annex I features: Calcareous dry grassland and scrub*	<1km
Outer Thames Estuary SPA	Article 4.1 qualification: Red-throated diver (W)	On CCC boundary

Table 3.1 (Continued) European Sites and Interest Features within 15km of Canterbury District (including those within the district) (see also Appendix A)

Site	Summary of Interest Features [†]	Approx. distance from CCC boundary
Medway Estuary and Marshes SPA	Article 4.1 qualification: Avocet (B,W); Common tern (B-); Little tern (B); Bewick's swan (W-). Article 4.2 qualification: Black-tailed godwit (W); Curlew (W-); Dark-bellied brent goose (W); Dunlin (ssp. alpina) (W); Great crested grebe (W-); Greenshank (W-); Grey plover (W); Knot (W-); Oystercatcher (W-); Pintail (W); Redshank (W); Ringed plover (P+, W); Shelduck (W); Shoveler (W-); Teal (W-); Turnstone (W-); Wigeon (W-); Breeding bird assemblage (B-); Waterfowl assemblage (W)	12.8km
Stodmarsh SPA	Article 4.1 qualification: Bittern (W); Hen harrier (W) Article 4.2 qualification: Gadwall (B-,W-); Shoveler (W-); Breeding bird assemblage (B-)	Within CCC boundary
Thanet Coast and Sandwich Bay SPA	Article 4.1 qualification: Golden plover (W-); Little tern (B-) Article 4.2 qualification: Turnstone (W)	Within CCC boundary
The Swale SPA	Article 4.1 qualification: Avocet (B+,W+); Marsh harrier (B+); Mediterranean gull (B+); Bar-tailed godwit (W+); Golden plover (W+); Hen harrier (W+) Article 4.2 qualification: Dark-bellied brent goose (W-); Ringed Plover (P+); Black-tailed godwit (W+); Dunlin (ssp. alpina) (W-); Knot (W+); Pintail (W+); Shoveler (W+); Waterfowl assemblage (W); Breeding bird assemblage (B-)	Within CCC boundary
Medway Estuary and Marshes Ramsar	Criterion 2 - Endangered etc species / communities (nationally scarce plants; 12 RDB wetland invertebrates) Criterion 5 - 20,000 or more waterbirds (47637 waterfowl in winter) Criterion 6 - 1% of a waterbird population (Dark-bellied brent goose; Dunlin (ssp. alpina); Grey plover; Knot; Pintail; Redshank; Ringed plover; Shelduck)	12.8km
Stodmarsh Ramsar	Criterion 2 - Endangered etc species / communities (6 RDB invertebrates; 2 nationally rare plants; 5 nationally scarce species; a diverse assemblage of rare wetland birds inc. gadwall, bittern, hen harrier, shoveler)	Within CCC boundary
Thanet Coast and Sandwich Bay Ramsar	Criterion 2 - Endangered etc species / communities (15 RDB invertebrates) Criterion 6 - 1% of a waterbird population (Turnstone)	Within CCC boundary
The Swale Ramsar	Criterion 2 - Endangered etc species / communities (nationally scarce plants; seven RDB invertebrates) Criterion 5 - 20,000 or more waterbirds (77501 waterfowl in winter) Criterion 6 - 1% of a waterbird population (Redshank, Dark-bellied brent goose, Grey Plover)	Within CCC boundary

Key

- † Interest features are abbreviated; see also Appendix A (Table A4)
- * Interest features (habitats or species) that are a primary reason for designation; all other habitats and species are qualifying features
- W Wintering species
- P Passage migrants
- B Breeding species
- Species included on original SPA citation but proposed for removal following the SPA Review
- + Species not included on the original SPA citation but added following the SPA Review
- Annex I / II Habitats or species listed on Annex I or II (respectively) of *Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora* (the 'Habitats Directive')
- Article 4.1 / 4.2 Bird species qualifying under Article 4.1 or 4.2 of *Directive 2009/147/EC on the Conservation of Wild Birds* (the 'new Wild Birds Directive')
- Criterion 2, 5, 6 Ramsar criteria; there are nine criteria used as a basis for selecting Ramsar sites; see Appendix A

It should be noted that some of the European sites in **Table 3.1** are also European Marine Sites (EMS). An EMS is simply any statutory European site¹⁸ or part thereof that is marine (i.e. below mean high water). The designation is largely for ‘procedural’ reasons: they are not designated for any reasons additional to those that underpin their classification or designation as an SPA or SAC. Some SACs and SPAs are grouped together for management purposes. The EMSs within the study area are:

- The Swale and Medway EMS (comprising the marine components of The Swale SPA and the Medway Estuary and Marshes SPA);
- North East Kent (Thanet) Coast EMS (comprising the marine components of the Thanet Coast SAC, Sandwich Bay SAC and Thanet Coast and Sandwich Bay SPA);
- Margate and Long Sands cSAC (all marine);
- Outer Thames Estuary SPA (all marine).

The EMSs are not explicitly considered as separate sites within this HRA.

3.1.2 Condition and Sensitivities

Table 3.2 summarises the condition of the sites (where known, based on the condition assessment data for the component SSSIs) and the sensitivities of the interest features including any know condition assessment data. The table also includes a very brief summary of the potential mechanisms by which the plan may affect the sites; this is expanded further in **Table 3.3**.

¹⁸ i.e. excluding Ramsar sites.

Table 3.2 Condition of European sites within 15km of Canterbury District (including those within the district) (see also Appendix A)

Site and interest features	Site condition status*	(%)**	Summary of current threats and potential vulnerabilities to outcomes of Canterbury Local Plan
Blean Complex SAC Oak-hornbeam forests	Favourable	100.5	This woodland SAC is almost entirely in favourable condition; coppice management is the key issue in the SSSI site unit that is unfavourable. The site is an NNR and managed in partnership by NE, RSPB and the Woodland Trust which helps ensure its favourable status. The site is within the CCC boundary and direct impacts on this site as a result of the plan are possible; it could be vulnerable to changes in air quality or visitor pressure that may be associated with the overall quantum of development.
	Unfavourable recovering	0.2	
	Unfavourable	0.0	
	Unfavourable declining	0.0	
	Uncertain	0.0	
Dover to Kingsdown Cliffs SAC Calcareous dry grassland and scrub Vegetated sea cliffs	Favourable	56.5	The SAC citation states that 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." Most of the site SSSI units are in favourable condition; those in unfavourable condition are primarily affected by poor or limited management of encroaching scrub and grazing of the calcareous grassland; as a result, the main issues affecting this site are coastal squeeze and management, which will not, at this site, be influenced by the plan. The site is 11km from the CCC boundary and direct impacts on this site as a result of the plan are likely to be limited. The interest features of the site are theoretically vulnerable to visitor pressure and air quality changes also that may be associated with the overall quantum of development although neither of these are likely to change substantially as a result of the plan (the HRA of the Dover District Local Development Framework concluded that this plan would not affect the site).
	Unfavourable recovering	36.4	
	Unfavourable	7.2	
	Unfavourable declining	0.0	
	Uncertain	0.0	
Folkestone to Etchinghill Escarpment SAC Calcareous dry grassland and scrub	Favourable	57.9	This is a section of calcareous escarpment approximately 7.3km south of the CCC area, which is classified as a priority sub-type of the Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) interest feature (important orchid site). The only issue identified in all the units that are unfavourable is management, particularly undergrazing and consequent scrub encroachment. The interest features of the site are theoretically vulnerable to visitor pressure and air quality changes also, although neither of these are likely to change substantially as a result of the CCC plan.
	Unfavourable recovering	36.0	
	Unfavourable	2.8	
	Unfavourable declining	3.8	
	Uncertain	0.0	
Lydden and Temple Ewell Downs SAC Calcareous dry grassland and scrub	Favourable	86.0	This is a section of calcareous escarpment approximately 3km south-east of the CCC area, which is also classified as a priority sub-type of the Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) interest feature (important orchid site). The only issue identified in all the units that are unfavourable is management, particularly management of grazing pressure, particularly from rabbits, and consequent scrub encroachment. The interest features of the site are theoretically vulnerable to visitor pressure and air quality changes also, although neither of these are likely to change substantially as a result of the CCC plan.
	Unfavourable recovering	14.0	
	Unfavourable	0.0	
	Unfavourable declining	0.0	
	Uncertain	0.0	

Table 3.2 (Continued) Condition of European sites within 15km of Canterbury District (including those within the district) (see also Appendix A)

Site and interest features	Site condition status*	(%)**	Summary of current threats and potential vulnerabilities to outcomes of Canterbury Local Plan
Margate and Long Sands SAC Sub-tidal sandbanks	Favourable	0.0	There is limited information on the current condition of this recently designated offshore SAC. The Regulation 35 advice states that “ <i>the interest features and associated biological communities of the Margate and Long Sands cSAC are sensitive to physical loss, physical damage, toxic and non-toxic contamination, and biological disturbance</i> ”. However, it should be noted that the site is at least 1km offshore from the CCC boundary and the Plan will not generally exert any influence over the most damaging activities (i.e. offshore activities such as dredging): the Regulation 35 advice notes that the exposure of the interest features to aspects associated with land-based activities (e.g. toxic and non-toxic contamination) is low.
	Unfavourable recovering	0.0	
	Unfavourable	0.0	
	Unfavourable declining	0.0	
	Uncertain	100	
Parkgate Down SAC Calcareous dry grassland and scrub*	Favourable	100	This is a small SAC just over 1km from the CCC boundary. The site is also classified as a priority sub-type of the Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) interest feature (important orchid site). The site is in favourable condition (grazing management) and is unlikely to be particularly vulnerable to the outcomes of the plan. The interest features of the site are theoretically vulnerable to visitor pressure and air quality changes also, although neither of these are likely to change substantially as a result of the CCC plan.
	Unfavourable recovering	0.0	
	Unfavourable	0.0	
	Unfavourable declining	0.0	
	Uncertain	0.0	
Sandwich Bay SAC Dunes with creeping willow White dunes Grey dunes Embryonic shifting dunes Humid dune slacks	Favourable	62.2	This site supports the most important sand dune system and sandy coastal grassland in south east England. The SAC SSSI units that are in unfavourable condition are affected by management (Unit 22, associated with a golf course) and hydro-ecological changes that have degraded some fixed dunes (Unit 18), the causes of which are currently under investigation (although these are likely to be due to local hydrological changes). The features of the SAC are vulnerable to a range of potential impacts including direct encroachment; coastal squeeze or developments (etc.) that alter the natural geomorphological processes; visitor pressure; management; air quality changes; and local water quality / quantity changes (note, current abstraction and discharges consents are not having an adverse effect on the site, based on Review of Consent data).
	Unfavourable recovering	27.4	
	Unfavourable	10.6	
	Unfavourable declining	0	
	Uncertain	0	
Stodmarsh SAC Desmoulin`s whorl snail	Favourable	75.8	This wetland site is predominantly in ‘favourable’ condition; the ‘unfavourable’ SSSI units are in this condition due to localised management issues, either of scrub encroachment or water levels (note, the water level issues are not due to over-abstraction). Most of the site is an NNR or managed under stewardship agreements, and so most potential impacts have suitable control mechanisms (e.g. control of water levels; management; visitor pressure; etc.). However, the interest features of the site (and their habitats) are vulnerable to diffuse ‘quantum of development’ impacts which the plan may contribute to, notable water abstraction (increases in development may require increased abstraction from local sources, which could affect the SAC) and air quality changes.
	Unfavourable recovering	21.1	
	Unfavourable	2.5	
	Unfavourable declining	0.0	
	Uncertain	0.0	

Table 3.2 (Continued) Condition of European sites within 15km of Canterbury District (including those within the district) (see also Appendix A)

