

An East Kent Approach to Green Infrastructure and Recreation

With Particular Reference to ‘Natura 2000’ sites

Phase I Report – Evidence Base

**Final Report
April 2014**

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Acknowledgements

This study would not have been possible without the input and support from many people across the study area. The authors would like to thank the many people who contributed time, data and knowledge to this study. These include officers from the four local authorities, Nick Delaney, Ashley Hills, Tony Child, Jillian Barr, Adrian Verrell, Piran Cooper and David Ilsley, Debbie Salmon and Sue Young of the Kent Wildlife Trust, Angela Marlow, Jenny Bowen and Jo Dear of Natural England, Owen Leyshon of the Romney Marsh Countryside Partnership, Ruth Wood of Visit Kent, Rebecca Hoffman of Kent County Council.

Suggested citation: S. Bayne and V. Hyland, An East Kent Approach to Green Infrastructure and Recreation (with particular reference to 'Natura 2000' sites), Phase I Report – Evidence Base, for Dover District Council 2013.

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Executive Summary

Background to this Report

This report was commissioned by a Steering Group formed of the Local Planning Authorities of Canterbury City Council, Thanet District Council, Dover District Council and Shepway District Council working in partnership, which together form part of the wider East Kent Green Infrastructure Partnership (EKGIP).

The aim of this report is to inform future co-operative working by the Local Planning Authorities, both as part of the EKGIP and as a working group of planning authorities. It is also intended to provide background to help guide the future direction of the wider group of the East Kent Green Infrastructure Partnership (EKGIP).

As the east Kent local planning authorities (LPAs) develop their Local Plans and finalise their proposals for future housing growth, the Habitats Regulations¹ require the effect of these plans on the European designated sites² across east Kent to be assessed and understood.

The regulations advise that a competent authority³ can only agree to a plan or project if it can be ascertained that it will not adversely affect the integrity of any European site, taking into account any conditions or restrictions that could be put in place. Any plan or project, if shown to adversely affect a European site, must include measures to mitigate this affect if the impact cannot be avoided. A robust evidence base is essential to ensure that the assessment of any plan or project provides a sound basis for any given conclusions.

The European designated sites in east Kent are spread across the study area, with concentrations of sites on the coast around Dungeness, Pegwell Bay and Sandwich Bay, Dover and the north coast from Seasalter to Margate.

Recreation has the potential to affect designated areas. Birds have been shown to be sensitive to disturbance from recreational activities and habitats can suffer from trampling and erosion. Several of the European designated sites across east Kent are subject to high levels of recreational activity.

Concerns around recreational pressure on the European sites across east Kent⁴ have been raised by Natural England (NE), the Kent Wildlife Trust (KWT) and other agencies operating in the area.

In response to concerns regarding the effect of recreational pressures on the European sites and their bird species from proposed new housing, the east Kent LPAs are taking a joint approach in advancing their understanding of the potential pressures on the suite of European sites across east Kent.

¹ The Conservation of Habitats and Species Regulations 2010 (and Amendments 2012).

² Sites include both Special Protection Areas (SPAs), designated for their international importance for bird species, and Special Areas of Conservation, designated for their outstanding habitats, alongside internationally designated Ramsar sites which under UK law are treated as if they were an SPA.

³ Includes local planning authorities.

⁴ See Table 1: Summary of Internationally Designated Sites and Qualifying Species and Habitats within Study Area.

The aim of this study is to provide a first step in developing an east-Kent approach to green infrastructure planning. It provides a reference document - at the time of writing - on the various plans, reports, surveys and assessments that have been carried out in east Kent; in order to advance understanding across the four study districts, to further requirements under the duty to cooperate and to lay a basis for future joint working.

The overall aims of this first phase study were to support planning and development in east Kent through advancing understanding of the potential recreational pressure on nature conservation sites, and in particular the east Kent 'Natura 2000' network sites and assisting in developing a consistent base for development plan making in accordance with the Duty to Cooperate.

This report has the following aims:

- To collate available information on the distribution of future housing in east Kent;
- To collate available information on recreation in east Kent;
- To collate available information on the Natura 2000 network;
- Identify any significant gaps in evidence and assess the need for further development of the evidence base;
- To outline the role and possible direction of future partnership working, both between the local planning authorities and the wider EKGIP;
- Make recommendations for taking forward strategic and joint working in east Kent.

Comparator Case Studies: Key Points and Lessons Learned

A number of UK case studies in which there were similar issues relating to recreational pressures on SPAs were examined. The key points of interest to the east Kent situation were:

- Approaches involved a wide partnership of local planning authorities;
- The research process was coordinated by one partner or an organisation that brought together and represented all the partners;
- Prior to carrying out studies into bird disturbance, in most cases a number of studies had already been commissioned relating to bird modelling, roost surveys, visitor and household surveys, recreation studies and user surveys;
- The studies provided a strong correlation between visitors and bird disturbance and declines in numbers. The evidence in all cases was not conclusive due to the possibility of other factors playing a role, and the focus of the studies on recreation. However, the evidence in most cases was considered to be sufficiently compelling to lead to the development or consideration of mitigation measures and/or the development of visitor access management approaches;
- Evidence from visitor surveys to the sites provided justification for developing zones of influence within which mitigation measures would be required to be provided by developers. In the examples examined the zones vary from 3.5km to 10km from access points into the sites;

- Mitigation Strategies vary, but comprise some or all of the following elements:
 - Wardening;
 - Visitor access management;
 - Infrastructure works including site protection;
 - Habitat improvements and/or management;
 - Education;
 - Enforcement;
 - Codes of Conduct;
 - Interpretation and Signage;
 - Dog project – to include education and involvement of dog owners;
 - Monitoring of birds and visitors;
 - Provision of alternative natural greenspace sites (SANGs - Suitable alternative natural greenspace sites) or where sites are not feasible, a contribution to listed projects through CIL (Community Infrastructure Levy).
- Where mitigation strategies have progressed, the LPA proposes to levy a tariff in order to fund the mitigation works;
- Green Infrastructure proposals were developed in local plans in order to attract visitors away from the designated sites.

The East Kent suite of European Sites

There are many Natura 2000 designated sites in east Kent:

Special Protection Areas (SPAs)	Ramsars ⁵	Special Areas of Conservation (SACs)
Stodmarsh	Stodmarsh	Stodmarsh
Thanet Coast and Sandwich Bay	Thanet Coast and Sandwich Bay	Thanet Coast
The Swale	The Swale	Sandwich Bay
Dungeness to Pett Level		Dungeness
Special Areas of Conservation (SACs)		
Dover to Kingsdown Cliffs	Lydden and Temple Ewell	Folkestone to Etchinghill Escarpment
Parkgate Down	Blean Complex	

Planning in East Kent

The timetables and processes have been brought together for the LPAs' Local Plans, together with their housing growth figures and locations of major housing sites⁶. Across the study area there is a forecast increase in population of 60,000 by 2031, plus significant increases in neighbouring authority areas.

⁵ SPA and Ramsar designations of the same name may overlap but do not necessarily have the same boundaries.

⁶ The information gathered and reported was correct at the time of drafting this report.

All the Local Planning Authorities are at different stages in their Local Plan development so figures may change, however at the time of writing approximately 46,000 new homes are proposed across the east Kent local authority areas, plus at least a further 20,000⁷ in neighbouring authority areas.

Visitors and Recreation

All the Natura 2000 sites in the study area have some public access and a degree of recreational use.

The coastal sites are a popular destination for both tourists and residents, with many of the latter using the designated sites for local dog walking. As a result there is a pattern of all year round useage with peaks in the summer. In some areas there are few alternative greenspace sites for local people other than the designated sites.

The English Coastal Path is also in the process of being developed around the Kent coast, although it will require its own HRA to be carried out in respect of the European designated sites along its route.

A number of visitor surveys have been carried out across the study area but some sites have little or no data on use. However, some are out of date and there is a lack of commonly adopted methodology, making comparisons - and conclusions - difficult to achieve. However, most visitor surveys indicate a majority use by local residents (although this can vary according to the season and the weather), with a high percentage of local users being accompanied by dogs.

In addition very few surveys are repeated, making trends in useage difficult to assess.

The designated sites form part of the character and attractiveness of east Kent. A number of the designated sites are actively promoted as tourist destinations but tourism surveys tend not to include questions regarding use of the designated sites. However, the promotion of the sites presents challenges. Shepway and Rother District Councils have decided to develop a “sustainable access strategy” for the Romney Marsh and Rye Bay area. This will be used to ensure that increased visiting does not adversely impact on the integrity of the designated sites. This sustainable approach may be a useful model for other areas of east Kent.

⁷ To be confirmed.

Summary of Conclusions and Recommendations

The Natura 2000 Sites – Thanet Coast Suite

The Thanet Coast sites present a complex situation for east Kent. The designated sites⁸ cover three district authorities; Thanet District, Canterbury City Council area and Dover District.

Until the 2013 turnstone survey population numbers had been relatively stable. However, the 2013 survey recorded a sharp decline in numbers. It cannot be determined at this stage whether this lower count reflects a fall in the population or whether it is an atypical count, perhaps due to weather conditions.

At the time of this report, Natural England consider that Thanet's projected population increase⁹ is likely to increase visits to the SPA and that this increase is likely to have a significant effect.¹⁰ A package of avoidance and mitigation measures is therefore required.

One of the key tools in implementing a strategic mitigation approach is the development of a catchment zone for the protected site. If a development should within fall within this zone a strategic mitigation approach would apply. An appropriate catchment zone for the Thanet sites is as yet undetermined.

Several recent surveys have centred on or around Pegwell Bay, with some surveys at Sandwich Bay, increasing understanding of visitor patterns and the catchment zone to those areas surveyed. However, there is no visitor information suitable for this purpose on the remaining areas of the SPA, including Ramsgate, Herne Bay and Whitstable, where there are also turnstone roosts.

The Kent Wildlife Trust bird disturbance report¹¹ provides useful and up to date information on disturbance activity in Pegwell Bay. However, although it records the magnitude and location of disturbance events, it is beyond the scope of the data collated to analyse whether the recent drop in turnstone population is due to recreational disturbance.

Advice from Natural England¹² has indicated that provision of a wardening scheme would provide a suitable approach to mitigation. However, the effect of mitigation should last in-perpetuity and monitoring would also normally be a fundamental part of a mitigation scheme.

Other elements of managing access which should be considered, for example on site measures to channel visitors, rationalisation of access points, the location of car parks, interpretation on sites and wider promotional material could make a wardening approach more effective. These could be drawn together in a strategic access management plan.

⁸ Thanet Coast SAC and Sandwich Bay SAC, Thanet Coast and Sandwich Bay SPA and Ramsar.

⁹ Predicted by Kent County Council at 6.3% between 2006 and 2026.

¹⁰ Letter from Natural England to Thanet District Council, 28th August 2013, Ref 92473.

¹¹ Swandale, T., Waite, A. (October 2012), Pegwell Bay, Kent: Bird Disturbance Study 2010-2011.

¹² Letter from Natural England to Thanet District Council, 28th August 2013, Ref 92473.

	Recommendation	SDC	DDC	TDC	CCC	EKGI
1	Consider the need, in consultation with Natural England, for visitor surveys at Reculver Country Park as the main visitor access point in Canterbury District, and at other turnstone roost sites in Canterbury District, in order to find out the information on visitors to support a mitigation strategy.			✓	✓	
2	Consider the need, in consultation with Natural England, for further information on visitors to the remainder of the Thanet Coast outside of Pegwell Bay.			✓	✓	
3	Utilise the forthcoming visitor survey for Reculver Country Park to include questions to support any mitigation strategy.				✓	
4	The efforts of the Thanet Coast wardens and 'Activity Sheets' could be better utilised to support this process, with implementation of surveys utilising a robust methodology.			✓		
5	Consider the need, scale and funding, in consultation with Natural England, of further ecological study to better understand the links between recreation and bird populations and the linkages around the entire SPA (Dover, Thanet and Canterbury).		✓	✓	✓	
6	Ensure that the methodology of the existing turnstone surveying supports the evidence requirements of developing mitigation, for example if appropriate to gather further information on disturbance events.		✓	✓	✓	
7	Carry out turnstone monitoring more frequently (has not been annually to date).		✓	✓	✓	
8	Dover District's mitigation strategy already includes a facility to carry out further surveys, and future monitoring will be required. Ensure that the methodology of these studies is 'fit for purpose' and that the cost of these is adequately provided for.		✓			
9	Dover, Thanet and Canterbury local authorities should consider the need for and justification of a combined approach to precautionary measures or mitigation.		✓	✓	✓	
10	Information should be shared and a combined approach taken by Thanet, Canterbury, Dover to evidence gathering along with information sharing by all other authorities as required under the duty to cooperate.		✓	✓	✓	
11	Consider, in consultation with Natural England, the design of a wardening scheme which will be effective, deliverable and proportionate, considering in particular enforcement roles and funding.		✓	✓	✓	
12	Ensure monitoring of mitigation is included in any scheme.		✓	✓	✓	
13	Approach Natural England to ensure that the dog strategy developed through the England Coastal Path project is circulated to all competent authorities and that implementation is secured.		✓	✓		
14	Evaluate current management arrangements, in particular arrangements for the NNR and the Thanet Coast project, in the context of their capacity for absorbing 'business as usual'.		✓	✓		
15	Consider developing a strategic sustainable access management approach.		✓	✓	✓	

The Natura 2000 Sites - Chalk Downland Sites

There are several chalk downland site within the study area:

- Dover to Kingsdown Cliffs SAC;
- Lydden and Temple Ewell SAC;
- Folkestone to Etchinghill Escarpment SAC;
- Parkgate Down SAC

Due to the similarity in habitat, all these sites require minimal trampling and grazing in order to support environmental conditions. Dover to Kingsdown Cliffs SAC, Lydden and Temple Ewell SAC and Folkestone to Etchinghill Escarpment SAC are also all located on urban edges of either Dover or

Folkestone. The most extensive investigation on any of these sites was carried out at Lydden and Temple Ewell SAC as part of the HRA for the Whitfield Urban Extension, for which green infrastructure is provided to deflect users from Lydden Temple Ewell. Apart from this report there is little data on impacts on sites and an opportunity for greater co-ordinated working to build the evidence base.

	Recommendation	SDC	DDC	TDC	CCC	EKGI
16	Expand the evidence base on visitors for the chalk downland sites.	✓	✓			
17	Implement consistent monitoring of the impacts on the sites.	✓	✓			
18	Coordinated working between Shepway and Dover District Councils to ensure that the evidence gathered is implemented and is comparable, transferable and robust.	✓	✓			
19	Utilise the opportunity presented by the 'Up on the Downs' Landscape Partnership Scheme to expand the evidence base using a robust methodology for future use in HRA which is also comparable with other surveys being undertaken and ensure that learning widely disseminated to other east Kent partners to further the development of strategic access and visitor management.	✓	✓			

The Natura 2000 Sites - Stodmarsh

There is little evidence on recreational impacts on Stodmarsh NNR. Further investigation will therefore need to be carried during Canterbury City Councils' Local Plan development due to the proximity of the housing allocation site to the north of the site at Hersden and to the west of Sturry.

The Natura 2000 Sites - The Blean Complex

The 2005 Blean visitor site survey revealed that it is mainly used by daily, local visitors from the Canterbury area with the most popular activity being to walk a dog.¹³ The Blean Complex falls within the 6km catchment of several proposed housing allocation sites. Due to the attraction of the complex as a whole and the local visitor base, it is likely that the Blean will receive an increase in visitors.

	Recommendation	SDC	DDC	TDC	CCC	EKGI
20	Retain and strengthen the Blean Partnership to continue the coordinated approach to management.				✓	
21	Gain a better understanding of visitation in the Blean and catchment area, as most site managers do not have an accurate picture of the number of visitors to their sites.				✓	
22	Further develop integrated visitor management through the Blean Partnership, perhaps developing an integrated access strategy which incorporates protection of sensitive areas.				✓	

The Natura 2000 Sites - Dungeness

Dungeness receives a high number of visitors. The need for sustainable access management alternative green infrastructure is well recognised in Shepway District, with policies to support both approaches in their local plan. The methodology and implementation of the forthcoming visitor survey will be of critical importance in understanding visitor patterns.

¹³ Rural Resources for Kent Wildlife Trust (2005), Kent Wildlife Trust Blean Audience Development Plan.

Joint Working and Strategic Approaches - A Landscape-Scale Approach

The population of east Kent is forecast to increase by 60k in the next 20 years, potentially creating pressures on protected wildlife sites, exacerbated in some areas through deficiencies in recreational open space.

Many of the issues cannot be resolved on a site by site, or even a district by district, basis. The inter-connected nature of east Kent's wildlife sites and the pressures on the area lead to the need for a pan-east Kent, landscape-scale approach that will address the range of issues, and to look across boundaries to ensure that development in this area is truly sustainable. A co-ordinated cross-district approach would add to and strengthen the existing approach of local authorities to include buffers or greenspace within development sites.

In order to progress this, some action are suggested as next steps.

- **Develop an evidence base** and decision-making tools, to fill information gaps and provide mechanisms for further development of information base;
- **Identify pressures for change:** e.g. through GIS mapping of 'Pressures for Change' in a common format across the study area;
- **Identify opportunities:** Significant improvements to the ecological network can be achieved over large areas by enlarging and enhancing existing wildlife sites, improving ecological connectivity and creating new sites and potentially extending the network into urban areas.
- **GIS opportunities mapping** provides a key tool to guide decisions about the identification and selection of projects.

Local Planning Authorities can now identify and agree where locally determined NIAs can take shape and include NIAs in their Local Plans. This may be an area that the client group may wish to investigate further.

Joint Working and Strategic Approaches - East Kent Approach to Green Infrastructure, Strategic Visitor Management, the EKGIP and Links with Visitor Economy

Green Infrastructure

Each of the LPAs in the study area has developed their own approach to GI planning, and an East Kent GI typology has been agreed. However, there may be a need to consider taking this work forward to develop an east Kent GI strategy that will take a shared and consistent approach to GI policy and planning and the prioritisation and targeting of delivery. By adopting a strategic green infrastructure approach east Kent could bring together the various strands of existing work being progressed at all scales and in neighbouring authorities.

A strategic approach to green infrastructure in east Kent would complement an east Kent sustainable access and recreation management strategy, assist in developing alternative greenspace

provision for recreational activities and support the provision of suitable alternative greenspaces which could better withstand visitor pressures.

The LPAs could lead a Green Infrastructure Partnership to:

- Develop a single, bold vision focused on developing a strategic green infrastructure network;
- Create guiding principles for all local authorities and other stakeholders to work to;
- Develop strategic priorities for east Kent;
- Make recommendations for investing in the provision and management of multi-functional green infrastructure;
- Provide evidence or mechanisms to support green infrastructure contributions through CIL and other funding sources;
- Develop action and delivery plans;
- Identify priority projects, support in fund raising and coordinating activity across the area.

Strategic Visitor Management

It has previously been recommended that a sustainable strategic access and recreation management approach would be of use for the Thanet suite of sites. However, there would be value in extending this approach across east Kent. Through understanding of the network of greenspace and countryside sites across east Kent, their sensitivity and capacity for visitors, a cross-east Kent approach would enable promotional material and on-site information to channel visitors away from more sensitive sites at particular times of year, and towards those areas which are more 'robust'. An ANG analysis across the study area would provide the information needed to complement a strategic approach to visitor management and access.

The Role of the EKGI Partnership

The East Kent Green Infrastructure Partnership was formed in 2009. Although not formally constituted, the core members have been the four east Kent local authorities, joined by Natural England, the Environment Agency, the Kent Wildlife Trust and the Royal Society of the Protection of Birds and Kent County Council, represented by the Natural Economy East Kent project (now ended).

The governance arrangements for East Kent's Green Infrastructure Partnership will be crucial to its success. In order to move any of these ideas forward it is important to assemble the right groupings that can develop ideas and take them from grass roots to the highest decision-making level. It will be important to raise the profile of east Kent's environment, and ensure that decision-making processes are well-connected into the local area, reaching out to wider agendas (e.g. social and economic) and linking into political decision-making.

The existing EKGI Partnership provides a sound base for developing ideas for partnership working; building on existing projects and decision-making frameworks.

Visitor Economy

East Kent could explore the development of ‘gateways’ from which visitors could visit the countryside. Traditionally access to the countryside has been through country park sites, but could be extended to encompass a range of villages and businesses offering the visitor a rural welcome. This could mean villages become ‘hubs’ for particular activities, developing, for example, a suite of walking routes, or cycling routes, depending on the infrastructure. Businesses such as farms and attractions could also become a ‘gateway’ into the wider countryside, attracting visitors, and therefore spend, to local economies. Such an approach would provide alternative recreation destinations or starting points, helping to channel recreation visitors to the most suitable sites and away from sensitive sites. This approach may also help to channel and retain spend further in local economies.

	Recommendation	SDC	DDC	TDC	CCC	EKGI
23	Work towards strategic approaches to landscape scale conservation and green infrastructure planning. Towards this end build a robust evidence base which provides a common information base (surveys, mapping etc.), identifies pressures for change and opportunities.					✓
24	EKGIP to consider establishing an east Kent Nature Improvement Area.					✓
25	EKGIP to consider developing a coordinated approach to green infrastructure planning.					✓
26	Carry out a strategic review of accessible natural greenspace and other recreational spaces, highlighting deficiencies in the network at a strategic level. Consider the extent to which protected sites make up the network of accessible recreational space, including Local Nature Reserves and Local Wildlife Sites.					✓
27	From the results of recommendation 27, consider developing a sustainable strategic access management across east Kent, particularly in the districts of Thanet, Canterbury and Dover.					✓
28	Consider and implement governance structures of the EKGIP, the need for a planners group and a wider pan-east Kent Green Infrastructure grouping.					✓
29	Set a work plan in order to focus progress of the EKGIP group(s).					✓
30	Utilise the background information in the Natural Economy East Kent Countryside Tourism Plan (2012, held by KCC, unpublished) to consider developing the concept of hubs both to channel recreational use and support the economy (links to recommendations 27, 28, and 32).					✓
31	Engage with tourism and countryside access partners to raise awareness of the pressures and issues facing the Natura 2000 sites and the connection between tourism promotion and evidence gathering and the requirement to manage recreation on protected sites.					✓

Joint Working and Strategic Approaches - Information on Recreation

It is clear that the quantity of surveys, their quality and frequency are key factors in determining their usefulness. Survey data should be robust and comparable if it is to be useful as evidence in developing strategies for mitigation. A better understanding of visitor levels, patterns and behaviour will help inform the management of access-sensitive sites and help towards the development of effective mitigation and management strategies.

The surveys reviewed varied greatly in their characteristics and methodology. There was little consistency in their approach, making comparisons difficult.

Qualitative factors include:

- Interview procedures;
- Surveys and monitoring should be repeated at regular intervals and should ensure that the widest range of site users is included;
- Survey timing needs to relate to the impacts being researched on any given site, e.g. surveys for over-wintering birds need to be carried out during the winter;
- Interview locations;
- The number of respondents varied, particularly in relation to overall visitor numbers. It is important to gather a statically valid survey number;
- Interviewers should be well-trained in approaching and interviewing visitors and in the importance of adhering to the methodology of the survey.

Joint working between the local authorities offers substantial opportunities for standardising the gathering of visitor information. This will enable comparability of results and will aid analysis of changes.

Ideally all information should be shared across the east Kent group in order to further the evidence base. In this regard consideration should be made of data sharing and data protection issues at the outset of the survey.

	Recommendation	SDC	DDC	TDC	CCC	EKGI
32	East Kent authorities and their partners, for example in tourism, should work together to develop common approaches and joint working in relation to visitor surveys in order to be able to compare survey results and thereby maximise cost effectiveness and the use and benefit of information received.					✓
33	Ensure coordination across partners and other organisations to ensure that any surveys already being carried out or planned add to the collation of pertinent data.					✓
34	Surveys should be extended to all protected sites to provide a comprehensive picture of usage across east Kent. The frequency of surveys is important in order to develop a robust evidence base of visitor information, and to facilitate analysis of trends over time.					✓

Introduction

Background to this Report

This report was commissioned by a Steering Group formed of the Local Planning Authorities of Canterbury City Council, Thanet District Council, Dover District Council and Shepway District Council working in partnership.

This group forms part of the wider East Kent Green Infrastructure Partnership (EKGIP) which covers the east Kent local authority areas of Canterbury, Thanet, Dover and Shepway.

The aim of this report is to inform future co-operative working by the Local Planning Authorities, both as part of the EKGIP and as a working group of planning authorities.

It is also intended to provide background to help guide the future direction of the wider group of the East Kent Green Infrastructure Partnership (EKGIP), which was established in 2010. Membership of this group, although not formally constituted, is wider than the local planning authorities and includes the Kent Wildlife Trust, Natural England, the Environment Agency and the Royal Society for the Protection of Birds.

Aims, Scope and Limitations

The aim of this study is to provide a first step in developing an east-Kent approach to green infrastructure planning. It provides a reference document, at the point of the time of writing, on the various plans, reports, surveys and assessments that have been carried out in east Kent in order to advance understanding across the four study districts, to further requirements under the duty to cooperate and to lay a basis for future joint working.

The overall aims of this first phase study were to:

Support planning and development in east Kent through:

- i. Advancing understanding of the potential recreational pressure on nature conservation sites, and in particular the east Kent 'Natura 2000' network sites
- ii. Assisting in developing a consistent base for development plan making in accordance with the Duty to Cooperate

This report has the following aims:

- To collate available information on the distribution of future housing in east Kent;
- To collate available information on recreation in east Kent;
- To collate available information on the Natura 2000 network;
- Identify any significant gaps in evidence and assess the need for further development of the evidence base;
- To outline the role and possible direction of future partnership working, both between the local planning authorities and the wider EKGIP;
- Make recommendations for taking forward strategic and joint working in east Kent.

This report provides an inventory of the information currently available in respect of recreation. It is a strategic overview to highlight possible approaches for the EKGI Partnership, collectively or as individual members, and local planning authorities, both individually and through continued joint working to investigate further.

The report does not investigate in detail the approaches which may be required by each local authority. Nor does it assess in detail the greenspace provision of each local authority or make detailed recommendations on the required standards of provision. Neither does it assess the methodology nor robustness of any given report or study.

Importantly, with regard to the Habitats Regulations 2010 this report:

- Does not constitute legal advice;
- Is not an assessment as required under the Habitats Regulations 2010 and does not set out to prove or disprove any significant effects on qualifying species or habitats;
- Does not prescribe any particular mitigation and avoidance strategy and approach, nor suggest that a mitigation approach is proven to be required. The detail, efficacy, funding and compliance under the Habitats Regulations 2010 is for the local planning authorities to consider, evaluate and determine;
- Outlines potential approaches only, and any assessments as required by the Habitats Regulations 2010 and any mitigation strategies need to be determined in consultation with Natural England;
- Does not negate the need for any local planning authority to undertake the assessment of any plans or projects as required under the Habitats Regulations 2010, the conclusions of which may not concur with the recommendations of this report;
- This report does not consider other issues which may require assessment under the Habitats Regulations, for example air pollution.

Methodology

Evidence for this report was gathered through:

- Meetings with each Local Planning Authority¹⁴ (notes in Appendix)
- A meeting with Kent Wildlife Trust
- Meetings with Natural England
- Information requests from a range of partners (see Appendix)
- Desktop review of evidence

A list of sources and further information is provided in the Appendix.

¹⁴ Thanet District Council on 13th March 2013, Shepway District Council on 20th March 2013, Dover District Council on 20th March 2013 and Canterbury City Council on 21st March 2013.

Section I: Background

Habitats Regulations 2010 and Planning Policy

Habitats Regulations 2010

The European Directives and their requirements to classify or designate, and then protect, restore and maintain SPAs and SACs are now all taken forward into domestic legislation in the Conservation of Habitats and Species Regulations 2010 (Habitats Regulations).¹⁵

The ultimate aim of the Habitats Directive is to "maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest."¹⁶ This aim relates to habitats and species, not the European sites themselves, although the sites have a significant role in delivering favourable conservation status.

For SPAs the overarching objective is to:

'Avoid the deterioration of the habitats of 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.'

