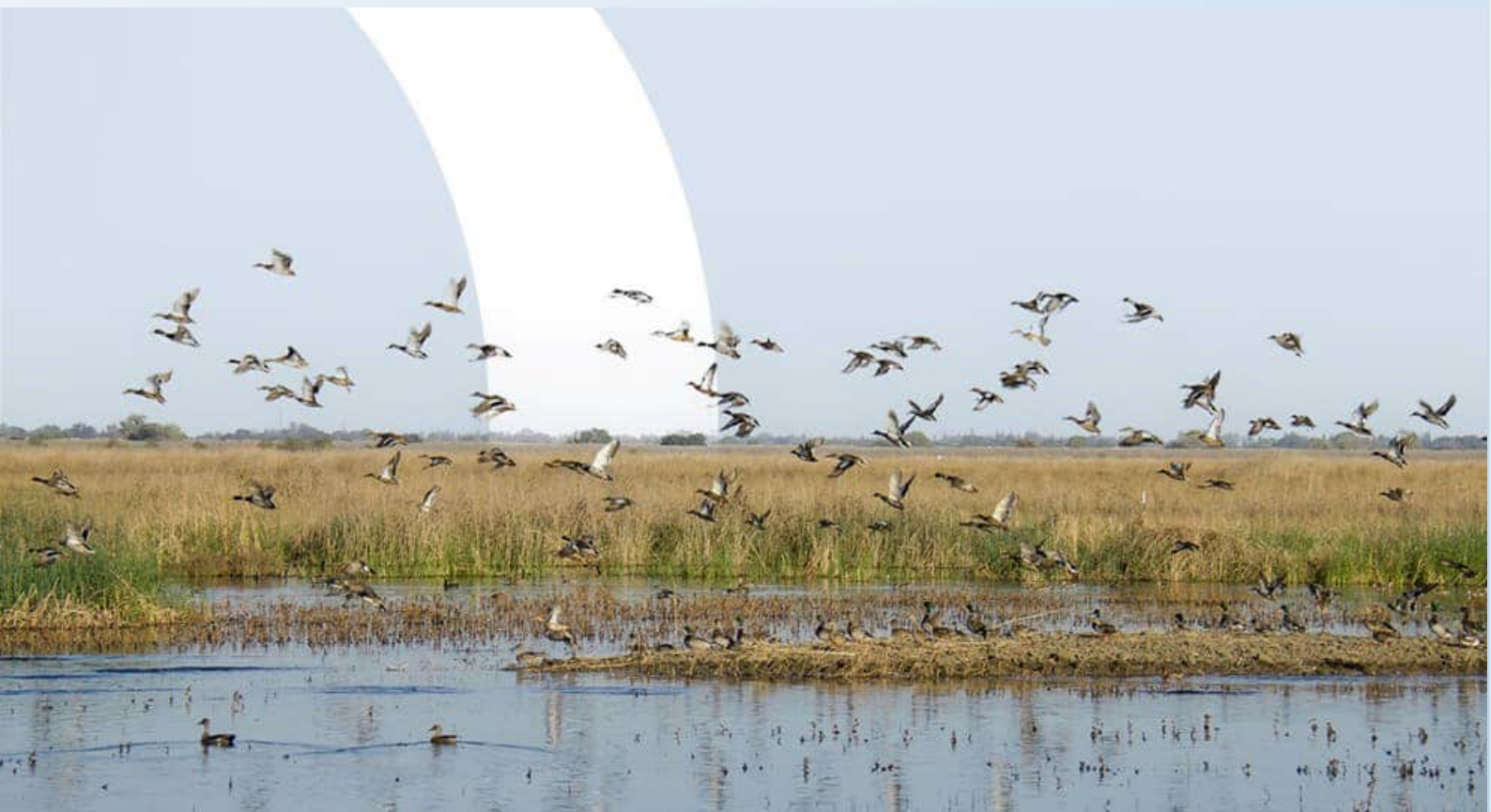




Canterbury City Council

CANTERBURY DISTRICT LOCAL PLAN

Habitats Regulations Assessment Supporting
Information - Draft Canterbury District Local Plan
– Pre-submission Draft (Regulation 19) (2026)





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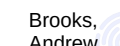
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1 INTRODUCTION

1.1 THE CANTERBURY CITY COUNCIL (CCC) LOCAL PLAN

- 1.1.1. Canterbury City Council (the Council) adopted the Canterbury District Local Plan 2011-2031 in July 2017. The Council is currently preparing a new Local Plan which will set out the vision, objectives, planning policies and site allocations that will guide development in the local authority area to 2042/43.
- 1.1.2. Plan making has been ongoing for several years. An initial consultation on the Draft Canterbury District Local Plan (2020-2045) (Regulation 18) occurred in October 2022. Following consideration of consultation feedback and further evidence base gathering, the Council prepared a Draft Canterbury District Local Plan (2020-2040) (Regulation 18) for consultation in March – June 2024. Following this, the National Planning Policy Framework (NPPF)¹ was updated in December 2024 to include a new approach to calculating Local Housing Needs (LHN) within Local Plans. As a result of the calculation updates, Canterbury District was required to plan for 1,215 new homes a year, an increase from 1,149 homes per year at the time of the 2024 consultation and 800 homes per year from the Local Plan adopted in 2017.
- 1.1.3. To meet this target, a “Call for Sites” exercise was completed in late 2024 to identify potential additional site allocations which would meet LHN requirements, concurrently with a review of previous site submissions where new evidence was available. This exercise identified an additional 36 draft site allocations, including changes to some of the previous draft strategic site allocations. A ‘focused’ consultation on these changes was undertaken in September and October 2025 (the ‘Focused Consultation’).
- 1.1.4. The Council has now produced the Canterbury District Local Plan – Pre-submission Draft (Regulation 19) (2026) (the ‘Regulation 19 draft Local Plan’) for consultation.
- 1.1.5. This report provides the information required to undertake a Habitats Regulations Assessment (HRA) of the Regulation 19 draft Local Plan.