Site and interest features	Site condition status*	(%)**	Summary of current threats and potential vulnerabilities to outcomes of Canterbury Local Plan
Tankerton Slopes and Swalecliffe cSAC Fisher's estuarine moth	Favourable Unfavourable recovering Unfavourable Unfavourable declining Uncertain	100	Fisher's estuarine moth <i>Gortyna borellii lunata</i> has a localised population distribution in the UK, due to its specific habitat requirements; this site supports its food plant hog's fennel (<i>Peucedanum officinale</i>), together with areas of neutral grassland also required by the species for egg laying. The SSSI unit that forms the SAC is in favourable condition but is heavily used by dog walkers and is vulnerable to under-management. The site is within the CCC boundary and as such could be vulnerable to increased visitor pressure in particular although it is noted that the site is steeply sloped with tall vegetation making much of the site difficult to access outside of the existing public footpaths.
Thanet Coast SAC Sea caves Reefs	Favourable Unfavourable recovering Unfavourable Unfavourable declining Uncertain	11.1 8.0 0.0 0.0 80.9	This site is partly within the CCC area and potentially vulnerable to the outcomes of the plan. The condition of most of the site is 'uncertain', since most of the offshore areas are not SSSI units and detailed information on condition is not available; however, the Regulation 33 advice for the site indicates that the features would be vulnerable to physical damage (removal, erosion, smothering); developments (etc.) that alter the natural geomorphological processes; toxic or non-toxic contamination; and invasive species. As a result, the features will be mainly sensitive to direct effects only (i.e. encroachment or factors that alter the geomorphological processes that otherwise dominate the condition of the features).
Wye and Crundale Downs SAC Calcareous dry grassland and scrub*	Favourable Unfavourable recovering Unfavourable Unfavourable declining Uncertain	94.5 6.6 0.0 0.0 0.0	The closest unit of this downland SAC is just under 1km from the CCC boundary. The site is also classified as a priority sub-type of the Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) interest feature (important orchid site), and supports the largest UK colony of <i>Orchis fuciflora</i> , representing about 50% of the national population. The site is mostly in favourable condition, other than one unit which is in 'unfavourable recovering' due to historical grazing management. The site is unlikely to be particularly vulnerable to the outcomes of the plan, although the interest features are theoretically vulnerable to visitor pressure and air quality changes.

Table 3.2 (Continued) Condition of European sites within 15km of Canterbury District (including those within the district) (see also Appendix A)

Site and interest features	Site condition status*	(%)**	Summary of current threats and potential vulnerabilities to outcomes of Canterbury Local Plan
Medway Estuary and Marshes SPA Article 4.1 qualification: Avocet (B,W); Common tern (B-); Little tern (B); Bewick's swan (W-). Article 4.2 qualification: Black-tailed godwit (W); Curlew (W-); Dark-bellied brent goose (W); Dunlin (ssp. alpina) (W); Great crested grebe (W-); Greenshank (W-); Grey plover (W); Knot (W-); Oystercatcher (W-); Pintail (W); Redshank (W); Ringed plover (P+, W); Shelduck (W); Shoveler (W-); Teal (W-); Turnstone (W-); Wigeon (W-); Breeding bird assemblage (B-); Waterfowl assemblage (W)	Favourable Unfavourable recovering Unfavourable Unfavourable declining Uncertain	0.0 100.6 0.2 0.0 0.0	Most of this site is over 15km from the Canterbury City Council area, and so the effects of the CCC plan are likely to be weak. Furthermore, any mitigation that is appropriate for the other sites (e.g. the Swale SPA) will be effective in preventing significant effects on this site. The Medway Estuary and Marshes SSSI is almost entirely in 'unfavourable recovering' condition. NE state that this assessment is "...based on bird data alone and has not taken into account habitat features"; specifically, WeBS data from 2003 – 2008 indicate that the conservation objective for wintering birds (population should be maintained above 50% of that at the time of designation) is not being met. NE state in the condition assessment for the SSSI that " <i>Wintering and breeding bird numbers have declined significantly at this site for reasons which are not clear. Management is in place to maintain the habitat required to support the assemblage of wintering and breeding birds through stewardship schemes, ditch management, the consenting process and the Local Development Framework process. Drawing from previous condition assessments, habitat quality is thought to be good and not the cause of declines. As it is currently unclear as to why bird declines are occurring, a number of reasons are being investigated including disturbance, bird movements within the region and internationally.</i> "
Outer Thames Estuary SPA Red-throated diver	Favourable Unfavourable recovering Unfavourable Unfavourable declining Uncertain	0.0 0.0 0.0 0.0 100	Red throated divers are sensitive to non-physical disturbance by noise and visual presence during the winter; generally they will not be particularly exposed to disturbance associated with the CCC plan (or within CCC's control) due to their preference for offshore areas, although some aspects (e.g. recreational boating) may have an effect.
Stodmarsh SPA Article 4.1 qualification: Bittern (W); Hen harrier (W) Article 4.2 qualification: Gadwall (B-,W-); Shoveler (W-); Breeding bird assemblage (B-)	Favourable Unfavourable recovering Unfavourable Unfavourable declining Uncertain	72.7 24.8 2.9 0.0 0.0	As with Stodmarsh SAC, this wetland site is predominantly in 'favourable' condition; the 'unfavourable' SSSI units are in this condition due to localised management issues, either of scrub encroachment or water levels (note, the water level issues are not due to over-abstraction). There are thought to be local disturbance issues associated with angling and shooting in some units. However, most of the site is an NNR or managed under stewardship agreements, and so most potential impacts have suitable control mechanisms (e.g. control of water levels; management; visitor pressure; etc.). However, the interest features of the SPA (and their habitats) are vulnerable to diffuse 'quantum of development' impacts which the CCC plan may contribute to, notable water abstraction (increases in development may require increased abstraction from local sources, which could affect the SAC) and air quality changes.

Table 3.2 (Continued) Condition of European sites within 15km of Canterbury District (including those within the district) (see also Appendix A)

Site and interest features	Site condition status*	(%)**	Summary of current threats and potential vulnerabilities to outcomes of Canterbury Local Plan
Thanet Coast and Sandwich Bay SPA	Favourable	68.3	The main current threat to the integrity of this site is disturbance of feeding and roosting waders, notably overwintering turnstones, by recreational activities (particularly dog walking, although other activities, such as kite sailing, are thought to have local impacts); this is reflected in the condition assessments for the the SSSI units that are in unfavourable condition (Sandwich Bay SSSI units 3, 35 – 39, 63 and Thanet Coast SSSI units 11, 12, 14, 16, 18 and 20): the SSSI condition assessments for the unfavourable Thanet Coast SSSI units all state that the units "...[remain] <i>unfavourable recovering due to effects of dog walkers on birds feeding and roosting</i> ". However, it should be noted that the SSSI units within the CCC area (1 – 9) are all in favourable condition. The habitats of the SPA will be vulnerable to the same aspects as Sandwich Bay SAC and Thanet Coast SAC (see above) although the relationship between the habitat condition and the status of the SPA interest features is complex, and effects on the habitats will not always directly and negatively affect the SPA interest features (for example, nutrient enrichment would degrade some habitats but probably enhance foraging conditions for tunstone). The main Local Plan issue for this site is therefore the overall quantum of development in CCC (and neighbouring authorities) and the consequent potential for recreational use of the beaches to increase during key periods. The plan will need to develop mitigating policies and safeguards to minimise the effect of this.
Article 4.1 qualification: Golden plover (W-); Little tern (B-)	Unfavourable recovering	30.4	
	Unfavourable	1.7	
Article 4.2 qualification: Turnstone (W)	Unfavourable declining	0.0	
	Uncertain	0.0	
The Swale SPA	Favourable	67.9	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. The intertidal area is also vulnerable to disturbance from waterborne recreation. This is being addressed as part of an estuary management plan. 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.
Article 4.1 qualification: Avocet (B+,W+); Marsh harrier (B+); Mediterranean gull (B+); Bar-tailed godwit (W+); Golden plover (W+); Hen harrier (W+)	Unfavourable recovering	0.0	
	Unfavourable	2.2	
	Unfavourable declining	0.0	
Article 4.2 qualification: Dark-bellied brent goose (W-); Ringed Plover (P+); Black-tailed godwit (W+); Dunlin (ssp. alpina) (W-); Knot (W+); Pintail (W+); Shoveler (W+); Waterfowl assemblage (W); Breeding bird assemblage (B-)	Uncertain	29.9	

Table 3.2 (Continued) Condition of European sites within 15km of Canterbury District (including those within the district) (see also Appendix A)

Site and interest features	Site condition status*	(%)**	Summary of current threats and potential vulnerabilities to outcomes of Canterbury Local Plan
Medway Estuary and Marshes Ramsar	Favourable	0.0	As for Medway Estuary and Marshes SPA.
Criterion 2 - Endangered etc species / communities	Unfavourable recovering	100.6	
	Unfavourable	0.2	
Criterion 5 - 20,000 or more waterbirds	Unfavourable declining	0.0	
Criterion 6 - 1% of a waterbird population	Uncertain	0.0	
Stodmarsh Ramsar	Favourable	72.7	This site is designated for six British Red Data Book wetland invertebrates; two nationally rare plants; five nationally scarce species; and its diverse assemblage of rare wetland birds. The Ramsar site is contiguous with the SAC and SPA, and the current threats and potential vulnerabilities are assumed to be the same as for the SAC and SPA (and so measures to avoid significant or adverse effects on the SPA / SAC features will also be appropriate for the Ramsar).
Cr. 2 - Endangered etc species / communities	Unfavourable recovering	24.8	
	Unfavourable	2.9	
	Unfavourable declining	0.0	
	Uncertain	0.0	
Thanet Coast & Sandwich Bay Ramsar	Favourable	63.0	This Ramsar site is largely contiguous with the SPA although it extends outside the SPA in a number of areas, notably around Hacklinge Marshes (south west of Sandwich Bay). The bird interest features are effectively as for the SPA; however, the Criteria 2 interest features (predominantly 15 British Red Data Book wetland invertebrates) are associated with the inland marsh and ditch network, which is not generally covered by the Sandwich Bay SAC. The citation notes that these areas are negatively affected by ditch management, local abstraction, and water quality issues; the unfavourable SSSI units that are contiguous with the Ramsar are affected by water level management, eutrophication associated with the surrounding farmland, and disturbance of the wintering birds.
Cr. 2 - Endangered etc species / communities	Unfavourable recovering	34.4	
	Unfavourable	3.4	
Cr. 6 - 1% of a waterbird population	Unfavourable declining	0.3	
	Uncertain	0.0	
The Swale Ramsar	Favourable	67.9	As for the Swale SPA
Cr.2 - Endangered etc species / communities	Unfavourable recovering	0.0	
	Unfavourable	2.2	
Cr. 5 - 20,000 or more waterbirds.	Unfavourable declining	0.0	
Cr. 6 - 1% of a waterbird population	Uncertain	29.9	

Key

- * Site status as per SSSI classification, with the addition of 'uncertain' as a category; condition is 'uncertain' where there is an absence of data, typically for those parts of the site that are not associated with an SSSI (e.g. inshore / offshore habitats).
- ** Based on the condition assessments of the SSSI units that correspond to the relevant European sites. Note: the total percentage does not always equal 100% as the boundaries of the component SSSI units (to which the condition assessments relate) do not always match the European site boundaries exactly (i.e. the SSSIs are usually larger, but it is not possible to split SSSI units further to determine the precise quantity of the European site that is in each condition category).