This is achieved by, subject to natural change, maintaining and restoring:

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

For SACs the overarching objective is to:

'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.'

This is achieved by, subject to natural change, maintaining and restoring:

- The extent and distribution of the 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;

¹⁵ These Regulations replace the previous Conservation (Natural Habitats &c.) Regulations 1994 normally referred to as the 'Habitats Regulations.' The original Habitats Regulations have had numerous amendments between 1994 and 2010.

¹⁶ Article 2(2)

Each member state must establish measures to avoid the deterioration of habitats and the disturbance of species for which a European site has been designated, which therefore brings a general duty to rectify any deterioration in European sites.

The Habitats Regulations also incorporate duties for public bodies that permit activities or give effect to plans that may affect a European site, or implement activities themselves that may affect a European site. This includes local planning authorities as decision makers on both plans and development projects.

Duties Imposed on Local Planning Authorities by the Habitat Regulations

Part 6 of the Habitats Regulations 2010 relates to the assessment of plans and projects for their effects upon European sites, their interest features and conservation objectives, and provides a process by which the consideration of potential effects and the decisions made with regard to whether plans and projects can proceed. Local planning authorities are 'competent authorities' to which the requirements of the Habitats Regulations apply.

Before undertaking a project, giving permission for a project, or giving effect to a plan, which includes the production of Core Strategies and other Development Plan Documents, Regulation 61(1)¹⁷ requires competent authorities, including local planning authorities, to consider whether such a plan or project is likely to have a significant effect upon a European site.

The 'likely significant effect' is a judgement made at the first stage of an assessment under the Habitats Regulations (the screening stage, includes assessment alone or in-combination) and is made by the Competent Authority, following advice from NE. It is based on sound judgement and must withstand scientific scrutiny.

It must be made in relation to the features for which the European site was designated and their conservation objectives and needs to consider the nature of effect, its timing, duration and reversibility.

The judgement is about how disturbance affects the survival of the species or habitats for which the site is designated.

Any plan or project that is likely to have a significant effect upon a European site, or where effects are uncertain, should be the subject of a more detailed 'appropriate assessment' in order to assess the implications of the plan or project for the European site, particularly in view of the conservation objectives for the European site.

Regulation 61(5) advises that a competent authority can only agree to the plan or project if it can be ascertained through the appropriate assessment that it will not adversely affect the integrity of any European site, taking into account any conditions or restrictions that could be put in place.

¹⁷ 'A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which:

(a) is likely to have a significant effect on a European site or a European offshore marine site

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

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

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

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

Evidence Base Requirements

The evidence base for any Appropriate Assessment normally requires both wider evidence relevant to the situation and specific information relevant to the site and/or the particular development, plan or project. Without a robust evidence base, the assessment of any plan or project will be based on assumptions, which may not provide a sufficiently sound basis for any given conclusions.

Fundamentally, the current position as to existing amenity pressure needs to be understood as the basis of forming judgements about the potential implications of further development. This evidence base includes:

- The current environmental condition of the European sites;
- The existing pressures and the impacts and effects of these;
- The scale and magnitude of potential impacts and effects arising from plans and projects being assessed.

The Conservation of Habitats and Species (Amendment) Regulations 2012

In 2012, regulation 9A was added to the Conservation of Habitats and Species Regulations 2010 which, in summary, requires the local planning authorities to take steps they consider appropriate to secure the objective of the preservation, maintenance and re-establishment of a sufficient diversity and area of habitat for wild birds in the UK, for example by means of the upkeep, management or creation of such habitat, whether in or outside a SPA.¹⁸

¹⁸ 9A.—(1) Without prejudice to regulation 9(1), the appropriate authority, the nature conservation bodies and, in relation to the marine area, a competent authority must take such steps in the exercise of their functions as they consider appropriate to secure the objective in paragraph (3), so far as lies within their powers. (3) The objective is the preservation, maintenance and re-establishment of a sufficient diversity and area of habitat for wild birds in the United Kingdom, including by means of the upkeep, management and creation of such habitat, as appropriate, having regard to the requirements of Article 2 of the new Wild Birds Directive.

National Planning Policy Framework and Duty to Cooperate in the Planning of Sustainable Development

Planning Policy Statement 9 relating to biodiversity has been repealed, but Circular 06/5: Biodiversity and Geological Conservation¹⁹ provides administrative guidance.

The National Planning Policy Framework (NPPF) sets out streamlined policy guidance with respect to biodiversity conservation.

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

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

Moreover, paragraph 114 states that local planning authorities should:

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

The Localism Act 2011 also introduces the Duty to Cooperate in relation to sustainable development,²⁰ which is designed to ensure that all bodies involved in planning work together on issues which are of more than local significance. Local authorities must demonstrate how they have complied with the duty at the independent examination of their Local Plans. The cooperation should produce effective and deliverable policies on strategic cross boundary matters.

Although the NPPF sets out a presumption in favour of sustainable development, paragraph 119 limits this presumption in respect of Natura 2000 sites:

“The presumption in favour of sustainable development (paragraph 14) does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined.”

¹⁹ Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within the Planning System, ODPM 06/2005

²⁰ Localism Act 2011, Section 110.

Part I of Circular 06/5 also outlines procedures when dealing with development affecting internationally designated sites. Defra guidance in 2012 sets out how competent authorities should coordinate under the Habitats Regulations.²¹ Paragraph 6 sets out that competent authorities should adopt the reasoning, conclusion or assessment of another competent authority in relation to the appropriate assessment requirements for a plan or project, if they can. Guidance for developers, regulators and land/marine managers is currently under consideration after being published for consultation.²²

²¹ Department for Environment, Food and Rural Affairs (July 2012); Habitats Directive Guidance on competent authority coordination under the Habitats Regulations.

²² The Habitats and Wild Birds Directives in England and its seas; Core guidance for developers, regulators & land/marine managers, December 2012 (draft for public consultation). <https://www.gov.uk/government/consultations/habitats-and-wild-birds-directives-simplification-of-guidance-in-england>

Comparator Areas

Thames Basin Heaths

The Issues

The Thames Basin Heaths SPA is a series of fragmented heathland sites that cover parts of Surrey, Berkshire and Hampshire. The sites cover 11 local authority areas.

The heaths support species of internationally protected bird - the woodlark, the nightjar, and the Dartford warbler. The heathland is a fragile habitat, sensitive to damage from the urban areas that surround it; in addition, the protected birds (which nest on or near the ground) are particularly vulnerable to disturbance - from cats and from recreation activities such as people with dogs walking on the heaths.

Development of Approach and Measures

The Thames Basins Heaths was one of the first areas in the UK to develop a strategic mitigation approach linked to planning policy across a number Local Planning Authority Areas. Each of the local authorities has adopted planning policy to mitigate the impact of increased disturbance due to recreation linked to new development.

No additional housing will be permitted within 400 metres of the SPA. New additional housing within 400m to 5 km of the SPA will be required to demonstrate that it can avoid any likely significant adverse effect.

Developers wishing to promote additional housing in the 400m to 5km zone will be required to demonstrate that their proposals can avoid any likely significant adverse effect on the SPA.

A key approach developed in the Thames Basin Heaths was that of SANGs (Suitable Alternative Natural Greenspaces). The role is to provide greenspace which is equally attractive to visitors in order to divert them away from sensitive sites.

In addition developers are required to provide SAMM (Strategic Access Management and Monitoring Measures) mitigation measures.

The Solent

The Issues

The Solent Disturbance and Mitigation Project was initiated by the Solent Forum in response to concerns over the impact recreational pressure on the Solent SPA, SAC and Ramsar sites. Of particular concern was the likely effect of increased visitor pressure and recreational use on these sites arising from proposed new housing development within reach of the Solent shores on the estuary sites and the effects on bird species.

The project encompasses several local authorities including Southampton, Eastleigh, Fareham, Gosport, Portsmouth, Havant and Chichester, East Hampshire, Test Valley, New Forest and Winchester.

Development of Approach and Measures

Many studies were commissioned in order to understand the potential effect of new development. These extensive studies included bird modelling, visitor and household surveys. The entire body of research was peer reviewed in late 2012.

Four years of study were concluded in 2013, with the agreement of a 5.6km zone of influence within which development must provide mitigation measures. The form of mitigation, pooling of funding and implementation are yet to be resolved.

http://www.solentforum.org/forum/sub_groups/Natural_Environment_Group/Disturbance_and_Mitigation_Project/

North Kent

The Issues

North Kent is of considerable strategic economic importance, and much of the area lies within the Thames Gateway Growth Area, a Government priority for regeneration and economic development. The shoreline between Gravesend and Whitstable in Kent is also of considerable environmental importance, hosting a swathe of national and international wildlife designations. This stretch of shoreline encompasses three Special Protection Areas (SPAs).

A number of WeBS alerts highlighted reduced numbers of birds in the SPA areas. While some of these declines in numbers could be attributed to redistribution across the SPAs, others were thought to be due to site-specific declines.

The north Kent area comprises the local planning authorities of Gravesham, Dartford, Medway and Swale – and Canterbury for the purposes of the bird disturbance studies. The Greening the Gateway Kent and Medway (GGKM) Partnership has worked with and on behalf of the partners in commissioning and managing a suite of studies in relation to bird disturbance.

Development of Approach and Measures

A number of studies and surveys have now been carried out in this area, including:

- Bird Disturbance Study;²³
- North Kent Visitor Survey Results;²⁴
- North Kent Comparative Recreation Study;²⁵
- Estuary Users Survey;²⁶
- GGKM Roost survey;²⁷
- Wetland Bird Surveys;²⁸
- Phase I Bird Disturbance Report.²⁹

The Bird Disturbance Studies could not provide conclusive proof that bird numbers related to visitor pressure. However, it is clear that the evidence shows a strong correlation between the busiest sites and fewer birds present and in particular to people walking with dogs. Therefore human disturbance is potentially a significant factor and indicates the need to manage visitors in the area.

The scale of new development in the general area – as set out in the relevant strategic plans – is considerable and may result in an increase in access levels of around 15%. The results of visitor surveys have shown that developments within 6km from access points into the SPAs are most likely to lead to increased visitor useage.

The Client group recognised that the bird studies have focused on recreation and not on other potential causes of decline in bird numbers – although advice was sought. The group have considered taking further steps in gathering evidence, including a study into the abundance of prey available for birds. However, as the correlation between visitors and bird numbers is strong, the group has moved forward and commissioned a Strategic Access and Recreation Management Strategy for the Thames, Medway and Swale Estuaries.³⁰

The study aims to provide an avoidance and mitigation strategy that protects birds from the increases in recreational disturbance linked to new developments; reduces the existing recorded recreation impact on birds in the SPA and Ramsar sites in North Kent; proposes options to reduce disturbance impacts and sets out examples of targeted mitigation options; and sets out a timetable for implementation and monitoring, including funding sources.

The reports draws the distinction between existing impacts already identified and taking place and those likely to occur or be exacerbated by additional growth. The report goes on to recommend that a forward plan should, as far as possible, identify and split measures that relate to the two

²³ Bird Disturbance Study , North Kent 2010/11 (Liley & Fearnley 2011)

²⁴ North Kent Visitor Survey Results (Fearnley & Liley 2011)

²⁵ North Kent Comparative Recreation Study (Fearnley & Liley 2012)

²⁶ Estuary Users Survey (Medway Swale Estuary Partnership, 2011)

²⁷ GGKM Roost survey (mapped in Liley & Fearnley 2011)

²⁸ Wetland Bird Surveys results produced by the British Trust for Ornithology

²⁹ Phase I Bird Disturbance Report (Liley, Lake, & Fearnley 2012)

³⁰ Liley, D. & Underhill-Day, J. (2013). Thames, Medway and Swale Estuaries – Sustainable Access and Recreation Management Plan (SARMP). October 2013 DRAFT Unpublished report by Footprint Ecology.

different aims. In this way mitigation activities that are the result of development may be identified for the purposes of development funding.

The list of mitigation activities proposed includes a dog project, wardening, infrastructure, access and habitat works, interpretation, codes of conduct and monitoring.

The report of this study is, at the time of writing, in draft, and a mitigation strategy is under consideration.

Pagham Harbour

The Issues

Pagham Harbour in West Sussex is a SPA and a Ramsar site as it supports important populations of rare birds for a large proportion of the year. It is a particularly small site and this means the site has less 'space' and opportunities for birds to avoid disturbance.

Pagham Harbour is vulnerable to disturbance, in particular as a result of recreational pressures which include disturbance to wintering and breeding birds by people and their dogs. The exact levels of disturbance are unknown, however it is assumed that with higher visitor numbers, the likelihood of disturbance and therefore impacts occurring that could have an impact on the integrity of the site and the features for which it is designated, will increase.

The Habitats Regulations Assessment³¹ has assessed the various habitats at the Harbour, the supported species and the main threats and opportunities for Pagham Harbour.

The harbour area falls within the district of Arun, but lies close to the border of Chichester District. In 2012 Chichester District Council commissioned on-site visitor surveys³² to inform the Habitat Regulations Assessment of a new Local Plan, with the issue of concern being the potential links between increased development leading to increased access and disturbance impacts to the SPA/Ramsar interest features.

Development of Approach and Measures

The key recommendation from the Arun HRA was the identification of zones to protect the site from development.

Due to the current and future pressure on Pagham Harbour a series of mitigatory measures have been proposed in the Arun Local Plan. For new housing developments within a zone of 400m to 5km measures include a contribution towards access management via a tariff, wardening, access management and site protection measures, habitat improvements, interpretation, education and

³¹ Habitats Regulations Assessment for the Arun District Core Strategy, Appropriate Assessment Report, UE Associates, April 2010 & Habitats Regulations Assessment for the Arun District Local Plan, Urban Edge Environmental Consulting, November 2012

³² Cruickshanks, K. & Liley, D. (2012). Pagham Harbour Visitor Surveys. Unpublished report by Footprint Ecology. Commissioned by Chichester District Council.

signage, monitoring of wildlife and visitor numbers, and the development of SANGs (or CIL contributions to projects on the Regulation 123 list when SANG sites are not feasible).

Chichester District Council has taken a similar approach in its local plan³³, identifying a 3.5km 'Zone of Influence' around Pagham Harbour, and including the requirement for new development within this zone to provide a contribution towards the appropriate management of the Pagham Harbour Local Nature Reserve, and 'a developer provided package of measures'. The different distances used in the Chichester Local Plan: Key Policies Pre-submission document (3.5km compared to 5km for Arun District) reflect the visitor survey results for the Chichester District part of Pagham Harbour.

Exe Estuary

The Issues

The Exe Estuary lies to the south of Exeter City in Devon. It is designated as a Special Protection Area (SPA), Ramsar site, European Marine Site and SSSI. It is a relatively small and very busy site around which several densely populated settlements are located and it is a popular location for dog walking, walking, wildlife watching and a variety of watersports.

The Exe Estuary Management Partnership recognised that levels of recreational use were increasing in the estuary, particularly activities such as kitesurfing, so a detailed study was required.

In addition to the increase in recreational use, the level of housing around the Exe Estuary is set to increase by 20% within a distance of 1km and 29% within 10km. Visits to the estuary are predicted to increase by 2.4 million (27%) as a result of new housing within 10km.

Development of Approach and Measures

The Exe Estuary Disturbance Study³⁴ was initially commissioned to consider the impacts of disturbance from watersports and the potential for future management of watersports within the estuary. The Disturbance Study was therefore not specifically commissioned to examine the need for mitigation linked to new development and does not consider the implications of new development.

The Exe Estuary Disturbance Study considers in detail both recreational access and the response of birds. The areas of the Estuary with the least access coincided with the highest numbers of birds and that disturbance had the greatest effect when on the intertidal or out on the water compared to the shore.

The relevant planning authorities³⁵ recognised the additional pressure that their levels of anticipated housing and other growth may bring to bear on the European sites in and around the Exe Estuary. In response the recently adopted or emerging plans identify the need for large scale, carefully designed green infrastructure, in locations well placed to attract new residents from the

³³ The Chichester Local Plan: Key Policies Pre-submission document

³⁴ Liley, D., Cruickshanks, K., Waldon, J. and Fearnley, H. Published: 21-12-2011

³⁵ East Devon District Council, Exeter City Council and Teignbridge District Council.

large strategic housing allocations, and at the same time anticipating that the new country parks and landscape enhancement will also attract some existing visitor use from the European sites.

A further study provided interim guidance to the three local planning authorities with respect to the implications of new development for the Exe Estuary and other wildlife sites³⁶

In the case of the Exe Estuary SPA, the evidence demonstrates:

- Interest features that are vulnerable to recreation;
- Where dedicated projects have considered recreation impacts, and evidence of existing impacts from recreational use;
- A link between houses and the recreational use of the sites.

It was therefore necessary to consider what measures could be established as mitigation for a marked increase in housing proposed in the surrounding areas (the 'visitor catchment').

The South East Devon European Sites Mitigation Strategy³⁷ recommends a range of mitigation measures, including a Delivery Officer, Wardening, a dog walking project and control order, SANGs, on-site access measures, zoning, signage, interpretation and promotion, revised codes of conduct and byelaws, as well as on-going monitoring and enforcement.

The report (currently a draft) also recommends the zone within which new housing will be required to make a contribution to the mitigation strategy, of 7.8km around the Exe Estuary. This is the distance within which 75% of the visits from their household survey originated, and therefore follows a similar approach to that used in other areas such as the Dorset Heaths and the Thames Basin Heaths.³⁸

The studies have now reached the point where it is likely that sufficient evidence exists for the three authorities to develop and adopt a long-term strategy that, once adopted, will secure the joint approach to collecting funds from relevant developments and the Governance and decision-making processes relating to the order in which mitigation measures are funded, how they are delivered and managed and how their effectiveness will be monitored. The first recipient of funds is likely to be the employment of a Mitigation Officer, to co-ordinate the process.

³⁶ Liley, D. & Hoskin, R. (2011). Exe Estuary SPA and Dawlish Warren SAC Interim Overarching Report Relating to Strategic Planning and Impacts from Recreation. Footprint Ecology

³⁷ Liley, D., Hoskin, R., Lake, S., Underhill-Day, J. & Cruickshanks, K. (2013). South-east Devon European Site Mitigation Strategy. Footprint Ecology. Unpublished report for East Devon District Council, Exeter City Council and Teignbridge District Council

³⁸ At the time of writing a distance of 10km was under discussion for the Exe Estuary.

Mitigation

Introduction

This section outlines the principles and potential component parts of any mitigation strategy, should it be determined through separate analysis that one is required.

Principles of Mitigation

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

Mitigation must address the issue or issues which is causing the significant effect. In terms of assessing development impact, the purpose of mitigation is to avoid potential impacts brought about by the development, and not to ameliorate pre-existing impacts.³⁹

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

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

- **Be evidence based:** Measures should be based on evidence to justify need, appropriateness and effectiveness. Assumptions used, for example the effect of a project a particular distance from a European site, must be based on robust evidence. However, evidence-gathering should be proportionate to the level of detail required;
- **Be necessary:** Measures should be required to enable planning permission to be granted;
- **Be effective:** A mitigation strategy must provide certainty that development can proceed without adverse effects on the European sites. Measures must avoid impacts or reduce them to levels which will not detrimentally affect the conservation interest of the site(s);
- **Last in perpetuity:** Any avoidance measures are required to be provided for in perpetuity;
- **Be adaptive:**⁴⁰ Demographic changes, changes in the distribution of birds, changes in access and the implementation of the mitigation strategy itself can result in changes. A mitigation strategy needs to be able to respond to these changing circumstances. Monitoring is, therefore, a fundamental component of any package;
- **Be specific to the situation:**⁴¹ Although approaches used elsewhere can be useful comparators, a mitigation approach should be tailored to the specific situation;
- **Be proportionate:** Mitigation needs to work and be sufficient to protect the site and satisfy legal requirements but should not go further than this. Developers should not be forced to pay to rectify existing impacts for which they are not responsible, but their mitigation measures can include proposals to avoid or reduce existing impacts to ensure that the net

³⁹ Although a mitigation strategy may also have coincidental beneficial effects on pre-existing impacts.

⁴⁰ In accordance with paragraphs 19, 190 and 205 of the NPPF.

⁴¹ In accordance with the Community Infrastructure Levy Regulations and paragraph 204 of the NPPF.

effect of new plus existing impacts means there is no significant effect on a European site. They should not include measure to meet duties relating to the maintenance and restoration of European sites outside of new development.⁴² Approaches should also be fair in respect of, in this case, the sources of recreational activity;

- Be **compliant**: with planning law and policy, including the Habitats Regulations, European Directives, the NPPF, the Community Infrastructure Levy Regulations and the planning legislation and policy relating to the use of Section 106 Planning Obligations.

Strategic Mitigation

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

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

A strategic approach potentially has several advantages:

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

There are, however, some potential drawbacks to a strategic approach:

- Establishment costs can be high and are usually not met by developer;
- Baseline evidence costs can be high and are usually not met by developer;
- It can take a long time to develop a fully comprehensive strategy;
- Takes time to build consensus and achieve “buy-in” across partners.

⁴² As required by Article 6(2) of the Habitats Directive or Article 4(4) of the Birds Directive.

The competent authority must decide whether or not to take a strategic approach. In making this decision, the competent authority should consider:

- The costs and benefits, having explored the full range of options;
- Its own costs in developing the approach (which might be substantial, but which it may be possible to recoup through lower costs later in dealing with individual cases, as compared with having no strategic approach in place);
- Its duty to cooperate with neighbouring authorities in supporting sustainable development and advice set out in the National Planning Policy Framework. For example, authorities should consider whether sharing information with other authorities would reduce costs, or whether sharing mitigation opportunities in one local planning authority's area may enable development in another.⁴³

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

- **Be flexible:** A strategic approach must also be able to deal with atypical projects. A strategic approach for a plan will be based on assumptions about the projects likely to make up the plan, so if individual projects don't conform to these assumptions they will require separate assessment;
- **Offer certainty:** Needs to be underpinned by secure financial and legal mechanisms. Loose commitments are insufficient.

Guidelines⁴⁴ state that, as one of the main aims of a strategic approach is to minimise disruption and costs to developers, when a strategic approach is being considered, decisions on such an approach should be progressed as quickly as possible. When this approach is being considered across a number of local authorities, slow progress in one area can undermine the potential benefits overall.

Potential Components of Mitigation

Listed here are a range of approaches which can be taken to reduce disturbance. Many of these can be a component of a mitigation package, although not all could necessarily be considered as compliant with the Habitats Regulations.

Provision of Alternative Sites

Suitable alternative natural greenspace sites (SANGs) are located away from the designated sites with the aim of drawing visitors away from the designated site. The sites need to be designed to provide an attractive alternative destination which matches the draw of the designated site.

This approach has been used in the Thames Basin Heaths SPA strategic mitigation approach through creating new natural greenspaces with a range of features designed to be attractive to dog walking visitors.

⁴³ <http://guidanceanddata.defra.gov.uk/strategicapproacheshra/deciding-whether-to-develop-a-strategic-approach/>

⁴⁴ Note 43.

While this approach may be suitable for some habitats the effectiveness of this approach in creating alternatives to coastal habitats, where the coast itself could be argued to provide a ‘unique’ experience, has yet to be tested. The efficacy of this approach will depend on whether the reason for visiting a site is due to the coastal experience or because it is the most convenient place for the activity taking place. If a significant proportion of visitors would carry out the activity elsewhere and the coastal site is simply the most convenient place available to them it could be argued that provision of alternative sites could displace current recreation activity.⁴⁵ Despite these difficulties associated with this approach for coastal sites, nonetheless, districts such as Gosport and Fareham, partners in the Solent Disturbance and Mitigation Project, are making the case for strategic level SANG where the draw of these sites are considered sufficient.⁴⁶

SANGs are also costly both to secure and to manage, which of course will need to be in perpetuity. This makes SANGs a longer term approach to mitigation and also may take SANGs beyond the reach of what would be a proportionate approach.

Visitor Management

Visitor management approaches encompass a wide range of possible measures. They can be implemented on-site and can also include access management around the periphery and outside of European sites. There are a range of measures which may be appropriate, for example:

- Restricting access at particular times e.g. seasonally or based on tide patterns;
- Restricting access through temporary fencing, diversions, barriers etc.;
- Provision of dedicated dog areas;
- Management of car parking, for example parking fees, moving parking locations, permit systems;
- Management and/or restriction of access points;
- Path routing, surfacing and path clearance can influence visitor flows;
- Zoning and designating particular areas for particular activities. Can be accompanied by code of conduct or byelaws.

⁴⁵ In the Solent (Phase II) one third of respondents (33.5%) said that ‘nothing’ would make an alternative site more attractive than a coastal site.

⁴⁶ Gosport Borough Council is developing Alver Valley Country Park, an inland site. Fareham Borough Council – the New Community North of Fareham is using SANGS to provide a proportion of mitigation rather than measures at the coast.

Education

A range of measures can be employed with the aim of both supporting the implementation of other visitor management measures and to change behaviours of visitors, if required:

- Signs, interpretation and leaflets providing a range of information as required, for example of the sensitivities of a site, areas available to visit and access restrictions;
- Codes of Conduct promoted through websites, leaflets etc.;
- Wardens can also provide an educational role, in addition to the enforcement role detailed below;
- Off-site information to highlight the site, issues and sensitivities, restrictions to access, codes of conduct and alternative sites etc. to the wider catchment area;
- Contact with existing clubs and user groups;
- Education initiatives such as school visits;

Although such 'soft' approaches may have benefits such as enhancing understanding of the protected sites, these schemes require the careful consideration of the message, target audience and communication style. In a survey of land managers conducted through the Solent Disturbance and Mitigation Project, education measures did not score highly and therefore confidence in effectiveness in the short term may be considered to be low.⁴⁷

Enforcement

Education measures alone may not be sufficient, for example any restrictions in access will require enforcement. Measures could include:

- Creation and legal enforcement of, for example, byelaws, nature conservation order and dog control orders;
- Wardening can have both an education and enforcement role. The ability of a warden to control disturbing activities is related to what, if any, control orders are in place and the powers invested in the warden;

A wardening scheme with elements of both education and enforcement would seem to offer the most effective approach. There are, however, some key considerations in designing such a scheme. If wardens are to have an enforcement role, clear guidance and legislative support may be required. In addition, while relatively simple to implement, the effects should last in perpetuity.

⁴⁷ Liley, D. & Tyldesley, D. (2013), Solent Disturbance and Mitigation Project: Phase III, Towards an Avoidance and Mitigation Strategy. Unpublished report. Footprint Ecology/David Tyldesley & Associates, p 23.

Development Contributions

To date the contributions made by developers to fund green/environmental infrastructure required as a result of their development have largely been through s106 agreements. Where infrastructure is required that extends beyond one development, the contributions from several developments could be 'pooled' and applied at the discretion of the LPA.

The 2008 Planning Act confers the power to charge the Community Infrastructure Levy (CIL) on charging authorities; in the case of east Kent these are the Local Planning Authorities. The LPAs may decide if they wish to levy CIL and, if so, they have to prepare a Charging Schedule which will set out the rates of CIL in their area, shown as £ per m² of net additional floor space. Rates may vary across different areas or zones.

CIL may only be used to fund infrastructure, although this can include not just the provision of infrastructure, but operation and maintenance. There must be evidence of a funding gap in relation to the delivery of infrastructure in order to justify the use of CIL.

The charge must also take account of economic viability and the LPA should provide evidence to support the charge rate.

The introduction of CIL should accompany an up to date Local Plan.

The Local Planning Authority is required to produce an Infrastructure Delivery Plan by the time CIL is introduced, in order to set out the infrastructure the LPA requires to support the proposed developments.

The developer is liable for all the CIL funding at the start of the build. However, most LPAs are considering an instalments policy. The LPA uses its discretion in applying the 'pot' of CIL funds.

Once CIL is introduced the number of S106 contributions that may be pooled to fund a type of infrastructure or project is limited to a maximum of five (Ref Regulation 123 of the CIL Regulations).

Also, to prevent double funding, CIL regulations state that LPAs may not continue to secure S106 funding infrastructure for items that will be funded by CIL. However, funds secured via S106 prior to the introduction of CIL may be topped up with CIL income. It may be possible to split projects into phases so that the pooling limit applies to each phase, but this has not been tested yet.