1.2 HABITATS REGULATIONS ASSESSMENT

- 1.2.1. Regulations 105 and 107 of The Conservation of Habitats and Species Regulations 2017 (as amended) (the ‘Habitats Regulations’) transpose the provisions of Articles 6(3) and 6(4) of Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the ‘Habitats Directive’) as they relate to land-use plans in England and Wales. Regulation 105 states that if a

¹ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

land-use plan is “(a) is likely to have a significant effect on a European site² or a European offshore marine site³ (either alone or in combination with other plans or projects); and (b) is not directly connected with or necessary to the management of the site” then the plan-making authority must “...make an appropriate assessment of the implications for the site in view of that site’s conservation objectives” before the plan is given effect.

- 1.2.2. The plan can only be given effect if it can be concluded (following an ‘appropriate assessment’) that the plan “...will not adversely affect the integrity” of a site, unless the provisions of Regulation 107 are met.
- 1.2.3. The process by which Regulation 105 is met is known as Habitats Regulations Assessment (HRA)⁴. A HRA determines whether there will be any ‘likely significant effects’ (LSE) on any European site as a result of a plan’s implementation (either on its own or ‘in combination’ with other plans or projects)⁵ and, if so, whether there will be any ‘adverse effects on site integrity’⁶. The Council has a statutory duty to prepare the Local Plan and is therefore the Competent Authority for an HRA.
- 1.2.4. WSP UK Ltd is supporting the Council with its HRA of the Regulation 19 draft Local Plan and has prepared reports to inform a HRA for the 2022 and 2024 consultations, plus the 2025 Focused Consultation (WSP, 2022⁷; 2024⁸; 2025⁹). These reports provided:
 - Details of the approach to the HRA of the Regulation 19 draft Local Plan.

² European sites are: any Special Area of Conservation (SAC) from the point at which the European Commission and the UK Government agreed the site as a ‘Site of Community Importance’ (SCI) (if this was before 31 Jan 2020); any classified Special Protection Area (SPA); and any candidate SAC (cSAC). However, the term is also commonly used when referring to potential SPAs (pSPAs), to which the provisions of Article 4(4) of Directive 2009/147/EC (the ‘new wild birds directive’) are applied; and to possible SACs (pSACs) and listed Ramsar Sites, to which the provisions of the Habitats Regulations are applied as a matter of Government policy (NPPF para. 194) when considering development proposals that may affect them. “European site” is therefore used in this document in its broadest sense, as an umbrella term for all of the above designated sites.

³ ‘European offshore marine sites’ are defined by Regulation 18 of *The Conservation of Offshore Marine Habitats and Species Regulations 2017* (as amended); these regulations cover waters (and hence sites) over 12 nautical miles from the coast.

⁴ The term ‘Appropriate Assessment’ has been historically used to describe the process of assessment; however, the process is more accurately termed ‘Habitats Regulations Assessment’ (HRA), with the term ‘Appropriate Assessment’ limited to the specific stage within the process.

⁵ Also referred to as the ‘test of significance’.

⁶ Also referred to as the ‘integrity test’.

⁷ WSP (2022) Canterbury District Local Plan (2020 – 2045) Habitats Regulations Assessment (HRA). Information to support an initial assessment of the Draft Canterbury District Local Plan (Regulation 18 Consultation) against Regulation 105 of the Conservation of Habitats and Species Regulations 2017

⁸ WSP (2024) Canterbury City Council Local Plan 2040 Habitats Regulations Assessment. HRA Supporting Information for Regulation 18 Consultation.

⁹ WSP (2025) Canterbury City Council Canterbury District Local Plan Focused Consultation (Regulation 18) 2025 Habitats Regulations Assessment

- A summary of the baseline condition of the European sites and features that are potentially vulnerable (i.e. both exposed and sensitive) to the likely effects of the Regulation 19 draft Local Plan, and the impact pathways.
- A summary of the initial screening assessments undertaken as part of the HRA of the emerging policies and proposals of the Regulation 19 draft Local Plan.
- Appropriate assessments for those European sites and features that are vulnerable to aspects of the Local Plan, taking into account avoidance or mitigation measures included in the Regulation 19 draft Local Plan.
- Identification of additional data requirements and/or additional measures that would be required to ensure that the Regulation 19 draft Local Plan avoids adverse effects on integrity.

1.3 SCOPE OF THIS REPORT

1.3.1. This report comprises a HRA to accompany the Regulation 19 draft Local Plan.

1.3.2. It draws upon the results of the previous reports that have accompanied the preceding stages and follows a similar layout. As such, it replicates some data and content from the previous HRA reports, with these data reviewed and updated as required. The report includes the following aspects:

- Details of the approach to the HRA of the Regulation 19 draft Local Plan (Section 2).
- A summary of the baseline condition of the European sites and features that are potentially vulnerable (i.e. both exposed and sensitive) to the likely effects of the Regulation 19 draft Local Plan, and the impact pathways (Section 3).
- A summary of the initial screening assessments undertaken as part of the HRA of the policies and proposals of the Regulation 19 draft Local Plan, identifying those European sites and features that will not be affected by plan proposals, and those plan aspects (policies or allocations) which will not significantly affect any European sites (Section 4).
- Appropriate assessments for those European sites and features that are vulnerable to aspects of the Regulation 19 draft Local Plan, taking account of avoidance or mitigation measures included in the Regulation 19 draft Local Plan (Sections 5 – 9).

2 APPROACH TO HRA OF THE LOCAL PLAN

2.1 OVERVIEW

2.1.1. The UK government has set out the step wise approach which should be followed to enable Competent Authorities to discharge their duties under The Habitats Regulations¹⁰ and provides further clarity on the interpretation of Articles 6 (3) and 6 (4), and the actions required under Regulation 63 (1) of The Habitats Regulations. The process used is usually summarised in three distinct stages of assessment, though not all stages are always required.