Table 3.3 Potential Effects on European Sites due to the Canterbury Local Plan

European Sites	Potential Impacts								
	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 ¹⁹	X	✓	✓ ²⁰	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	✓ ²¹	X	X	X
The Swale SPA / Ramsar (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 ²²	✓	X	X	X	X
Lydden and Temple Ewell Downs SAC	X	X	X	X ²⁴	✓	X	X	X	X
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 ²³	X
Tankerton Slopes and Swalecliffe SAC	X	X	X	✓	X	X	X	X	X
KEY									

¹⁹ The part of the site that supports *Vertigo moulinsiana* is inaccessible to the public

²⁰ Stodmarsh is vulnerable to over-abstraction from the River Stour

²¹ 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.

²² 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.

²³ 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

European Sites	Potential Impacts								
	Direct habitat loss	Noise, light or visual impact	Cat predation	Recreation	Air quality	Water quality	Water levels	Coastal dynamics	Coastal squeeze
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**.

3.1.3 Conservation Objectives

The **conservation objectives** for all of the sites have been revised by Natural England since 2009; currently, the conservation objectives for all sites are as follows:

For SACs:

Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.

Subject to natural change, to maintain or restore:

- *The extent and distribution of qualifying natural habitats and habitats of qualifying species;*
- *The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species;*
- *The supporting processes on which qualifying natural habitats and habitats of qualifying species rely;*
- *The populations of qualifying species;*
- *The distribution of qualifying species within the site.*

For SPAs:

Avoid the deterioration of the habitats of the qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds Directive.

Subject to natural change, to maintain or restore:

- *The extent and distribution of the habitats of the qualifying features;*

- *The structure and function of the habitats of the qualifying features;*
- *The supporting processes on which the habitats of the qualifying features rely;*
- *The populations of the qualifying features;*
- *The distribution of the qualifying features within the site.*

The conservation objectives for Ramsar sites are taken to be the same as for the corresponding SACs/ SPAs (where sites overlap). The conservation objectives are considered when assessing the potential effects of plans and policies on the sites; information on the sensitivities of the interest features also informs the assessment.

3.2 Potential Effects

European Sites could be affected by the following environmental changes related to new development proposed through the draft Local Plan. These changes could occur during the construction and/or operation of new developments (and where relevant their decommissioning).

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 squeeze as a result of new development or associated coastal protection work.

3.3 Supporting Studies

As noted in section 3.2, European Sites could be affected by environmental changes related to new development proposed through the draft Local Plan. At the Local Plan level and at this stage in the development process, there is limited information for many of the development proposals that could usefully be used to inform more detailed studies into areas of concern (for example, detailed air quality modelling) in order to establish the nature and magnitude of any effects. Notwithstanding this, and given the strategic information that is available, CCC has undertaken a number of studies (in consultation with Natural England and other stakeholders) and related activities in order to consider the sustainability of the draft Local Plan and inform the HRA process. Details of these studies / activities are provided below and will be referenced where appropriate in section 4.0 where the conclusions of these studies have been used to inform this assessment.

- **Habitat Regulation Issues: Topic Paper 3** – CCC has been working with various stakeholders and consultees to resolve concerns relating to the draft Local Plan and its effect on European sites, in particular in relation to air quality, water quality and recreational disturbance impacts. This information is contained in Habitat Regulation Issues: Topic Paper 3 of the Council's submission documentation.
- **Strategic Air Quality Studies – Nitrogen oxides (NO_x) emissions** associated with an increase in traffic loading attributable to the growth proposed within the draft Local Plan have been calculated²⁴ for the road network within the zone of influence of the Blean Complex SAC (notably along the A290) in accordance with best practice approaches²⁵. The Department for Transport's Transport Analysis Guidance states that 'beyond 200m the contribution of vehicle emissions from the roadside to local pollution levels is not significant'²⁶. The A290 has been the focus of these studies due to its location within 200m of the Blean Complex SAC, comprising woodland habitats that are vulnerable to increases in nitrogen deposition. According to the World Health Organisation the critical threshold associated with the protection of vegetation is 30µgm-3 for NO_x. Calculations have shown that predicted increases of nitrogen oxides above the baseline level as a result of new proposals will not exceed 1% of the critical load of 15kg/ha/year for quercus woodland²⁷ at potential sensitive sites adjacent to the A290 i.e. less than the agreed 1% threshold cited by Natural England²⁸. As such, air quality effects associated with changes in traffic volumes are not considered to be significant. A summary of the predicted increased nitrogen deposition resulting from predicted increases in traffic on the A290 across the plan period is provided in **Appendix C**.
- **Strategic Water Resources Studies** – Stodmarsh SAC / SPA / Ramsar is vulnerable to changes in water quality that may result from increases in wastewater emissions from Sturry sewage treatment

²⁴ CCC (2014) *The assessment of the likely air quality impacts of the increase in traffic resulting from the Canterbury District Publication Draft Local Plan 2014 on the Blean Complex Special Area of Conservation*, CCC, Kent

²⁵ Highways Agency (2007) Revised Guidance for Air Quality Assessments DMRB

²⁶ Department for Transport (2004) Transport Analysis Guidance

²⁷ English Nature (2004), *The ecological effects of diffuse air pollution from road transport* English Nature Research Reports 580

²⁸ Environment Agency (2010), AQTAG06 – Technical Guidance on detailed modelling approach for an appropriate assessment for emissions to air. Environment Agency, working Draft version 10, 20/4/10.

works (STW) arising from the strategic allocations in and around Canterbury and Sturry / Broadoak. As such, CCC instigated discussions²⁹ with Southern Water (SW) in order to establish whether a more detailed assessment of these effects could be undertaken at the strategic level. Southern Water, have stated that they have sufficient capacity to support the Local Plan. Southern Water has a statutory duty to serve new development and is committed to providing the right infrastructure in the right place at the right time. Depending on the exact location of the development, this is likely to include improved local sewers and water mains and potentially strategic assets such as truck sewers, pumping stations and treatment works. Southern Water state that *“We have assessed the proposals set out in your draft Local Plan and have not identified any constraints in the environmental permits that would prevent us from delivering necessary wastewater treatment capacity in parallel with development. Your adopted Local Plan and site allocations (in due course) will inform our forecasts and investment planning. We can plan investment through the water industry's price review process so that we remain compliant with our environmental permits, and thereby protect water quality objectives. We may need a new permit from the EA in some cases, depending on the precise location of development, but we anticipate that they will apply the "no deterioration" principle³⁰ and allow additional flow.”*

Furthermore, any modifications to local waste water treatment works (WWTW) and resulting discharges would need to be consistent with the requirements of the Urban Wastewater Treatment Directive. The European Commission Urban Waste Water Treatment Directive (UWWTD, 91/271/EEC) sets down minimum standards for the discharge of treated effluent from waste water treatment works (WWTWs). The Directive was transposed into legislation in England in 1994 in the form of the Urban Waste Water Treatment (England and Wales) Regulations 1994 as amended in 2003. The Regulations require that all significant discharges of sewage be treated whether the discharge is to inland surface waters, groundwater, estuaries or coastal waters. Where these discharges go into sensitive waterbodies they are to be treated to higher levels such as secondary (bacterial breakdown) or tertiary (nutrient removal). The River Stour is considered a sensitive waterbody/receiving environment and as such is treated to a secondary level. Any changes to the WWTW discharge would have to be consistent with the requirements of the Urban Wastewater Treatment Directive 91/271/EEC and all discharges would need consent from the Environment Agency (who themselves would then need to consider the effects on any downstream designated sites in consultation with Natural England.).

Given these conclusions, it was deemed that there are no foreseeable concerns with the future capacity of the WWTW and any unforeseeable changes to this would need to meet the requirements of the Habitats Directive through a consenting process.

- **Strategic Recreational Impact Studies** – The growth proposed as part of the draft Local Plan has the potential to result in increases in visitor numbers in the coastal Swale SPA / Ramsar and Thanet SPA / Ramsar. CCC have been working closely with Natural England and adjacent local authorities in order to assess and agree a zone of influence for these effects (supporting studies include visitor surveys carried out in February and March 2014)³¹; details relating to wardening requirements (and a commitment to providing this service in perpetuity); financial contributions per new household within

²⁹ Southern Water (Email dated 21 October 2014)

³⁰ If planned new development is predicted to increase the volume of flow arriving WTWs and exceed the volume permitted to release, Southern Water can apply to the Environment Agency for a new or revised permit. The Agency is likely to agree to increase the volume but tighten the treatment standards so that the overall load to the environment is not increased. This is often referred to as the "no deterioration" principle.

³¹ Footprint Ecology (2014) *Thanet Coast and Sandwich Bay Visitor Survey 2014*, Footprint Ecology, Wareham

the plan area in the relevant zone of influence to provide funding for specific mitigation measures; and other measures. It is proposed that the mitigation would be implemented collaboratively with neighbouring authorities in order to ensure a sustainable and joined up approach. The resulting management plans and monitoring proposals are summarised as follows:

- Thames, Medway and Swale Estuaries Strategic Access Management Plan³² (to mitigate effects upon the Thames Estuary and Marshes SPA / Ramsar; Medway Estuary and Marshes SPA / Ramsar; and The Swale SPA / Ramsar). This plan will be implemented collaboratively by the local authorities within the plan area. Key elements within this plan include:
 - A North Kent Coast Dog Project;
 - Wardening and Visitor Engagement;
 - New Access Infrastructure;
 - Parking (a strategic review and changes to parking arrangements);
 - Codes of Conduct;
 - Interpretation and signage;
 - Working with local clubs / groups;
 - Refuge;
 - Enhancement of the existing green infrastructure away from the European sites;
 - Enforcement;
 - Developer contributions;
 - Monitoring.
- Thanet Coast and Sandwich Bay SPA Strategic Access Management and Monitoring Strategy (SAMM)³³ (to mitigate effects on the Thanet Coast and Sandwich Bay SPA and the Tankerton Slopes and Swalecliffe SAC). Mitigation requirements will apply to all development within the given zone of influence including the following proposed allocations: Land at Sturry / Broad Oak; Hillborough site, Herne Bay; Herne Bay Golf Course; Strode Farm, Herne Bay; land at Greenhill, Herne Bay; Thanet Way, Whitstable; land north of Hersden; and land at Bullockstone Road, Herne Bay. Other developments outside the zone of influence may also need to comply if they are shown to have an impact on the SPA. Key elements within this plan include:
 - Wardening;

³² North Kent Planning Group (2014) *The Thames, Medway and Swale Estuaries Strategic Access Management Plan - Draft*, NKPG, Kent

³³ North Kent Planning Group (2014) *Thanet Coast and Sandwich Bay SPA Strategic Access Management and Monitoring Strategy - Draft*, NKPG, Kent

- Project co-ordination;
- Enforcement and education;
- A coastal dogs project;
- Developer contributions;
- Monitoring.

4. Policy Screening Assessment

This section sets out an assessment of the 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 shows the traffic light colour that is relevant to each numbered policy as per the methodology set out in Section 2.4. Based on the currently policy wording the HRA screening assessment column details the potential impacts of implementing each draft policy in isolation. If relevant, the ‘Further considerations’ column (Table 4.3 only) details policy specific issues that are addressed elsewhere within the plan and where appropriate, additional measures that should be taken into account beyond the Plan.

4.1 Policies Unlikely to have a Significant Effect

There are a number of policies within the draft Local Plan that can be ruled out from further consideration at this stage as they do not promote development themselves and/ or they help to implement the Habitats Regulations by providing 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 these, this will ensure that no plan or project is approved that has an adverse effect on the integrity of a European site. As such, these policies are not deemed likely to result in any significant adverse effects upon the integrity of European sites. These policies are identified in **Table 4.1** below.