CIL is designed to provide gap funding, and it is expected that CIL income will not fully fund the items identified in local infrastructure delivery plans. Therefore projects where other sources of funding have been secured, or may be 'leveraged' by CIL income, are likely to be prioritised.

However, the Community Infrastructure Levy has yet to be adopted by the LPAs in east Kent, and there remain some areas of uncertainty regarding its application. The Client has sought advice from other LPAs and from Natural England, and the results of this suggest that site monitoring and wardening are not considered to be 'infrastructure' projects as described under the CIL regulations.

Accordingly it is understood that s106 contributions may continue to be collected for the funding of site monitoring and wardening; and those funds will not be subject to a pooling restriction.

East Kent – Current Approaches

Across east Kent no LPA has yet adopted CIL. However, Dover District Council has consulted on its proposed CIL preliminary draft charging schedule (PDCS), setting out four different residential rates based on location. The district is divided into four different Charging Areas, comprising Aylesham, Dover, Deal and the rest of the district. All developments within Aylesham are proposed to be subject to a zero rate levy. The proposed residential rates are £50 per square metre within Dover; £75 per square metre within Deal and £125 throughout the rest of the district. Currently Dover DC has, within the Land Allocations Document, proposed a Mitigation Strategy for the Thanet Coast and Sandwich Bay SPA that is funded from a tariff system of deriving developer contributions. Mitigation for Whitfield Urban Extension is through on-site provision of greenspace.

Canterbury City Council has adopted a Developer Contributions SPD (2007) that includes a tariff-based system to fund infrastructure including open space. CIL may be adopted by Canterbury CC, but in line with the current trajectory of the Local Plan process this is unlikely before 2015.

Thanet District Council has adopted a Planning Obligations and Developer Contributions SPD (2009) which details the planning obligations required of developers. The funding of open spaces is detailed within the Leisure and Recreation chapter, although there is no mention of protected sites. Thanet District Council's Planning Obligations and Developer Contributions Statement of Consultation 2009 included a request for the tariff proposed to raise funds from new development for staff costs and local projects to raise awareness and reduce impacts of increased public pressure on areas covered by Habitat Regulations designations. The response stated there was no evidence base for need, cost, threshold, projects or timescales, and no policy support for coastal improvement project contributions.

Shepway District Council currently uses s106 agreements to secure developer contributions. However, now that the Core Strategy Local Plan has been adopted (as of 18/09/2013) the Council will draft the Shepway Community Infrastructure Levy (CIL) charging schedule for public consultation in 2014.

Example – Dover District Council's Mitigation Strategy

Dover District Council is the only LPA in the study area to have adopted a mitigation strategy.⁴⁸ The strategy comprises four elements:

- 1) The ability, if necessary, to draw on funding, via a bond, to support wardening at Sandwich Bay for a period up to 10 years;
- 2) Monitoring of potential impacts associated with Dover development to identify if and when such wardening (1) or other mitigation (4) is required;
- 3) Contribution to the Pegwell Bay and Sandwich Bay Disturbance Study to complement (2), provide weighting for different forms of disturbance and thus direct the role of wardening (1);
- 4) To use the monitoring (2) to identify lesser sources of development-related disturbance and to draw on the relevant development contributions for mitigation of such. Financial contributions will address the cumulative 'in combination' impact of the smaller developments allocated for development in this Plan. For developments requiring EIA, project-level HRA will be required in order to confirm any site specific details that may trigger a requirement for additional measures, notwithstanding the requirement to contribute to the Strategic Mitigation Strategy.

Dover District Council's Mitigation Strategy is to be applied using a tariff system to all development of more than 15 units and the developer contribution is calculated as a 'cost per dwelling' based upon the number of bedrooms in that dwelling.⁴⁹

Dover District Council states that 2013 values indicate that the tariff ranges from £16.50 for a 1 bed dwelling to £66 for a 4 bed dwelling. In the example a 3 bed house the cost would be around £50; £17 towards monitoring and £33 (balance) into a pot for the longer term review of the Pegwell Bay bird disturbance study.

The contributions to the Mitigation Strategy will address the cumulative 'in combination' impact of the smaller sites allocated for development in the Local Plan as well as at least part of the impact from the larger sites.⁵⁰

Some sites may require financial contributions to the strategic Mitigation Strategy to be accompanied by additional site-specific measures, such as on site alternative greenspace or additional contributions to access management beyond that set out in the strategic Mitigation Strategy, for example to deliver additional wardening, provision of information to new occupants directing them to less sensitive areas or rerouting of footpaths where appropriate to direct visitors away from the SPA.

⁴⁸ Dover District Council (2012), Thanet Coast SPA Mitigation Strategy October 2012.

⁴⁹ The Dover District Local Development Framework-Land Allocations Pre-Submission Local Plan Submission Document-Habitat Regulations Assessment.

⁵⁰ Urban Expansion Areas: Three Urban Extension Areas in Deal (PHS009 – Land between Deal and Sholden, PHS010 – Land at Sholden New Road, PHS013 – Station Road, Walmer) and one in Sandwich (PHS 17 & 18 – Land at St Barts Road).

Comparator Examples - Pagham Harbour, Chichester and Arun⁵¹

Chichester's Local Plan⁵² (ref) proposes a mitigation approach based on the 'precautionary principle' that is derived from:

- Recognition of the similarity between the habitats of Pagham Harbour SPA and the Solent SPAs (evidence collected during the Solent Disturbance and Mitigation project indicates that bird species in Chichester and Langstone Harbours SPA are being adversely affected by disturbance with human activity a major influence);
- The presence of summer ground-nesting birds;
- Evidence from visitor surveys that reveal the majority of visitors to live within 3.5km of the sites;

Natural England advise that a likely significant effect from all new housing around the Solent in combination cannot be ruled out and therefore new housing developments will need to provide for a package of avoidance and mitigation measures. In the medium to long term this is likely to be provided through a Solent-wide joint project to which developments will contribute through S106 agreements and /or CIL.

At Pagham Harbour, the visitor surveys have informed the zone of influence of new residential development. Within the 3.5km 'zone of influence' developments should provide for mitigation measures to avoid any impact or be subject to an 'appropriate assessment'.

Also in relation to Pagham Harbour, Arun's Local Plan proposes a series of mitigation measures, including management measures and SANGSs (suitable alternative natural greenspaces). If these measures cannot be applied to a particular area the developer will make contributions for projects identified on the Regulation 123 list, through the Community Infrastructure Levy.

Management measures include:

- Wardening - increasing the number of wardens at the site to ensure that people do not stray into sensitive areas;
- Access management and site protection - improving paths, erecting fencing or establishing other barriers, in order to prevent or reduce access to sensitive areas;
- Habitat improvements - mitigating against any disturbance to birds, including their nesting, roosting or feeding habitats which could instead be enhanced or created;
- Interpretation, education and signage - improving visitor facilities and informing visitors of the requirement to protect the wildlife of the site and outlining how best to achieve this;
- Monitoring of wildlife and visitor numbers and the effect that disturbance has on wildlife, so that access management can be modified as appropriate.

SANGs should be capable of accommodating the predicted increases in demand for local walking and dog walking.

⁵¹ Pagham Harbour is situated in both Chichester and Arun Districts

⁵² Chichester District Council Local Plan – Further consultation on Key Policies – July 2013

Section 2: East Kent

Natura 2000 Sites in East Kent

Summary of Sites and Features

There are many designated sites in east Kent. SAC, SPA, Ramsar and other designated sites are shown on Plans 1 and 2. Table 1 lists the sites and a brief list of the qualifying species and features for designation.

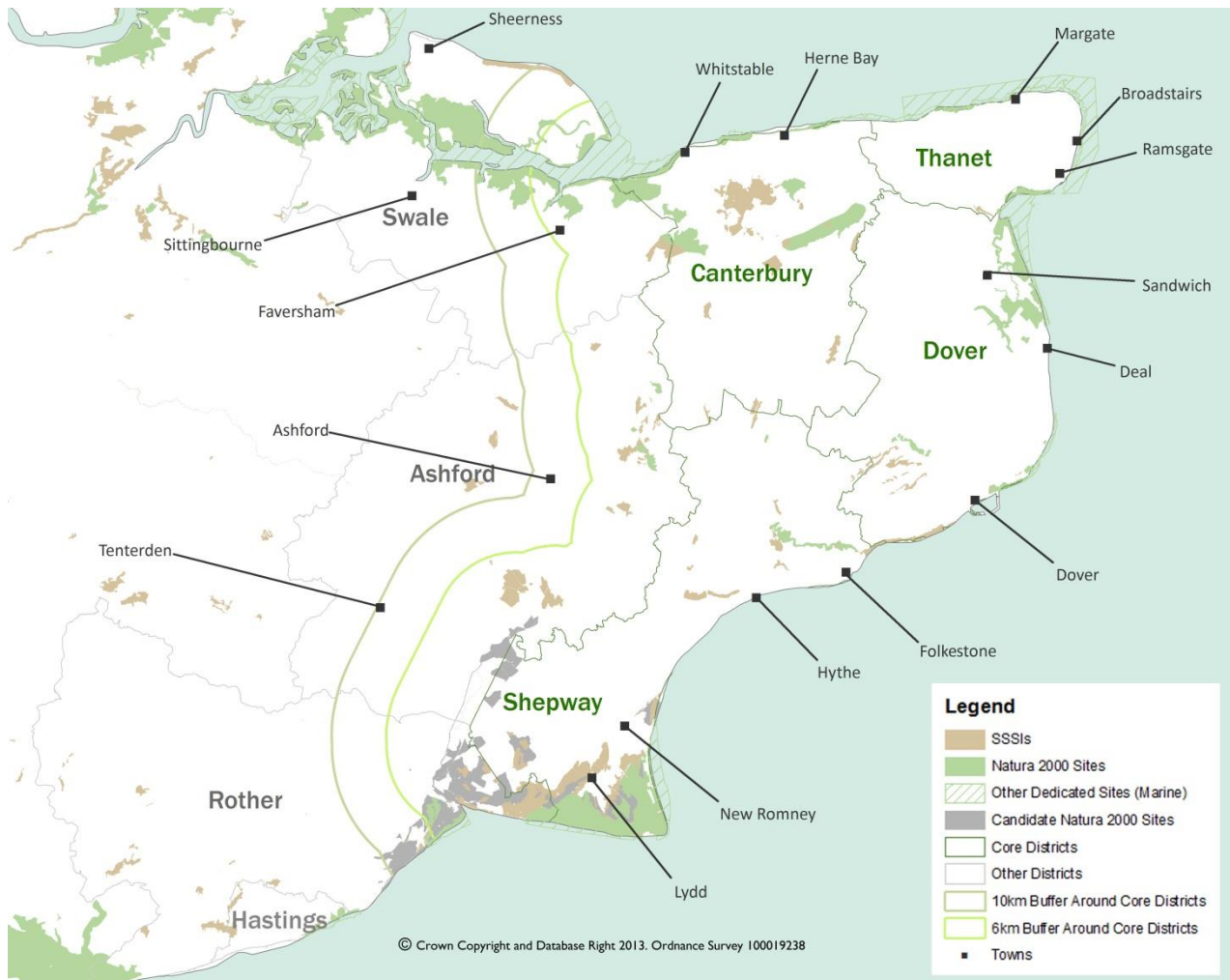
Table 1: Summary of Internationally Designated Sites and Qualifying Species and Habitats within Study Area

Special Protection Areas (SPAs)	Ramsars ⁵³	Special Areas of Conservation (SACs)
Stodmarsh	Stodmarsh	Stodmarsh
<ul style="list-style-type: none"> • Wintering Northern Shoveler • Breeding and wintering Gadwall • Wintering Eurasian bittern • Wintering Hen Harrier 	<ul style="list-style-type: none"> • Wintering Northern Shoveler • Breeding and wintering Gadwall • Wintering Eurasian bittern • Wintering Hen Harrier 	<ul style="list-style-type: none"> • Desmoulin's whorl snail
Thanet Coast and Sandwich Bay	Thanet Coast and Sandwich Bay	Thanet Coast
<ul style="list-style-type: none"> • Wintering Turnstone • Wintering European Golden Plover • Breeding Little Tern 	<ul style="list-style-type: none"> • Turnstone • Supports 15 British Red Data Book wetland invertebrates 	<ul style="list-style-type: none"> • Reefs • Partially submerged sea caves
		Sandwich Bay
		<ul style="list-style-type: none"> • Priority feature: Fixed dunes with herbaceous vegetation ('grey dunes') • Embryonic shifting dunes • Shifting dunes along the shoreline ('white dunes') • Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>)
The Swale	The Swale	
<ul style="list-style-type: none"> • Wintering Common Redshank • Wintering Dark-bellied Brent Goose • Dunlin 	<ul style="list-style-type: none"> • Common Redshank • Dark-bellied Brent Goose • Grey Plover 	
Dungeness to Pett Level⁵⁴		Dungeness
<ul style="list-style-type: none"> • Wintering Northern Shoveler • Breeding Little Tern • Wintering Bewick's Swan • Breeding Mediterranean Gull • Breeding Common Tern 		<ul style="list-style-type: none"> • Annual vegetation of drift lines • Perennial vegetation of stony banks • Great crested newt
Special Areas of Conservation (SACs)		
Dover to Kingsdown Cliffs	Lydden and Temple Ewell	Folkestone to Etchinghill Escarpment
<ul style="list-style-type: none"> • Vegetated sea cliffs of the Atlantic and Baltic coasts • Semi-natural dry grasslands and scrubland facies: on calcareous substrates 	<ul style="list-style-type: none"> • Semi-natural dry grasslands and scrubland facies: on calcareous substrates 	<ul style="list-style-type: none"> • Semi-natural dry grasslands and scrubland facies: on calcareous substrates
Parkgate Down	Blean Complex	
<ul style="list-style-type: none"> • Semi-natural dry grasslands and scrubland facies: on calcareous substrates 	<ul style="list-style-type: none"> • Sub-Atlantic and medio-European oak or oak-hornbeam forests of the <i>Carpinion betuli</i> 	

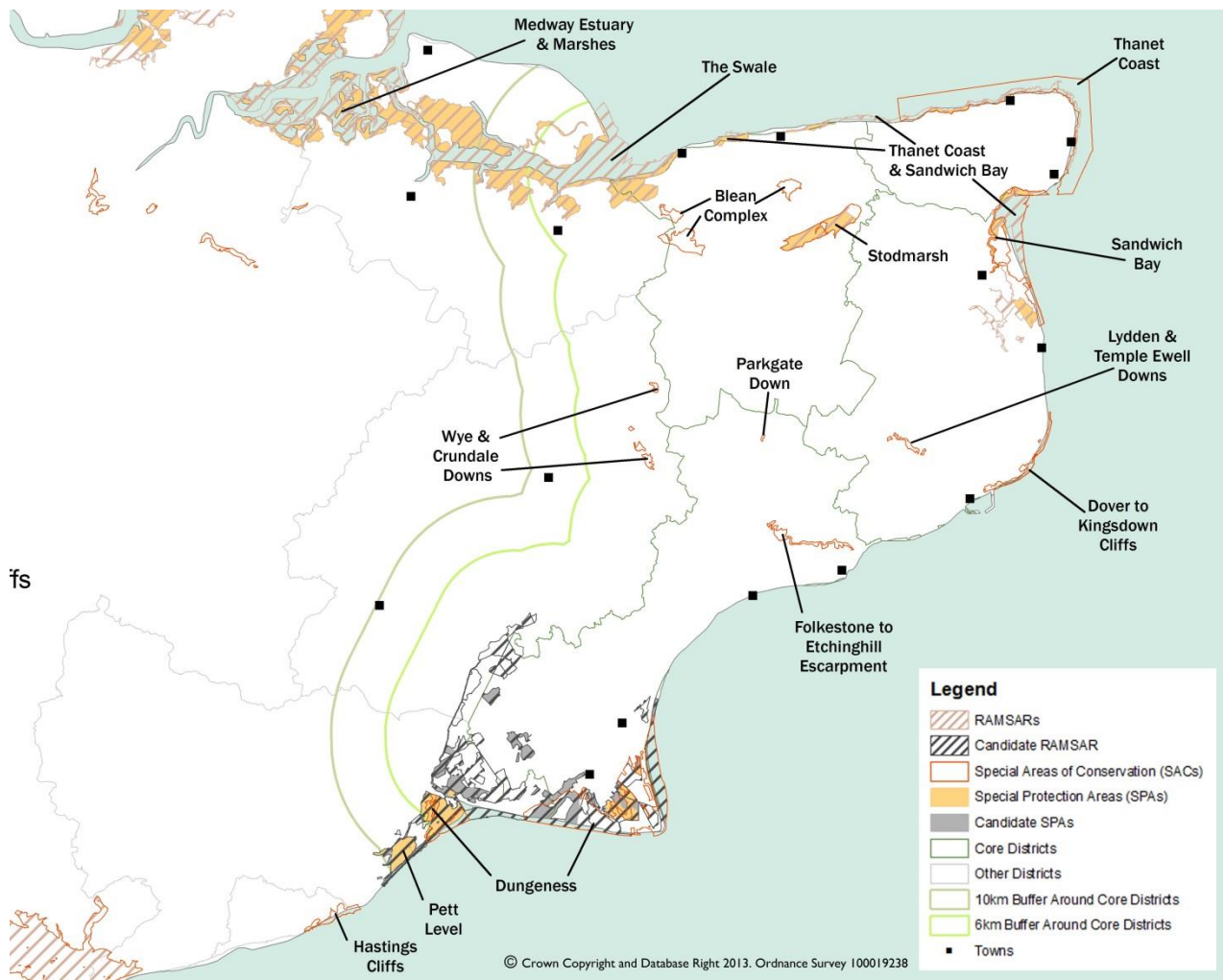
⁵³ SPA, SAC and Ramsar designations of the same name may overlap but do not necessarily have the same boundaries.

⁵⁴ The Dungeness to Pett Level SPA is proposed to be extended, along with the designation of a new Ramsar.

Plan I: Designated Sites - SSSIs and Natura 2000 Sites



Plan 2: Natura 2000 Sites



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Sources of Information

Habitats Regulations Assessments

Several assessments under the Habitats Regulations have been carried out:

Canterbury City Council

- Habitats Regulations Assessment of Draft Local Plan (Report to Inform Screening for Appropriate Assessment) (May 2013)

Dover District

- Habitat Regulations Assessment of the Dover LDF Core Strategy (2009);
- Habitat Regulations Assessment of the Addendum to the Land Allocations Pre-Submission Local Plan (May 2013);
- Dover District Council, Whitfield Urban Extension Masterplan SPD, Habitats Regulations Assessment (April 2011) and Consultation Results (March 2011).

Shepway District:

- Shepway Core Strategy, Habitats Regulations Assessment (Sites other than the Dungeness Complex) (Final Report following Publication Core Strategy Consultation January 2012);
- Rother and Shepway Core Strategies, Habitats Regulations Assessment (Dungeness SAC; Dungeness to Pett Level SPA and SPA extension; and Dungeness, Romney Marsh and Rye Bay proposed Ramsar site) (Final Report following Publication Stage consultation, January 2012).

Thanet District:

- Local Development Framework, Cliftonville Development Plan Document, Habitats Regulations Assessment, Screening for Appropriate Assessment (February 2009).

Also of relevance:

- Rother District Council, Core Strategy Development Plan Document, Appropriate Assessment Screening Report (December 2007);
- Appropriate Assessment of the Kent Downs AONB Management Plan 1st Revision (March 2009);
- Environmental Report for the Strategic Assessment and Sustainability Appraisal of the Kent Downs AONB Management Plan 2014-19 (June 2013 Consultation Draft).

Wetland Bird Survey (WeBS)

The Wetland Bird Survey, carried out by the British Trust for Ornithology (BTO), is the main source of data on the numbers and trends of wintering birds in the UK, and bird numbers have been recorded since 1947.

Two types of data are recorded:

- Core Counts – monthly counts at all sites, generally at high tide in estuaries
- Low Tide Counts – only carried out at a limited number of sites

The major WeBS monitoring sites in east Kent which are:⁵⁵

- The Swale SPA (also Low Tide Distribution)
- Thanet Coast and Sandwich Bay SPA (also Low Tide Distribution data for Pegwell Bay)
- Dungeness to Pett Level SPA
- Pegwell Bay
- Stodmarsh

In addition, the system of 'WeBs alerts' which provides a review of the status of species on sites which are designated due to their conservation value. Species which have undergone major changes in numbers are flagged through an 'alert'.⁵⁶

Natura 2000 Designation Information

Vulnerabilities at the time of designation are listed in Natura 2000 Data forms. While this provides interesting background, in many cases the commentary is out of date.

SSSI Condition Statements

Also listed are extracts from the condition assessments for the SSSIs underlying the international designations and any commentary relating to recreational impacts. Although the condition assessment for the SSSI cannot be assumed to apply exactly to the international interest features, it does give a general indicator of the condition of the site and its fragility.

⁵⁵ <http://blx1.bto.org/websonline/public/public-area-site-list.jsp?area=24>

⁵⁶ Citation for all WeBS Alert information used in this report: Cook, A.S.C.P., Barimore, C., Holt, C.A., Read, W.J. & Austin, G.E. (2013). Wetland Bird Survey Alerts 2009/2010: Changes in numbers of wintering waterbirds in the Constituent Countries of the United Kingdom, Special Protection Areas (SPAs) and Sites of Special Scientific Interest (SSSIs). BTO Research Report 641. BTO, Thetford. <http://www.bto.org/webs/alerts>

Thanet Coast Suite

Introduction

The East Kent coast consists of two Special Areas of Conservation (Thanet Coast SAC and Sandwich Bay SAC), a Special Protection Area (Thanet Coast and Sandwich Bay SPA) and a Ramsar.

The designated coastline consists of a long stretch of rocky shore, adjoining areas of estuary, sand dune, maritime grassland, saltmarsh and grazing marsh. The site holds important numbers of turnstone and golden plover and is also used by large numbers of other migratory birds; however these other bird species are not technically covered by the SPA designation.

Information on Environmental Conditions

The following key environmental conditions were identified for all the sites:

- Sufficient space between the site and development to allow for managed retreat of intertidal habitats and avoid coastal squeeze;
- No dredging or land-claim of coastal habitats;
- Unpolluted water;
- Absence of nutrient enrichment;
- Absence of non-native species;
- Maintenance of freshwater inputs;
- Balance of saline and non-saline conditions;
- Minimal disturbance; and
- Minimal activities that alter sediment characteristics.

WeBS Alerts

Thanet Coast and Sandwich Bay SPA, winter 09/10. Species evaluated: Turnstone

Medium alert for Turnstone

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

Summary of commentary from WeBS:

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

Vulnerability – Natura 2000 Designation Data

Thanet Coast and Sandwich Bay SPA	Thanet Coast and Sandwich Bay Ramsar	Thanet Coast SAC
<p>Commentary at time of Natura 2000 designation:</p> <p>Compiled 1994, updated 1999</p> <ul style="list-style-type: none"> High potential for disturbance of wintering birds due to recreational use on and off water Particular disturbance potential for high tide roosts and breeding colonies, especially Little Tern Port of Ramsgate, oil spills Eutrophication from surrounding agricultural land 	<p>Commentary at time of Natura 2000 designation:</p> <p>Compiled 1994</p> <ul style="list-style-type: none"> Vegetation succession Water diversion for irrigation/domestic/industrial use Eutrophication Pollution: pesticides/agricultural runoff Recreational/tourism disturbance: Disturbance of turnstones <i>Arenaria interpres</i>, especially by dog walking and kite surfing/boarding, which can result in loss of condition to birds if unmanaged. Urban use Kite surfing causes bird disturbance 	<p>Commentary at time of Natura 2000 designation:</p> <p>Compiled 1996, updated 2001</p> <ul style="list-style-type: none"> Soft chalk vulnerable to erosion and physical destruction Potentially damaging activities include high levels of tourism and recreation high, commercial fishing and bait digging 75% of cliff face protected
		<p>Sandwich Bay SAC</p> <p>Commentary at time of Natura 2000 designation:</p> <p>Compiled 1996, updated 2001</p> <ul style="list-style-type: none"> Management of golf courses

SSSI Condition Statements

SSSI Details	SSSI Units not in Favourable Condition Relating to Recreational Pressure or Views about Management Relating to Recreation
<p>Thanet Coast and Sandwich Bay SPA, Ramsar, Thanet Coast SAC, Sandwich Bay SAC</p>	
<p><u>Sandwich Bay to Hacklinge Marshes SSSI</u></p> <p>Condition assessment Aug 2013:</p> <p>50.34% favourable</p> <p>39.38% unfavourable recovering</p> <p>9.94% unfavourable no change</p> <p>0.33% unfavourable declining</p>	<ul style="list-style-type: none"> Unit 3 – Littoral sediment. Unfavourable recovering. Commentary: Bird Disturbance Study 2010-11 published by Kent Wildlife Trust Oct 2012 provides strong evidence indicating that recreational and commercial activities including dog walking, walking without dogs, bait digging and kite surfing are having a detrimental impact on bird populations in Pegwell Bay. The most disturbing activity, particularly in the north section of the bay, is dog walkers with dogs off leads. This is being addressed through a dog management strategy which aims to provide alternative open space for dogs off leads. The voluntary agreement over kite surfing also needs to be reviewed given disturbance levels associated with this recreational activity. Continued monitoring is required particularly with regard housing development within Dover and Thanet Districts. Mitigation measures are being sought with regard these development plans including monitoring and possible wardening if monitoring indicates increased disturbance activity. Trampling and erosion of dunes; impacts on breeding birds; minimising bird disturbance on over-wintering areas.⁵⁷
<p><u>Thanet Coast SSSI</u></p> <p>Condition assessment Aug 2013:</p> <p>78.1% favourable, 21.9% unfavourable recovering</p>	<ul style="list-style-type: none"> Units 11, 12, 14, 16, 18, 20 – Littoral rock. Commentary for all: Unit remains unfavourable recovering due to effects of dog walkers on birds feeding and roosting.⁵⁸

⁵⁷ Views about management (2005): Many of the vegetation types supported by sand dunes are fragile and vulnerable to erosion from heavy trampling. Where recreational pressures are significant enough to result in the loss of vegetation cover and prevent recovery, it may be necessary to take steps to manage access by putting boardwalks in or controlling activities in vulnerable areas such as the foredunes. It may also be necessary to manage access to limit the impacts of disturbance on breeding birds. Where recreation pressure is not severe, the impact of trampling can help to retain diversity on some sites – sandy tracks break up the vegetation sward and provide areas of bare sand thus increasing the diversity of habitats available. The maintenance of a mosaic of shallow surface pools and un-flooded areas during the winter will provide roosting and feeding habitat for wintering wildfowl and waders. The birds using these features are directly vulnerable to disturbance, which can cause them to lose time spent feeding or drive them to areas with a poorer supply of food. Management should seek to minimise any harmful disturbance, especially at times when bird populations are under stress, such as severely cold conditions.

⁵⁸ Views about management (2005): The birds that use mud and sandflats for feeding and roosting are vulnerable to disturbance from human activities, for example, bait digging, dog walking and wildfowling. These activities can lead to reduced time spent feeding, or individuals being restricted to areas with a poor food supply. Disturbance should therefore be minimised, especially at times when bird populations may be stressed, such as during severe winter weather.

Habitats Regulations Assessments

- All sites: Potential for significant effects identified in Canterbury City Council Habitats Regulations Assessment of Draft Local Plan (Report to Inform Screening for Appropriate Assessment, May 2013). Conclusion: Not screened out, requires further assessment;
- Whitfield Urban Extension (WUE) Masterplan SPD Habitats Regulations Assessment (April 2011): Concluded that contribution recreational pressure from WUE would be insignificant;
- Habitat Regulations Assessment of the Dover LDF Core Strategy (2009): Provides general commentary on housing increase and states that Dover Council will need to work with other Kent authorities and Natural England to input into managing recreation and monitoring disturbance, commensurate with the relative contribution to the increased population of Dover alongside Shepway, Thanet and Canterbury.
- Habitat Regulations Assessment of the Addendum to the Land Allocations Pre-Submission Local Plan (May 2013): The HRA reports on the further visitor survey work carried out after the 2009 Core Strategy, reporting that visitor survey data identified a 6% increase in visitors to the SPA as a result of the Plan, which, in combination with visit increases from Thanet and Canterbury districts, would lead to a 10-14% increase in visitor numbers.⁵⁹
- Local Development Framework, Cliftonville Development Plan Document, Habitats Regulations Assessment, Screening for Appropriate Assessment (February 2009): No significant impact from DPD policies reported. North East Kent Marine Sites Management Scheme 2007-2012 cited as a route to minimise disturbance.