- **Stage 1: Screening:** the process which identifies the likely effects of a project or plan on a European site, either alone or 'in combination' with other projects or plans, and considers whether these effects are likely to be significant. The 'screening' test or 'test of significance' is a low bar, intended as a trigger rather than a threshold test: a plan should be considered 'likely' to have an effect if the competent authority is unable (on the basis of objective information) to exclude the possibility that the plan or project could have significant effects on any European site, either alone or in combination with other plans or projects; an effect will be 'significant' simply if it could undermine the site's conservation objectives. Note that mitigation measures should not be taken into account at the 'screening' stage, in accordance with the People over Wind (Court of Justice of the European Union (ECJ) Case C-323/17).
- **Stage 2: Appropriate Assessment:** the detailed consideration (if required) of the effect on the integrity of relevant European sites by the plan or project, either alone or in combination with other plans or projects, with respect to the European site's conservation objectives and its structure and function. The assessments must be 'appropriate' to the effects and proposal being considered, and sufficient to ensure that there is no reasonable doubt that adverse effects on site integrity will not occur. Mitigation measures should be considered at this stage.
- **Stage 3: Derogations:** the process under which a plan or project may still go ahead if it fails the integrity test at Stage 2. To qualify for a derogation, the plan or project must pass three legal tests:
 - There are no feasible alternative solutions that would be less damaging or avoid damage to the site;
 - The plan or project needs to be carried out for imperative reasons of overriding public interest (IROPI); and
 - Necessary compensatory measures to maintain the overall coherence of the National Site Network¹¹ can be secured.

¹⁰ UK Gov. 2023. Guidance 'Habitats regulations assessments: protecting a European site'. Available at: <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

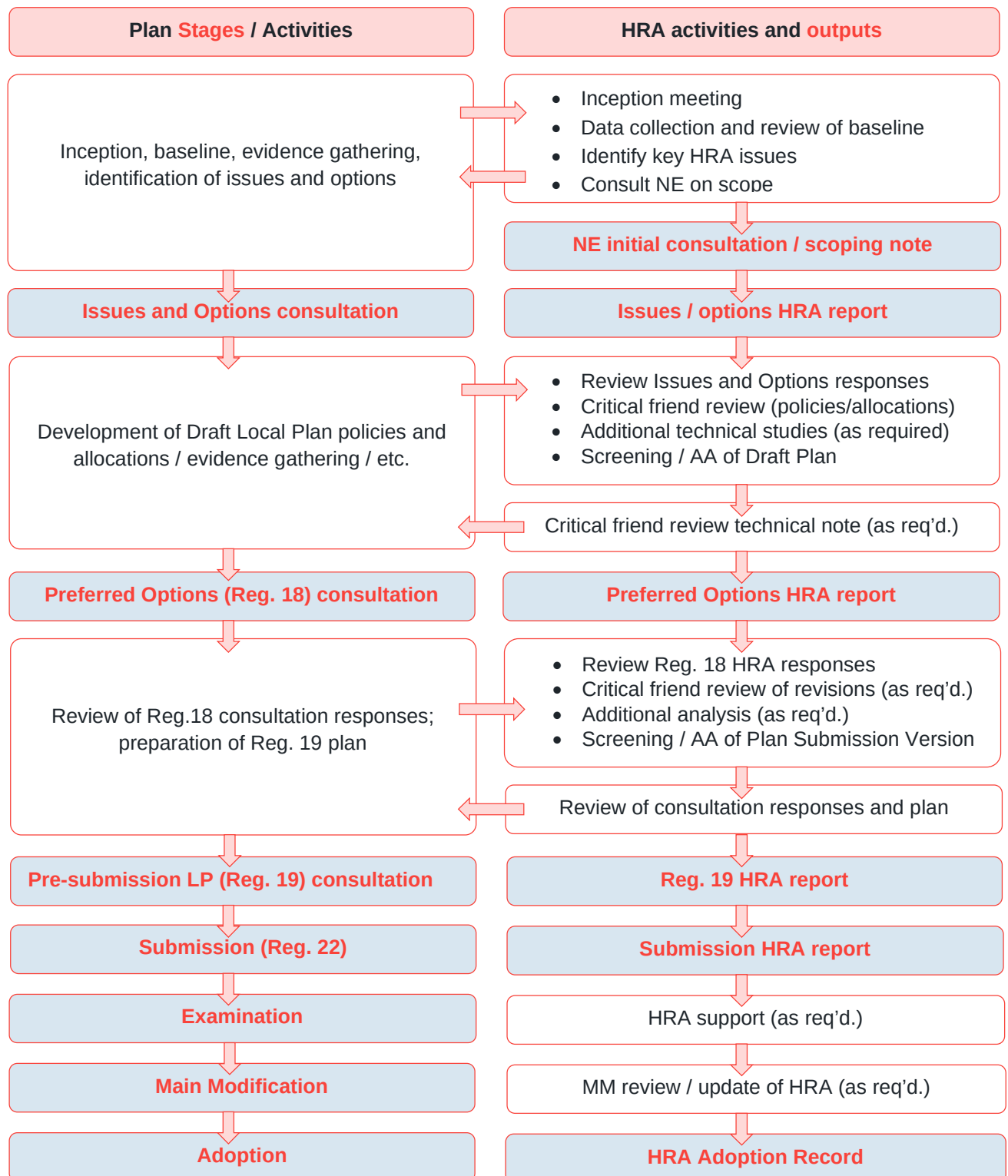
¹¹ UK European sites are no longer legally part of the 'Natura 2000' network of protected sites, with this being replaced in the UK by the 'national site network' which comprises all existing SACs and SPAs and any new

- 2.1.2. In accordance with the People over Wind Judgment (People over Wind and Peter Sweetman v Coillte, 2018) (Case 323/17) targeted measures to mitigate effects on the Habitats Sites will not be considered at the HRA screening stage. The People Over Wind ruling states that:
- “...in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects of the plan or project on that site.”*
- 2.1.3. UK government guidance to Competent Authorities carrying out HRA¹² further confirms this requirement. In relation to HRA screening, this guidance states that:
- “At this stage, you should not consider any mitigation measures included by the proposer for the purpose of avoiding or minimising risk to a European site. These mitigation measures need to be considered at the appropriate assessment stage.”*
- 2.1.4. An iterative approach to HRA has been taken during development of the Local Plan, and the HRA reports issued at each stage of the plan development reflect the assessment and process at that point in time. These reports have and will be updated for subsequent consultation stages to reflect consultation responses and plan amendments. Figure 2-1 demonstrates the indicative HRA process for Local Plans.