Table 4.1 Policies Unlikely to have a Significant Effect - Screening Assessment

Policy	HRA Screening Assessment
SP6	<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>

Policy	HRA Screening Assessment
SP7	<p>This policy states that:</p> <p><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, and where it cannot be demonstrated that there would be no adverse effect on the integrity of the sites. The strategic development sites identified in the Plan would therefore be required to fund, in perpetuity, the following mitigation measures:</i></p> <p><i>1 – Wardening of sensitive international wildlife sites, and increased education, to be funded by the development in perpetuity;</i></p> <p><i>2 – Ongoing monitoring and surveys of sensitive sites in the district to be funded via the wardening programme;</i></p> <p><i>3 – Consideration of other measures as required; for example, access management; and</i></p> <p><i>4 – The provision of open space on the new sites, as set out in the Council’s Development Contributions SPD.</i></p> <p><i>Contributions will be made in accordance with the guidance prepared by the Council.”</i></p> <p>This policy does not promote development in itself and specifically provides protection to European sites specifically in respect of the Strategic development proposals within the plan area so is not likely to have a significant effect on European sites. By definition, significant effects are those that adversely affect the integrity of a site. Different Strategic development sites will require differing suites of mitigation measures in order to ensure that associated effects are sufficiently mitigated. These suites of mitigation could and are likely to include (but are not restricted to) those listed in the policy wording (hence the need for point 3 in the SP7 wording) but will need to be determined on a case by case basis at the project level once more detailed information is available relating to the specific nature and component parts of the development, and any resulting effects.</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>
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>
TCL8	<p>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.</p>
EMP12	<p>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.</p>
T2	<p>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.</p>
T3	<p>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.</p>
T4	<p>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.</p>
T5	<p>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.</p>
T6	<p>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.</p>
T9	<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>
T10	<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>
T16	<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>

Policy	HRA Screening Assessment
T17	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.
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.
CC5	This policy states that on sites that have not previously been developed in Flood Zones 2 and 3, no new development will be permitted unless exceptional justification can be demonstrated through the Sequential and Exception Tests. Furthermore, extensions to existing property and change of use must meet the requirements of flood risk assessments. 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.
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.
CC7	This policy states that, in overtopping hazard zones, no development will be permitted. 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.
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.
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.
CC12	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.
DBE1	This policy requires that all development should respond to the objectives of sustainable development, conserve resources such as energy, and by reducing / minimising waste 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.
DBE3	This policy relates to high quality design for development proposals, including the conservation, integration, extension, connection and management 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.
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.
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.
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.
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.
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.
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.

Policy	HRA Screening Assessment
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.
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.
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.
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.
HE6	This policy relates to development within Conservation Areas which should preserve or enhance the special architectural or historic character or appearance. Development in or adjoining a Conservation Area that would harm its character, appearance or setting 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.
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.
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.
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.
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.
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.
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.
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.
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.

Policy	HRA Screening Assessment
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 run contrary to landscape character (including settlement character), or impact directly or indirectly upon historic setting, archaeological or nature conservation interests, where relevant 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>
LB3	<p>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.</p>
LB4	<p>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.</p>
LB5	<p>This policy states that sites of international nature conservation importance must receive the highest levels of protection. No development will be permitted which may have an adverse impact 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 the plan. Where a likely significant effect of a plan or project on a European Site cannot be excluded during Habitats Regulations Assessment Screening, 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. The policy clearly extends the application of the commitments under the Habitats Directive to all development proposals, rather than just being focused on the strategic sites (SP7).</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. Additionally, the policy requires that protected species surveys are undertaken and appropriate mitigation and enhancement measures are adopted before development is permitted. 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>
LB9	<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>
LB10	<p>This policy states that developments should retain, restore and enhance trees, hedgerows, woodland and other landscape features of value.</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>
LB11	<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 particular support to projects that benefit the landscape through sensitive and traditional woodland practices and which support the timber market and local economy. Furthermore, the Council will refuse projects that damage the character and integrity of the Blean Complex. As such, this policy is not likely to have a significant effect.</p>

Policy	HRA Screening Assessment
LB13	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. 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.
OS2	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.
OS9	This policy relates to the loss of open spaces and play areas provided as part of new residential developments which 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.
OS15	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.
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.
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.
QL13	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: <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>

4.2 Non-specific development related policies

There are a number of policies within the draft Local Plan that seek to promote or steer development within the plan area but are not site specific and do not provide sufficient detail relating to any proposals in order that more site specific mitigation recommendations can be provided in order to meet the requirements of the Habitats Regulations. In this instance, the conclusions reached following the supporting studies (where appropriate), protective or mitigation measures provided by other policies and / or the wording provided in Policy SP7 and LB5 (see details in Table 4.1 above) is deemed sufficient in giving adequate protection to European sites. As such, no further amendments to these policies are deemed necessary and the requirements of the Habitats Regulations are met. Details of these policies are outlined below in **Table 4.2**.

Table 4.2 Non-specific Development Related Policies Screening Assessment

Policy	HRA Screening Assessment
SP1	<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 an adverse effect on integrity to be granted approval. This is covered by the details provided in Policy LB5.</p>
SP4	<p>This policy is locationally specific in that it relates to the strategic sites in Policy SP3 and sets out that 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.</p> <p>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. This is covered by the details provided in Policy SP7.</p>
SP5	<p>This policy sets out that the Council will prepare a Green Infrastructure (GI) strategy and that new development should make provision for Green Infrastructure as an integral part of the design. In particular it states that <i>“the strategy should: Provide measures to protect and enhance biodiversity and meet the requirements of the habitats regulations,”</i></p> <p>This wording is included to ensure that GI is appropriately designed so that impacts associated with increased access will not occur. 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>
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. This is covered by the details provided in Policy LB5.</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. This is covered by the details provided in Policy LB5.</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. This is covered by the details provided in Policy LB5.</p>
HD7	<p>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. This is covered by the details provided in Policy LB5.</p>
HD8	<p>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. This is covered by the details provided in Policy LB5.</p>

Policy	HRA Screening Assessment
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. This is covered by the details provided in Policy LB5.
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 because their component parts comprise SSSIs, but the policy wording could be strengthened. Strength is however provided by Policy LB5.
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. <p>HERNE BAY</p> <ul style="list-style-type: none"> • Eddington Lane 7.9ha; • Altira Park 10ha; • Metric Site 0.5ha. <p>WHITSTABLE</p> <ul style="list-style-type: none"> • Land at Wraik Hill 3.4ha; • Extension to Joseph Wilson Business Park – 2.5ha. <p>RURAL</p> <ul style="list-style-type: none"> • 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. This is covered by the details provided in Policy LB5.</p>
EMP2	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. This is covered by the details provided in Policy LB5.
EMP3	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 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. This is covered by the details provided in Policy LB5.
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. This is covered by the details provided in Policy LB5.</p>
EMP5	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. 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. This is covered by the details provided in Policy LB5.

Policy	HRA Screening Assessment
EMP6	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. This is covered by the details provided in Policy LB5.
EMP7	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. This is covered by the details provided in Policy LB5.
EMP8	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. This is covered by the details provided in Policy LB5.
EMP9	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. This is covered by the details provided in Policy LB5.
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. This is covered by the details provided in Policy LB5.
EMP13	This policy states that permission will be granted for agricultural related buildings, structures 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. This is covered by the details provided in Policy LB5.
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. This is covered by the details provided in Policy LB5.
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. This is covered by the details provided in Policy LB5.
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. This is covered by the details provided in Policy LB5.
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/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. This is covered by the details provided in Policy LB5.

Policy	HRA Screening Assessment
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/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. This is covered by the details provided in Policy LB5.
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/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. This is covered by the details provided in Policy LB5.
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. This is covered by the details provided in Policy LB5.
TCL6	This policy relates to permission for Main Town Centre Uses outside of the defined town centre boundary (or Primary Shopping Area in the case of retail uses), 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. This is covered by the details provided in Policy LB5.
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. This is covered by the details provided in Policy LB5.
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, 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. This is covered by the details provided in Policy LB5.
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. This is covered by the details provided in Policy LB5.</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. This is covered by the details provided in Policy LB5.</p>
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. This is covered by the details provided in Policy LB5.

Policy	HRA Screening Assessment
TV1	<p>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. This is covered by the details provided in Policy LB5.</p>
TV2	<p>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. This is covered by the details provided in Policy LB5.</p>
TV4	<p>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.</p> <p>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. This is covered by the details provided in Policy LB5.</p>
TV5	<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> <ul style="list-style-type: none"> • 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. • 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>Indirectly this gives protection to SACs and SPAs, but the policy wording could be strengthened. This is covered by the details provided in Policy LB5.</p>
TV7	<p>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. This is covered by the details provided in Policy LB5.</p>
TV8	<p>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. This is covered by the details provided in Policy LB5.</p>
CC1	<p>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 in appropriate locations. 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. This is covered by the details provided in Policy LB5.</p>
CC2	<p>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. This is covered by the details provided in Policy LB5.</p>

Policy	HRA Screening Assessment
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. This is covered by the details provided in Policy SP7 and LB5.
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> <p>Given the wording provided in Policy LB5 however, it is clear that development will not be permitted where it would be likely to lead to an adverse effect upon the integrity of a European site, thereby giving adequate protection to these sites in line with the requirements of the Habitats Directive.</p>
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. This is covered by the details provided in Policy LB5.
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. This is covered by the details provided in Policy LB5.
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. This is covered by the details provided in Policy LB5.
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. This is covered by the details provided in Policy LB5.
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. 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. This is covered by the details provided in Policy LB5.
LB12	<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 protect biodiversity given the SPA designation it should be strengthened to ensure that the conservation objectives of the site are given taken into account. This is covered by the details provided in Policy LB5.</p>
OS1	This policy identifies existing recreational sites as Local Green Space. Only proposals that protect or enhance these Local Green Spaces will be permitted. Proposals such as new recreational facilities, building extensions and public safety related operations will be allowed under very special circumstances. Such activities could indirectly affects European sites because there is no mention of projects being refused if they are not in accordance with environmental policies in the Local Plan. This is covered by the details provided in Policy LB5.

Policy	HRA Screening Assessment
OS3	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. This is covered by the details provided in Policy LB5.
OS4	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. This is covered by the details provided in Policy LB5.
OS5	This policy allocates land at Stuppington Lane, Canterbury for 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. This is covered by the details provided in Policy LB5.
OS6	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. This is covered by the details provided in Policy LB5.
OS7	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. This is covered by the details provided in Policy LB5.
OS8	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. This is covered by the details provided in Policy LB5.
OS10	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. This is covered by the details provided in Policy LB5.
OS12	<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. This is covered by the details provided in Policy LB5.</p>
OS13	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. This is covered by the details provided in Policy LB5.
OS14	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. This is covered by the details provided in Policy LB5.
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. This is covered by the details provided in Policy LB5.

Policy	HRA Screening Assessment
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. This is covered by the details provided in Policy LB5.
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. This is covered by the details provided in Policy LB5.
QL5	<p>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.</p> <p>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. This is covered by the details provided in Policy LB5.</p>
QL7	<p>This policy allocates the following sites for community purposes:</p> <ul style="list-style-type: none"> • Land south of Greenhill, Herne Bay • Land at end of Vauxhall Avenue, Canterbury <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. This is covered by the details provided in Policy LB5.</p>
QL8	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. This is covered by the details provided in Policy LB5.
QL9	<p>This policy allocates the following sites for health related development:</p> <ul style="list-style-type: none"> • Kent and Canterbury Hospital <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. This is covered by the details provided in Policy LB5.</p>
QL10	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. This is covered by the details provided in Policy LB5.