Other Information

A study of bird disturbance at Pegwell Bay was carried out in a two year period between January 2010 and December 2011 by the Kent Wildlife Trust.⁶⁰ This study had the aim of assessing the impact of recreation activities on bird populations. The key conclusions of the study were:

- The south section of Pegwell bay supports a greater diversity of birds, with peak counts of 32 species in the southern section and 9 species in the northern section;
- The number of water birds recorded in the northern sections at high tide was generally extremely low. The report concludes that this is due to a lack of undisturbed roots sites;
- The impact of human disturbance on birds is greater in the northern section, with a higher number of human and dog-related disturbance events 58% higher than in the southern section;
- The 'No Bait Digging Zone' affords a degree of protection for large numbers of lapwing and golden plover;
- The most frequent source of disturbance to birds was 'walkers with dogs off leads', with other significant sources of disturbance being avian predators (13%), walkers (12%), bait digging (7%) and kite surfers (7%);

⁵⁹ Para 1.4

⁶⁰ Swandale, T., Waite, A. (October 2012), Pegwell Bay, Kent: Bird Disturbance Study 2010-2011.

- The activities which produced the highest levels of disturbance response from birds were motorcycling, motorboats, bait digging, yachts and kite surfing;
- The presence of kite surfers in the recording area had a significant impact on the numbers of water birds counted;

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

Monitoring of turnstone has been carried out within the Thanet and Sandwich Bay SPA between 2001 and 2013 by the Sandwich Bay Bird Observatory Trust (SBBOT) in 2001, 2002, 2003, 2006, 2008, 2010 and 2013. The survey records turnstone in 21 sectors between Pegwell Bay and Whitstable. As well as recording roost sites, the survey records disturbance responses and source of disturbance.

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

“Seven surveys have now been conducted since 2001 and results from this year’s survey are of particular concern. The apparent serious decline in Turnstone numbers does not seem to be matched by increased numbers elsewhere around the Kent coast, so it does not appear that the missing birds have moved to other sites away from the Thanet and Sandwich Bay SPA. However, the only sure way in which it can be established that this decline is not temporary is to repeat the co-ordinated count in subsequent winters.”⁶¹

The survey will be repeated in 2014.⁶²

A report on the human impact on turnstone and other wading birds was published in 2002.⁶³

Dover District Council (2011), Green Infrastructure Strategy: As part of the development of the Green Infrastructure Strategy, visitor surveys were carried out to determine which greenspaces Dover residents visit. This strategy acknowledges the importance of green infrastructure in mitigation for Natura 2000 network.

Dover District Council (2012), Thanet Coast SPA Mitigation Strategy: Sets out wardening and monitoring mitigation approach for Thanet Coast SPA for Dover District Council.

⁶¹ Hodgson, I., (2013), Thanet Coast Turnstone (*Arenaria interpres*) Monitoring, Sandwich Bay Bird Observatory Trust, p 8.

⁶² Pers. comm. Natural England.

⁶³ Webb, K. (2002), The Effects of Human Activity on Turnstone and other Wading Birds with the Thanet Sandwich Bay Special Protection Area (SPA)

The Swale

To the west of the study area, there is a gap of a few miles between the Thanet Coast and Sandwich Bay SPA designation and The Swale SPA, covering the Swale estuary. Although only just within the study area, the linkages between these areas need to be considered.

WeBS Alerts

The Swale SPA, winter 09/10.

Species evaluated: White-fronted Goose (European); Brent Goose (Dark-bellied); Shelduck; Wigeon; Gadwall; Teal; Pintail; Shoveler; Little Grebe; Cormorant; Oystercatcher; Avocet; Golden Plover; Grey Plover; Lapwing; Knot; Dunlin; Black-tailed Godwit; Bar-tailed Godwit; Curlew; Redshank

High Alert: White-fronted Goose (European); Little Grebe; Cormorant

Medium alert: Shelduck; Shoveler; Little Grebe; Cormorant; Grey Plover; Lapwing; Dunlin; Redshank

Species for which there are WeBS alerts (not all species surveyed):

Species	First winter	Ref Winter	Short term % change	Medium Term % change	Long term % change	All time % change	% change since classification
Key - Alert Status		High			Medium		
White-fronted Goose	84/85	09/10	10	-23	-73	-	-75
Little Grebe	90/91	09/10	-31	-74	-48	-	-
Cormorant	88/89	09/10	-14	-31	-72	-	-
Shelduck	84/85	09/10	-15	-26	22	-	40
Shoveler	84/85	09/10	5	-25	8	-	8
Grey Plover	84/85	09/10	-2	-44	-14	-	1
Lapwing	84/85	09/10	-17	-42	52	-	-3
Dunlin	84/85	09/10	14	-5	-30	-	-16
Redshank	84/85	09/10	-4	-36	-43	-	-20

Summary of commentary from WeBS:

- **White-fronted Goose, Little Grebe** - fluctuating numbers make interpretation difficult but difference between regional and site trend suggests decline likely to be due to **site specific factors**
- Cormorant, Shelduck, Shoveler, Grey Plover, Lapwing, Dunlin, Redshank – similarity between regional, British and site trends probably indicates broad-scale population trends

Vulnerability – Natura 2000 Designation Data

The assessment of vulnerability at the time of designation does not include recreational pressures.

The Swale SPA	The Swale Ramsar
Commentary at time of Natura 2000 designation: Compiled 1982, updated 1993	Commentary at time of Natura 2000 designation: Compiled 1982
<ul style="list-style-type: none">• Erosion of intertidal habitat• Abstraction• A need to graze marshes	<ul style="list-style-type: none">• Erosion•

SSSI Condition Statements

SSSI Details	SSSI Units not in Favourable Condition Relating to Recreational Pressure or Views about Management Relating to Recreation
The Swale SPA, Ramsar	
The Swale SSSI Condition assessment Aug 2013: 97.83% favourable 2.17% unfavourable no change	<ul style="list-style-type: none">• No direct link with recreation stated.• Bird disturbance on sand flats due to dog walking, bait digging and wildfowling.⁶⁴

Habitats Regulations Assessments

- Potential for significant effects identified in Canterbury City Council Habitats Regulations Assessment of Draft Local Plan (Report to Inform Screening for Appropriate Assessment, May 2013). Conclusion: Requires further assessment;

Other Information

This site is covered by a current research and visitor access management programme in North Kent, led by Greening the Gateway Kent and Medway.

⁶⁴ As note 15.

Dungeness

Introduction

This extensive area of designated sites contains a wide range of coastal habitats, including saltmarsh, sand dunes, vegetated shingle, saline lagoons, standing waters, lowland ditch systems, and fens.

Dungeness shingle beach, the UK's largest shingle structure, is also of international importance, with a complex pattern of ridges reflecting its accretion and development over hundreds of years. The total area of exposed shingle covers 1,600 ha, with an even greater area of buried shingle ridges.

Despite considerable disturbance and destruction of the surface shingle, the site retains very large areas of intact parallel ridges along with its characteristic zonation of vegetation. A feature of the site is the small depressions formed in the shingle, which support fen and open-water communities.

The extensive areas of natural and semi-natural habitats support a large range of nationally rare and nationally scarce plants, including populations of four plant species that are listed in Schedule 8 of the Wildlife and Countryside Act 1981.

The SSSI is regularly used by at least 40 breeding bird species typical of shingle beaches and saltmarshes, lowland damp grasslands, lowland open waters and scrub and regularly includes nationally important breeding numbers of several species. The extensive areas of open water, grazing marsh, reedbed and intertidal habitat provide safe feeding and roosting sites for nationally important numbers of waterfowl, regularly supporting in excess of 20,000 individuals of more than 60 species. The SSSI also supports nationally important numbers of hen harrier in winter and aquatic warbler on autumn passage.

The grazing marsh ditches support a large population of water vole.

Information on Environmental Conditions

The key environmental conditions that support the features of European interest are:

- Maintenance of grazing/ mowing regimes;
- Freshwater inputs are of value for providing a localised increase in prey biomass for certain bird species, specific microclimatic conditions and are used for preening and drinking;
- Sufficient space between site and development to allow for managed retreat of intertidal habitat and avoid coastal squeeze;
- Unpolluted water;
- Absence of nutrient enrichment;
- Absence of non-native species;
- Balance of saline and non-saline conditions;
- Control of predator numbers (e.g. badger, fox and mink);
- Maintenance of suitable grassland on adjacent land for off-site grazing and roosting;
- Adequate water levels for Ramsar and SAC features such as great crested newts and aquatic invertebrates;
- Minimal disturbance.

WeBS Alerts

Dungeness to Pett Level SPA, winter 09/10. Species evaluated: Bewick's Swan, Shoveler

No alert

Vulnerability – Natura 2000 Designation Data

Dungeness to Pett Level SPA	Dungeness SAC
Commentary at time of Natura 2000 designation: Compiled 1999	Commentary at time of Natura 2000 designation: Compiled 1996, updated 2001
<ul style="list-style-type: none"> • Coastal erosion • Predation risk to birds • Some risk from recreational use • Lowering of water levels 	<ul style="list-style-type: none"> • Shingle vulnerable to vehicles and walkers

SSSI Condition Statements

SSSI Details	SSSI Units not in Favourable Condition Relating to Recreational Pressure or Views about Management Relating to Recreation
Dungeness, Romney Marsh and Rye Bay SSSI Condition assessment Aug 2013: 64.32% favourable 35.41% unfavourable recovering 0.14% unfavourable no change 0.13% unfavourable declining	<ul style="list-style-type: none"> • Commentary summary: Issues include implementation of beach reprofiling, historical damage to fossil ridge topography, disturbance from training range, improvement of grassland management to benefit invertebrates and increase legumes, invasive species. • No direct link with recreation stated.

Further Commentary from SSSI Condition Statement

The target for total number of non-breeding birds utilising the site is met. Mean winter peak based upon the WeBs combined total for 2002 to 2007 is 37,387, exceeding the target of 37,000 individuals. Data indicate that the targets for population size of non-breeding birds are exceeded. The only species where data are not currently available is aquatic warbler which has a target of 1 individual. Suitable habitat conditions are present to support this species. For all other species targets for population size are met or exceeded: shoveler, mute swan, Bewick's swan, white-fronted goose, wigeon, gadwall, teal, pochard, little grebe, great crested grebe, cormorant, bittern, hen harrier, coot, golden plover, ruff, sanderling, whimbrel, common sandpiper. Analysis of data for the last 15 years indicates that, for the 21 species monitored, the site can be considered favourable with regard to wintering bird numbers. Mute swan, greylag, wigeon, gadwall, teal, mallard, pintail, shoveler, little grebe, great crested grebe, cormorant, golden plover have all increased although some have shown declines in parts of the site. Numbers of pochard, tufted duck and goldeneye have fluctuated but there is no evidence of long-term decline. Lapwing and sanderling have also fluctuated and there are signs of re-distribution within site. But numbers are still significant and the site remains important in a regional context for these species. Currently available data do not allow for assessment of breeding bird numbers over the whole site.

Habitat Regulations Assessment

- Rother and Shepway Core Strategies, Habitats Regulations Assessment (Dungeness SAC; Dungeness to Pett Level SPA and SPA extension; and Dungeness, Romney Marsh and Rye Bay proposed Ramsar site) (Final Report following Publication Stage consultation, January 2012). The HRA states:

Visitor pressure is one of the issues that theoretically could have an impact upon these interest features either by trampling of shingle vegetation (and thus damage of well-established shingle communities) or by disturbance of SPA birds. There are four geographical components of the Dungeness, Romney Marsh and Rye Bay pSPA and pRamsar site that are of particular relevance concerning visitors:

- Dungeness RSPB Reserve;
- Dungeness Point and National Nature Reserve outside the RSPB Reserve;
- Camber Sands; and [Rother]
- Rye Harbour Local Nature Reserve. [Rother]⁶⁵

Approximately 30,000 visitors per annum currently use the RSPB reserve. The RSPB has a declared intention to cap visitors to their reserve at 40,000 per annum.⁶⁶

Visitor numbers are based on a 2006 survey. These state:

- 550,000 annual visits;
- 33% of visitors live more than 50 miles/80km from Dungeness;
- 66% of visitors were within 50 miles/80km of Dungeness;
- Only 10% originated within 10 miles/16 km.⁶⁷

This profile of visitors from the 2006 survey is used to calculate the impact of the increased population in Shepway District, concluding that as the contributions to future recreational pressure from Rother/Shepway residents is likely to be small that a restrictive development control policy applied to the two districts would be ineffective in actually managing the vast majority (potentially over 90%) of the future increase in visitors to Dungeness since most visits will probably originate outside the two districts and that a 'sustainable access' policy is required.

⁶⁵ Para 5.1.20

⁶⁶ Para 5.2.2

⁶⁷ Note 66

Other Information

It is proposed to extend the Dungeness to Pett Levels SPA and to designate a new Ramsar site.⁶⁸

It is proposed to extend the boundary of the SPA and add eight further qualifying species and one assemblage:

- Bittern (*Botaurus stellaris*);
- Hen harrier (*Circus cyaneus*);
- Golden plover (*Pluvialis apricaria*);
- Ruff (*Philomachus pugnax*);
- Aquatic warbler (*Acrocephalus paludicola*);
- Marsh harrier (*Circus aeruginosus*);
- Avocet (*Recurvirostra avosetta*);
- Sandwich tern (*Sterna sandvicensis*).

Assemblage:

In the non-breeding season, the area is regularly used by 34,625 individual waterbirds (5 year peak mean 2002/3 – 2006/7), including (but not limited to) Bewick's swan (*Cygnus columbianus bewickii*), European white-fronted goose (*Anser albifrons albifrons*), wigeon (*Anas Penelope*), gadwall (*A. strepera*), Shoveler (*A. clypeata*), pochard (*Aythya farina*), little grebe (*Tachybaptus ruficollis*), great crested grebe (*Podiceps cristatus*), cormorant (*Phalacrocorax carbo*), bittern (*Botaurus stellaris*), coot (*Fulica atra*), golden plover (*Pluvialis apricaria*), lapwing (*Vanellus vanellus*), sanderling (*Calidris alba*), ruff (*Philomachus pugnax*), whimbrel (*Numenius phaeopus*) and common sandpiper (*Actitis hypoleucos*).

In the view of Natural England, in addition to supporting internationally important populations of birds listed in table one, the Dungeness, Romney Marsh and Rye Bay proposed Ramsar site also qualifies for the following reasons:

- The site contains representative, rare, or unique examples of natural or near-natural wetland types such as vegetated annual drift lines, perennial vegetated stony banks, natural shingle wetlands, saline lagoons, freshwater pits and basin fens.
- The site supports vulnerable, endangered, or critically endangered species or threatened ecological communities associated with wetland habitats. These communities include rich and diverse assemblages of bryophytes, vascular plants and invertebrates that are rare, threatened or specially protected.

⁶⁸ http://www.naturalengland.org.uk/regions/south_east/ourwork/dungenessconsultation/default.aspx

Dover to Kingsdown Cliffs SAC

Introduction

This long narrow site covers a large stretch of the coast between Dover and Kingsdown. It supports a full zonation of chalk substrate maritime cliff communities, reflecting different levels of exposure to wind and salt spray. The lowest, most exposed parts of the cliff face support rock-crevice communities with rock samphire, rock sea-lavender and the rare hoary stock. The endangered oxtongue broomrape, confined in the UK to unstable coastal chalk cliffs of southern England, has a stronghold on this site. The cliffs are internationally important for chalk cliff exposures.

The most accessible part of the Dover to Kingsdown Cliffs SAC, the 'White Cliffs of Dover' s owned by the National Trust constituting their estate. The estate as a whole attracts more than 220,000 visits per year. The National Trust reports that the site attracted 241,174 visits in the year from March 2009 – February 2010, as well as 70,214 vehicles.⁶⁹

Information on Environmental Conditions

The key environmental conditions that support the features of European interest are:

- Well-drained soils;
- Absence of direct fertilisation;
- Adequate undeveloped land behind the cliffs to enable managed retreat of the SAC in response to erosion and avoid coastal squeeze;
- Minimal air pollution – nitrogen deposition may cause reduction in diversity, sulphur deposition can cause acidification;
- Low levels of trampling;
- Maintenance of grazing.

Vulnerability – Natura 2000 Designation Data

Squeeze of cliff top grassland between eroding cliff and arable land.⁷⁰

SSSI Condition Statements

Dover to Kingsdown Cliffs SSSI

SSSI Units not in Favourable Condition Relating to Recreational Pressure or Views about Management Relating to Recreation

Condition assessment Aug 2013:
61.34% favourable
32.31% unfavourable recovering
6.35% unfavourable no change

- No direct link with recreation stated.

⁶⁹ Shepway Core Strategy, Habitats Regulations Assessment (Sites other than the Dungeness Complex) (Final Report following Publication Core Strategy Consultation January 2012), para 7.2.1.

⁷⁰ Compiled 2004, updated 2011

Habitats Regulations Assessments

- Whitfield Urban Extension (WUE) Masterplan SPD Habitats Regulations Assessment (April 2011): Concluded that contribution recreational pressure from WUE would be insignificant;
- Shepway Core Strategy, Habitats Regulations Assessment (Sites other than the Dungeness Complex) (Final Report following Publication Core Strategy Consultation January 2012): Reference RMG:Clarity Dover Visitor Survey 2011, only 6.8% of visitors from Shepway (however it should be noted that the small sample size of 45 individuals and self-selecting sample means that not possible to extrapolate from this survey data). Conclusion that low impact on sward and contribution from Folkestone/Hythe inconsequential and that visitation is significantly tourist in origin.
- Habitat Regulations Assessment of the Dover LDF Core Strategy (2009); Requirement of low levels of tramping to maintain site integrity. Connaught Barracks and Fort Burgoyne within 500m of site requiring greenspace provision to serve similar function to that provided by SAC.
- Habitat Regulations Assessment of the Addendum to the Land Allocations Pre-Submission Local Plan (May 2013);

Lydden and Temple Ewell SAC

Introduction

This site includes some of the richest chalk grassland in Kent, with an outstanding range of plants and invertebrates. A number of rarities include the early spider orchid, burnt orchid and musk orchid. Invertebrate fauna includes downland butterflies such as the marbled white, adonis blue, chalkhill blue and the rare silver-spotted skipper as well as two rare moths; the dew and the straw belle.

Information on Environmental Conditions

The key environmental conditions that support the features of European interest are:

- Maintenance of grazing;
- Lack of excessive trampling from both excessive recreational footfall and over-stocking leading to erosion/poaching;
- Minimal air pollution – nitrogen deposition may cause reduction in diversity, sulphur deposition can cause acidification;
- Absence of direct fertilisation;
- Well-drained soils.

Vulnerability – Natura 2000 Designation Data

Grazing management required.⁷¹

SSSI Condition Statements

Lydden and Temple Ewell Downs SSSI	SSSI Units not in Favourable Condition Relating to Recreational Pressure or Views about Management Relating to Recreation
Condition assessment Aug 2013: 85.96% favourable 14.04% unfavourable recovering 6.35% unfavourable no change	• No direct link with recreation stated.

Habitats Regulations Assessments

- Whitfield Urban Extension (WUE) Masterplan SPD Habitats Regulations Assessment (April 2011): Assessment of recreational impact on Lydden Temple Ewell is carried out as WUE is adjacent to the SAC. Visitor survey on the site carried out in 2010.

Main recreational pressures identified as:

“The main current issue for nature conservation relates to restrictions on what grazing stock may be used on the reserve. Sheep grazing has been used in the past to manage areas of grassland but this is no longer considered practicable due to sheep worrying incidents. Consequently grazing is now by cattle and

⁷¹ Compiled 1995, updated 2011

goats (and wild rabbit), although the livestock species may not provide the optimum sward characteristics for key wildlife species.”

Alongside this are listed localised pressures including vandalism, motorbikes and cycles, general litter and dog fouling.⁷²

Conclusion that contribution of recreational pressure from WUE would require mitigation from greenspace provision within the development site and further visitor surveys, as developed through further work and assessment;⁷³

- Potential for significant effects identified in Canterbury City Council Habitats Regulations Assessment of Draft Local Plan (Report to Inform Screening for Appropriate Assessment, May 2013). Conclusion: Not screened out, requires further assessment;
- Shepway Core Strategy, Habitats Regulations Assessment (Sites other than the Dungeness Complex) (Final Report following Publication Core Strategy Consultation January 2012); Reports that survey data (Aspect Ecology) indicates that site is largely a local recreational resourced with core catchment of 4km. The report states that Swingfield Street is the only Shepway settlement within this zone, with larger Hawkinge 6km distant. Conclusion of no significant effect from Core Strategy.
- Habitat Regulations Assessment of the Dover LDF Core Strategy (2009); Main impact pathway from Whitfield Urban Extension and requirement for alternative greenspace provision. This was further developed through the WUE HRA and masterplan, considered above.

Other Information

Lydden and Temple Ewell Downs SAC and NNR Visitor Study (2010).

⁷² Paras 3.3.3, 3.3.4

⁷³ Dedicated Mitigation Areas within the Whitfield Urban Expansion, DDC, 2010, as amended March 2011.

Folkestone to Etchinghill Escarpment SAC

Introduction

The site is one of the largest remaining areas of unimproved chalk downland in Kent, with three nationally rare plants⁷⁴ present; late spider orchid, early spider orchid and bedstraw broomrape. The site supports a diverse insect fauna including nationally rare flies, moths and butterflies. This site lies on a steep escarpment in a heavily urbanised environment situated on the outskirts of Folkestone and bisected by the A20.

Information on Environmental Conditions

The key environmental conditions that support the features of European interest are:

- Maintenance of grazing;
- Low levels of trampling;
- Minimal air pollution – nitrogen deposition may cause reduction in diversity, sulphur deposition can cause acidification;
- Absence of direct fertilisation;
- Well-drained soils.

Vulnerability – Natura 2000 Designation Data

Low intensity grazing management required.⁷⁵

SSSI Condition Statements

Folkestone to Etchinghill Escarpment SSSI	SSSI Units not in Favourable Condition Relating to Recreational Pressure or Views about Management Relating to Recreation
Condition assessment Aug 2013: 70.19% favourable 25.20% unfavourable recovering 1.93% unfavourable no change 2.68 unfavourable declining	• No direct link with recreation stated.

Habitats Regulations Assessments

- Potential for significant effects identified in Canterbury City Council Habitats Regulations Assessment of Draft Local Plan (Report to Inform Screening for Appropriate Assessment, May 2013). Conclusion: Not screened out, requires further assessment;
- Whitfield Urban Extension (WUE) Masterplan SPD Habitats Regulations Assessment (April 2011): Concluded that contribution recreational pressure from WUE would be insignificant;

⁷⁴ Listed on Schedule 8 of the Wildlife and Countryside Act 1981.

⁷⁵ Compiled 1996, updated 2011.

- Shepway Core Strategy, Habitats Regulations Assessment (Sites other than the Dungeness Complex) (Final Report following Publication Core Strategy Consultation January 2012): The HRA reports no specific visitor survey data for the site, but estimates from a draft survey that visitor numbers are low and extrapolates data from Lydden Temple Ewell visitor survey (completed as part of Whitfield Urban Extension HRA). Some issues reported with localised damage and anti-social behaviours.⁷⁶ In the absence of definitive data precautionary monitoring of recreational activity is required, which is committed to in the Core Strategy alongside the provision of additional green infrastructure.⁷⁷
- Habitat Regulations Assessment of the Dover LDF Core Strategy (2009); Due to general increase in population in the area, with Dover and Shepway, requirement for greenspace provision as alternative to SAC sites, as outlined in Policies DM31 (Open Space and Outdoor Recreation) and DM20 (Biodiversity and Geology). No specific analysis of impact on Folkestone and Etchingill Escarpment undertaken.

Other Information

An uncompleted visitor survey carried out by the White Cliffs Countryside Partnership is reported in Shepway District Council Habitats Regulations Assessment (Sites other than the Dungeness Complex).⁷⁸

⁷⁶ Paras 5.2.2, 5.2.3, 5.2.4.

⁷⁷ Para 5.2.15 of HRA.

⁷⁸ The White Cliffs Countryside Partnership has been approached as part of the data-gathering exercise of this project but visitor survey had not been received at time of conclusion of the report.

Blean Complex SAC

Introduction

This suite of sites together form one of the best remaining examples of primary deciduous woodland in the wider Blean Woods complex north of Canterbury. Church Woods contain a diverse range of deciduous trees, with sweet chestnut coppice a substantial component. The invertebrate community is notable and a number of scarce woodland bird species, including lesser-spotted woodpecker and redstart breed. Ellenden Wood comprises sessile oak-beech woodland on acid soils and hornbeam with pedunculate and sessile oak on clay, plus a small amount of sweet chestnut coppice.

Information on Environmental Conditions

The key environmental conditions that support the features of European interest are:

- Low levels of trampling;
- Maintenance of coppice management;
- Minimal air pollution;
- Absence of direct fertilisation;
- Well-drained soil.

Vulnerability – Natura 2000 Designation Data

Coppicing preferred, although not essential.⁷⁹

SSSI Condition Statements

SSSI Details	SSSI Units not in Favourable Condition Relating to Recreational Pressure or Views about Management Relating to Recreation
West Blean and Thornden Woods SSSI Condition assessment Aug 2013: 42.88% favourable, 51.95% unfavourable recovering, 3.05% unfavourable no change, 2.12% unfavourable declining	• No direct link with recreation stated.
Ellenden Wood SSSI Condition assessment Aug 2013: 100% favourable	
Church Woods, Blean SSSI Condition assessment Aug 2013: 92.2% favourable, 7.8% unfavourable recovering	
East Blean Woods SSSI Condition assessment Aug 2013: 99.29% favourable, 0.71% unfavourable recovering	

⁷⁹ Compiled 2003, updated 2011

Habitats Regulations Assessments

- Potential for significant effects identified in Canterbury City Council Habitats Regulations Assessment of Draft Local Plan (Report to Inform Screening for Appropriate Assessment, May 2013); Conclusion: Not screened out, requires further assessment;
- Habitat Regulations Assessment of the Dover LDF Core Strategy (2009); No impact; recreation use is 'easily manageable and is not considered to put the survival of the qualifying features at risk'.⁸⁰

Other Information

An audience development plan was produced for Kent Wildlife Trust in 2005.⁸¹

⁸⁰ Para 8.5

⁸¹ Rural Resources for Kent Wildlife Trust (2005), Kent Wildlife Trust Blean Audience Development Plan

Parkgate Down SAC

Introduction

Parkgate Down is a small (7 ha) chalk downland site, with outstanding assemblage of orchids including the nationally rare monkey orchid, late spider orchid and nationally scarce musk orchid and lady orchid.

Information on Environmental Conditions

The key environmental conditions that support the features of European interest are:

- Maintenance of grazing;
- Minimal recreational trampling;
- Minimal air pollution – nitrogen deposition may cause reduction in diversity, sulphur deposition can cause acidification;
- Absence of direct fertilisation;
- Well drained soils.

Vulnerability – Natura 2000 Designation Data

Grazing management required.⁸²

SSSI Condition Statements

Parkgate Down SSSI Condition assessment Aug 2013: 100% Favourable

Habitats Regulations Assessments

- Potential for significant effects identified in Canterbury City Council Habitats Regulations Assessment of Draft Local Plan (Report to Inform Screening for Appropriate Assessment, May 2013). Conclusion: Not screened out, requires further assessment;
- Shepway Core Strategy, Habitats Regulations Assessment (Sites other than the Dungeness Complex) (Final Report following Publication Core Strategy Consultation January 2012): The HRA reports that no visitor information is available for this site and concludes that, notwithstanding visitors with a particular interest in orchids, the distance from tourist centres, lack of transport links, lack of parking and more accessible areas means that site is unlikely to be significantly visited.