SACs and SPAs. This also has relevance if compensation measures are required for an adverse effect, as the relevant metric is the overall coherence of the ‘national site network’. The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 establish management objectives for the national site network which contribute to the conservation of UK habitats and species that are also of pan-European importance and to the achievement of their favourable conservation status within the UK.

¹² Defra, Natural England, Welsh Government and Natural Resources Wales. 2021. Available at: <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

Figure 2-1 - Indicative HRA process for Local Plans



- 2.1.5. For consistency, the approach to HRA completed within this report is the same as that detailed within sections 2.4 to 2.9 of the Local Plan 2040 Habitats Regulations Assessment (Regulation 18) (WSP, 2024)⁸ and the 2025 Focused Consultation addendum (WSP, 2025)⁹. In particular, this includes:
- Use of a study area which considers all European sites within 20km of the Council's administrative area, as well as any additional sites which may be hydrologically linked to the Regulation 19 draft Local Plan's zone of influence.
 - Consideration of baseline condition of European sites using appropriate data derived from JNCC-hosted GIS datasets, Standard Data Forms for SACs and SPAs, Information Sheets for Ramsar sites, published site Conservation Objectives, Supplementary Advice to the conservation objectives (SACO) where available¹³, Site Improvement Plans (SIPs) and the supporting Site of Special Scientific Interest's (SSSIs) favourable condition tables where relevant and where no SACOs applicable to the feature are available.
 - Consideration of other features that may be relevant to site integrity, including 'typical species', within-site supporting habitats and designated or non-designated 'functional habitats'.
- 2.1.6. Following the issue of each previous HRA report, representations were received from Natural England¹⁴ with further written advice relating to recreational pressure¹⁵ and Functionally Linked Land¹⁶. This report has been produced with reference to the representations and advice received from Natural England in these various communications.

2.2 GUIDANCE

- 2.2.1. The following guidance has been used during the review and assessment of the Regulation 19 draft Local Plan:
- UK Government (2019). *Appropriate assessment: Guidance on the use of Habitats Regulations Assessment* [online]. Available at: <https://www.gov.uk/guidance/appropriate-assessment> [Accessed February 2026].

¹³ NE has published 'Supplementary advice on conserving and restoring site features' for most European sites in England which describe in more detail the range of ecological attributes which are most likely to contribute to a site's overall integrity, and the targets each qualifying feature needs to achieve in order for the site's conservation objectives to be met.

¹⁴ Natural England letters to Canterbury City Council dated 30 January 2023 Draft Canterbury District Local Plan to 2045 - Regulation 18 Consultation; 31 May 2024 Draft Canterbury District Local Plan To 2040 – Regulation 18 Consultation; and 20 October 2025 Draft Canterbury District Local Pal to 2040 – Focused Regulation 18 Consultation.

¹⁵ Email communication from Nancy Warne dated 27 August 2024 – Draft Canterbury District Local Plan to 2040 – Regulation 18 Consultation (HRA - Recreational Pressure).

¹⁶ Email communication from Luke Hasler dated 20 August 2024 – Draft Canterbury District Local Plan to 2040 – Regulation 18 Consultation (Functionally Linked Land).

- Tyldesley, D. & Chapman, C. (2023). *The Habitats Regulations Assessment Handbook* [online]. DTA Publications Limited. Available at: <https://www.dtapublications.co.uk/handbook/>. [withdrawn].
- EC (2018). *Managing Natura 2000 sites: The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC*. Commission Notice C(2018) 7621 final, Brussels, 21.11.2018.
- Natural England (2020). *Guidance on how to use Natural England's Conservation Advice Packages in Environmental Assessments*. Natural England, Peterborough.
- European Commission (2018). *Managing Natura 2000 sites - The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC*. European Union, 1-86.
- Defra (2012). *The Habitats and Wild Birds Directives in England and its seas: Core guidance for developers, regulators & land/marine managers* [online]. Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/82706/habitats-simplify-guide-draft-20121211.pdf. [Accessed February 2026].
- PINS Note 05/2018: *Consideration of avoidance and reduction measures in Habitats Regulations Assessment: People over Wind, Peter Sweetman v Coillte Teoranta*. [withdrawn].
- SNH (2025). SNH Guidance Note: *The handling of mitigation in Habitats Regulations Appraisal – the People Over Wind CJEU judgement* [online]. Scottish Natural Heritage. Available at: <https://www.nature.scot/doc/naturescot-guidance-note-handling-mitigation-habitats-regulations-appraisal-people-over-wind-cjeu> [Accessed February 2026].

2.2.2. Additional topic-specific guidance (for example, in relation to the assessment of air quality effects) is identified within the relevant assessment sections.