4.3 Policies requiring more Detailed Consideration

A number of policies have the potential to result in significant effects on the integrity of European sites as they promote or steer development within the plan area and the policies themselves provide sufficient detail, whether it be related to location or quantum of development, such that a more accurate assessment of the effect of proposals can be made and more specific mitigation and amendment can be advised. Policies SP7 and LB5 provide overarching protection to European sites as they state that development will not be permitted should there be resulting

adverse effects on their integrity, however, in line with good practice³⁴ approaches, it is not appropriate to rely wholly on these policies to ensure that the Plan meets with the requirements of the Habitats Directive. Each policy needs to be intrinsically compliant with Directive and as such, policy specific mitigation measures are required for some policies in order to ensure that the integrity of European sites is protected. In the most part these measures are provided through the inclusion of other environmental policies within the Plan. Table 4.3 below outlines those policies where there are recommendations for mitigation or where other environmental policies within the Plan have provided this additional protection.

Additionally, **Table 4.3** outlines a number of policies where, although compliant with the Habitats Directive, there are further recommendations that should be implemented beyond the plan (for example, measures to be included within individual development briefs for specific strategic site allocations).

Table 4.3 Policies Requiring Further Consideration - Screening Assessment

Policy	HRA Screening Assessment	Recommendations
SP2	<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 m² 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 have prepared a draft Water Resources Management Plan to deliver water supply requirements for the next 25 years from 2015-2040. This has been through a consultation process and is currently with government for approval. A Habitats Regulations Assessment (HRA) has been undertaken for this plan³⁵ and the screening assessment concludes that although there is the potential for Option EF-11 (Aylesford Water Re-use at Aylesford) to have significant adverse effects on the Medway Estuary and Marshes SPA/Ramsar it is best dealt with in a 'down-the-line' assessment due to the current absence of detailed information available and the time that will have elapsed when the option would be due to be implemented in 2023.</p> <p>The only new scheme envisaged to support this is the Broad</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, 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 (for example in relation to Option EF-11 in the South East Water Resources Management Plan) 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 to be consulted to confirm that sufficient water supply and sewage treatment capacity exists in the network.</p> <p>In relation to air quality emissions the Highways Agency DMRB air quality assessment method³⁶ identifies that, at a local level, only designated sites within 200m of a road,</p>

³⁴ Tyldesly, D. & Chapman, C. (2014) *The Habitats Regulations Assessment Handbook*, [Online] DTA Publications Ltd, Nottingham. Available at <http://www.dtapublications.co.uk/handbook> (Accessed on 19 May 2014)

³⁵ South East Water (2013) *2014 Water Resources Management Plan Habitats Regulations Assessment – Screening Report and Appropriate Assessment*, November 2013 [Online] Available at http://www.southeastwater.co.uk/media/182831/rWRMP_ER_Appendix_5_HRA_v2a.pdf (Accessed 30 May 2014).

³⁶ 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>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 increased quantum of housing could in theory also result in a deterioration in water quality (particularly at Stodmarsh SPA / Ramsar) resulting from increases in wastewater discharges from the Sturry sewage treatment works (STW) arising from the strategic allocations, if there were capacity concerns at the existing STWs. However, following consultation with Southern Water, CCC has been informed that there is sufficient capacity to support the Local Plan (refer to section 3.3 above for further details). Furthermore, the requirements of the Urban Waster Water Treatment (UWWT) Directive ensure that water quality targets are managed through the consenting process and must also meet with the requirements of the Habitats Directive (see also section 3.3 above).</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. Due to these concerns, CCC has undertaken supporting analysis in order to model the emissions resulting from increased traffic loads as a result of the allocations for the period of the Local Plan. Calculations have shown that predicted increases of nitrogen oxides above the baseline level as a result of new proposals will not exceed 1% when compared against a critical load of 15kg/ha/year i.e. less than the agreed threshold cited by Natural England and as such, are not deemed to be significant in respect of effects on European sites (refer to section 3.3 for additional details). Furthermore, implementation of a Transport Strategy (refer to transport policies T1, T2, T3, T4, T10 and T17 in particular) that seeks to limit vehicle use and encourage alternative modes of travel, and progression in the development of low emission vehicles, should also further limit pollutant levels locally. Significant effects are therefore deemed unlikely.</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. Management plans to deal with existing recreational pressures are in place for the European Sites that currently have public access but additional or enhanced measures may be necessary to address the additional number of visitors associated with the quantum of development. In order to address this issue across the plan area and within adjoining authority areas, CCC has been part of a collaborative partnership to develop strategic management initiatives. In consultation with Natural England, the Thames, Medway and Swale Estuaries Strategic Access Management Plan (SAMM) and the Thanet Coast and Estuary SAMM (also extended to cover Tankerton Slopes and Swalecliffe SAC in terms of wardening and remedial management) have been developed that outline a suite of mitigation measures that will be funded by developer contributions within the zone of influence (informed by visitor surveys in 2014) of these vulnerable European sites (refer to section 3.3 above for further details). These plans will be implemented collaboratively and will place a requirement on all development within each defined zone of influence (and beyond where the nature of the development may result in significant effects). Given the requirements of these plans, significant recreational effects on European sites are deemed unlikely.</p> <p>Given all of the above, in addition to the wording provided by</p>	<p>subject to certain changes in traffic volume or speed, have the potential to be significantly affected by air quality changes.</p> <p>It is anticipated that the presence of SAMM plans for those European sites impacted by recreational activities will mitigate the potential adverse effect of increased numbers of recreational visitors associated with the proposed new residential development</p> <p>The policy wording provided in Policy SP7 is deemed to provide sufficient additional protection to European sites with respect to these potential significant effects and as such, no further amendments are considered necessary.</p>

Policy	HRA Screening Assessment	Recommendations
	<p>Policy SP7, significant effects on European sites as result of the allocations provided by Policy SP2 are deemed unlikely..</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> <ul style="list-style-type: none"> • South Canterbury (4000 dwellings) located 3.1km southwest of Stodmarsh SAC and SPA • Land at Sturry/Broad Oak (1000 dwellings) located 0.7km northwest of Stodmarsh SAC and SPA • Hillborough Site, Herne Bay (1300 dwellings) located 0.6km south of Thanet Coast and Sandwich Bay SPA • Herne Bay Golf Club (600 dwellings) located 1.7km southeast of Thanet Coast and Sandwich Bay SPA and 1.7km north of Blean SAC • Strode Farm, Herne Bay (800 dwellings) located 1.4km north of Blean SAC • Land at Greenhill, Herne Bay (300 dwellings) located 1.3km south of Thanet Coast and Sandwich Bay SPA • Thanet Way Site, Whitstable (400 dwellings) located 1.3km southeast of The Swale SPA • Land North of Hersden (500 dwellings) located 0.5km north of Stodmarsh SAC and SPA and 1.2km southeast of Blean SAC • Land at Howe Barracks (no development shall take place on the western slopes) (400 dwellings) located 2.1km from Stodmarsh SAC and SPA. • Canterbury Hospital / Ridlands (810 dwellings) located 4.1km southwest of Stodmarsh SAC and SPA. <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> <ul style="list-style-type: none"> • New and modified junction on the A2 located 3.1km from Stodmarsh SAC and SPA • New bridge crossing at Sturry located 0.7km from Stodmarsh SAC and SPA, involving a crossing of the Great Stour River • New car park for Sturry station located 0.7km from Stodmarsh SAC and SPA • Herne Relief Road located 0.8km from Blean SAC • New A28-A257 Link Road located 2km from Stodmarsh SAC and SPA <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>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</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.</p> <p>The following measures could be included in the development briefs for individual development projects.</p> <ul style="list-style-type: none"> • 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. • 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. • Recreation: To avoid increasing recreational pressure on European Sites, potentially resulting in increased disturbance of bird populations, it should be ensured that access is managed. This management could be achieved through the implementation of a Wardening Scheme that would also include monitoring surveys and improved public awareness, as noted for SP2 above. Additionally, alternative open space resources in accordance with CCCs Open Space Strategy may be deemed appropriate. • Changes in noise, light or visual impact, or cat predation: To avoid effects caused by these changes, development within the zone of influence 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 or cat predation, and monitoring requirements during and post-construction. <p>The policy wording provided in Policy SP7 is deemed to provide sufficient additional protection to European sites with respect to these potential significant effects and as such, no further amendments are considered necessary.</p>

Policy	HRA Screening Assessment	Recommendations
	<p>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 have prepared a draft Water Resources Management Plan to deliver water supply requirements for the next 25 years from 2015-2040. This has been through a consultation process and is currently with government for approval. A Habitats Regulations Assessment (HRA) has been undertaken for this plan³⁷ and the screening assessment concludes that although there is the potential for Option EF-11 (Aylesford Water Re-use at Aylesford) to have significant adverse effects on the Medway Estuary and Marshes SPA/Ramsar it is best dealt with in a 'down-the-line' assessment due to the current absence of detailed information available and the time that will have elapsed when the option would be due to be implemented in 2023.</p> <p>The only new scheme envisaged to support this is the Broad Oak Reservoir on the River Stour. Effluent discharges enter the River Stour from Sturry (Canterbury), Maystreet, Westbere, Minster, Weatherlees, and Pfizers sewage treatment works; other sewage treatment works outfalls are located on the open coast.</p> <p>The increased quantum of housing could also result in a deterioration in water quality (particularly at Stodmarsh SPA / Ramsar) resulting from increases in wastewater emissions from the Sturry sewage treatment works (STW) arising from the strategic allocations. However, following consultation with Southern Water, CCC have been informed that there is sufficient capacity to support the Local Plan (refer to section 3.3 above for further details). Furthermore, the requirements of the Urban Waster Water Treatment (UWWT) directive ensure that water quality targets are managed through the consenting process and must also meet with the requirements of the Habitats Directive (see also section 3.3 above).</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. Due to these concerns, CCC has undertaken supporting analysis in order to model the emissions resulting from increased traffic loads as a result of the allocations for the period of the Local Plan. Calculations have shown that predicted increases of nitrogen oxides above the baseline level as a result of new proposals will not exceed 1% when compared against a critical load of 15kg/ha/year i.e. less than the agreed threshold cited by Natural England and as such, are not deemed to be significant in respect of effects on European sites (refer to section 3.3 for additional details). Furthermore, implementation of a Transport Strategy (refer to transport policies T1, T2, T3, T4, T10 and T17 in particular) that seeks to limit vehicle use and encourage alternative modes of travel, and progression in the development of low emission vehicles, should also further limit pollutant levels locally. Significant effects are therefore deemed unlikely.</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.</p>	

³⁷ South East Water (2013) *2014 Water Resources Management Plan Habitats Regulations Assessment – Screening Report and Appropriate Assessment*, November 2013 [Online] Available at http://www.southeastwater.co.uk/media/182831/rWRMP_ER_Appendix_5_HRA_v2a.pdf (Accessed 30 May 2014).