⁸² Compiled 2003, updated 2011.

Stodmarsh SPA, SAC, Ramsar

Information on Environmental Conditions

Vulnerability – Natura 2000 Designation Data

Special Protection Areas (SPAs)	Ramsars ⁸³	Special Areas of Conservation (SACs)
Stodmarsh SPA	Stodmarsh Ramsar	Stodmarsh SAC
Commentary at time of Natura 2000 designation: Compiled 1993, updated 1999 • Water supply	Commentary at time of Natura 2000 designation: Compiled 1993 • None reported	Commentary at time of Natura 2000 designation: Compiled 2001 • None listed

SSSI Condition Statements

SSSI Details	SSSI Units not in Favourable Condition Relating to Recreational Pressure or Views about Management Relating to Recreation
Stodmarsh SSSI Condition assessment Aug 2013: 78.61% favourable 21.39% unfavourable recovering	• No direct link with recreation stated. • Views about management (2005) do not comment on recreational impacts.

Habitats Regulations Assessments

- Stodmarsh SPA: Potential for significant effects identified in Canterbury City Council Habitats Regulations Assessment of Draft Local Plan (Report to Inform Screening for Appropriate Assessment, May 2013). Conclusion: Requires further assessment;
- Habitat Regulations Assessment of the Dover LDF Core Strategy (2009); Main source of impact through the Core Strategy from water resources, no discussion of recreational impacts.

Other Information

Stodmarsh NNR – Natural England website:

<http://www.naturalengland.org.uk/ourwork/conservation/designations/nnr/1005003.aspx>

Site leaflet and environmental information pack available.⁸⁴

⁸³ SPA and Ramsar designations of the same name may overlap but do not necessarily have the same boundaries.

⁸⁴ <http://publications.naturalengland.org.uk/publication/35044?category=59026>

East Kent – Planning and Development

Core Strategies, Local Plans and Development

Core Strategies and Local Plans

Table 2 sets out the current⁸⁵ position regarding the LPAs Local Plans, the timetables and processes for developing Plans, proposed housing growth figures and relevant policies and strategies.

Housing Allocations

Table 3 lists the major housing development sites in the study area. Information is also provided on the housing growth proposals for the neighbouring local authority areas of Ashford, Rother and Swale.

The locations of the developments are shown in the following plans.

Other Development

A number of proposed developments have been listed separately where the housing figures are in addition to the overall figure quoted for the LPA, or where housing figures are not yet known. The developments are:

- Discovery Park;
- Farthingloe Farm/Western Heights;
- Deal Transport and Flood Alleviation Scheme.

Strategic Overview of Development in East Kent

The population forecasts for the east Kent districts up to 2031 show increases in population of more than 60,000 people across the study area, see Table 4. Notably the neighbouring district of Ashford is forecast to increase by more than 50,000 in the same period.

Plan 3 shows the locations of major housing developments sites (>50 dwellings proposed), based on draft Plan Allocations at the time of writing (*NB As all the Local Planning Authorities are at different stages in their Local Plan development, these figures are subject to change; and some information has been updated more recently as it has become available*). The plan indicates sites within the study area, but also key development locations outside the study area such as Chilmington Green in Ashford district. The map includes sites within the Local Plan proposed site allocations documents. Three sites in Dover are indicated (Discovery Park, Farthingloe Farm and Deal Transport and Flooding scheme) where the potential housing numbers may be additional to the site allocations, or the potential scale of development is not known.

⁸⁵ The position of the Local Plans and their proposals is current as at the point of writing this report.

Table 2: East Kent Local Planning Authorities: Development and Funding

	Status of Local Plan	Housing numbers	GI Policy or Strategy	Open Space Strategy	Funding for open space and/or environmental mitigation
Canterbury	Consultation stage of Preferred Option of Local Plan in summer 2013; Local Plan format but at the equivalent of preferred option stage. Hoping to be examination next spring/summer 2014.	15,600 by 2031	Landscape Study (2010) in draft; includes biodiversity opportunity mapping. Draft to be consulted on and adopted as SPD. Canterbury District Draft Local Plan Preferred Option Draft Consultation 2013: A green infrastructure strategy will be produced jointly by Canterbury City Council with other local authorities and the North Kent Environment Group, this will aim to create a sustainable green infrastructure network that goes beyond the District boundary to ensure all areas are interlinked.	Open Spaces Strategy 2009-2014; includes national standards for open space. Consultation with Local Plan timetable.	Developer Contributions SPD; open spaces receive £6k per house (pending adoption of CIL; but this might not be effective until 2015 with the current timetable).
Thanet	Issues and Options were consulted on during summer 2013. Preferred Options due for consultation June 2014.	11,700 by 2031* figure based on one option being tested as potential Local Plan target. No formal target established, therefore subject to change.	Preparing a paper on Green Infrastructure and Natural Environment to go forward into the Local Plan.	PPG17 Open Spaces Audit 2005. This was measured against ANG standards.	No decision on CIL, but if to follow Local Plan adoption it would take until 2015 for CIL to be introduced. Interim mitigation strategy currently being imposed - collecting a financial contribution towards wardening of the coast from new housing development.
Dover	Adopted Core Strategy 2010. Land allocations document EiP September 2013; will then have strategic housing land allocations.	10,100 by 2026 (14,400 including later expansion at Whitfield)	Adopted Core Strategy 2010 Policy CP7 Green Infrastructure Green Infrastructure Strategy (2011) (currently being revised)	Adopted Core Strategy 2010. Policy DM 25 - Open Space. Adopted documents, e.g. play space, parks and open spaces documents.	SPA mitigation strategy and tariff for Dover. Spent on monitoring. Around £50 based on a 3 bed house. £17 towards monitoring and £33 into a pot for the longer term review of the Pegwell Bay bird disturbance study. CIL Charging Schedule has been consulted on. Possible adoption of CIL by April 2014.
Shepway	Core Strategy to Full Council meeting on 18/9/13 for formal adoption	8,750 minimum, 2006-2031	GI report has audit and comparison with ANG; EK Typology with ANG standards; Quantifies SSSI's, nature reserves etc., with some limited information on what that might mean for development sites; Green Infrastructure Policy CSD4; Policy SS2: Housing and the Economy Growth Strategy; Policy SS6: Spatial Strategy for Folkestone Seafront; Policy SS7: Spatial Strategy for Shorncliffe Garrison, Folkestone; Policy CSD8: New Romney Strategy; Policy CSD9: Sellindge Strategy;	Shepway Green Infrastructure Report, Open Spaces: Sports & Recreation Report.	Now that the Core Strategy Local Plan has been adopted by the Council on 18/09/2013 the Council is aiming to work-up a first draft Shepway Community Infrastructure Levy (CIL) charging schedule for public consultation in 2014.

Table 3: East Kent Districts Planned/Proposed Totals of Developments⁸⁶

	Housing Sites - Name and Location	No of units and Timescale	Notes
Thanet	Whole local authority area	11,700 by 2031	'Figures based on one option being tested for the emerging Local Plan, and do not represent an established target. Therefore maybe subject to change.'
	Westwood sites	4500	
	Birchington sites	1526	
	Ramsgate sites	2561	
	Margate sites	2192	
	Broadstairs sites	621	
Canterbury	Whole local authority area	15,600 by 2031	Contribution from sites with planning permission (up to 31.3.12) 1,226 units
	Land at South Canterbury	4,000	
	Strode Farm, Herne Bay	800	
	Land at Greenhill, Herne Bay	600	
	Land at Herne Bay Golf Club, Herne Bay	400	
	Land at Hillborough, Herne Bay	1000	
	Whitstable Sites: North of Thanet Way, Whitstable	400	
	Land at Sturry/Broad Oak	1000	
	Land North of Hersden	800	
Shepway	Whole local authority area	8750 minimum, 2006-2031	From draft Core Strategy to Full Council 18/8/2013; and the (Shepway) Authority Monitoring Report 2013
	Folkestone MOD land at Shorncliffe	280 by 2019 (1200 by 2031)	
	Folkestone Harbour and Sea front	137 by 2019 (1000 total later)	
	Marine Parade, Folkestone	64 by 2019	
	Sellingle	190 by 2019 (250 total later)	
	New Romney	116 by 2019 (300 total later)	
	St. Mary's Bay	72 by 2019	
	Nichols Quarry, Hythe	192 (1050 total by 2031)	
	Hythe (all sites except Nichols Quarry)	112 by 2019	
	Folkestone sites	50+59+68+130+127 by 2019	
	Hawkinge	70 by 2019	
Dover ⁸⁷	Whole local authority area	10,100 by 2026 (14,400 later)	10 100 units by 2026 14 400 later including Whitfield expansion
	Dover Waterfront (Wellington Dock)	300	
	Connaught Barracks	500	
	Dover Mid Town	100	
	Whitfield expansion	2280 until 2026 after that 3470 (total of 5750)	
	Capel	100	
	Elvington	50	
	Eastry	80 + 50 + 20	
	Deal	220 + 3no @ c50	
	Sholden	460	
	Sandwich	120 + 50 + 60	
	Ash	95 + 79	
	Other significant sites (potential)		
	Discovery Park: 82 hectares includes Enterprise Park; potential for up to 500 additional new homes; a key link with Thanet DC for in combination effects.	500	
Farthingloe Farm/Western Heights: up to 521 homes; 90 apartment retirement village;	600+		

⁸⁶ Only sites >50 units listed

⁸⁷ DDC figures from the Land Allocation Pre-submission Local Plan; subject to change following the EiP.

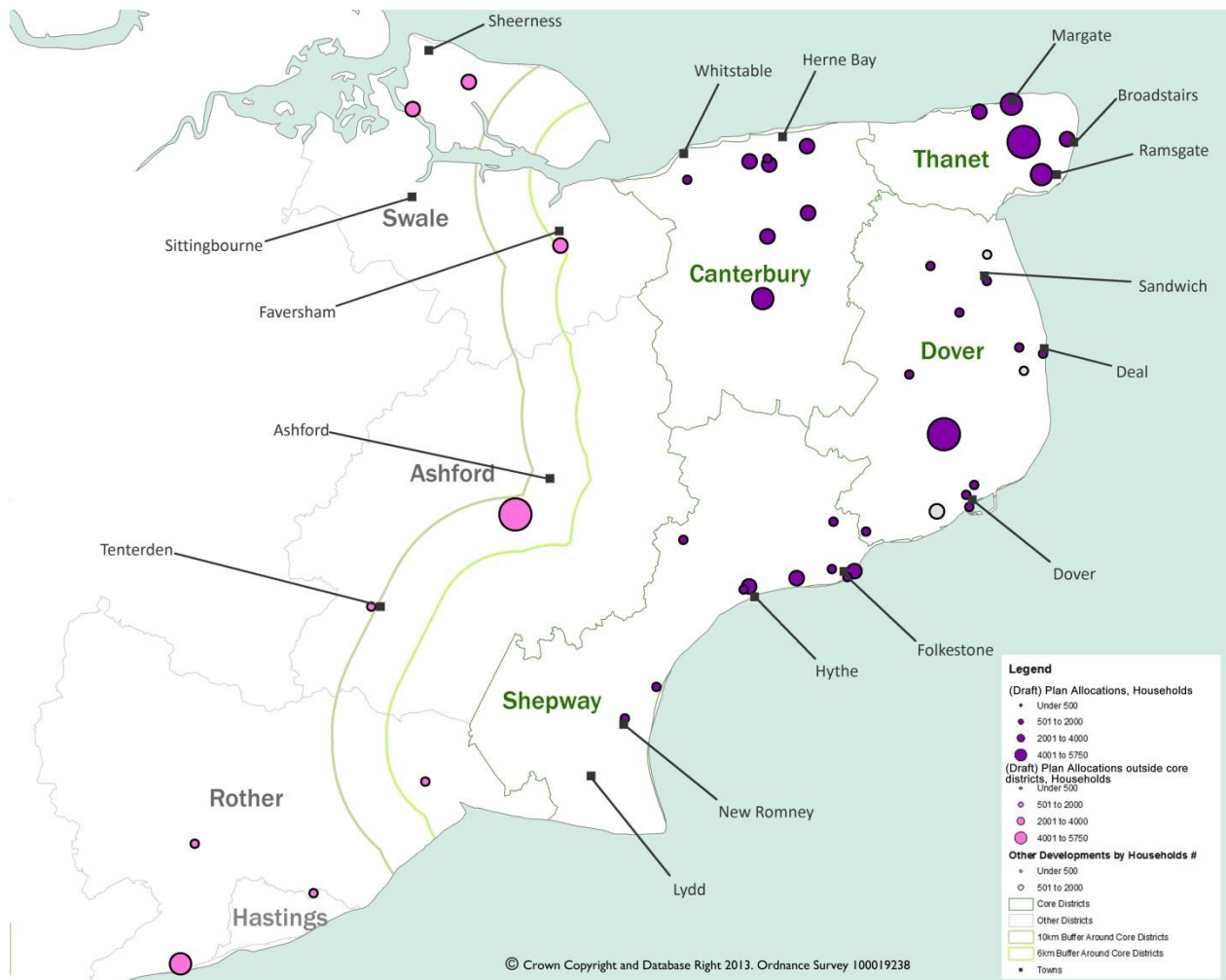
	Housing Sites - Name and Location	No of units and Timescale	Notes
	Hotel, conference centre, pub/restaurant, shop, B&B, Museum.		
	Deal Transport and Flooding project: to address constraints on development from flood risk, transport and environment.		
Ashford	Whole local authority area	By 2021 (2008-2021; CS under review by the end of 2014)	
	Chilmington Green (in draft AAP)	5750	
	Tenterden	475	
	Rural	390	
Rother	Whole local authority area	(Minimum) 5,700 by 2028	Based on revised proposals in the Schedule of Main Modifications to the Core Strategy September 2013
	Bexhill	3,100	
	Hastings Fringes	100 - 250	
	Battle	475 - 500	
	Rye/Rye Harbour	355 - 400	
	Rural Areas	1,670 (800 from 2011-2028)	
Swale	Whole local authority area	10,800	Based on the draft Local Plan for Swale
	Faversham (up to 16 locations)	1000	
	Minster (Isle of Sheppey) (up to 10 locations)	1400	
	Queenborough (Isle of Sheppey)	1400	

Table 4: Population Forecasts

District	2011 population	2031 population forecast ⁸⁸	Increased population numbers	Percentage increase 2011 - 2031	
Canterbury	150 600	173 700	23 100	15.3	
Dover	111 700	134 700	23 000	20.6	
Thanet	134 400	141 700	7 300	5.5	As of September 2013 TDC housing growth could accommodate population growth of 18 100 in this period
Shepway	108 200	116 100	7 900	7.3	
Buffer districts					
Ashford	118 400	170 100	51 700	43.7	
Swale	136 300	151 700	15 300	11.3	
Rother					

⁸⁸ Based on KCC Population Forecast toolkit data that accounts for housing growth as of November 2012.

Plan 3: Major Housing Development Sites in East Kent with (Draft) Plan Allocations (>50 units)



Plan 4 shows the development sites with 6km buffers. This and the following plans using buffers should be treated with caution as simply applying a 'zone of influence' to development sites is too simplistic an approach in ascertaining the likely effects from any given development when considering the effects on Natura 2000 sites. It uses an 'as the crow flies' approach and should not be used to develop a strategic approach to mitigation. Further analysis of the transport network and understanding of visitors would be needed to present a more robust proposal.⁸⁹

However, this approach is included here as a useful tool to demonstrate how development sites across the districts of the study area and adjacent districts overlap and how these overlaps cross local authority boundaries. The 6km distance has been applied in North Kent as the catchment zone for sites and has been derived through visitor survey. The catchment distance in other areas varies, but is usually somewhere between 3km and 7km.

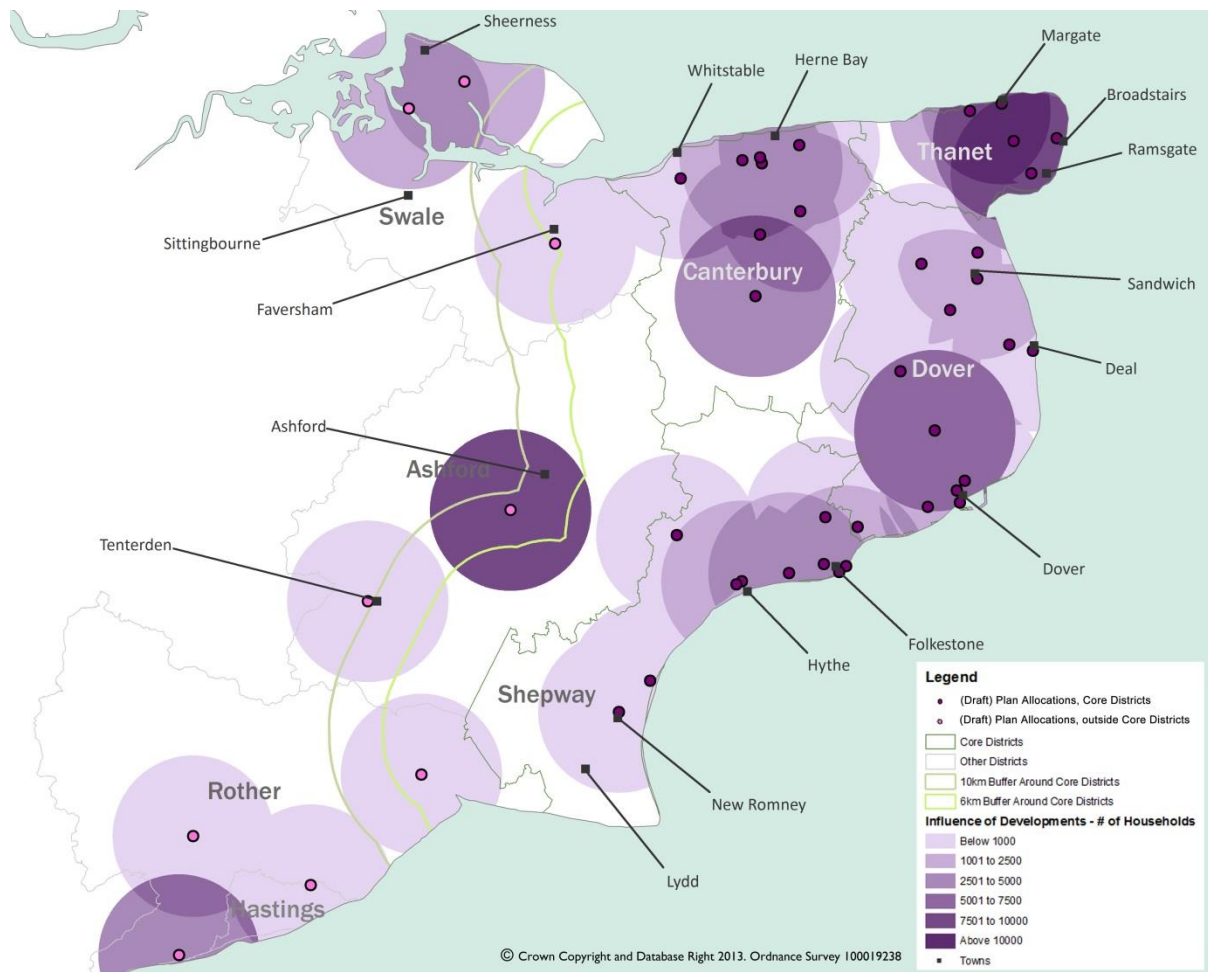
The buffers are shaded to indicate the quantum of housing (6 shades with the lightest indicating less than 1000 units up to more than 10k units). Concentrations of developments are obvious in Thanet, parts of Canterbury and around Whitfield in Dover.

Plan 5 shows the proposed development sites alongside the European designated sites. There are significant overlaps with development buffer areas in each of the study area districts, although to a lesser extent in the south of Shepway.

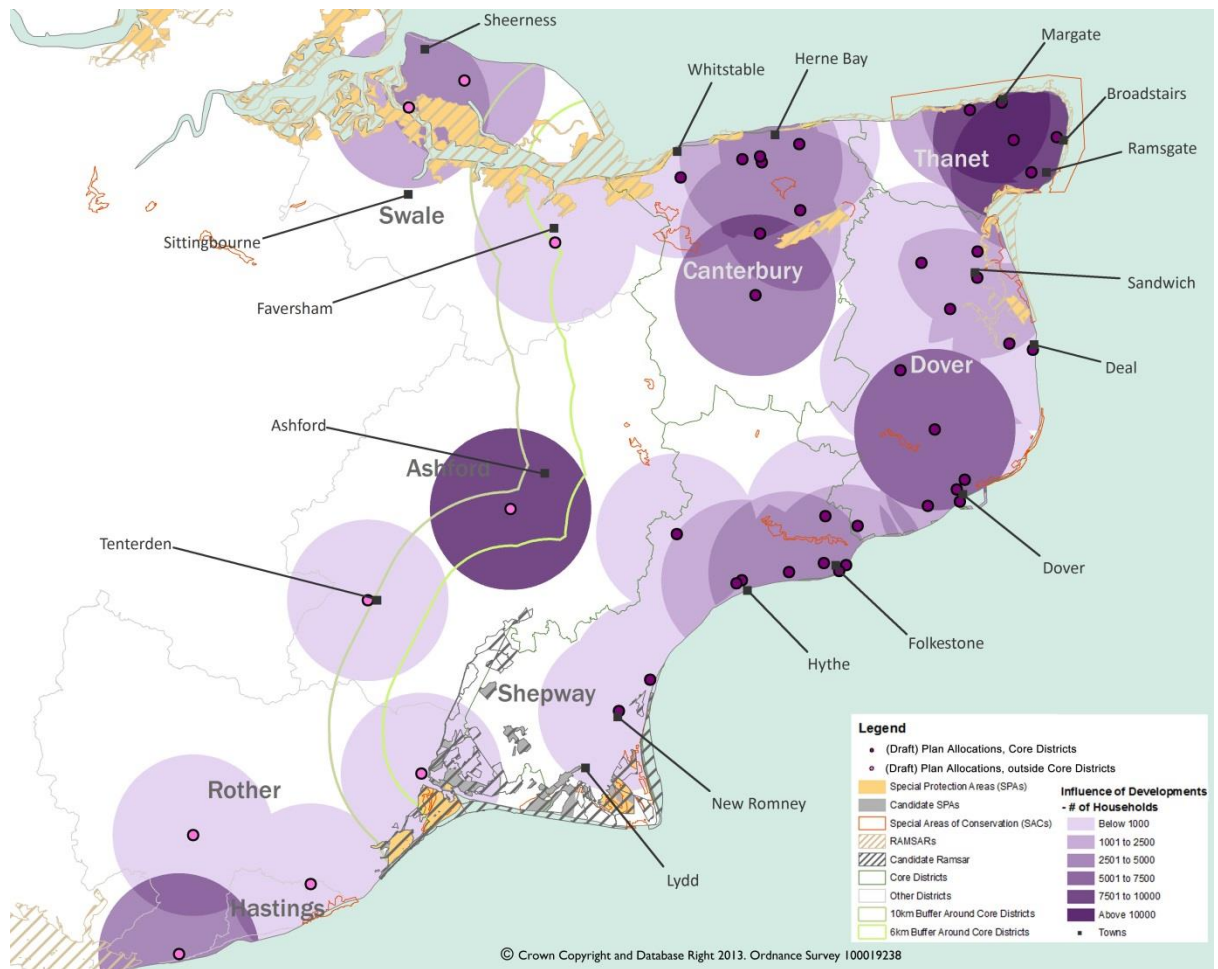
Plan 6 extends the coverage of sites in Plan 5 to include SSSIs, in order to illustrate the potential impact on all sensitive sites.

⁸⁹ <http://guidanceanddata.defra.gov.uk/strategicapproacheshra/principle-2-keep-it-understandable/>

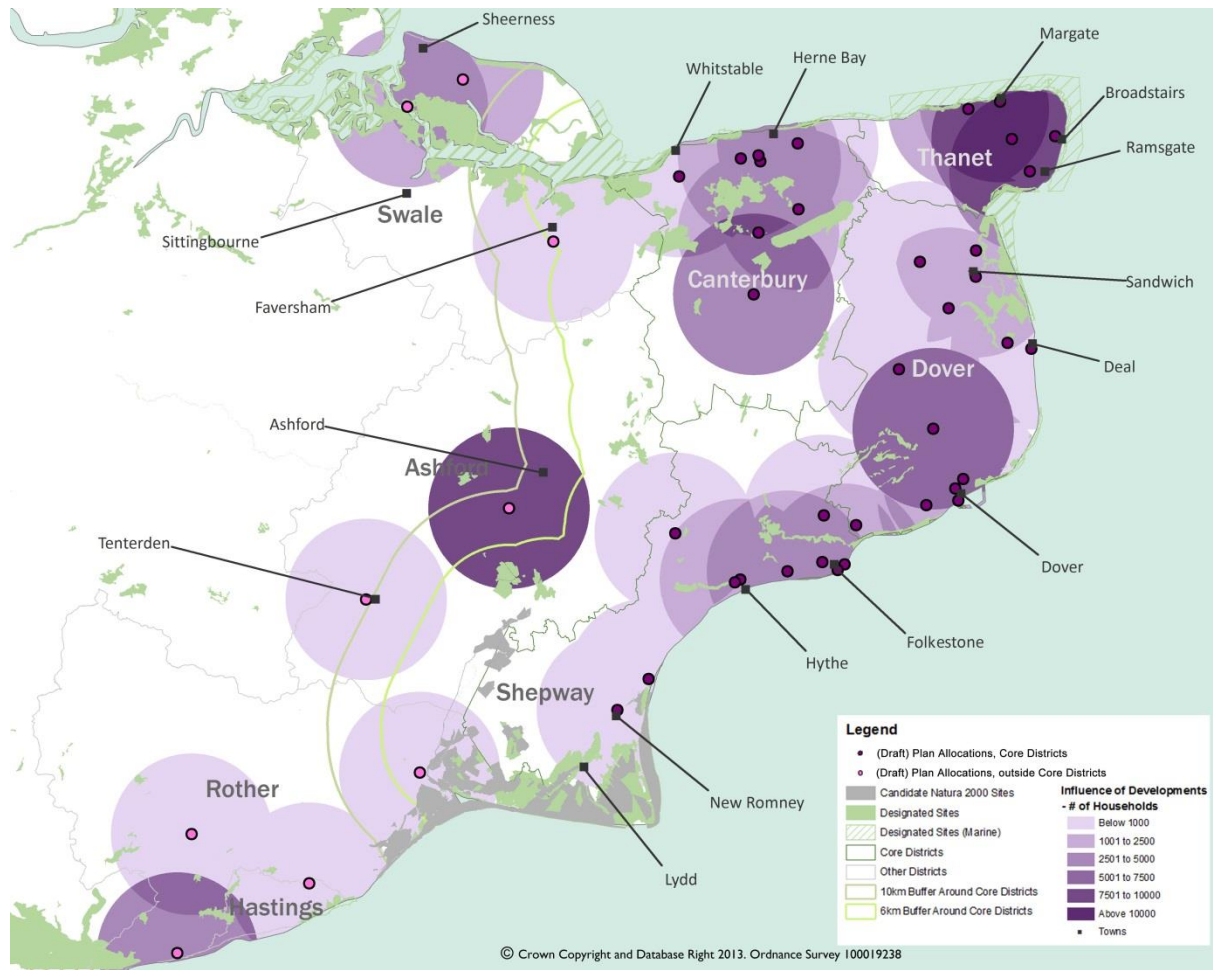
Plan 4: Development Sites with (Draft) Plan Allocations, 6km Buffer



Plan 5: Development Sites with (Draft) Plan Allocations, 6km Buffer, Natura 2000 Sites



Plan 6: Development Sites with (Draft) Plan Allocations, 6km Buffer, Natura 2000 Sites and SSSIs

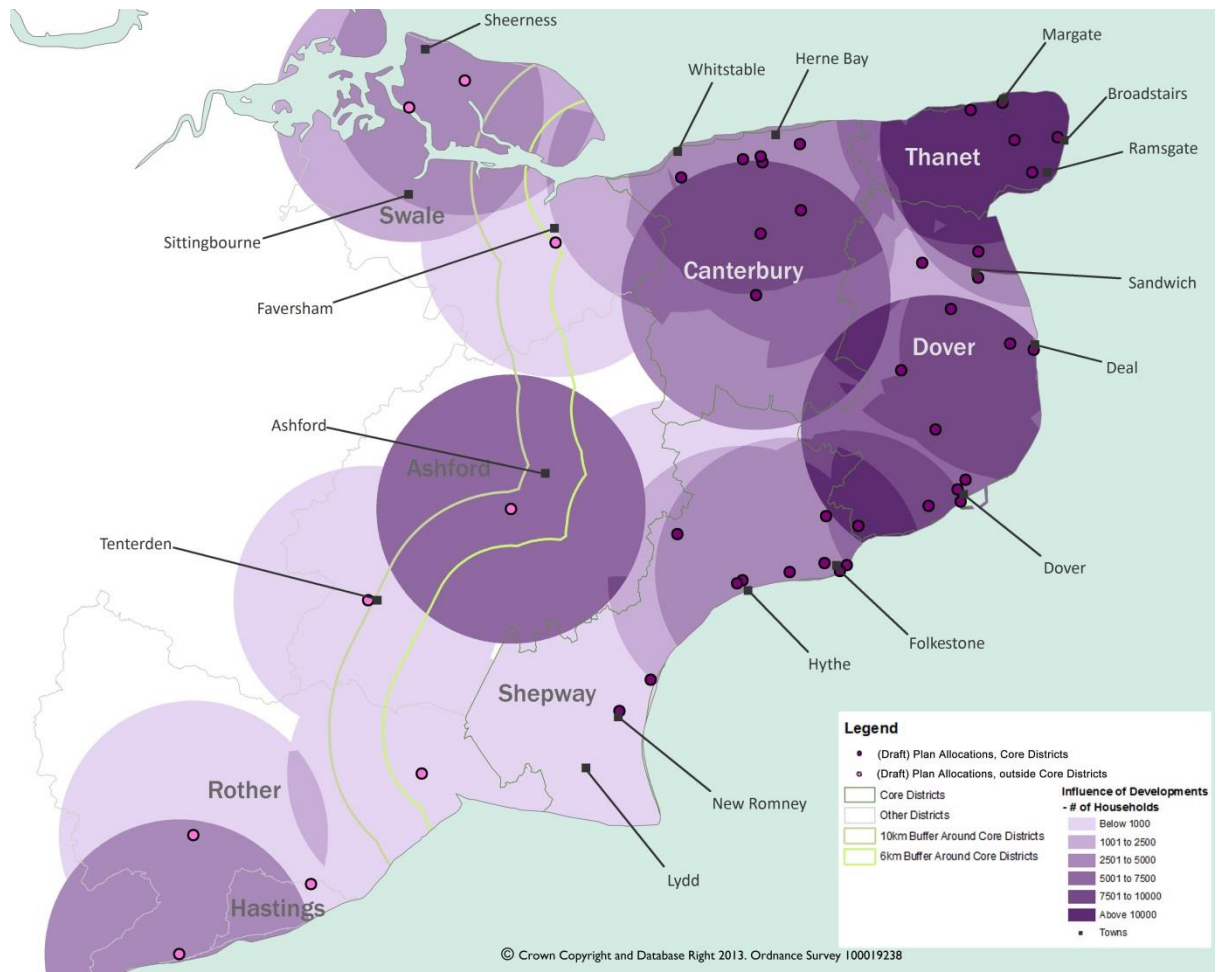


Plan 7 shows the same information as the previous maps, but with a 10km buffer around the development sites. Using the national ANG standard (Natural England's Accessible Natural Greenspace standard), this shows the area within which a regional-scale greenspace site should be provided, if applying the standard.