2.3 STUDY AREA

- 2.3.1. The zone of influence of a Local Plan varies according to the aspect being considered (for example, noise effects would rarely extend more than a few hundred metres from the source), and so it is not usually appropriate to employ 'arbitrary' spatial buffers to determine those European sites that should be considered within a HRA.
- 2.3.2. However, as distance is a strong determinant of the scale and likelihood of most effects, the considered use of a suitably precautionary search area as a starting point for the assessment (based on an understanding of both the likely plan outcomes and European site interest features) has some important advantages. Using buffers allows the systematic identification of European sites using GIS, so minimising the risk of sites or features being overlooked and ensures that sites for which there are no reasonable impact pathways can be quickly and transparently excluded from any further screening or assessment. It also has the significant advantage of providing a consistent point of reference for consultees following the assessment process, allowing the screening to focus on the potential effects, rather than on explaining why certain sites may or may not have been considered in relation to a particular aspect of the plan.
- 2.3.3. Most Local Plan HRAs adopt a 15 – 20km buffer for the identification of European sites that may be exposed to significant effects, with sites beyond this distance considered as required. The HRA of this plan therefore considers:
- all European sites within 20km of the Council's administrative area (see **Table 3.2**);
 - any additional sites that may be hydrologically linked to the Regulation 19 draft Local Plan's zone of influence; and

- any additional sites identified by Natural England following the Sustainability Appraisal (SA) Scoping Consultation (particularly in relation to air or water quality, see below).

2.3.4. This is considered to be a suitably precautionary starting point for the assessment of the Regulation 19 draft Local Plan and continues the principle set by the Regulation 18 HRA reports. Note, at the screening stage the assessment essentially assumes that there will be 'no effect' (and hence no possibility of 'in combination' effects) on European sites not included within the scope.

2.4 DATA COLLECTION

2.4.1. The screening and appropriate assessment stages take account of the baseline condition of the European sites and their interest features¹⁷, including (where reported) data on:

- the European site boundaries and the boundaries of the component SSSIs;
- the conservation objectives;
- information on the attributes of the European sites that contribute to and define their integrity;
- the condition, vulnerabilities and sensitivities of the sites and their interest features, including known pressures and threats;
- the approximate locations of the interest features within each site (if reported); and
- designated or non-designated 'functional habitats' (if identified).

2.4.2. These data are derived from (where available / relevant):

- the most recent JNCC-hosted GIS datasets;
- the Standard Data forms for SACs and SPAs and Information Sheets for Ramsar sites;
- Article 12 and 17 reporting;
- the published site Conservation Objectives;
- Supplementary Advice to the conservation objectives (SACO) where available¹⁸;
- Site Improvement Plans (SIPs); and
- the component SSSI's favourable condition tables where relevant and where no SACOs applicable to the features are available.

2.4.3. Note:

¹⁷ The interest features are taken to be the qualifying features and other site features that may be relevant to site integrity, particularly 'typical species' (for SACs) and within-site supporting habitats for SPAs.

¹⁸ NE has published 'Supplementary advice on conserving and restoring site features' for most European sites in England which describe in more detail the range of ecological attributes which are most likely to contribute to a site's overall integrity and the targets each qualifying feature needs to achieve in order for the site's conservation objectives to be met.

- For SPAs, the qualifying features are taken as those identified on the most recent JNCC datasets and citations or Natural England conservation objectives sheets, where these post-date the most recent SPA Review¹⁹ (i.e. it will be assumed that any amendments suggested by the SPA review have been made) unless otherwise identified to us by Natural England. Any site-specific issues relating to the SPA Review can be addressed in the screening and appropriate assessment of the proposed options (see below).
- The conservation objectives for Ramsar sites are taken to be the same as for the corresponding SACs / SPAs (where sites overlap). SSSI Definition of Favourable Condition (FCTs) are used for those Ramsar site features not covered by SAC/SPA designations.

2.4.4. Where possible, the site data is used to identify other features that may be relevant to site integrity, particularly 'typical species' (for SACs), within-site supporting habitats, and designated or non-designated 'functional habitats'.

2.4.5. A 'typical species' is broadly described by European Commission (EC) guidance as being any species (or community of species) which is particularly characteristic of, confined to, and/or dependent upon the qualifying Annex I habitat feature at a particular site. This may include those species which:

- are critical to the composition or structure of an Annex I habitat (e.g. constant species identified by the National Vegetation Classification (NVC) community classification);
- exert a critical positive influence on the Annex I habitat's structure or function (e.g. a bioturbator (mixer of soil/sediment), grazer, surface borer or predator);
- are consistently associated with, and dependent upon, the Annex I habitat feature for specific ecological needs (e.g. feeding, sheltering), completion of life-cycle stages (e.g. egg-laying) and/or during certain seasons/times; or
- are particularly distinctive or representative of the Annex I habitat feature at a particular site.

2.4.6. Within-site supporting habitats are those which support the population(s) of the qualifying species and which are therefore critical to the integrity of the feature.

2.4.7. 'Functional habitats' are generally taken to be habitats or features outside a European site boundary that are important or critical to the functional integrity of the site habitats and / or its interest features. These might include, for example:

- 'buffer' areas around a site (e.g. dense scrub areas preventing public access or areas of land that reduce the effects of agricultural run-off; etc.);
- specific features or habitats relied on by mobile species during their lifecycle (e.g. high-tide roosts for waders, significant maternity colonies for bats known to hibernate within an SAC, areas that

¹⁹ <https://data.jncc.gov.uk/data/5b816ab9-4268-4c48-bdc5-5241e4464d4b/third-uk-spa-review-phase-2-report-2025.pdf>

are critical for foraging or migration etc. Note, this is not intended as a speculative catch-all covering any habitat that might be occasionally used by, or suitable for, a particular species²⁰).

- 2.4.8. Note, many SPAs and Ramsar sites are largely coincident, both spatially and in terms of features. Within this document, SPA and Ramsar site names may therefore sometimes be combined with the suffix “SPA/Ramsar site” for simplicity where this is not material to the assessment of specific sites or features.