Policy	HRA Screening Assessment	Recommendations
	<p>Management plans to deal with existing recreational pressures are in place for the European Sites that currently have public access but additional or enhanced measures may be necessary to address the additional number of visitors associated with the quantum of development. In order to address this issue across the plan area and within adjoining authority areas, CCC has been part of a collaborative partnership to develop strategic management initiatives. In consultation with Natural England, the Thames, Medway and Swale Estuaries Strategic Access Management Plan (SAMM) and the Thanet Coast and Estuary SAMM (also extended to cover Tankerton Slopes and Swalecliffe SAC in terms of wardening and remedial management) have been developed that outline a suite of mitigation measures that will be funded by developer contributions within the zone of influence (informed by visitor surveys in 2014) of these vulnerable European sites (refer to section 3.3 above for further details). These plans will be implemented collaboratively and will place a requirement on all development within each defined zone of influence (and beyond where the nature of the development may result in significant effects). Given the requirements of these plans, significant recreational effects on European sites are deemed unlikely.</p> <p>Given all of the above, in addition to the wording provided by Policy SP7, significant effects on European sites as result of the allocations provided by Policy SP3 are deemed unlikely.</p>	
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>Given the wording provided in Policy LB5 however, it is clear that development will not be permitted where it would be likely to lead to an adverse effect upon the integrity of a European site, thereby giving adequate protection to these sites in line with the requirements of the Habitats Directive.</p>	<p>The policy wording provided in Policy LB5 is deemed to provide sufficient protection to European sites with respect to adverse effects on site integrity and as such, no further amendments are considered necessary.</p> <p>However, it is also important to note that 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>
EMP11	<p>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.</p> <p>Given the wording provided in Policy LB5 however, it is clear that development will not be permitted where it would be likely to lead to an adverse effect upon the integrity of a European site, thereby giving adequate protection to these sites in line with the requirements of the Habitats Directive.</p>	<p>The policy wording provided in Policy LB5 is deemed to provide sufficient protection to European sites with respect to adverse effects on site integrity and as such, no further amendments are considered necessary.</p> <p>It is also important to note that 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>

Policy	HRA Screening Assessment	Recommendations
<p>TCL10</p>	<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 <p>WHITSTABLE</p> <ul style="list-style-type: none"> • 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>Given the wording provided in Policy LB5 however, it is clear that development will not be permitted where it would be likely to lead to an adverse effect upon the integrity of a European site, thereby giving adequate protection to these sites in line with the requirements of the Habitats Directive.</p>	<p>The policy wording provided in Policy LB5 is deemed to provide sufficient protection to European sites with respect to adverse effects on site integrity and as such, no further amendments are considered necessary.</p> <p>It should be noted that 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>
<p>T7</p>	<p>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>	<p>Given the wording provided in Policy LB5 however, it is clear that development will not be permitted where it would be likely to lead to an adverse effect upon the integrity of a European site, thereby giving adequate protection to these sites in line with the requirements of the Habitats Directive. Refer also to section 3.3 outlining the requirements of the UWWT Directive and the need to comply with the Habitats Directive, thereby ensuring that significant effects on European sites are deemed unlikely.</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. This requirement is covered by Policy CC4 and Policy QL12.</p>
<p>T8</p>	<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.</p>	<p>Given the wording provided in Policy LB5 however, it is clear that development will not be permitted where it would be likely to lead to an adverse effect upon the integrity of a European site, thereby giving adequate protection to these sites in line with the requirements of the Habitats Directive.</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. This requirement is covered by Policy CC4 and Policy QL12. Refer also to section 3.3 outlining the requirements of the UWWT Directive and the need to comply with the Habitats Directive, thereby ensuring that significant effects on European sites are deemed unlikely.</p>

Policy	HRA Screening Assessment	Recommendations
T11	<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 and changes to traffic volumes or speeds on the road network in the vicinity of the SAC are deemed unlikely due to this distance. Notwithstanding this, CCC has undertaken supporting analysis in order to model the emissions resulting from increased traffic loads as a result of the allocations for the period of the Local Plan on the Blean SAC. Calculations have shown that predicted increases of nitrogen oxides above the baseline level as a result of new proposals will not exceed 1% when compared against a critical load of 15kg/ha/year i.e. less than the agreed threshold cited by Natural England and as such, are not deemed to be significant in respect of effects on European sites (refer to section 3.3 for additional details). Furthermore, implementation of a Transport Strategy (refer to transport policies T1, T2, T3, T4, T10 and T17 in particular) that seeks to limit vehicle use and encourage alternative modes of travel, and progression in the development of low emission vehicles, should also further limit pollutant levels locally. Significant effects are therefore deemed unlikely.</p>	<p>Given the wording provided in Policy LB5 however, it is clear that development will not be permitted where it would be likely to lead to an adverse effect upon the integrity of a European site, thereby giving adequate protection to these sites in line with the requirements of the Habitats Directive.</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. This requirement is covered by Policy CC4 and Policy QL12. Refer also to section 3.3 outlining the requirements of the UWWT Directive and the need to comply with the Habitats Directive, thereby ensuring that significant effects on European sites are deemed unlikely.</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. Policy T17 within the Plan also provides sufficient protection in this regard through the requirement for a transport assessment where necessary.</p>
T12	<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 SACs sensitive to air quality changes. CCC has undertaken supporting analysis in order to model the emissions resulting from increased traffic loads as a result of the allocations for the period of the Local Plan on the Blean SAC. Calculations have shown that predicted increases of nitrogen oxides above the baseline level as a result of new proposals will not exceed 1% when compared against a critical load of 15kg/ha/year i.e. less than the agreed threshold cited by Natural England and as such, are not deemed to be significant in respect of effects on European sites (refer to section 3.3 for additional details). Furthermore, implementation of a Transport Strategy (refer to transport policies T1, T2, T3, T4, T10 and T17 in particular) that seek to limit vehicle use and encourage alternative modes of travel, and progression in the development of low emission vehicles, should also further limit pollutant levels locally. Significant effects are therefore deemed unlikely.</p>	<p>Given the wording provided in Policy LB5 however, it is clear that development will not be permitted where it would be likely to lead to an adverse effect upon the integrity of a European site, thereby giving adequate protection to these sites in line with the requirements of the Habitats Directive.</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. This requirement is covered by Policy CC4 and Policy QL12. Refer also to section 3.3 outlining the requirements of the UWWT Directive and the need to comply with the Habitats Directive, thereby ensuring that significant effects on European sites are deemed unlikely.</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. Policy T17 within the Plan also provides sufficient protection in this regard through the requirement for a transport assessment where necessary.</p>

Policy	HRA Screening Assessment	Recommendations
<p>T13</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. CCC has undertaken supporting analysis in order to model the emissions resulting from increased traffic loads as a result of the allocations for the period of the Local Plan on the Blean SAC. Calculations have shown that predicted increases of nitrogen oxides above the baseline level as a result of new proposals will not exceed 1% when compared against a critical load of 15kg/ha/year i.e. less than the agreed threshold cited by Natural England and as such, are not deemed to be significant in respect of effects on European sites (refer to section 3.3 for additional details). Furthermore, implementation of a Transport Strategy (refer to transport policies T1, T2, T3, T4, T10 and T17 in particular) that seek to limit vehicle use and encourage alternative modes of travel, and progression in the development of low emission vehicles, should also further limit pollutant levels locally. Significant effects are therefore deemed unlikely.</p>	<p>Given the wording provided in Policy LB5 however, it is clear that development will not be permitted where it would be likely to lead to an adverse effect upon the integrity of a European site, thereby giving adequate protection to these sites in line with the requirements of the Habitats Directive.</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. This requirement is covered by Policy CC4 and Policy QL12. Refer also to section 3.3 outlining the requirements of the UWWT Directive and the need to comply with the Habitats Directive, thereby ensuring that significant effects on European sites are deemed unlikely.</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. Policy T17 within the Plan provides sufficient protection in this regard through the requirement for a transport assessment where necessary.</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
T14	<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. CCC has undertaken supporting analysis in order to model the emissions resulting from increased traffic loads as a result of the allocations for the period of the Local Plan on the Blean SAC. Calculations have shown that predicted increases of nitrogen oxides above the baseline level as a result of new proposals will not exceed 1% when compared against a critical load of 15kg/ha/year i.e. less than the agreed threshold cited by Natural England and as such, are not deemed to be significant in respect of effects on European sites (refer to section 3.3 for additional details). Furthermore, implementation of a Transport Strategy (refer to transport policies T1, T2, T3, T4, T10 and T17 in particular) that seek to limit vehicle use and encourage alternative modes of travel, and progression in the development of low emission vehicles, should also further limit pollutant levels locally. Significant effects are therefore deemed unlikely.</p>	<p>Given the wording provided in Policy LB5 however, it is clear that development will not be permitted where it would be likely to lead to an adverse effect upon the integrity of a European site, thereby giving adequate protection to these sites in line with the requirements of the Habitats Directive.</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. This requirement is covered by Policy CC4 and Policy QL12. Refer also to section 3.3 outlining the requirements of the UWWT Directive and the need to comply with the Habitats Directive, thereby ensuring that significant effects on European sites are deemed unlikely.</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. Policy T17 within the Plan provides sufficient protection in this regard through the requirement for a transport assessment where necessary.</p> <p>To avoid indirect effects due to pollution, noise, light or visual impact, development of the Sturry crossing should be required, unless exempted by Natural England, to demonstrate how impacts upon Stodmarsh SAC and SPA 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 SAC and SPA, and monitoring requirements during and post-construction.</p>

Policy	HRA Screening Assessment	Recommendations
T15	<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. CCC has undertaken supporting analysis in order to model the emissions resulting from increased traffic loads as a result of the allocations for the period of the Local Plan on the Blean SAC. Calculations have shown that predicted increases of nitrogen oxides above the baseline level as a result of new proposals will not exceed 1% when compared against a critical load of 15kg/ha/year i.e. less than the agreed threshold cited by Natural England and as such, are not deemed to be significant in respect of effects on European sites (refer to section 3.3 for additional details). Furthermore, implementation of a Transport Strategy (refer to transport policies T1, T2, T3, T4, T10 and T17 in particular) that seek to limit vehicle use and encourage alternative modes of travel, and progression in the development of low emission vehicles, should also further limit pollutant levels locally. Significant effects are therefore deemed unlikely.</p>	<p>Given the wording provided in Policy LB5 however, it is clear that development will not be permitted where it would be likely to lead to an adverse effect upon the integrity of a European site, thereby giving adequate protection to these sites in line with the requirements of the Habitats Directive.</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. This requirement is covered by Policy CC4 and Policy QL12. Refer also to section 3.3 outlining the requirements of the UWWT Directive and the need to comply with the Habitats Directive, thereby ensuring that significant effects on European sites are deemed unlikely.</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. Policy T17 within the Plan provides sufficient protection in this regard through the requirement for a transport assessment where necessary.</p>

Policy	HRA Screening Assessment	Recommendations
TV6	<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>Increased urbanisation can increase recreational pressure on publically accessible SACs, SPAs or Ramsar Sites resulting in physical damage or disturbance of bird populations. Management plans to deal with existing recreational pressures are in place for the European Sites that currently have public access but additional or enhanced measures may be necessary to address the additional number of visitors associated with the quantum of development. In order to address this issue across the plan area and within adjoining authority areas, CCC has been part of a collaborative partnership to develop strategic management initiatives. In consultation with Natural England, the Thames, , Medway and Swale Estuaries Strategic Access Management Plan (SAMM) and the Thanet Coast and Estuary SAMM (also extended to cover Tankerton Slopes and Swalecliffe SAC in terms of wardening and remedial management) have been developed that outline a suite of mitigation measures that will be funded by developer contributions within the zone of influence (informed by visitor surveys in 2014) of these vulnerable European sites (refer to section 3.3 above for further details). These plans will be implemented collaboratively and will place a requirement on all development within each defined zone of influence (and beyond where the nature of the development may result in significant effects). Given the requirements of these plans, significant recreational effects on European sites are deemed unlikely.</p> <p>The wording provided in Policy LB5 strengthens the protection as, it is clear that development will not be permitted where it would be likely to lead to an adverse effect upon the integrity of a European site, thereby giving adequate protection to these sites in line with the requirements of the Habitats Directive.</p>	<p>The policy wording provided in Policy SP7, in particular in relation to the implementation of SAMM plans, is deemed to provide sufficient protection to European sites with respect to adverse effects on site integrity and as such, no further amendments are considered necessary.</p> <p>The following list comprises generic mitigation measures that are applicable to the Reculver Masterplan, which are equally applicable to this policy.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>

Policy	HRA Screening Assessment	Recommendations
CC4	<p>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.</p>	<p>Given the wording provided in Policy LB5 however, it is clear that development will not be permitted where it would be likely to lead to an adverse effect upon the integrity of a European site, thereby giving adequate protection to these sites in line with the requirements of the Habitats Directive.</p> <p>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.</p>
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>Given the wording provided in Policy LB5 however, it is clear that development will not be permitted where it would be likely to lead to an adverse effect upon the integrity of a European site, thereby giving adequate protection to these sites in line with the requirements of the Habitats Directive.</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. This requirement is covered by Policy CC4 and Policy QL12. Refer also to section 3.3 outlining the requirements of the UWWT Directive and the need to comply with the Habitats Directive, thereby ensuring that significant effects on European sites are deemed unlikely.</p>