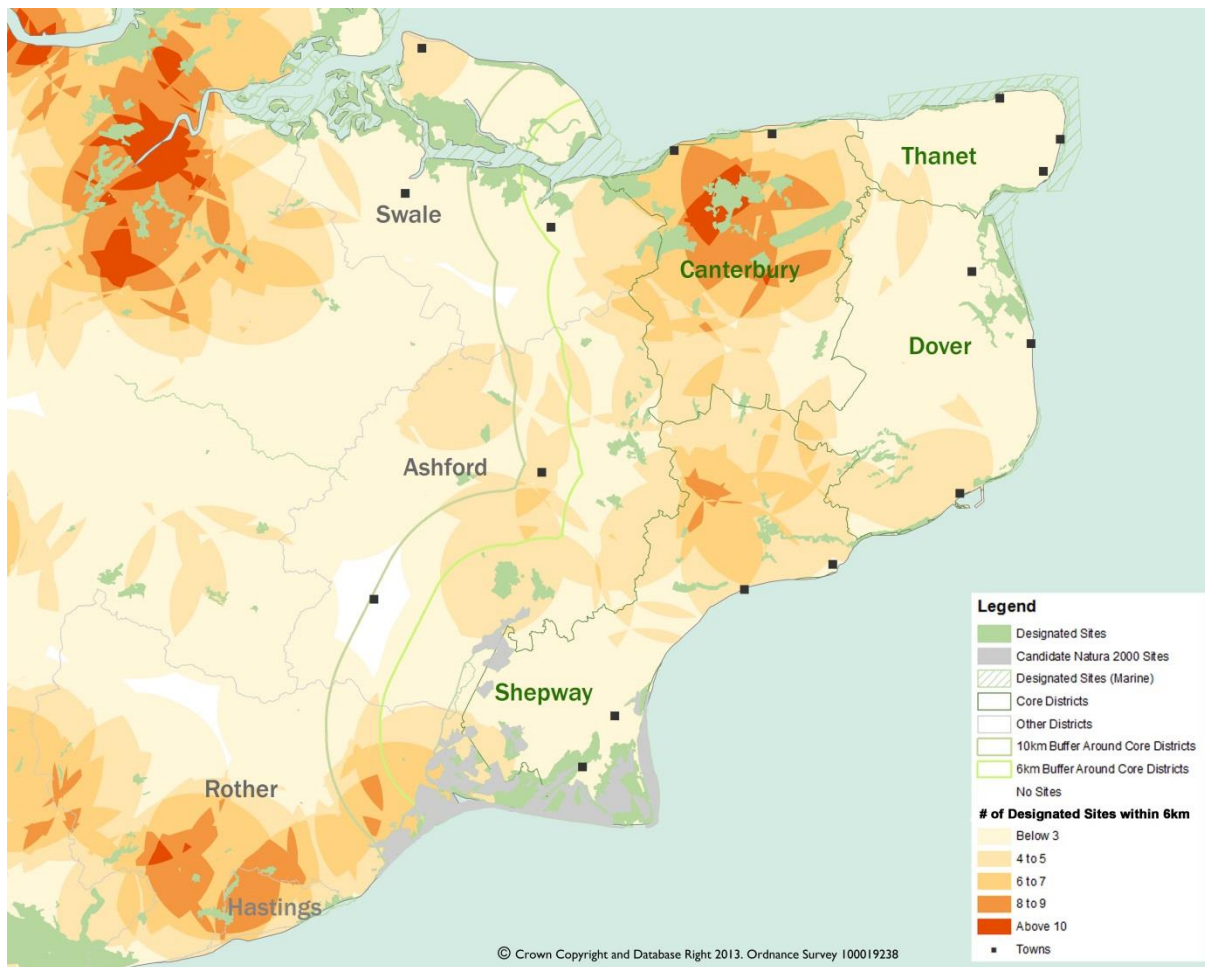
At this buffer scale the entire area of Thanet falls within the influence of a number of developments, including some from within Dover and Canterbury. Developments in Faversham (Swale) are seen to have an influence on sites in Canterbury district, Thanet developments may affect sites in Dover and developments in the south of Dover district may affect sites in Shepway. It is notable that designated sites within all the districts fall within the influence of at least one major development; and some sites in Dover, Thanet and Canterbury are affected by a number of developments. Interestingly, neither the 6km nor 10km buffer of the major proposal in Ashford (Chilmington) reaches the study area. However, this highlights the importance of understanding the catchment area of a particular site through evidence gathering, as an initial study for Dungeness found that the catchment zone for this area was much greater (discussed later).

Plan 8 shows the accumulation of overlapping 6km buffers around each of the designated sites (SSSIs and Natura 2000 sites). This is a very crude approach and does not take into account the size of the designated sites. Therefore the whole of the Dungeness SSSI is only counted once and has a light shade, whereas areas with many SSSIs will show a darker shade. It does reveal, however, areas in which there are a number of protected sites. The concentration of sites in Canterbury district is interesting when viewed alongside the development shown in Plan 4.

Plan 7: Development Sites with (Draft) Plan Allocations, 10km Buffer (Regional Scale ANG)



Plan 8: Concentrations of Designated Sites



Visitors and Recreation in East Kent

In order to develop an approach to visitor management and to develop any required mitigation it is necessary to have a full understanding of visitor levels, patterns and behaviour. This section of the report reviews the visitor data for the European sites in east Kent.

The information search yielded survey data, survey reports, visitor questionnaires and visitor counts from across the study area.

Current Recreational Use

The European designated sites across east Kent are found around the coast of Canterbury, Thanet, Dover and Shepway, as well as some inland sites such as Blean Woods and Lydden and Temple and Ewell downs.

The Kent coast continues to be a popular destination for tourists, many of whom visit the European designated sites. These sites are also popular with local residents, and many use them as their local open space and dog walking area.

The east Kent coastal area, and its designated sites, are unlike some of the other comparator areas considered in this study in that it receives a large influx of visitors in the summer. This means that recreational use takes place from local residents for most of the year alongside the additional visitors who come to view wildlife and to visit the coast in the summer.

In particular the Thanet Coast and Sandwich Bay SPA surrounds urban Thanet, and therefore is subject to high levels of recreational activity:

“The coastline is urbanised with the three large resorts of Margate, Broadstairs and Ramsgate abutting the shore. There is intense recreation and tourism use, both off shore and shore based, with 2 million day visitors, 600,000 long stay visitors, and 127,000 local people.”⁹⁰

Current Access Provision

In addition to the designated sites, east Kent has a number of beaches, country parks and other sites that offer opportunities for recreation.

The area's beaches offer miles of public access resource. In Canterbury, Tankerton Slopes and the beach at Reculver (Herne Bay) are promoted by Visit Kent's website as 'top beaches'. Other 'top beaches' include in Thanet, Margate Main Sands*, Joss Bay* and Botany Bay,* in Dover the beaches at Deal and St Margaret's Bay and in Shepway both Folkestone and Dymchurch beaches.

Blue Flag beaches (denoted in preceding text by *) are awarded annually for their high standards of water quality and cleanliness. Other Blue Flag beaches include West Bay, St Mildred's Bay,

⁹⁰ The North East Kent European marine sites Management Scheme 2001-2006; 5.0 Human activities in and around the NE Kent European marine sites.

Westbrook Bay, Stone Bay and Minnis Bay. All of the 8 Blue Flag beaches in Kent in 2013 are in Thanet.

Sites such as Reculver Country Park, Fowlmead, Brockhill Country Park and Folkestone's Coastal Park offer opportunities for recreation and access in semi-natural surroundings. These formalised recreation sites have the advantage of offering visitors a range of facilities including car parking, toilets and in some cases refreshments.

Pegwell Bay Country Park is situated within, and surrounded by, the NNR and the European designated sites. This small country park offers a more robust site to the visitor, as long as visitors do not stray onto more sensitive areas.

An additional source of recreational activity will be the English Coastal Path to be created following The Marine and Coastal Access Act 2009, with the first section created in Kent between Folkestone and Ramsgate.⁹¹ The coastal path will open up more opportunities for accessing the coast and its hinterland. Research carried out by Visit Kent suggests that the coastal path could attract more users to walk and cycle along the coast.⁹² The coastal path requires its own assessment under the Habitat Regulations for the Natura 2000 sites along its route. The proposals for the Sandwich area of the route also include access control measures and monitoring:

- The exclusion of coastal access rights on the intertidal areas of the Bay;
- Restrictions on the beach at Pegwell Bay – to keep dogs on leads;
- Provision of new interpretation and signage at key beach access points around Pegwell Bay, and to direct people to suitable seal viewing points. This will include working with local communities to develop appropriate and relevant signage;
- The exclusion of coastal access rights to the dune pastures & other sensitive areas on Sandwich peninsula;
- Provision of new interpretation and signage on Sandwich peninsula;
- Monitoring, especially around Pegwell Bay to assess any, unexpected, impacts from Coastal Access. The Countryside and Rights of Way Act 2000 has the flexibility to increase the restrictions on the 'spreading room' or move the trail alignment if changes were to occur.⁹³

The next stretch currently under consideration is between Camber in East Sussex and Folkestone, which also includes some European sites potentially sensitive to disturbance. A report of a proposed alignment and associated measures to avoid impacts on the integrity of the sites, alone or in combination, is planned for 2014. Evidence on access will be supplemented by the planned survey of existing use organised by Shepway, Natural England and Rother.

⁹¹ Natural England is currently working up the final report on the England Coast Path for the Secretary of State for the Ramsgate to Folkestone stretch of Kent coast. The report should go to the Secretary of State in October 2013, with an 8 week opportunity for interests to object or make representations. Approval is predicted in early 2014 and, if so, infrastructure should be in place during 2014 to open most of the route in 2014/15, with Sandwich peninsula opening after the EA works there are completed. Pers. comm. Natural England 12th September 2013.

⁹² Visit Kent Coasts Research – Written report by Lake Market Research (for KCC).

⁹³ Pers. comm. Natural England 12th September 2013.

All the Natura 2000 sites in the study area have some public access and a degree of recreational use. There are a number of reasons for this. In some cases the site may be the nearest open space to a residential area (e.g. as reported in the Lydden and Temple Ewell Survey). It may be the open space of choice for local users due to its convenience and familiarity or it may be that there is no other, or a limited choice of, alternative recreation sites. A number of survey respondents mention ‘word of mouth’ when asked about how they know about a site.

Information on Visitors

A number of visitor surveys have been carried out on or near to the European sites in east Kent, and by a range of organisations.

The surveys found are listed in Table 5.

Table 5: East Kent: Visitor Access and Recreation information

Visitor Surveys	
Canterbury	<p>Reculver Visitor Survey 2008 (to be repeated this year).</p> <p>The Canterbury Visitor Survey 2012 (October 2012; by TSE Research: Tourism, Leisure & Culture Research & Consultancy). Visitor survey of the City of Canterbury included dispersal patterns. 7.5 million each year but many go to the City and the Cathedral.</p> <p>Blean Audience Development Plan (including visitor survey) (2005).</p>
Thanet	<p>Beach Surveys 2009 and 2010.</p> <p>Thanet Coast Project ‘Activity Surveys’.</p> <p>Pegwell Bay Country Park Visitor Survey (Summer 2012) (KCC – not published).</p>
Thanet and Dover	<p>Scoping exercise for developing visitor facilities on the Sandwich and Pegwell Bay reserve - DICE (Durrell Institute of Conservation and Ecology) survey report (2010).</p> <p>Milnes, J. (2012), Visitors’ Perceptions of Popular Recreational Activity and Awareness of Sensitive Flora, Fauna and Associated Habitats at Sandwich and Pegwell Bay, Kent, Research Dissertation University of Southampton. Included summer survey in 2011.</p>
Dover	<p>Dover District Council February 2011. Dover’s Visitors’ Survey.</p> <p>Dover District Council March 2012 (Published April 2012), Dover Visitor Survey Sandwich and Pegwell Bay.</p> <p>Lydden and Temple Ewell Downs SAC and NNR Visitor Survey March – August 2010.</p> <p>Samphire Hoe Visitor Surveys April 2006 and November 2006.</p>
Shepway	<p>Folkestone & Etchinghill Visitor Survey 2000.</p> <p>Dungeness Visitor Survey 2006.</p> <p>Dymchurch PC Jet-Ski Survey 2011 (an opinion survey of non-users so limited relevance).</p> <p><u>Future Plans:</u></p> <p>The White Cliffs Countryside Partnership is carrying out visitor surveys on sites managed by them. On site and on-line.</p> <p>Dymchurch PC Visitor Survey being carried out this year.</p> <p>Committed in Core Strategy to produce a sustainable access strategy for the southern sites at Romney Marsh, CSD4 GI Policy. Romney Marsh and Rye Bay Visitor Surveys pending; leading to a Visitor Access and Management Strategy.</p>

Summary of Key Points from Visitor Surveys

The following is a very brief summary of the key points from each survey sourced for the study area, arranged under standardised heading. The methodology of each survey is different and this summary should be treated with caution. Before using the data each survey should be accessed to check applicability and methodology. Where a heading is left blank, this data was not available from the survey reporting.

Thanet and Dover:	Sandwich and Pegwell Bay: Summer 2011 (J Milnes)
Number of responses:	212
Source of visitors:	Majority local visitors (<30 mins from home)
Frequency of visits:	Majority 1 – 3 times per week
Motive:	Convenience and suitability for activity
Activity:	Majority walking with and without a dog
Key Points:	Local visitors perceived off-lead dog walking to be of low impact to wildlife; poor awareness of causes of negative impacts, and of flora and fauna on site; information about site mostly derived from on-site boards; most local visitors wanted more information about the site
Thanet and Dover:	Sandwich and Pegwell Bay: February 2011 (Dover DC survey)
Number of responses:	203 (98 Pegwell, 105 Sandwich)
Source of visitors:	25% Sandwich (to Sandwich area) and 35% Ramsgate (to Pegwell Bay area)
Frequency of visits:	mainly regular users; only 7% first time users; 39% visit several times per week
Motive:	Walking, exercise, peace and quiet
Activity:	Walking and dog-walking; wildlife watching (Pegwell Bay only)
Key Points:	Most people drive to the site; 66% of visitors wander off the main paths; 89.3% of visitors visit exclusively to let dogs off the lead
Thanet and Dover:	Sandwich and Pegwell Bay: March 2012 (Dover DC survey)
Number of responses:	377 (245 Pegwell Bay, 132 Sandwich Bay)
Source of visitors:	14% Deal, 11% Sandwich (to Sandwich area); 24% Ramsgate (to Pegwell Bay area);
Pegwell Bay area):	3% London; rest from Kent
Frequency of visits:	12% first timers; 88% repeat visits;
Motive:	Walking, exercise and enjoying coast
Activity:	Walking and dog-walking
Key Points:	No seasonal influence unless weather is poor (affects over 50% of visits); majority have noticed no change since (part) closure of Pfizer

Thanet:	Beach survey 2010 (Thanet DC survey)
Number of responses:	-
Source of visitors:	Almost 70% of visitors are local;
Frequency of visits:	Half visit at least once per week;
Motive:	Family day out and to get out into the fresh air = most important reason for over 70% (dog walking = 12%);
Activity:	
Key Points:	Beaches visited due to being close to home for over 70% of respondents; Pegwell Bay visited by 15% but only 0.4% stated it as their favourite beach; 72% of visitors are aware of the wildlife importance of the beaches;
Thanet:	Thanet Coastal Project has been running ' Activity Surveys ' at different bays by their Thanet Coastal Wardens. Wardens regularly complete assessment sheets based on their observations of visitor activities. These surveys provide information on site useage and activities, and an indication of trends. However, the survey data has not been collated or analysed, and it is thought that the survey methodology is not yet sufficiently robust to be able to draw any valid conclusions.
Shepway: ⁹⁴	Folkestone and Etchinghill Escarpment (White Cliffs Countryside Partnership survey) ⁹⁵
Number of responses:	-
Source of visitors:	Approximately 78% are 'locals'.
Frequency of visits:	-
Motive:	-
Activity:	-
Key Points:	Preliminary results of the first few months of survey only; Visitor numbers are low (approximately 30,000 visitors per annum i.e. approximately 12% of that received by Dover to Kingsdown Cliffs SAC).
Shepway:	Folkestone Warren Visitor Survey 2000 (White Cliffs Countryside Partnership)
Number of responses:	384 questionnaires
Source of visitors:	There was an even split between local visitors and non-local visitors
Frequency of visits:	-
Motive:	-
Activity:	-
Key Points:	34% of respondents visited the Shepway area to specifically visit the Warren

⁹⁴ The White Cliffs Countryside Partnership manages a number of sites on behalf of the local authority, and undertakes visitor surveys on these sites. Some of the survey data is gathered on site, and users of their website are invited to complete questionnaires on-line.

⁹⁵ This information is taken from a summary in Shepway District Council's HRA Assessment, which itself has come from a verbal communication from the WCCP. The survey has been requested but has not been received.

Dover:	Samphire Hoe Visitor Surveys – April to November 2006
Number of responses:	100 (280 visitors)
Source of visitors:	77% Kent (mostly <30mins travel time); 46% local (Dover or Shepway)
Frequency of visits:	27% first timers; 45% visited 6 times or more;
Motive:	Mainly general interest, views and stopover for tourists;
Activity:	Walking, then angling, wildlife, picnics and dog walking;
Key Points:	Repeats survey of 2004;
Dover:	Lydden and Temple Ewell Downs SAC and NNR Visitor Survey March – August 2010 (Aspect Ecology)
Number of responses:	140 (324 visitors)
Source of visitors:	Majority of visitors live locally, with 50% of visitors travelling less than 2km and three quarters travelling less than 4 km.
Frequency of visits:	80% weekly; 46% daily
Motive:	nearest site (65.7%) and only greenspace within walking distance of home (69.3%);
Activity:	71% dog walkers
Key Points:	87% of dog walkers let dogs off leads; 75% travel on foot and 24% by car;
Canterbury:	The Canterbury Visitor Survey 2012 (October 2012; by TSE Research: Tourism, Leisure & Culture Research & Consultancy).
Number of responses:	400 visitors to the City of Canterbury
Source of visitors:	-
Frequency of visits:	-
Motive:	-
Activity:	-
Key Points:	The survey included questions on other East Kent locations visited. Forty-two percent of all visitors said that they would be visiting another destination in East Kent whilst on their visit to Canterbury that day. The most popular ‘other’ destinations were: Whitstable, Dover, Herne Bay and Broadstairs
Canterbury:	Reculver Visitor Survey 2008
Number of responses:	100
Source of visitors:	84% within Kent; 3% Europe; 10% from local caravan site
Frequency of visits:	28% first timers; only 7% daily and 18% weekly
Motive:	75% for the scenery; relaxation 50%; exercise 40%
Activity:	Various; cycling 17%; dog walking 13%; kite flying 4%; fishing 4%
Key Points:	7 3% of visits are based on local knowledge

Shepway:	Dungeness Visitor Survey – July to September 2006
Number of responses:	234 (504 visitors) and car counter data from the entrance to the Dungeness estate during summer 2005 and March 2006
Source of visitors:	10% from <10 miles (local); 34% from 20-50 miles; 30% from >50 miles;
Frequency of visits:	Mostly rare or first time visitors. Only 6% regular visitors (once a week or more)
Motive:	Day out/treat for children or RSPB reserve visit
Activity:	To travel on the RH&D train (22%), also the Old Lighthouse and food. Very few people visited the site to walk their dogs. Almost a third of local people visited for the cycle route, and interestingly other data confirms that 40% of local visitors (<10 miles) arrive by cycle. NB low sample size for local visitors.
Key Points:	The survey had some limitations; in particular the sample size was relatively small (504 people out of an estimated annual number of 540,000 visitors), and survey locations may not have represented the range of visitors. However, it is the best data currently available regarding visitor activity around Dungeness Point/NNR. See also the Appendix for a summary and analysis of the above survey report.

Other Designated Sites

Blean Woods had no available survey data, but an Audience Development Plan was produced in 2005 which contains some information on visitation. This reports that the Blean Complex is mainly used by daily, local visitors from the Canterbury area with the most popular activity being to walk a dog.⁹⁶

The RSPB report that the site receives 30-50,000 visitors per year mainly from the local area.⁹⁷

Stodmarsh NNR had no available data.

Large parts of the Romney Marsh and Rye Bay are designated as being internationally important for their wildlife and habitats. The beaches and countryside within this area are also much visited and are an integral part of the visitor economies of both districts. In preparing their core strategy planning documents Shepway and Rother District Councils have jointly assessed the impact of development proposals on these wildlife sites. This assessment has led to both councils agreeing the need to develop a “sustainable access strategy” for the area. This will be used to ensure that increased visiting does not adversely impact on the integrity of the internationally wildlife sites. As a first step towards the sustainable access strategy the authorities are commissioning visitor surveys.

⁹⁶ Rural Resources for Kent Wildlife Trust (2005), Kent Wildlife Trust Blean Audience Development Plan.

⁹⁷ <http://www.rspb.org.uk/reserves/guide/b/bleanwoods/work.aspx>

Site Managers' Survey

A survey was sent to all managers of countryside recreation and wildlife sites across Canterbury, Dover, Shepway and Thanet in 2010 as part of the Natural Economy East Kent project. 29 responses were received. Although the results are subjective as they are based purely on the opinions of the site managers, this is nevertheless an interesting set of responses.

The site managers were asked questions about where they think their visitors come from and whether they think there are recreational pressures at their sites. The results varied, and the variation seems, in part, due to the expectations from the site, i.e. if a site is designated for wildlife then the perception is that recreational uses will have a greater significance.

Summary of results:

- All sites provide open access;
- All provide car parking;
- The majority have PROW within their sites;
- All sites provide some visitor facilities;
- The majority provide information boards, and half provide site leaflets;
- Half the sites have provision for disabled access;
- The sites are visited by between 10k and 200k visitors per annum, with the White Cliffs, Reculver Country Park and the northern section of Sandwich and Pegwell Bay estimated to receive the highest numbers of around 200k or more;
- Almost three quarters of visits generally are in the summer months or school holidays, except where the wildlife interest attracts visitors in the winter e.g. Stodmarsh;
- With the exception of Reculver Country Park and the White Cliffs, most visitors are local and travel less than 2 hours to the site (59% travel less than 30 minutes);
- With few exceptions the sites are promoted to attract more visitors;
- Of the designated sites, only Folkestone Warren and Sandwich and Pegwell Bay managers thought there were sometimes too many visitors;
- Positive impacts would be the improvement in awareness and education, and increase in site income;
- Negative impacts were considered to be disturbance and damage to wildlife and erosion of the site;
- 72% of managers said their site was sensitive to recreational pressures, and this was increasing.

Links with Tourism

East Kent's natural sites help to define the character of the area, and add to its attractiveness to visitors. East Kent has traditionally relied on tourism to help boost the local economy and, despite the demise of the traditional coastal resorts, natural sites on the coast and inland are popular destinations. However, the promotion of these sites presents some challenges. This visiting and tourism is crucial to the local economy but clearly needs management to ensure that environmental impacts are minimised. Promotion of the sites may require a more sensitive approach than the more resilient visitor destinations.

Dover DC's Adopted Core Strategy makes specific reference to the district's natural assets, as a term to describe landscape, biodiversity, green infrastructure, agricultural land, water, air and renewable energy. As the Strategy states, these assets play a great part in shaping the character and distinctiveness of the District. Two of the District's top three attractions are natural sites; Samphire Hoe and Langdon Cliffs⁹⁸ and they both feature as 'destinations' on the Visit Kent website.

Other 'natural' sites promoted as destinations on the Visit Kent website include Dungeness – and in particular the RSPB Reserve – and Blean Woods. The visit Kent website has a section on Nature Reserves which showcases the key reserves in the county.

Surveys of visitors to east Kent are often commissioned or supported by Visit Kent. These surveys tend to focus on traditional tourism destinations and coastal towns. The Canterbury Visitor Survey 2012,⁹⁹ for example, was based on interviews with 400 visitors to the City of Canterbury. The survey included questions on other east Kent locations visited. Forty-two percent of all visitors said that they would be visiting another destination in east Kent whilst on their visit to Canterbury that day. Only 16% of day visitors from home were intending to visit another destination compared with 52% of day visitors on holiday and 42% of staying visitors. The most popular 'other' destinations were Whitstable, Dover, Herne Bay and Broadstairs. Unfortunately no further information was elicited which could help to gather information on visits to countryside or coastal sites by tourists and day trippers.