2.5 REVIEWING THE EMERGING PLAN

- 2.5.1. The principles²¹ of ‘screening’ are applied to the emerging plan and its components (i.e. the policies and allocations) as part of an iterative review process, to ensure that:
- any necessary technical assessments focus on those plan aspects that are likely to result in significant effects on European sites; and
 - that the policies of the adopted plan are drafted to provide appropriate overarching safeguards that help (alongside any subsequently identified mitigation) to ensure that the adopted plan will have no significant effects or no significant adverse effects.
- 2.5.2. The outcomes of the HRA reviews are reported as appropriate at each consultation stage; this reporting may outline anticipated conclusions in relation to specific plan aspects. The outcomes of these reviews are re-visited throughout plan evolution to ensure that they remain robust, and that the overall performance of the plan in relation to the safeguarding of European sites meets expectations.
- 2.5.3. The reviews are intended to be a coarse filter for identifying potential effect pathways that cannot be self-evidently discounted, and hence those aspects where further investigation (‘appropriate assessment’) is required to determine the scale or nature of any effects and / or any bespoke mitigation that is necessary, rather than detailed assessments in their own right.

2.6 SCREENING / ASSESSMENT OF THE DRAFT PLANS

- 2.6.1. The Preferred Options (Regulation 18) and Regulation 19 draft Local Plan are accompanied by HRA documents that include a ‘screening’ and ‘appropriate assessment’, setting out the HRA-related evidence and the anticipated conclusion (if the plan were to be adopted as drafted, recognising that the HRA can only be completed for the final, adopted plan).

²⁰ Case law notes that such land should be necessary to the conservation of the protected habitat types and species (*Holohan v An Bord Pleanala C-461/17*) or play an important role in maintaining or restoring the population of qualifying species at favourable conservation status.

²¹ i.e. exploring whether significant effects on European sites are possible. Note, from a strict procedural perspective, the tests in Regulation 105 (including the ‘test of significance’) can only be formally applied to the plan intended for adoption and not to its various phases or iterations; therefore the term ‘screening’ is used advisedly when applied to assessments completed at earlier stages of the plan development.

- 2.6.2. The ‘screening’ in these HRAs identifies the following aspects and excludes them from the scope of the appropriate assessment:
- those European sites that are not vulnerable (i.e. both exposed and sensitive) to the outcomes of the plan); and
 - the policies and allocations that cannot have significant effects, alone or in combination, or which cannot be assessed at the plan level (e.g. policies that support development or other changes) but which are too general to allow any specific assessments of effects (i.e. the locations, scale, quantum etc. are not specified below the geographical level of the plan, assuming that the type of development proposed is not such that significant effects would be unavoidable regardless of these aspects).
- 2.6.3. The ‘screening’ does not take into account ‘mitigation’, in accordance with ‘People over Wind’ (see below).
- 2.6.4. The ‘appropriate assessment’ determines whether any aspect of the plan will have ‘adverse effects on integrity’ for any European sites, taking into account the sites’ conservation objectives and conservation status. Site integrity (in HRA terms) is *“the coherent sum of the site’s ecological structure, function and ecological processes, across its whole area, which enables it to sustain the habitats, complex of habitats and/or populations of species for which the site is designated”* (EC Guidance ‘Managing Natura 2000’ (2018))²².
- 2.6.5. Where a site or interest feature has a ‘favourable’ conservation status then a ‘no adverse effects on integrity’ conclusion can be reached provided that this status will not be undermined by the plan or project at hand. If the conservation status is ‘unfavourable’, then the plan or project must not reduce the conservation status further or create conditions that would make it more difficult for the site or feature to reach ‘favourable’ conservation status. It should be noted that this is not simply a test of whether there are negative effects; an effect may be negative but not undermine the site’s conservation objectives. The integrity test incorporates the precautionary principle, whereby plans or projects should not be approved unless there is no reasonable scientific doubt that adverse effects on site integrity will not occur²³.
- 2.6.6. Appropriate assessments are therefore used to provide a more detailed examination of those plan aspects where significant effects are likely, or (commonly) where there is a residual uncertainty which the assessment is intended to resolve or a mitigation measure requires examination. The ‘appropriate assessment’ stage may therefore conclude that the proposals are likely to have an

²² https://environment.ec.europa.eu/topics/nature-and-biodiversity/natura-2000/managing-and-protecting-natura-2000-sites_en

²³ It should be noted that ‘no reasonable scientific doubt’ does not mean ‘absolute certainty’ (which is rarely achievable in any case, particularly at the plan level where detail on specific future developments is often unavailable). Sufficient certainty may be achieved through the use of suitably conservative assumptions (e.g. in modelling) or evidence from best-practice elsewhere, taking into account any advice from the relevant statutory bodies. The plan-making authority can then put in place a legally enforceable framework that provides certainty by ensuring that the potential adverse effects identified using the best-available information will not be realised.

adverse effect on the integrity of a site (in which case they should be abandoned or modified) or that the effects will be 'significant' in HRA terms but not adverse (i.e. an effect pathway exists, but those effects will not undermine site integrity, perhaps due to mitigation proposed for inclusion within the plan) or that the effects would, if screening were re-visited, be 'not significant' (i.e. the anticipated effect is subsequently shown to be nugatory or de minimis²⁴).

- 2.6.7. The approaches used for appropriate assessments vary according to the sites affected and the effect-pathways.