Policy	HRA Screening Assessment	Recommendations
CC13	<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 have prepared a draft Water Resources Management Plan to deliver water supply requirements for the next 25 years from 2015-2040. This has been through a consultation process and is currently with government for approval. A Habitats Regulations Assessment (HRA) has been undertaken for this plan³⁸ and the screening assessment concludes that although there is the potential for Option EF-11 (Aylesford Water Re-use at Aylesford) to have significant adverse effects on the Medway Estuary and Marshes SPA/Ramsar it is best dealt with in a 'down-the-line' assessment due to the current absence of detailed information available and the time that will have elapsed when the option would be due to be implemented in 2023.</p> <p>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, 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 (for example in relation to Option EF-11 in the South East Water Resources Management Plan) 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. Consultation with Southern Water (refer to section 3.3 above) has however confirmed that they have sufficient capacity to support the Local Plan and that the UWWT Directive ensures that any new consents will also meet with the requirements of the Habitats Directive.</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, as confirmed by Southern Water, without an adverse effect on the integrity of any SACs, SPAs or Ramsar sites. It is deemed that Policy CC12 provides additional strength to this policy and helps to mitigate for the quantum of development set out in Policy SP2, thereby providing sufficient protection to European sites that could be effected by a deterioration in water availability.</p>

³⁸ South East Water (2013) 2014 Water Resources Management Plan Habitats Regulations Assessment – Screening Report and Appropriate Assessment, November 2013 [Online] Available at http://www.southeastwater.co.uk/media/182831/rWRMP_ER_Appendix_5_HRA_v2a.pdf (Accessed 30 May 2014).

Policy	HRA Screening Assessment	Recommendations
DBE11	<p>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> <p>Given the wording provided in Policy LB5 however, it is clear that development will not be permitted where it would be likely to lead to an adverse effect upon the integrity of a European site, thereby giving adequate protection to these sites in line with the requirements of the Habitats Directive.</p>	<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>The policy wording provided in Policy LB5 is deemed to provide sufficient protection to European sites with respect to adverse effects on site integrity and as such, no further amendments are considered necessary.</p>
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> <ul style="list-style-type: none"> • The objectives of the designated area and overall integrity of the area would not be compromised, or • 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>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 as the requirements of the Habitats Regulations override the legislative requirements related to other statutory protected sites within the UK.</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 as the requirements of the Habitats Regulations override those related to non-statutory protected sites within the UK.</p>

Policy	HRA Screening Assessment	Recommendations
<p>OS11</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, it should be ensured that access is managed. This management could be achieved through the implementation of a variety of measures including the provision of a Wardening Scheme that would also include monitoring surveys and improved public awareness, as noted for SP2 above. Additionally, alternative open space resources in accordance with CCCs Open Space Strategy may be deemed appropriate.</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 a given distance³⁹ of a European site could provide a financial contribution (appropriate to the scale of development in question and distance from the European site) towards a comprehensive wardening scheme (that would likely monitoring surveys and improving public awareness) and on-going access management in accordance with the adopted management plan. It is understood that discussions with Natural England are already underway in this regard and CCC are progressing with further studies outlining funding options and establishing an appropriate distance within which residential development is likely to be required to contribute.</p>
<p>QL11</p>	<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>Given the wording provided in Policy LB5 however, it is clear that development will not be permitted where it would be likely to lead to an adverse effect upon the integrity of a European site, thereby giving adequate protection to these sites in line with the requirements of the Habitats Directive.</p> <p>Furthermore, in relation to air quality emissions impacting on SAC, SPA or Ramsar sites, sufficient provision for the provision of transport assessments is provided by Policy T17.</p>

³⁹ The appropriate distance from a European site within which residential developments should contribute to on-going access management of these sites should be determined following consultation with the relevant stakeholders and statutory bodies alongside relevant research and where appropriate, travel studies of the locality. It is understood that such studies are currently ongoing in this regard.

Policy	HRA Screening Assessment	Recommendations
QL12	<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>Given the wording provided in Policy LB5 however, it is clear that development will not be permitted where it would be likely to lead to an adverse effect upon the integrity of a European site, thereby giving adequate protection to these sites in line with the requirements of the Habitats Directive.</p> <p>Furthermore, In relation to pollution impacting on SAC, SPA or Ramsar sites, Policy QL12 is deemed to provide sufficient protection.</p> <p>To avoid indirect effects due to pollution, noise, light or visual impact, development within the zone of influence 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 or cat predation, and monitoring requirements during and post-construction.</p>

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;
- Reculver Masterplan;
- Dover District Council Land Allocations Local Plan; and
- Herne Bay Action Plan

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.

In addition to the details outlined in Section 4, collaborative working between the Kent authorities, alongside Natural England, has been ongoing in order to develop strategic, cross-boundary solutions to issues relating to recreational disturbance as a result of in-combination effects from development related plans. North Kent authorities are working towards producing a strategic access and recreation management plan for the Thames, Medway and Swale estuaries. East Kent authorities have been undertaking joint research which will contribute to a Green Infrastructure strategy for East Kent, and Thanet District Council will be closely involved with preparation of an access management plan for the Thanet Coast. Once contributory studies are complete and management plans are finalised and adequately implemented, adverse effects on the integrity European sites are not deemed likely to be significant and furthermore, existing recorded recreation impacts on birds on European sites within the defined region will be reduced, thereby meeting the duties relating to the maintenance and restoration of European sites as required by Article 4(4) of the Birds Directive.

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) (Refer to comments provided for Policy SP2 above when considering in-combination effects from this Plan);
- 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 Local Plan is not likely to result in significant effects on European Sites. In respect of compliance of the Plan with the requirements of the Habitats Directive, no further amendments are deemed necessary. Should further iterations of the Plan result in changes to the current and screened policy wording, a further screening assessment of these changes should be undertaken and where necessary, mitigation measures and amendments may be required.

Appendix A

Box A1 European site definitions and legislation

Special Area of Conservation	SAC	Designated under the EU <i>Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora</i> , and implemented in the UK through the <i>Conservation of Habitats and Species Regulations 2010</i> (as amended), and the <i>Conservation (Natural Habitats, & c.) Regulations (Northern Ireland) 1995</i> (as amended).
Sites of Community Importance	SCI	Sites of Community Importance (SCIs) are sites which have been adopted by the European Commission but not yet formally designated as SACs by the UK government. Although not formally designated they are nevertheless fully protected by <i>Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora</i> , the <i>Conservation of Habitats and Species Regulations 2010</i> (as amended), and the <i>Conservation (Natural Habitats, & c.) Regulations (Northern Ireland) 1995</i> (as amended).
Candidate SAC	cSAC	Candidate SACs (cSACs) are sites that have been submitted to the European Commission, but not yet formally adopted. Although these sites are still undergoing designation and adoption they are fully protected by <i>Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora</i> , the <i>Conservation of Habitats and Species Regulations 2010</i> (as amended) and the <i>Conservation (Natural Habitats, & c.) Regulations (Northern Ireland) 1995</i> (as amended).
Possible SACs	pSAC	Sites that have been formally advised to UK Government, but not yet submitted to the European Commission. As a matter of policy the Governments in England, Scotland and Wales extend the same protection to these sites in respect of new development as that afforded to SACs.
Draft SACs	dSAC	Areas that have been formally advised to UK government as suitable for selection as SACs, but have not been formally approved by government as sites for public consultation. These are not protected (unless covered by some other designation) and it is likely that their existence will not be established through desk study except through direct contact with the relevant statutory authority; however, the statutory authority is likely to take into account the proposed reasons for designation when considering potential impacts on them.
Special Protection Area	SPA	Designated under <i>EU Council Directive 79/409/EEC on the Conservation of Wild Birds</i> (the 'old Wild Birds Directive') and <i>Directive 2009/147/EC on the Conservation of Wild Birds</i> (the 'new Wild Birds Directive', which repeals the 'old Wild Birds Directive'), and protected by Article 6 of <i>Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora</i> . These directives are implemented in the UK through the <i>Wildlife & Countryside Act 1981</i> (as amended), the <i>Conservation of Habitats and Species Regulations 2010</i> (as amended), the <i>Wildlife (Northern Ireland) Order 1985</i> , the <i>Nature Conservation and Amenity Lands (Northern Ireland) Order 1985</i> and <i>The Conservation (Natural Habitats, & c.) (Northern Ireland) Regulations 1995</i> (as amended) and the <i>Offshore Marine Conservation (Natural Habitats & c.) Regulations 2007</i> .
Potential SPA	pSPA	These are sites that are still undergoing designation and have not been designated by the Secretary of State; however, ECJ case law indicates that these sites are protected under Article 4(4) of <i>Directive 2009/147/EC</i> (which in theory provides a higher level of protection than the Habitats Directive, which does not apply until the sites are designated as SPAs), and as a matter of policy the Governments in England, Scotland and Wales extend the same protection to these sites in respect of new development as that afforded to SPAs, and they may be protected by some other designation (e.g. SSSI).
Ramsar		The <i>Convention on Wetlands of International Importance especially as Waterfowl Habitat</i> (Ramsar Convention or Wetlands Convention) was adopted in Ramsar, Iran in February 1971. The UK ratified the Convention in 1976. In the UK Ramsar sites are generally underpinned by notification of these areas as Sites of Special Scientific Interest (SSSIs) (or Areas of Special Scientific Interest (ASSIs) in Northern Ireland). Ramsar sites therefore receive statutory protection under the <i>Wildlife & Countryside Act 1981</i> (as amended), and the <i>Nature Conservation and Amenity Lands (Northern Ireland) Order 1985</i> . However, as a matter of policy the Governments in England, Scotland and Wales extend the same protection to listed Ramsar sites in respect of new development as that afforded to SPAs and SACs.