Another piece of research was commissioned by Visit Kent into the visitor usage of the Kent coast. The Visit Kent Coasts Research¹⁰⁰ has a high survey base of 1073 users providing a valuable insight into coast users, perceptions and motivations. However, despite a section focussing on countryside access, asking questions for example on provision of walking and cycling information, the opportunity was missed to gain information on coastal users in relation to the information required for improving visitor management on the Natura 2000 sites.

The Natural Economy East Kent initiative (NE-EK) aimed to promote the natural and man-made heritage of east Kent in a sustainable way. The NE-EK initiative worked with the local authorities and Visit Kent to develop sustainable approaches to countryside tourism promotion. This approach could be developed to include the appropriate promotion of other 'natural' areas in east Kent including access-sensitive sites.¹⁰¹

⁹⁸ Dover Tourism Development Plan 2008.

⁹⁹ October 2012; by TSE Research: Tourism, Leisure & Culture Research & Consultancy.

¹⁰⁰ Lake Market Research (for KCC) (2010), Visit Kent Coasts Research - Written Report

¹⁰¹ However, the NE-EK initiative ended in 2012 and since that time there has been no further joint working between tourism promoters and managers of natural sites.

Section 3: Discussion

Discussion

Summary of Recommendations

A summary of recommendations is provided in Table 6. These are explored in detail in the following section.

Table 6: Recommendations Summary

	Recommendation	SDC	DDC	TDC	CCC	EKGI
Recommendations for Thanet Coast Suite						
1	Consider the need, in consultation with Natural England, for visitor surveys at Reculver Country Park as the main visitor access point in Canterbury District, and at other turnstone roost sites in Canterbury District, in order to find out the information on visitors to support a mitigation strategy.			✓	✓	
2	Consider the need, in consultation with Natural England, for further information on visitors to the remainder of the Thanet Coast outside of Pegwell Bay.			✓	✓	
3	Utilise the forthcoming visitor survey for Reculver Country Park to include questions to support any mitigation strategy.				✓	
4	The efforts of the Thanet Coast wardens and 'Activity Sheets' could be better utilised to support this process, with implementation of surveys utilising a robust methodology.			✓		
5	Consider the need, scale and funding, in consultation with Natural England, of further ecological study to better understand the links between recreation and bird populations and the linkages around the entire SPA (Dover, Thanet and Canterbury).		✓	✓	✓	
6	Ensure that the methodology of the existing turnstone surveying supports the evidence requirements of developing mitigation, for example if appropriate to gather further information on disturbance events.		✓	✓	✓	
7	Carry out turnstone monitoring more frequently (has not been annually to date).		✓	✓	✓	
8	Dover District's mitigation strategy already includes a facility to carry out further surveys, and future monitoring will be required. Ensure that the methodology of these studies is 'fit for purpose' and that the cost of these is adequately provided for.		✓			
9	Dover, Thanet and Canterbury local authorities should consider the need for and justification of a combined approach to precautionary measures or mitigation.		✓	✓	✓	
10	Information should be shared and a combined approach taken by Thanet, Canterbury, Dover to evidence gathering along with information sharing by all other authorities as required under the duty to cooperate.		✓	✓	✓	
11	Consider, in consultation with Natural England, the design of a wardening scheme which will be effective, deliverable and proportionate, considering in particular enforcement roles and funding.		✓	✓	✓	
12	Ensure monitoring of mitigation is included in any scheme.		✓	✓	✓	
13	Approach Natural England to ensure that the dog strategy developed through the England Coastal Path project is circulated to all competent authorities and that implementation is secured.		✓	✓		
14	Evaluate current management arrangements, in particular arrangements for the NNR and the Thanet Coast project, in the context of their capacity for absorbing 'business as usual'.		✓	✓		
15	Consider developing a strategic sustainable access management approach.		✓	✓	✓	
Chalk Downland Sites - Dover to Kingsdown Cliffs SAC, Lydden and Temple Ewell SAC, Folkestone to Etchinghill Escarpment SAC, Parkgate Down SAC						
16	Expand the evidence base on visitors for the chalk downland sites.	✓	✓			
17	Implement consistent monitoring of the impacts on the sites.	✓	✓			
18	Coordinated working between Shepway and Dover District Councils to ensure that the evidence gathered is implemented and is comparable, transferable and robust.	✓	✓			

	Recommendation	SDC	DDC	TDC	CCC	EKGI
19	Utilise the opportunity presented by the 'Up on the Downs' Landscape Partnership Scheme to expand the evidence base using a robust methodology for future use in HRA which is also comparable with other surveys being undertaken and ensure that learning widely disseminated to other east Kent partners to further the development of strategic access and visitor management.	✓	✓			
The Blean Complex						
20	Retain and strengthen the Blean Partnership to continue the coordinated approach to management.				✓	
21	Gain a better understanding of visitation in the Blean and catchment area, as most site managers do not have an accurate picture of the number of visitors to their sites.				✓	
22	Further develop integrated visitor management through the Blean Partnership, perhaps developing an integrated access strategy which incorporates protection of sensitive areas.				✓	
Joint Working and Strategic Approaches – A Landscape-Scale Approach, Pan East Kent Approach to Green Infrastructure, Strategic Visitor Management and the Role of the EKGI Partnership						
23	Work towards strategic approaches to landscape scale conservation and green infrastructure planning. Towards this end build a robust evidence base which provides a common information base (surveys, mapping etc.), identifies pressures for change and opportunities.					✓
24	EKGIP to consider establishing an east Kent Nature Improvement Area.					✓
25	EKGIP to consider developing a coordinated approach to green infrastructure planning.					✓
26	Carry out a strategic review of accessible natural greenspace and other recreational spaces, highlighting deficiencies in the network at a strategic level. Consider the extent to which protected sites make up the network of accessible recreational space, including Local Nature Reserves and Local Wildlife Sites.					✓
27	From the results of recommendation 27, consider developing a sustainable strategic access management across east Kent, particularly in the districts of Thanet, Canterbury and Dover.					✓
28	Consider and implement governance structures of the EKGIP, the need for a planners group and a wider pan-east Kent Green Infrastructure grouping.					✓
29	Set a work plan in order to focus progress of the EKGIP group(s).					✓
30	Utilise the background information in the Natural Economy East Kent Countryside Tourism Plan (2012, held by KCC, unpublished) to consider developing the concept of hubs both to channel recreational use and support the economy (links to recommendations 27, 28, and 32).					✓
31	Engage with tourism and countryside access partners to raise awareness of the pressures and issues facing the Natura 2000 sites and the connection between tourism promotion and evidence gathering and the requirement to manage recreation on protected sites.					✓
Joint Working and Strategic Approaches - Information on Recreation						
32	East Kent authorities and their partners, for example in tourism, should work together to develop common approaches and joint working in relation to visitor surveys in order to be able to compare survey results and thereby maximise cost effectiveness and the use and benefit of information received.					✓
33	Ensure coordination across partners and other organisations to ensure that any surveys already being carried out or planned add to the collation of pertinent data.					✓
34	Surveys should be extended to all protected sites to provide a comprehensive picture of usage across east Kent. The frequency of surveys is important in order to develop a robust evidence base of visitor information, and to facilitate analysis of trends over time.					✓

The Natura 2000 Sites

Introduction

It is not the purpose of this study to evaluate the evidence in relation to recreational disturbance on the Natura 2000 network with the purpose of concluding or dismissing any likely significant effect. It is also not the purpose of this strategic study to evaluate the robustness - scientific, statistical or otherwise - of any particular piece of evidence or study under consideration, or to evaluate the conclusions of any already completed assessment.

Rather, the purpose of this study has been to detail the range of evidence in place and to make an initial identification of potential gaps and opportunities for joint working. In terms of assessment under the Habitat Regulations, it is for the relevant competent authority(ies) to determine what further evidence is required and to seek this as part of the assessment process as necessary.

It is also beyond the scope of this report to suggest a mitigation strategy for any given local planning authority or any particular development site. Indeed, to do so would be to presuppose that mitigation is required, which in itself needs to be determined through the processes required under plan development and assessment. Any mitigation strategy, should it be required, would need to be developed following guidelines as set out in the section covering the principles and components of mitigation, see page 26.

Given that this is an evidence-gathering and strategically focussed report, it is not appropriate to make detailed recommendations on the management of any individual sites, as this commentary will quite obviously be superficial.

Rather, given the preceding, what is presented here is a summary of evidence and some suggestions of areas which may be investigated further by the relevant organisations.

Thanet Coast Suite

The Thanet Coast suite of sites presents a particularly complex situation for east Kent. The designated sites¹⁰² cover three district authorities, with the main area falling within Thanet District, and areas in Canterbury City Council area to the west and Dover District to the south. The roost sites for turnstone are located around the coast, including as far west as Whitstable and Herne Bay.

Although there are two SAC sites, the primary impact pathway for recreational disturbance considered here is on the overwintering birds for which the SPA qualifies.

Until the most recent turnstone survey of 2013, population numbers had been relatively stable. However, the 2013 survey showed a sharp decline in the numbers counted. It cannot be determined at this stage whether this lower count reflects a fall in the population or whether it is an inconsistent atypical count, perhaps due to weather conditions.

¹⁰² Thanet Coast SAC and Sandwich Bay SAC, Thanet Coast and Sandwich Bay SPA and Ramsar.

It is clear from the housing allocation sites shown on Plan 4 that, while the main allocation of new housing within 6km of the site is derived from Thanet District, several housing allocations in Dover and Canterbury local authority areas are also within 6km of the sites. As previously outlined, this analysis is very crude and should be treated with caution. It not only applies a straight line distance, it also applies a 6km catchment zone which has not been determined through surveys of visitors to this coastline, but has been derived from the north Kent study on access and Natura 2000 sites. It is only included here as an illustration of the potential catchment area and would be contrary to Defra guidance to use this to develop a mitigation strategy.¹⁰³

At the time of this report, Natural England consider that the increase in population for Thanet District predicted by Kent County Council at 6.3% between 2006 and 2026 is likely to increase the number of visits to the SPA and that this level of increase is likely to have a significant effect.¹⁰⁴ Therefore, given this view of likely significant effect, a package of avoidance and mitigation measures is therefore required.

The advice from Natural England is that Thanet Council should consider the likely effects that could arise from the housing developments in Thanet at the plan level rather than on an individual development basis. This would mean developing a strategic mitigation approach. The principles of developing a mitigation approach are outlined in the preceding section on 'Mitigation' which includes discussion of the requirements in developing a strategic approach to mitigation.

It is beyond the scope of this report to devise a mitigation strategy for the Thanet Coast suite of sites, as to do so on the evidence presented here would be contrary to the principles and Defra guidelines applied to developing mitigation strategies. However, the review of evidence to date has revealed areas which could be investigated further.

Visitor Information

One of the key tools in implementing a strategic mitigation approach is the development of a catchment zone for the protected site. This defines a zone which, if a development should fall within it, a strategic mitigation approach would apply. Although catchment zones in comparator areas tend to fall within a band of a few kilometres from the site, Defra guidelines state that it is not appropriate to apply a catchment zone from another area.

There have been several surveys in recent years centred on or around Pegwell Bay, with some surveys at Sandwich Bay. This has increased understanding of visitor patterns and the catchment zone to these areas. These are detailed in the section on Visitors and Recreation in East Kent (from page 61), with the main surveys being:

- Sandwich and Pegwell Bay – Summer 2011 (Author Jade Milnes, University of Southampton dissertation)
- Sandwich and Pegwell Bay: February 2011 (Dover DC survey)
- Sandwich and Pegwell Bay: March 2012 (Dover DC survey)

¹⁰³ <http://guidanceanddata.defra.gov.uk/strategicapproacheshra/principle-2-keep-it-understandable/>

¹⁰⁴ Letter from Natural England to Thanet District Council, 28th August 2013, Ref 92473.

However, there is no visitor information suitable for this purpose on the remaining areas of the SPA, which includes Ramsgate and around the Thanet Coast to Herne Bay and Whitstable, where there are also turnstone roosts.

It should also be noted that this information must be tailored to the needs of the site. In this case the qualifying species are over-wintering birds and therefore understanding of visitor patterns during the winter is required.

Understanding Links with Recreation

The Kent Wildlife Trust report provides useful and up to date information on disturbance activity in Pegwell Bay.¹⁰⁵ However, although it records the magnitude and location of disturbance events, it is beyond the scope of the data collated to analyse whether the recent drop in turnstone population is due to recreational disturbance. It is important that all future surveys and studies add to the body of knowledge in understanding the issues.

In order to progress assessments under the Habitats Regulations a robust evidence base is required to:

- Support a transparent decision making process with a clear auditable rationale for the conclusions reached;
- Provide an objective scientific assessment of the evidence available;
- Work within and have reference to the legal and policy context of the decision making framework;
- Present clear conclusions.

In several comparable areas of the UK this evidence gathering process has been lengthy and complex. For the Solent Disturbance and Mitigation study, for example, research has been on-going from 2009 to 2013. This began with a Phase I literature review, data collation and stakeholder surveys. Phase II between 2010 and 2012 involved on-site visitor surveys and bird surveys, a household visitor survey and bird modelling. The work was peer reviewed in 2012 and only in 2013 were proposed mitigation strategies published. In north Kent, a bird disturbance study was carried out in 2010/11, alongside a visitor survey in the same year. Work has now progressed to a Sustainable Access and Recreation Management Plan.

It must also be noted that guidelines on developing a strategic mitigation approach state that the costs of assessment and mitigation should be minimised.¹⁰⁶ In developing a mitigation approach all of these factors need to be balanced.

It is impossible to draw any conclusion on the potential of recreational impacts in Canterbury District as there is no data available.

The local authorities should also consider, under the requirements of the duty to cooperate, the NPPF and the guidelines on developing a strategic approach, whether a combined approach is required to protect the integrity of the SPA. At the very least, this should involve coordination of evidence gathering and sharing of information. A combined approach could also offer more certainty for developers.

¹⁰⁵ Swandale, T., Waite, A. (October 2012), Pegwell Bay, Kent: Bird Disturbance Study 2010-2011.

¹⁰⁶ <http://guidanceanddata.defra.gov.uk/strategicapproacheshra/principle-3-minimise-the-cost-of-assessment-and-mitigation/>

Delivering Mitigation

Advice from Natural England¹⁰⁷ has indicated that provision of a wardening scheme would provide a suitable approach to mitigation. However, the effect of mitigation should last in-perpetuity. A time period of 10 years has been discussed for wardening. Monitoring would also normally be a fundamental part of a mitigation scheme.

The competent authorities must therefore be satisfied that the design of wardening scheme is able to deliver a proportionate level of mitigation. Consideration will need to be given, amongst other factors, to the number of wardens, location of wardening effort, timing of wardening, the most effective methods. In comparator areas an enforcement role has been preferred and in this circumstance consideration needs to be given as to the legal framework required to support enforcement. If the role is not one of enforcement, consideration should be given to the effectiveness of a 'soft' approach and whether this is sufficient.

The dissertation by Jade Milnes offers some interesting points on lack of awareness of sensitive habitats and species in Sandwich and Pegwell Bay and a general lack of awareness of the impact of dog walking by visitors.¹⁰⁸ The level of understanding of the impact of activities seems to be very low among users. The summer 2011 surveyed showed that only 2% of local visitors thought walking a dog off the lead was an activity damaging to wildlife, with only 3% considering walking on the mudflats as damaging. Local visitors overwhelmingly considered quad and motorbikes and jet skis as damaging (64%). These findings have implications for any future wardening scheme, and the efficacy of previous approaches needs to be evaluated. This work could be useful in ensuring sufficient impact of any wardening scheme. Moreover, the turnstone survey makes this commentary, although of course this is subjective:

“This study suggests that in spite of provision of signage there has been little or no alteration in the behaviour of dog-walkers since proposals were made to reduce or minimise roost disturbance in 2006. Volunteers did suggest that there may be more opportunities, where the opportunity arises, for a direct approach by volunteer wardens, who can actively speak to users of the beaches and hand out leaflets explaining the need to minimise disturbance of roosting birds.”¹⁰⁹

The competent authorities also need to consider, perhaps as part of a joint approach, the timing of funding. It is likely that developers will seek to pay on completion of build phases, but this could make it difficult to secure sufficient funds to employ a warden and thereby could compromise the effectiveness of the scheme.

Natural England also advises Thanet Council to consider that 'business as usual' arrangements could, over a limited period, absorb increased visitor numbers. This point will require careful consideration by the competent authorities. Wardening presence at Pegwell Bay Country Park, for example, has decreased in recent years due to funding cuts by Kent County Council. Due to the current funding situation within the public sector, Pegwell Bay Country Park must generate income to cover basic recreation provision and further funding for wardening is unlikely to derive from this route. The Thanet Coast Project is also a key organisation in managing recreation on the wider coast.

¹⁰⁷ Letter from Natural England to Thanet District Council, 28th August 2013, Ref 92473.

¹⁰⁸ Milnes, J. (2012), Visitors' Perceptions of Popular Recreational Activity and Awareness of Sensitive Flora, Fauna and Associated Habitats at Sandwich and Pegwell Bay, Kent, Research Dissertation University of Southampton

¹⁰⁹ Hodgson, I., (2013), Thanet Coast Turnstone (*Arenaria interpres*) Monitoring, Sandwich Bay Bird Observatory Trust.

As part of the England Coastal Path project two dog reports specifically focussed on Sandwich and Pegwell Bay have been commissioned, in order to identify what needs to be considered to improve access management to the area. This is not published yet, but will be available soon to members of the NNR steering group. This is also an important component part of recreation management which should also be circulated to all competent authorities under the Duty to Cooperate.

Strategic Access Management

Although Natural England has indicated that wardening (and monitoring) may be a suitable approach to investigate further in terms of mitigation, there are other elements of managing access which should be considered.

On site measures to channel visitors, rationalisation of access points, the location of car parks, interpretation on sites and wider promotional material could make a wardening approach more effective. These could be drawn together in a strategic access management plan.

Such a strategy is being developed in north Kent. The objectives from the consultants' brief are included in the Appendix.

Whether this could be delivered through mitigation, given that this has to be proportionate, requires further consideration.

Recommendations

- 1) Consider the need, in consultation with Natural England, for visitor surveys at Reculver Country Park as the main visitor access point in Canterbury District, and at other turnstone roost sites in Canterbury District, in order to find out the information on visitors to support a mitigation strategy.
- 2) Consider the need, in consultation with Natural England, for further information on visitors to the remainder of the Thanet Coast outside of Pegwell Bay.
- 3) Utilise the forthcoming visitor survey for Reculver Country Park to include questions to support any mitigation strategy.
- 4) The efforts of the Thanet Coast wardens and 'Activity Sheets' could be better utilised to support this process, with implementation of surveys utilising a robust methodology.
- 5) Consider the need, scale and funding, in consultation with Natural England, of further ecological study to better understand the links between recreation and bird populations and the linkages around the entire SPA (Dover, Thanet and Canterbury).
- 6) Ensure that the methodology of the existing turnstone surveying supports the evidence requirements of developing mitigation, for example if appropriate to gather further information on disturbance events.
- 7) Carry out turnstone monitoring more frequently (has not been annually to date).

- 8) Dover District's mitigation strategy already includes a facility to carry out further surveys, and future monitoring will be required. Ensure that the methodology of these studies is 'fit for purpose' and that the cost of these is adequately provided for.
- 9) Dover, Thanet and Canterbury local authorities should consider the need for and justification of a combined approach to precautionary measures or mitigation.
- 10) Information should be shared and a combined approach taken by Thanet, Canterbury, Dover to evidence gathering along with information sharing by all other authorities as required under the duty to cooperate.
- 11) Consider, in consultation with Natural England, the design of a wardening scheme which will be effective, deliverable and proportionate, considering in particular enforcement roles and funding.
- 12) Ensure monitoring of mitigation is included in any scheme.
- 13) Approach Natural England to ensure that the dog strategy developed through the England Coastal Path project is circulated to all competent authorities and that implementation is secured.
- 14) Evaluate current management arrangements, in particular arrangements for the NNR and the Thanet Coast project, in the context of their capacity for absorbing 'business as usual'.
- 15) Consider developing a strategic sustainable access management approach.

Chalk Downland Sites

Several chalk downland site fall within the study area and for the purposes of this discussion are considered together:

- Dover to Kingsdown Cliffs SAC;
- Lydden and Temple Ewell SAC;
- Folkestone to Etchinghill Escarpment SAC;
- Parkgate Down SAC

Due to the similarity in habitat, all these sites require minimal trampling and grazing in order to support environmental conditions. Alongside these Natura 2000 sites are a chalk downland SSSI's.¹¹⁰

Dover to Kingsdown Cliffs SAC, Lydden and Temple Ewell SAC and Folkestone to Etchinghill Escarpment SAC are also all located on urban edges of either Dover or Folkestone.

There is some overlap in the 6km zone around the proposed housing allocation sites for Dover and Folkestone Districts, but the closest housing sites are within the respective districts, see Plan 4. However, due to the lack of robust visitor surveys there is not sufficient evidence to determine the origin of visitors with certainty.

¹¹⁰ Great Shuttlesfield Down, areas of Alkham, Lydden and Swingfield Woods.

The most extensive investigation on any of these sites was carried out at Lydden and Temple Ewell SAC as part of the HRA for the Whitfield Urban Extension, for which green infrastructure is provided to deflect users from Lydden Temple Ewell. There is also some information on Dover to Kingsdown SAC through visitor counts at the National Trust managed visitor site, which attract around 250,000 annual visits. A visitor study at Folkestone to Etchinghill Escarpment, carried out by the White Cliffs Countryside Partnership in 2011, has been referenced in Habitat Regulations Assessment but has not been available for this study. In the absence of site specific information, Shepway District Council's HRA uses visitor data from Lydden Temple Ewell from the Whitfield Urban Extension HRA to provide a core visitor area. The same document recognises that evidence gathering and site monitoring is required and that Shepway will "*explore new opportunities to monitor impacts and manage the Folkestone - Etchinghill international habitat*".¹¹¹

There are many partners and managing organisations with an interest in the downland including, amongst others, the White Cliffs Countryside Partnership, the National Trust, the Kent Downs AONB and the Kent Wildlife Trust.

The development of the 'Up on the Downs' Landscape Partnership Scheme has brought together many of these partners and will deliver significant benefits to the downland sites in this area. The Landscape Conservation Action Plan (2012) details that important sites on the urban fringes of Folkestone and Dover have very high visitor numbers and intense recreational pressures.¹¹² Opportunities are listed as:

- positively manage public access to ensure that sites' integrity is not compromised;
- provide signed or guided routes to minimise the impact of visitors on sites;
- promote responsible use of sites and raise awareness of the impact people have on heritage as visitors;
- use key visitor attractions such as Samphire Hoe, Langdon Cliffs and Dover Museum and other popular sites to promote the responsible use of sites and their heritage.

Programme C, 'Access and Learning' offers potential for increasing understanding of the visitation and pressures on the sites using a robust methodology which is comparable to other surveys being undertaken (explored in depth in the section 'Information on Recreation' in the Discussion). Programme D, 'Training and Skills', could support staff and volunteers in survey methodology and techniques.

Recommendations

16) Expand the evidence base on visitors for the chalk downland sites.

17) Implement consistent monitoring of the impacts on the sites.

18) Coordinated working between Shepway and Dover District Councils to ensure that the evidence gathered is implemented and is comparable, transferable and robust.

¹¹¹ Shepway Core Strategy, Habitats Regulations Assessment (Sites other than the Dungeness Complex) (Final Report following Publication Core Strategy Consultation January 2012), para 5.2.18.

¹¹² Section 3.5, p77.

19) Utilise the opportunity presented by the 'Up on the Downs' Landscape Partnership Scheme to expand the evidence base using a robust methodology for future use in HRA which is also comparable with other surveys being undertaken and ensure that learning widely disseminated to other east Kent partners to further the development of strategic access and visitor management.

Stodmarsh

There is little evidence on recreational impacts on Stodmarsh NNR. In 2011 a survey of site managers was carried out (see page 81). Key points from this survey include:

- Estimated visitor numbers at between 10,000 and 49,999;
- Lower visitor numbers in the summer due to lower bird numbers;
- Most visitors on a day out (of less than 2 hours away from their home) [perhaps reflecting the draw of visitors with a special interest];
- Indicated that the site could be sensitive to recreational pressure due to disturbance of wildlife;
- That the site could be under increased recreational pressure due to development in the area.

An earlier questionnaire carried out for Natural East Kent in 2007 reports the following points relevant to recreation:

- Used well by local communities for walking and bird watching;
- Close to Canterbury, Stour Valley Walk passes through the Reserve with the long distance walking route Saxon Shore Way passing nearby. In addition National Cycle Route 1 passes near to the southern boundary of the Reserve;
- Damage to habitats and disturbance to wildlife can be managed reasonably well on this Reserve as the site comprises wetland so visitor access is generally restricted to the existing path network. It does not experience many of the negative access issues or vandalism that other sites suffer.

However, no specific information on the catchment area for this site were found.

Further investigation will therefore need to be carried during Canterbury City Councils' Local Plan development due to the proximity of the housing allocation site to the north of the site at Hersden and to the west of Sturry.

The Blean Complex

The 2005 on-site survey of visitors to the Blean Complex revealed that it is mainly used by daily, local visitors from the Canterbury area with the most popular activity being to walk a dog.¹¹³

The mapping of development sites shows that the Blean Complex falls within the 6km catchment of several proposed housing allocation sites. Due to the attraction of the complex as a whole and the local visitor base, it is likely that the Blean will receive an increase in visitors.

¹¹³ Rural Resources for Kent Wildlife Trust (2005), Kent Wildlife Trust Blean Audience Development Plan.

Although recreation is not listed as a vulnerability under the Natura 2000 designation data, environmental conditions which support the features of European interest includes low levels of trampling.

In 2011 a survey of site managers was carried out (see page 81). A summary of the Blean site managers' responses is shown in Table 6. Some general concerns were raised about impacts on wildlife interest, along with some concerns regarding anti-social behaviours associated with access.

It is possible that recreation increase could have a negative impact on nature conservation interest of the Blean Complex, but at present there is a lack of data on either visitors or impacts.

Nonetheless, outside of the possible effects on nature conservation, several of the site managers raised concerns that the aesthetic character of a quiet place for enjoyment should not be lost.

Table 7: Site Managers' Survey, The Blean

	Responding Organisation	Annual visitors ¹¹⁴	Does the site have too many visitors?	Potential negative recreational impacts	Do you think the site will be under increased recreational pressure?
Blean Woods National Nature Reserve	RSPB	Between 10,000 and 49,999	The site seldom has too many visitors	More problems with dogs interfering with non-dog walkers. Loss of tranquillity.	Yes - More people wanting to enjoy the countryside, with more time to spare, and wishing to keep healthy. My main concern is not the direct impact of visitors on the reserve, but the indirect effect of visitors, particularly dog walkers and cyclists, on other visitors who merely wish to enjoy the peace and quiet that a wood should be able to offer.
Victory Wood	Woodland Trust	Up to 9,999	The site seldom has too many visitors	Lack of car parking space; disturb wildlife; disturb the tranquillity of the site. Traveller invasion, motorbike incursions.	Yes - As the site matures the site will attract more people and it will put pressure on access structures
South Blean Woods	Kent Wildlife Trust			Uncontrolled dogs and illegal motorbikes and quad bikes	
East Blean Woods	Kent Wildlife Trust			Parking issues	
West Blean & Thornden Woods	Kent Wildlife Trust			Parking issues. Uncontrolled dogs, illegal motorbikes, quad bikes. Dog faeces, people in sensitive areas off paths.	Yes - More visitors to Wildart Trail.
Clowes Wood	Forestry Commission		Seldom has too many visitors.	Ground erosion/ habitat impact. Vandalism/arson.	Yes – Government justification.
The Blean Complex	Natural England	Between 50,000 and 99,999	The site seldom has too many visitors.	Increased disturbance to wildlife; increase in anti-social behaviour.	Yes - increase in development in Canterbury area.
South Blean Woods Nature Reserve	Kent Wildlife Trust	Up to 9,999	The site never has too many visitors.	Disturbance of wildlife and other visitors. Uncontrolled dogs and illegal motorbikes and quad bikes.	Yes - New long distance Big Blean Walk will increase awareness of site.
East Blean Wood National Nature Reserve	Kent Wildlife Trust	Up to 9,999	The site seldom has too many visitors.	More disturbance of wildlife. Uncontrolled dogs, illegal motorbikes and quad bikes.	Size of car park limits number of visitors and is unlikely to be increased.