IN-COMBINATION EFFECTS

- 2.6.8. Consideration of 'in-combination' effects is not a separate assessment but is integral to both the screening and appropriate assessment stages.
- 2.6.9. At the screening stage, the 'in-combination' assessment focuses on those Local Plan effects that are 'not significant', aiming to identify whether these effects might interact with other plans or projects to result in significant effects on a European site in combination (recognising that Local Plan effects that are effectively nil and indistinguishable from background variations cannot operate 'in-combination' and so can be excluded from the in-combination assessment at the screening stage). Any significant 'in-combination' effects identified are then considered at the appropriate assessment stage, where the assessment aims to determine whether the residual effects of the Local Plan (after mitigation is accounted for) could nevertheless interact with aspects of other plans and projects to adversely affect the integrity of a European site.
- 2.6.10. There is limited guidance available on the scope of the 'in-combination' element, particularly with regard to which plans or projects should be considered.
- 2.6.11. The assessment of in-combination effects arising within the Local Plan itself, or between Local Plans (e.g. of allocations cumulatively or the overall quantum of development regionally) are fundamentally integrated into the assessments, as most effect pathways (e.g. increased recreational pressure) are inherently cumulative.
- 2.6.12. However, the assessment should not be limited to plans at the same level in the planning hierarchy and there is consequently a wide range of strategic plans that could have potential 'in-combination' effects with the Local Plan. The plans identified by the SA provide the basis for the assessment of in-combination effects with strategic plans; these plans are reviewed to identify any potential effects (see **Appendix C**) and then considered (as necessary) within the screening and appropriate assessment stages. The assessment does not generally include national strategies, national policy or legislation since the Local Plan must be compliant with these. The assessment takes account of any HRAs completed for those plans, where these are freely available for review²⁵. It is considered

²⁴ In the absence of avoidance or mitigation measures, as per 'People over Wind'.

²⁵ There is no statutory requirement to issue HRAs for public comment, and so many HRAs are not available or are only made available publicly for short consultation periods. In these instances, it is assumed that the HRA of the plan was able to conclude 'no adverse effects' if the relevant plan has been adopted.

that in-combination effects are most likely in respect of other regional and sub-regional development plans and strategies.

- 2.6.13. With regard to projects, The Planning Inspectorate's National Infrastructure Projects database²⁶ is used to identify major projects with the potential to affect the European sites in the HRA scope, along with any other major projects that the Council are advised of during the plan development process. However, it should be noted that the in-combination assessment can be greatly limited by the information available for other plans and projects, particularly where these are at an early stage of development.
- 2.6.14. It is not generally possible to produce a definitive list of existing minor planning applications near each European site, and generating a list of these is typically of little value since many will be consented and delivered prior to the plan being adopted and/or before developments supported by the plan are brought forward (i.e. they will form part of the baseline for future project-level HRAs); they typically must meet the policy requirements of the Local Plan also.

2.7 NOTES ON MITIGATION AND AVOIDANCE

- 2.7.1. The development of avoidance or mitigation measures is important to the HRA and plan development process. Avoidance measures are those that are implemented during the iterative plan development process (for example, abandoning a policy or allocation that is likely to have unavoidable adverse effects if implemented)²⁷. Mitigation measures are used where significant effects are identified in order to prevent adverse effects on a site's integrity²⁸.
- 2.7.2. Avoidance or mitigation measures should aim to reduce the probability or magnitude of impacts on a European site until 'no likely significant effects' or 'no adverse effects on integrity' are anticipated and they will generally involve the development and adoption of (for example) wording changes to policies, or additional safeguarding policies. Measures must be specific and targeted and likely to work; it is not appropriate to re-state existing legislation or policy, for example by adding "*and must have no significant effect on any European site*" (or similar) to every policy. The avoidance or mitigation measures should also reflect the limited influence that the Council can exert on non-planning issues and should not generally exceed requirements set by national planning policy or guidance.
- 2.7.3. The 'People Over Wind' judgment creates some issues for the application of avoidance and mitigation measures in the HRA process, stating that "*...it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects [mitigation] of the*

²⁶ <https://infrastructure.planninginspectorate.gov.uk/projects/>

²⁷ Note, the term 'avoidance measures' in this context is not synonymous with the representation of 'mitigation' used in the People over Wind judgment.

²⁸ Although it should be noted that not all likely significant effects will require mitigation measures. The effect may be considered to be likely to be significant (i.e. has the potential to undermine the conservation objectives) but may be shown on further examination to be too limited to have any risk of adversely affecting site integrity.

plan or project on that site"; as noted, this contrasts with established practice in this area (based on the 'Dilly Lane' judgment).

- 2.7.4. There is limited guidance on the practical implementation of the 'People over Wind' judgment, particularly for plan-level HRAs where the assessment process is usually concurrent with plan development and where measures are invariably incorporated into the plan before the formal 'screening' of the final version takes place. Indeed, many 'recommendations' derived from an iterative policy review process might be interpreted as 'avoidance' or 'mitigation' measures if viewed solely in terms of their implications for European sites, making it difficult to distinguish between basic good policy practice and 'mitigation'.
- 2.7.5. For example, generic policies promoting the use of Sustainable Drainage Systems (SuDS), safeguarding designated sites (including European sites) or requiring that developers ensure utility provision in advance of occupation are fairly standard inclusions in virtually all land-use plans but will all act to moderate potential environmental changes that could affect European sites. However, it would clearly be illogical to attempt to screen a hypothetical version of the plan that did not include such policies, particularly if these are included independently of the HRA results.
- 2.7.6. The broader context of the 'People over Wind' case suggests that the judgment is principally focusing on those instances where specific measures are included or relied on to avoid or mitigate a specific effect that has been identified, and which would otherwise be significant. The judgment argues that the effectiveness of any such measures should be examined through an appropriate assessment stage. It is therefore arguable that an exhaustive examination of a plan's genesis to see if any aspects might count as 'mitigation' for screening purposes is not necessary, or (arguably) consistent with the intent of the Habitats Directive or the 'People over Wind' judgment.
- 2.7.7. Therefore, the screening does not take account of specific measures that are included in response to a specific identified effect on a European site, and which are intended to avoid or reduce that effect. However, generic policy safeguards that would be included regardless of the presence of European sites are essentially just 'the plan' and are not considered to be mitigation unless there is a specific effect or pathway that they are intended or relied on to obviate. Aspects requiring specific investigations to understand the problem (and hence the mitigation requirements), or which rely on established mitigation to avoid an effect, are subject to appropriate assessment.