Table A1 SACs and Interest Features (based on www.jncc.gov.uk) (Note: I = Annex I Habitat; II = Annexe II Species; * = Feature that is Primary Reason for site selection; all other features are Qualifying Features)

SAC	Interest Features	
Blean Complex	Sub-Atlantic and medio-European oak or oak-hornbeam forests of the Carpinion betuli	I*
Dover to Kingsdown Cliffs	Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>)	I
	Vegetated sea cliffs of the Atlantic and Baltic Coasts	I*
Folkestone to Etchinghill Escarpment	Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>)	I*
Lydden and Temple Ewell Downs	Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>)	I*
Margate and Long Sands	Sandbanks which are slightly covered by sea water all the time	I*
Parkgate Down	Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>)	I*
Sandwich Bay	Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>)	I*
	"Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes")"	I*
	"Fixed coastal dunes with herbaceous vegetation ("grey dunes")"	I*
	Embryonic shifting dunes	I*
	Humid dune slacks	I
Stodmarsh	Desmoulin's whorl snail <i>Vertigo moulinsiana</i>	II*
Tankerton Slopes and Swalecliffe cSAC	Fisher's estuarine moth <i>Gortyna borellii lunata</i>	II*
Thanet Coast	Submerged or partially submerged sea caves	I*
	Reefs	I*
Wye and Crundale Downs SAC	Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>)	

Table A2 SPAs and Interest Features (based on www.jncc.gov.uk)

SPA	Interest Features	Art.	B	W	P
Medway Estuary and Marshes SPA	Avocet <i>Recurvirostra avosetta</i>	4.1	✓	✓	
	Common Tern <i>Sterna hirundo</i>	4.1	x		
	Little Tern <i>Sterna albifrons</i>	4.1	x		
	Bewick's swan <i>Cygnus columbianus bewickii</i>	4.1		✓	
	Black-tailed Godwit <i>Limosa limosa islandica</i>	4.2		✓	
	Curlew <i>Numenius arquata</i>	4.2		x	
	Dark-bellied Brent goose <i>Branta bernicla</i>	4.2		✓	
	Dunlin <i>Calidris alpina alpina</i>	4.2		✓	
	Great crested grebe <i>Podiceps cristatus</i>	4.2		x	
	Greenshank <i>Tringa nebularia</i>	4.2		x	
	Grey plover <i>Pluvialis squatarola</i>	4.2		✓	
	Knot <i>Calidris canutus</i>	4.2		x	
	Oystercatcher <i>Haematopus ostralaegus</i>	4.2		x	
	Pintail <i>Anas acuta</i>	4.2		✓	
	Redshank <i>Tringa totanus</i>	4.2		✓	
	Ringed Plover <i>Charadrius hiaticula</i>	4.2		✓	+
	Shelduck <i>Tadorna tadorna</i>	4.2		✓	
	Shoveler <i>Anas clypeata</i>	4.2		x	
	Teal <i>Anas crecca</i>	4.2		x	
	Turnstone <i>Arenaria interpres</i>	4.2		x	
Wigeon <i>Anas penelope</i>	4.2		x		
Breeding bird assemblage	4.2	x			
Waterfowl assemblage	4.2		✓		
Outer Thames Estuary SPA	Red-throated diver <i>Gavia stellata</i>	4.1		✓	
Stodmarsh SPA	Bittern <i>Botaurus stellaris</i>	4.1		✓	
	Hen harrier <i>Circus cyaneus</i>	4.1		✓	
	Gadwall <i>Anas strepera</i>	4.2	x	x	
	Shoveler <i>Anas clypeata</i>	4.2		x	
	Breeding bird assemblage	4.2	x		

Table A2 (Continued) SPAs and Interest Features (based on www.jncc.gov.uk)

SPA	Interest Features	Art.	B	W	P
Thanet Coast and Sandwich Bay SPA	Golden plover <i>Pluvialis apricaria</i>	4.1		x	
	Little Tern <i>Sterna albifrons</i>	4.1	x		
	Turnstone <i>Arenaria interpres</i>	4.2		✓	
The Swale SPA	Avocet <i>Recurvirostra avosetta</i>	4.1	+	+	
	Marsh harrier <i>Circus aeruginosus</i>	4.1	+		
	Mediterranean gull <i>Larus melanocephalus</i>	4.1	+		
	Bar-tailed godwit <i>Limosa lapponica</i>	4.1		+	
	Golden plover <i>Pluvialis apricaria</i>	4.1		+	
	Hen harrier <i>Circus cyaneus</i>	4.1		+	
	Dark-bellied Brent goose <i>Branta bernicla</i>	4.2	-		
	Ringed Plover <i>Charadrius hiaticula</i>	4.2			+
	Black-tailed Godwit <i>Limosa limosa islandica</i>	4.2		+	
	Dunlin <i>Calidris alpina alpina</i>	4.2		-	
	Knot <i>Calidris canutus</i>	4.2		+	
	Pintail <i>Anas acuta</i>	4.2		+	
	Shoveler <i>Anas clypeata</i>	4.2		+	
	Waterfowl assemblage	4.2		✓	
Breeding bird assemblage	4.2	-			

KEY

Art. 4.1	Article 4.1 Qualification
Art. 4.2	Article 4.2 Qualification
B	Breeding
W	Wintering
P	On Passage
+	Species added in SPA review
x	Species removed in SPA review

Table A3 Ramsar Sites Considered During HRA

Ramsar Site	Cri.	Features
Medway Estuary and Marshes Ramsar	2	The site supports a number of species of rare plants and animals. The site holds several nationally scarce plants, including sea barley <i>Hordeum marinum</i> , curved hard-grass <i>Parapholis incurva</i> , annual beard-grass <i>Polypogon monspeliensis</i> , Borrer's saltmarsh-grass <i>Puccinellia fasciculata</i> , slender hare's-ear <i>Bupleurum tenuissimum</i> , sea clover <i>Trifolium squamosum</i> , saltmarsh goose-foot <i>Chenopodium chenopodioides</i> , golden samphire <i>Inula crithmoides</i> , perennial glasswort <i>Sarcocornia perennis</i> and one-flowered glasswort <i>Salicornia pusilla</i> . A total of at least twelve British Red Data Book species of wetland invertebrates have been recorded on the site. These include a ground beetle <i>Polistichus connexus</i> , a fly <i>Cephalops perspicuus</i> , a dancefly <i>Poecilobothrus ducalis</i> , a fly <i>Anagnota collini</i> , a weevil <i>Baris scolopacea</i> , a water beetle <i>Berosus spinosus</i> , a beetle <i>Malachius vulneratus</i> , a rove beetle <i>Philonthus punctus</i> , the ground lackey moth <i>Malacosoma castrensis</i> , a horsefly <i>Atylotus latistriatus</i> , a fly <i>Campsicnemus magius</i> , a soldier beetle, <i>Cantharis fusca</i> , and a crane fly <i>Limonia danica</i> . A significant number of non-wetland British Red Data Book species also occur.
	5	47637 waterfowl (5 year peak mean 1998/99-2002/2003)
	6	1% of a waterbird population (Dark-bellied brent goose; Dunlin (ssp. alpina); Grey plover; Knot; Pintail; Redshank; Ringed plover; Shelduck)
Stodmarsh Ramsar	2	Six British Red Data Book wetland invertebrates. Two nationally rare plants, and five nationally scarce species. A diverse assemblage of rare wetland birds.
Thanet Coast and Sandwich Bay Ramsar	2	Supports 15 British Red Data Book wetland invertebrates.
	6	1% of a waterbird population (Turnstone)
The Swale Ramsar	2	The site supports nationally scarce plants and at least seven British Red data book invertebrates.
	5	20,000 or more waterbirds (77501 waterfowl in winter)
	6	1% of a waterbird population (Redshank, Dark-bellied brent goose, Grey Plover)

NOTES ON CRITERIA

- 1 Contains a representative, rare, or unique example of a natural or near-natural wetland type found within the biogeographic region.
- 2 Supports vulnerable, endangered, or critically endangered species or threatened ecological communities.
- 3 Supports populations of plant and/or animal species important for maintaining the biodiversity of a particular biogeographic region.
- 4 Supports plant and/or animal species at a critical stage in their life cycles, or provides refuge during adverse conditions.
- 5 Regularly supports 20,000 or more waterbirds.
- 6 Regularly supports 1% of the individuals in a population of one species or subspecies of waterbird.
- 7 Supports a significant proportion of indigenous fish subspecies, species or families, life-history stages, species interactions and/or populations that are representative of wetland benefits and/or values and thereby contributes to global biological diversity.
- 8 An important source of food for fish, spawning ground, nursery and/or migration path on which fish stocks, either within the wetland or elsewhere, depend.
- 9 Regularly supports 1% of the individuals in a population of one species or subspecies of wetland-dependent non-avian animal species.

Appendix B

Feature abbreviations

Table B1 Interest feature abbreviations

Abbreviation	Feature
Oak-hornbeam forests	Sub-Atlantic and medio-European oak or oak-hornbeam forests of the <i>Carpinion betuli</i>
Calcareous dry grassland and scrub	Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>)
Vegetated sea cliffs	Vegetated sea cliffs of the Atlantic and Baltic Coasts
Sub-tidal sandbanks	Sandbanks which are slightly covered by sea water all the time
Dunes with creeping willow	Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>)
White dunes	Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes")
Grey dunes	Fixed coastal dunes with herbaceous vegetation ("grey dunes")
Embryonic shifting dunes	Embryonic shifting dunes
Humid dune slacks	Humid dune slacks
Desmoulin's whorl snail	Desmoulin's whorl snail <i>Vertigo moulinsiana</i>
Fisher's estuarine moth	Fisher's estuarine moth <i>Gortyna borelii lunata</i>
Sea caves	Submerged or partially submerged sea caves
Reefs	Reefs

Appendix C Nitrogen Deposition Summary Tables

Table C1: Predicted increased in Nitrogen deposition resulting from predicted increases in traffic on the A290 across the plan period.

Site ⁴⁰	Increases ⁴¹	Total Traffic volumes (AADT)	Predicted NO _x conc'n for plan period (ug/m ³) ⁴²	NO ₂ conc'n for year 2025 (NO ₂ = NOug/m ³ x (46/30))	Flux (NO ₂ ugm ⁻² s ⁻¹) (ground level conc'n X velocity {0.003})	N Deposition amounts (kg/ha/yr) (NO ₂ ugm ⁻² s ⁻¹ X conversion factor 96)	Difference between without and with plan allocations (N kg/ha/yr) ³	Nitrogen deposition increase as % of critical vol (15kg/ha/yr) {(diff/15) X 100} btwn with/without plan
Pean Hill	Current baseline	12212	20.5	31.4333	0.0943	9.0528		
Pean Hill	Without LP	15033	21.5	32.9667	0.0989	9.4944		
Pean Hill	Total with LP	16600	21.8	33.4267	0.1003	9.6269	0.1325	0.883
Blean Common	Current baseline	12212	18.4	28.2133	0.0846	8.1254		
Blean Common	Without LP	15033	19	29.1333	0.0874	8.3904		
Blean Common	Total with LP	16600	19.1	21.2867	0.0879	8.4346	0.0442	0.294
Tile Kiln Hill	Current baseline	12212	17	26.0667	0.0782	7.5072		
Tile Kiln Hill	Without LP	15033	17.2	26.3733	0.0791	7.5955		
Tile Kiln Hill	Total with LP	16600	17.3	26.5267	0.0796	7.6397	0.0442	0.294

⁴⁰ Road locations within 200m of the SAC woodland.

⁴¹ This and the next column show the current traffic count, the predicted increase in traffic without the local plan, and the predicted total increase in traffic (with local plan allocations) over the Local Plan period. The total includes the local plan allocations and background increases in car ownership and use.

⁴² NO_x amounts calculated using the DMRB model for assessing air pollution and DEFRA's predicted background pollution levels. The NO_x data is calculated using Defra's 2011 air pollution levels.

Table C2: Information put into DMRB Assessment of Local Air Quality to provide predicted NO_x amounts resulting from predicted increases in traffic on the A290 due to allocations in the publication draft of the Canterbury District Local Plan, across the plan period

Site ⁴³	Assessment	Total predicted Traffic volumes (AADT) (for plan period)	Distance to receptor (m) (designated habitat)	Average Speed km/h	Road type	Predicted Background NO _x ⁴⁴ 2025 (ug/m ³)	Predicted Background NO ₂ ⁴⁵ 2025 (ug/m ³)
Pean Hill	Current/baseline	12212 (actual)	35	64	A	15.8	11.8
Pean Hill	Without LP	15033	35	64	A	15.8	11.8
Pean Hill	Total with LP	16600	35	64	A	15.8	11.8
Blean Common	Current/baseline	12212 (actual)	59	56	A	15.8	11.8
Blean Common	Without LP	15033	59	56	A	15.8	11.8
Blean Common	Total with LP	16600	59	56	A	15.8	11.8
Tile Kiln Hill	Current/baseline	12212 (actual)	106	61	A	16.2	12.2
Tile Kiln Hill	Without LP	15033	106	61	A	16.2	12.2
Tile Kiln Hill	Total with LP	16600	106	61	A	16.2	12.2

⁴³ Road locations within 200m of the SAC woodland.

⁴⁴ For the year 2011 – Taken from DEFRA Modelling.

⁴⁵ For the year 2011 – Taken from DEFRA Modelling