¹¹⁴ Chosen from a selection of bands.

A group of organisations, including the site managing organisations,¹¹⁵ work together under the Blean Partnership¹¹⁶ with the purpose to “*maintain, enhance and promote The Blean as a coherent landscape for biodiversity and people.*”¹¹⁷ This partnership has implemented made important advances in coordinating management across the Blean area. Although funding for the part time Partnership Officer ended in 2012, this grouping is an ideal partnership to take forward an integrated access and visitor management approach which could further existing approaches to date and could include zoning,¹¹⁸ review of car parking and coordinated visitor promotion.

Recommendations

- 20) Retain and strengthen the Blean Partnership to continue the coordinated approach to management.
- 21) Gain a better understanding of visitation in the Blean and catchment area, as most site managers do not have an accurate picture of the number of visitors to their sites.
- 22) Further develop integrated visitor management through the Blean Partnership, perhaps developing an integrated access strategy which incorporates protection of sensitive areas.

Dungeness

It is clear from the evidence of site managers and the 2006 Visitor Survey that Dungeness receives a high number of visitors. The need for sustainable access management alternative green infrastructure is well recognised in Shepway District, with policies to support both approaches in their local plan. These approaches are being progressed and there is a working partnership between Shepway District Council, Rother District Council and other partner organisations. A bid to develop a stage I Landscape Partnership Scheme was submitted to the Heritage Lottery Fund in May 2013. A further visitor survey is planned to be commissioned in the autumn 2013. Links have already been made with the visitor economy industry.¹¹⁹

It is clear from the preceding that there are mechanisms already developed at Dungeness to assess and manage recreational use.

The methodology and implementation of the forthcoming visitor survey will be of critical importance in understanding visitor patterns. Due to the limited level of surveys, which is a common situation across these sites and not confined to Dungeness, HRA across the county use the same results in each report to determine the level of impact of any plan or project. It is therefore crucial that the information is robust and accurate.

The Appropriate Assessment for Ashford’s Core Strategy; Screening Assessment for Chilmington Green AAP, for example, uses the Dungeness visitor survey (2006) as part of its evidence base. The

¹¹⁵ Blean Heritage & Community Group, Canterbury City Council, Forestry Commission, Kent Association of Parish Councils, Kent County Council, Kent Wildlife Trust, Kentish Stour Countryside Project, Natural England, Royal Society for the Protection of Birds, Swale Borough Council, Woodland Trust.

¹¹⁶ www.theblean.co.uk

¹¹⁷ The Blean Initiative terms of reference.

¹¹⁸ Pers comm. RSPB 2007.

¹¹⁹ For example the Shepway Coastal Recreation Strategy (2010, The Tourism Company)

Assessment states that (based on the visitor survey data) any effect on Dungeness will be managed by visitor management and green infrastructure.

Some of the potential issues with the survey methodology¹²⁰ should be addressed in the next stage of visitor surveying. It is acknowledged that Dungeness may have a 'special' visitor profile, but the results bore little similarity to any of the other surveys analysed in this study, both in Kent and beyond. It may be the case that the survey is a fair representation of the situation at Dungeness. However, without the assurance of robust methodology and a number of surveys to identify trends, it may not be helpful for the future of Shepway's protected sites for third party studies to rely on this data.

The Swale

This site is covered by a current research and visitor access management programme in North Kent, led by Greening the Gateway Kent and Medway. This project has important synergies with the project area, with the eastern extent of the study area reaching Canterbury. Links with Canterbury City Council have been made by the North Kent project.

The Swale SPA is therefore not considered in further depth in this study; rather the North Kent work should be referred to.

¹²⁰ Potential weaknesses of the survey and its methodology: * Survey sample comprised just 1% of estimated number of annual visitors; * Some questions were not sufficiently 'open' and had the potential to lead the interviewee; * Survey positions favoured attractions, thus potentially elevating the results for the lighthouse and the train; * A summer survey is not fully representative of visitor useage of the site.

Joint Working and Strategic Approaches

Introduction

In developing this study, it is evident that attention needs to be paid to specific protected sites in terms of their management and potential impacts. However there are also areas where a pan-east Kent approach would be beneficial; to deal with areas such as visitor access and management including visitor surveys, development of the ecological network, the availability of open space for recreation and other purposes, and resourcing. This approach requires joint working and co-operation across boundaries. At a strategic level, an east Kent vision for the natural environment would help draw in other stakeholders and guide the planning and delivery of activities in the future.

The economic situation facing public authorities could have an effect on the management of protected sites. As local authorities tighten their fiscal belts, cuts in direct funding for sites and indirect funding to delivery partners will have an effect on resourcing (funding and staffing), making some operations non-viable e.g. the loss of the Blean Woods Partnership Officer and reduction in funding at Pegwell Bay Country Park.

In the public and voluntary sectors capital funding for infrastructure development has also reduced, with fewer opportunities now available. Many visitor facilities and sites are now reliant upon income from visitors and other sources to maintain the fabric of their sites, and the funding of management has by necessity become short-term. In the Site Managers' Survey 2011, most respondents (site managers) were of the opinion that more funds were needed to manage their sites properly. East Kent needs to find a way of supporting the necessary and longer-term management of protected sites.

A Landscape-Scale Approach

East Kent is undergoing major changes. There is pressure in growth from housing and jobs, the population is forecast to increase by 60k across east Kent in the next 20 years, there are pressures on protected and dedicated wildlife sites, together with deficiencies in recreational open space. A co-ordinated cross-district approach would add to and strengthen the existing approach of local authorities to include buffers or greenspace within development sites.

Some of the site-specific issues can be discretely targeted for action. However, many of the issues cannot be resolved on a site by site, or even a district by district, basis. The inter-connected nature of east Kent's wildlife sites and the pressures on the area lead to the need for a pan-east Kent, landscape-scale approach that will address the range of issues, and to look across boundaries to ensure that development in this area is truly sustainable.

In order to take this forward, these are some suggested actions as next steps.

- **Develop an evidence base** and decision-making tools, to fill information gaps and provide mechanisms for further development of information base. This will include a common and consistent approach to visitor information (includes surveys to a common methodology) and to mapped data across all the LPAs, and ideally their partner organisations and other stakeholders;

- **Identify pressures for change:** GIS mapping of 'Pressures for Change' in a common format across the study area, including impacts on the current and future ecological functionality of (suites of) sites and pressures, including decline in/impacts on bird numbers, housing and jobs, tourism, access and recreation, sea level rise and climate change;
- **Identify opportunities:** Significant improvements to the ecological network can be achieved over large areas by enlarging and enhancing existing wildlife sites, improving ecological connectivity and creating new sites and potentially extending the network into urban areas. Surrounding land uses (e.g. farmland) may be better integrated with valued landscapes and habitats and underpin the natural processes that will help to adapt to climate change impacts. Other areas may lend themselves to multi-functional uses as part of the GI network.
- **GIS opportunities mapping** provides a key tool to guide decisions about the identification and selection of projects. Examples include mapping all existing biodiversity networks (e.g. designated sites, land subject to dedicated nature conservation management, the distribution of priority habitats and species, land in agri-environment schemes, especially HLS, gaps in the ecological network (as per Lawton Review) and sites that could contribute to supporting biodiversity (e.g. potential bird roosting and feeding sites), and any sites known to be earmarked for management that will deliver biodiversity.

A similar approach is being taken in north Kent as part of the development of the Greater Thames Marshes Nature Improvement Area (NIA).

The government announced the first 12 pilot NIAs in 2012. The NIA's are places where:

- Opportunities to deliver ecological networks, both in terms of large area and scale and valuable benefits to wildlife and people, are particularly high;
- A shared vision for the natural environment exists among a wide partnership of local people, including statutory and voluntary sectors;
- Significant improvements to the ecological network can be achieved over large areas by enlarging and enhancing existing wildlife sites, improving ecological connectivity and creating new sites;
- The surrounding land use can be better integrated with valued landscapes and action to restore wildlife habitats and underpinning natural processes helping to adapt to climate change impacts;
- Benefits to urban areas and communities can be achieved and, where appropriate, NIAs may contain urban areas as part of an enhanced ecological network;
- 'Win-win' opportunities are identified and have the potential to be exploited to the full to derive multiple benefits, for example with benefits for the water environment and Water Framework Directive objectives, flood and coastal erosion risk management and the low-carbon economy;
- There are opportunities to inspire people through an enhanced experience of the outside world.

Local Planning Authorities can now identify and agree where locally determined NIAs can take shape and include NIAs in their Local Plans. LPAs will be able to seek developer contributions to NIAs via Community Infrastructure Levy/planning obligations if there are clear policies to support NIAs in

their Local Plans and CIL Charging Schedules. This may be an area that the client group may wish to investigate further through a scoping exercise.

Develop a Pan-East Kent Approach to Green Infrastructure:

The topic of green infrastructure is closely associated with this study. Each of the LPAs in the study area has developed their own approach to GI planning, and an East Kent GI typology has been agreed which provides a systematic approach to identifying the GI resource locally. However, there may be a need to consider taking this work forward to develop an east Kent GI strategy that will take a shared and consistent approach to GI policy and planning and the prioritisation and targeting of delivery. By adopting a strategic green infrastructure approach east Kent could bring together the various strands of existing work being progressed at all scales and in neighbouring authorities.

A strategic approach to GI would also help to identify sites that might provide other functions, including inland overwintering/feeding areas for birds, required to support bird populations on the coast, or to meet the lack of capacity in some areas to accommodate pressures. By taking a cross-boundary approach to GI planning, sites may be considered within their landscapes and ecological networks and not on the basis of political boundaries.

In carrying out this analysis of evidence, it appears that many of the key recreational sites in east Kent mostly comprise or include protected biodiversity sites. This statement is based on rudimentary analysis and personal knowledge, and further investigation and a strategic review of accessible sites is required in order to determine what extent of the accessible network is comprised of protected sites.¹²¹ If the existing network of sites is mostly protected, this has implications for any sustainable access and visitor management strategy, discussed later, aiming to move visitors to alternative sites. In particular accessible natural greenspace and other accessible greenspace typologies, and should also include Local Nature Reserves and Sites of Importance for Nature Conservation in the analysis of pressures.

A strategic approach to green infrastructure in east Kent would complement an east Kent sustainable access and recreation management strategy, assist in developing alternative greenspace provision for recreational activities and support the provision of suitable alternative greenspaces which could better withstand visitor pressures.

A relevant example of a strategic approach to GI is the PUSH (Partnership for Urban South Hampshire) initiative. An outline of the project and opinion/analysis of the success of its GI programme is included in the Appendix. Some factors key lessons from this project are the need for:

- A shared vision;
- A governance structure;
- Collaborative/partnership working across political boundaries;
- Lead Officers in each partner authority who are realistic about what can be achieved;
- Identification of clear funding opportunities and sharing of funding opportunities;
- A strategy that is not too ambitious;

¹²¹ The Accessible Natural Greenspace information collated in 2007 by Natural England has been requested.

- Prioritising project delivery and encourage and support project champions/owners;
- Data management, archiving and accessibility;

The LPAs could lead a Green Infrastructure Partnership to:

- Develop a single, bold vision focused on developing a strategic green infrastructure network;
- Create guiding principles for all local authorities and other stakeholders to work to;
- Develop strategic priorities for east Kent;
- Make recommendations for investing in the provision and management of multi-functional green infrastructure;
- Provide evidence or mechanisms to support green infrastructure contributions through CIL and other funding sources;
- Develop action and delivery plans;
- Identify priority projects, support in fund raising and coordinating activity across the area.

This consistent approach, applied across east Kent, will demonstrate transparency, establish an evidence-based, repeatable decision-making tool and will ensure that resources are targeted according to need. This approach also helps the LPAs in meeting their obligations in the NPPF and in their Duty to Cooperate.

Strategic Visitor Management

A strategic approach to visitor management and access could help to identify recreation sites for changes in management in order to provide alternatives to protected sites. Upgraded visitor facilities such as car parking, cafes and designated dog walking areas may help to attract some users away from more sensitive sites if they can offer a similar experience.

It has previously been recommended that a sustainable strategic access and recreation management approach would be of use for the Thanet suite of sites. However, there would be value in extending this approach across east Kent. Through understanding of the network of greenspace and countryside sites across east Kent, their sensitivity and capacity for visitors, a cross-east Kent approach would enable promotional material and on-site information to channel visitors away from more sensitive sites at particular times of year, and towards those areas which are more 'robust'. An ANG analysis across the study area would provide the information needed to complement a strategic approach to visitor management and access.

The Role of the EKGIP Partnership

The East Kent Green Infrastructure Partnership was formed in 2009. Although not formally constituted, the core members of the group have been the four east Kent local authorities, joined by Natural England, the Environment Agency, the Kent Wildlife Trust and the Royal Society of the Protection of Birds and Kent County Council, represented by the Natural Economy East Kent project (now ended).

The early work of the partnership was aimed at working towards a joint approach in preparing a green infrastructure network. A paper¹²² sets out the following principles of joint working between the four local authorities:

- Establish a EKGI Core Steering Group and agree a common understanding of role and importance of EKGI;
- Create a partnership that is fully committed to working together to deliver and manage both the existing and future EKGI network that has a better chance being delivered by working together;
- Agree a definition of EKGI;
- Develop a EKGI framework and methodology within which each district can develop its own GI work at a pace that suits its own local circumstances providing that it is consistent with the wider aims and objectives of the EKGI Network;
- Develop a timetable for progressing with work on the EKGI network;
- Map the existing EKGI network on GIS by pooling resources and sharing EKGI GIS mapping;
- Consult and engage with wider EKGI stakeholders to align and gather together information that they already hold on EKGI;
- Seek funding opportunities for the implementation and management of EKGI across district boundaries and plan for the long term management and funding of the EKGI;
- Understand and analyse the current condition, visitor information and usage of existing EKGI assets and the importance of this in terms of the benefits that GI brings to the local economy and advocate the wider GI benefits;
- Use the EKGI Framework to inform development plans across the District;
- Identify opportunities for cross boundary EKGI projects that help to connect and strengthen the existing EKGI network;
- Use common monitoring to measure the effectiveness of EKGI;
- Demonstrate through joint working, exemplars of GI; and
- Jointly seek funding opportunities for the implementation and management of EKGI across district boundaries.

Initial efforts focused around coordinating mapping of green infrastructure assets across the four local authorities. Groundwork was commissioned, with funding from the South East Green Infrastructure Partnership, to support the development of GIS mapping. This process, however, proved to be challenging and was not fully completed. As part of this process a stakeholder event was held in July 2010, and an accompanying report produced, which identifies potential strategic green infrastructure areas, as identified by the participants on the day.¹²³ The full EKGI Partnership has not met for some time.

The governance arrangements for East Kent's Green Infrastructure Partnership (or other title) will be crucial to its success. In order to move any of these ideas forward it is important to assemble the right groupings that can develop ideas and take them from grass roots to the highest decision-making level.

¹²² East Kent Local Planning Authorities Joint Approach towards preparing a Green Infrastructure Network (undated).

¹²³ Dover District Council, Towards a Green Infrastructure Strategy for East Kent – Stakeholder Event 22nd July 2010.

The existing EKGI Partnership provides a sound base for developing ideas for partnership working; building on existing projects and decision-making frameworks.

However, it will be important to raise the profile of east Kent's environment, and ensure that decision-making processes are well-connected into the local area, reaching out to wider agendas (e.g. social and economic) and linking into political decision-making.

This study highlights the broad range of issues that are needed to be taken forward by the Partnership. It may be that there is now more than one role required of a pan east Kent grouping. In the short term the EKGIP should continue to provide planning input, liaison with the LPAs and coordination. The group can provide a steer, and oversee and support this work through its next crucial steps.

In north Kent, the North Kent Environmental Planning Group (NKEPG) has a pivotal role in dealing with a range of strategic environmental issues. In east Kent a similar grouping could help drive the environmental and GI agendas, help develop a NIA (if appropriate) and respond to the requirements of the NPPF.

Key sources of potential funding for these areas of work include lottery grants (e.g. the recent success of the Up on the Downs Landscape Partnership Scheme) and European funding through the ERDF programmes. The funding bid processes associated with each of these sources is lengthy and time-consuming. As staffing levels reduce in local authorities and third sector organisations, an east Kent partnership could lead the way in developing priority actions, and help to coordinate funding bids to deliver action on the ground.

Visitor Economy

Between 2009 and 2011, Natural Economy East Kent and Hidden Britain undertook a series of projects to bring businesses together with the aim of fostering joint working and the development of local, rural destinations and a local sense of place. Groups of businesses from all sectors, not just tourism businesses, worked together to produce itineraries of short breaks, which are advertised on the Visit Kent website. The aim of these itineraries is to encourage visitors to stay for longer in rural destinations, ideally for a short break, and for spend to be captured by locally based businesses, thereby benefiting the local economy. Several of these groups have gone on to develop working partnerships to promote local destinations.

A further development of this concept could be the development of 'gateways' from which visitors could visit the countryside. Traditionally access to the countryside has been through country park sites, but could be extended to encompass a range of villages and businesses offering the visitor a rural welcome. This could mean villages become 'hubs' for particular activities, developing, for example, a suite of walking routes, or cycling routes, depending on the infrastructure. Businesses such as farms and attractions could also become a 'gateway' into the wider countryside, attracting visitors, and therefore spend, to local economies. Such an approach would provide alternative recreation destinations or starting points, helping to channel recreation visitors to the most suitable sites and away from sensitive sites. This approach may also help to channel and retain spend further in local economies.

The approach, along with additional background on the access resources in east Kent, is included in the Natural Economy East Kent Countryside Tourism Plan (2012, held by KCC, unpublished).

Recommendations

- 23) Work towards strategic approaches to landscape scale conservation and green infrastructure planning. Towards this end build a robust evidence base which provides a common information base (surveys, mapping etc.), identifies pressures for change and opportunities.
- 24) EKGIP to consider establishing an east Kent Nature Improvement Area.
- 25) EKGIP to consider developing a coordinated approach to green infrastructure planning.
- 26) Carry out a strategic review of accessible natural greenspace and other recreational spaces, highlighting deficiencies in the network at a strategic level. Consider the extent to which protected sites make up the network of accessible recreational space, including Local Nature Reserves and Local Wildlife Sites.
- 27) From the results of recommendation 26, consider developing a sustainable strategic access management across east Kent, particularly in the districts of Thanet, Canterbury and Dover.
- 28) Consider and implement governance structures of the EKGIP, the need for a planners group and a wider pan-east Kent Green Infrastructure grouping.
- 29) Set a work plan in order to focus progress of the EKGIP group(s).
- 30) Utilise the background information in the Natural Economy East Kent Countryside Tourism Plan (2012, held by KCC, unpublished) to consider developing the concept of hubs both to channel recreational use and support the economy (links to recommendations 27, 28, and 32).
- 31) Engage with tourism and countryside access partners to raise awareness of the pressures and issues facing the Natura 2000 sites and the connection between tourism promotion and evidence gathering and the requirement to manage recreation on protected sites.

Information on Recreation

In reviewing the surveys that have been carried out in east Kent, it is clear that the quantity of surveys, their quality and frequency are key factors in determining their usefulness. Survey data should be robust and comparable if it is to be useful as evidence in developing strategies for mitigation. From the review of data it is clear that a better understanding of visitor levels, patterns and behaviour will help inform the management of access-sensitive sites and help towards the development of effective mitigation and management strategies.

The surveys reviewed varied greatly in their characteristics and methodology. There was little consistency in their approach, making comparisons difficult.

Qualitative factors include:

- Interview procedures; these should be standardised in order to be comparable;
- Surveys and monitoring should be repeated at regular intervals and should ensure that the widest range of site users is included (random times of year and days of week, ensuring the inclusion of weekends and holidays and other times);
- Survey timing needs to relate to the impacts being researched on any given site, e.g. surveys for over-wintering birds need to be carried out during the winter;
- Interview locations; in some cases these were selected carefully to encompass the full site and the different types of visitors but in other cases such as the Dungeness Visitor Survey (2006) the selection of survey points may not have reflected the full range of visitor sites;
- The number of respondents varied, particularly in relation to overall visitor numbers. It is important to gather a statistically valid survey number. In some cases a larger sample size would have provided a stronger evidence base, and data collected over time would help to identify trends. This is particularly important where the effects of recreational impacts are not obvious or are difficult to prove and where there may be a number of potential factors involved in the negative effects on species and habitats;
- Interviewers should be well-trained in approaching and interviewing visitors, and in the importance of adhering to the methodology of the survey e.g. random times, locations, random rather than selective approaches to potential of respondents. There is no evidence to suggest that interviewers were not well-trained in the east Kent examples, but in some cases there was a reliance on a pool of volunteers (e.g. Thanet Coast Project) to carry out the interviews. If a pool of interviewers is used, all should be trained to apply the same approach.

In designing surveys, factors that need to be recorded include:

- Visitor characteristics – including where visitors originate from (especially important in determining the core visitor catchment of sensitive sites), how they have travelled, their age group and gender. Gathering postcodes enables finer grained analysis of where visitors originate and can lead to more in depth profiling using tools such as Mosaic;
- Visitor behaviours - where they go on site, how long they stay, what routes do they walk/cycle, whether they have dogs or not, whether they let dogs off the lead, how often do they visit, does this vary with season, what other sites do they use;
- Visitor motives and activities and, linked to this, willingness to carry out these activities elsewhere.

In order to develop effective wardening, the following factors are also useful to determine:

- Visitor perceptions of damaging activities, the scale of impact and how damage can be reduced
- Where visitors source educational material and their perception of its quality. Did it alter their perception?;
- Visitor perceptions of recreational activities and the impacts on wildlife and habitats;
- Visitor awareness of site designations, sensitive flora and fauna and habitats;

Joint working between the local authorities offers substantial opportunities for standardising the gathering of visitor information. This will enable comparability of results and will aid analysis of changes.

Resources for gaining information on visitor patterns are in short supply. However, there are several publicly funded projects operating in the study area, some of which already carry out visitor surveys. There is an opportunity to maximise the resource input already being expended through utilising these projects to increase levels of understanding of visitors, their origin, behaviours etc. The surveys should be carried out using the standardised approach previously outlined.

Opportunities potentially exist through:

- Up on the Downs Landscape Partnership Scheme – this scheme covers downland between Folkestone and Dover. Within the study area are Folkestone and Etchinghill Escarpment, Parkgate Down, Lydden Temple Ewell and Dover and Kings
- WCCP
- Thanet Coast Project
- Kentish Stour
- Blean Partnership
- Site managing organisations

Ideally all information should be shared across the east Kent group in order to further the evidence base. In this regard consideration should be made of data sharing and data protection issues at the outset of the survey.

In addition information on absolute numbers of annual visitors is not available for many sites. It is acknowledged, however, that this is difficult to achieve in some sites and is easy to collate from sites where there is only one car park entrance point rather than many pedestrian access points.

Recommendations

- 32) East Kent authorities and their partners, for example in tourism, should work together to develop common approaches and joint working in relation to visitor surveys in order to be able to compare survey results and thereby maximise cost effectiveness and the use and benefit of information received.
- 33) Ensure coordination across partners and other organisations to ensure that any surveys already being carried out or planned add to the collation of pertinent data.
- 34) Surveys should be extended to all protected sites to provide a comprehensive picture of usage across east Kent. The frequency of surveys is important in order to develop a robust evidence base of visitor information, and to facilitate analysis of trends over time.

Appendix

Appendix – Supporting Information

Review of the PUSH Initiative – Lessons

The Partnership for Urban South Hampshire (PUSH) is a strategic partnership that aims to add value to the efforts of the individual partners on strategic sub-regional issues. The partnership is made up of 10 unitary, county and district authorities covering Portsmouth, Southampton and South Hampshire, working with local partners and government agencies to deliver sustainable, economic-led growth and regeneration in South Hampshire.

PUSH identified the need for a Green Infrastructure Strategy to deliver its environmental policy objectives and its vision to improve South Hampshire's quality of life. The PUSH Green Infrastructure Strategy was adopted in June 2010 with a vision to provide a long term framework (to 2026) to shape and enhance a connected and multifunctional green network of South Hampshire's distinctive local environments.

The aims of the Strategy are to:

- Identify sub-regional strategic initiatives and project proposals to provide a high quality of life for the people who live and work in the sub-region;
- Seek to maximise multifunctional use of open space and natural spaces for a range of benefits including biodiversity, climate change, economic investment and activity, health, landscape, recreation and well-being;
- Promote connectivity of all types of greenspace at a range of scales;
- Provide a key element of the sub-region's mitigation strategy in relation to the Habitats Regulations.

46 projects were initially developed (later reduced to 13) under 5 themes. A Green Infrastructure Implementation Framework was developed as a guide to green infrastructure development; to support the development of the existing green infrastructure of the area; the delivery of key strategic projects and assist partner authorities to develop their own mitigation strategies where new development is being considered.

Key to the success of the specific projects was embedding the projects in the planning process, identifying funding streams and a strong project leader.

Key to securing funding for the projects was the authorities working as a 'family', sharing funding opportunities as and when they arise.

The following would appear to have worked well in respect of the PUSH approach to green infrastructure:

- Model green infrastructure policy approach;
- Sub regional strategic framework approach with a shared vision;
- Governance structure;
- Collaborative / partnership working across political boundaries;
- Lead Officers in each partner authority who are realistic about what can be achieved;
- Project delivery in a number of key green infrastructure sites;
- Sharing of funding opportunities;
- Contribution has been made to the overall Green Grid vision.

What appears to have not worked so well:

- A strategy that was too ambitious and did not prioritise project delivery and encourage and support project champions / owners;
- Identification of clear funding opportunities for projects;
- Data management, archiving and accessibility;
- Loss of a dedicated PUSH officer / team to drive progress;
- Developing a model Supplementary Planning Document;
- Failure to include a robust monitoring process in the Implementation Framework to gauge sub regional delivery of the Green Grid.

North Kent Sustainable Access and Recreation Management Plan

11. The SARMP will provide an avoidance and mitigation strategy that:

- a) protects the birds in these areas from the increases in recreational disturbance linked to new developments and
- b) reduces the existing recorded recreation impact on birds in the SPA and Ramsar sites in North Kent;

The specific objectives are to:

- a) provide stakeholders (to be defined) with a resilience based strategy which recommends options identified and agreed as the most effective as spatially specific measures, identifying those which can be brought forward in a short timescale and those that will take longer to fund deliver;
- b) identify phasing to enable the coordination and implementation/delivery of the strategy measures;
- c) prepare a monitoring strategy to enable the success of the implemented measures to be assessed.

12. When specifying projects for objective 11 (a) the study should suggest links to appropriate Core Strategy/Local Plan Infrastructure Delivery protects the birds in these areas from the increases in recreational disturbance linked to new developments / CIL and s106 funding mechanisms.

13. When specifying projects for objective 11 (b) the study should investigate and suggest non CIL / s106 funding mechanisms such as grant funding streams not associated with development that will aid the recovery of the SPA populations.

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Data Requests and Meetings

Meetings with officers from each of the LPAs were held in March 2013.¹²⁴

The following individuals and organisations were contacted in order to obtain information relevant to this study:

Natural England	Angela Marlow - Lead Advisor Sustainable Land Use Operations	Information request Response on Richborough Gate Meeting on 19 th June 2013 Meeting on 4 th September On sabbatical until September 2013
	Tom Lord - Coastal Path Jenny Bowen Jo Dear – Lead Conservation Advisor Miriam Knollys	
Romney Marsh	Owen Leyshon - RMCP Steve Humphreys – Romney Marsh Visitor Centre	
RSPB	Martin Randall	
Kent Wildlife Trust	Debbie Salmon	Information request Also meeting on 19 th June 2013
Tourism	Paul Hadaway Chris Kirkham Paula Harbidge Tracey Parker and Ruth Wood	
Rother District Council	Norman Kwan	

¹²⁴ Thanet District Council on 13th March 2013, Shepway District Council on 20th March 2013, Dover District Council on 20th March 2013 and Canterbury City Council on 21st March 2013.