2.8 UNCERTAINTY AND 'DOWN THE LINE' ASSESSMENT

- 2.8.1. For most policies, even at the strategic level, it will be clear if adverse effects are likely at an early stage, and in these instances the policy should not be included within the plan since plans should not include proposals which would be likely to fail the Habitats Regulations tests at the project application stage. For other options, however, the effects may be uncertain and it is therefore important that this uncertainty is addressed either through additional investigation or (if this is not possible) appropriate mitigation measures that provide certainty that the predicted effect will not occur or will not adversely affect site integrity.
- 2.8.2. It is usually possible to incorporate caveats or measures within policy text that are sufficient to ensure that adverse effects will not occur. However, for other policies this may not be possible because there is insufficient available information about the nature of the development that is being proposed through the policy to enable a robust conclusion to be reached. In these instances, it may be appropriate and acceptable for assessment to be undertaken 'down-the-line' at a lower tier in the planning hierarchy. For this to be acceptable, the following conditions must be met:

- the higher tier plan appraisal cannot reasonably predict the effects on a European site in a meaningful way; whereas;
- the lower tier plan, which will identify more precisely the nature, scale or location of development, and thus its potential effects, retains enough flexibility within the terms of the higher tier plan over the exact location, scale or nature of the proposal to enable an adverse effect on site integrity to be avoided; and
- HRA of the plan at the lower tier is required as a matter of law or Government policy.

2.8.3. This approach is applied as appropriate to the screening and appropriate assessment stages set out within this report.

3 BASELINE SUMMARY AND IMPACT PATHWAYS

3.1 EFFECT PATHWAYS AND KEY REGIONAL PRESSURES

- 3.1.1. The provisions of the Habitats Regulations ensure that ‘direct’ (encroachment) effects on European sites as a result of land use change (i.e. the partial or complete destruction of a European site) are extremely unlikely under normal circumstances, and this will not occur as a result of the Local Plan. Indeed, local plans will generally assist the safeguarding of European sites through their protective policies. However, there will be a number of areas where the direction, controls or influence provided by a plan can result in outcomes that can affect European site interest features.
- 3.1.2. Most potential effect pathways are associated with broad ‘quantum of development’ or population growth aspects, and whilst a local plan is not necessarily the main driver of these effects, they do have a key role in managing them locally through the site allocation process. In this context, the main aspects through which the Local Plan could affect European sites in the study area are:
- through individual allocations or supported developments that are ‘directed’ to a specific location or area; or
 - through ‘in-combination’ effects resulting from the cumulative impacts of development associated with the Local Plan and with the plans and programmes of external authorities (such as neighbouring LPAs).
- 3.1.3. These aspects could affect European sites on their own, through typical development-related mechanisms operating at the local scale in relation to specific allocations (e.g. noise, lighting, etc.; see **Table 3-1**) or collectively by exacerbating regional pressures (e.g. pressures on water supply).

Table 3-1 - Typical effect pathways and environmental changes associated with terrestrial development

Pressure / Threat	Common environmental changes
Hydrological changes	Temperature changes Salinity changes Water flow changes Flood regime changes
Pollution and other chemical changes	Non-synthetic and synthetic compound contamination Radionuclide contamination Introduction of other substances (solid, liquid or gas) De-oxygenation Nutrient enrichment Organic enrichment Chemical deposition from pollutants released to the air
Physical loss	Physical loss of habitat Physical change to another habitat

Pressure / Threat	Common environmental changes
Physical damage	Habitat structure changes Changes in suspended solids Siltation rate changes
Other physical pressures	Litter Electromagnetic changes Noise changes Introduction of light Barrier to species movement Death or injury by collision
Biological pressures	Visual disturbance Genetic modification and translocation of indigenous species Introduction or spread of non-indigenous species Introduction of microbial pathogens Exploitation / harvesting of species Removal of non-target species during exploitation / harvesting

- 3.1.4. Significant effects or significant adverse effects as a result of individual allocations 'alone' are typically unlikely as most environmental changes have a limited 'zone of influence' (for example, noise effects on species will rarely be significant over 500m from the source based on natural rates of attenuation alone) and most allocations will not be located particularly close to a European site. However, the Local Plan HRA must also consider the potential for development supported by the plan to operate in-combination both internally (e.g. between allocations) or with external plans and programmes (e.g. cumulative housing growth regionally). In-combination changes are often of an inherently larger scale or operate over larger areas.
- 3.1.5. There is obviously a wide range of potential mechanisms and pathways for in-combination effects depending on the European sites and features. However, there are a few key mechanisms by which local plans (etc.) most commonly operate cumulatively to affect European sites. These are noted below and provide the broad framework for assessing potential in-combination effects associated with the Local Plan:
- **Recreational pressure:** Many European sites will be vulnerable to some degree of impact as a result of recreational pressure, although the effects of recreational pressure are complex and very much dependent on the specific conditions and interest features at each site. Local plans can influence recreational pressure through their allocations and associated controls.
 - **Urbanisation:** Urbanisation is generally used as a collective term covering a suite of often disparate risks and impacts that occur due to increases in human populations near protected sites. This would include varied aspects such as fly-tipping or vandalism, predation by cats, or the dispersal of invasive species, although the effects of these aspects depend on proximity, accessibility and the interest features of the sites. This is generally only realised where allocations are close to a designated site.
 - **Atmospheric pollution:** The most relevant air pollutants to habitats and species (particularly plant species) are nitrogen oxides (NOX, mainly from vehicles) and ammonia (NH3, typically from

agriculture). These pollutants affect habitats and species mainly through acidification and eutrophication. Local Plans will generally have few specific point-sources for air emissions, and such emissions would typically be controlled through project-level permissions. The main issue for Local Plans is the assessment of in-combination effects due to air quality changes that might be associated with the quantum of development growth proposed or supported by a Local Plan, particularly in relation to traffic and N deposition.

- **Water resources and flow regulation:** The exploitation and management of water resources is connected to a range of activities, most of which are not directly controlled or influenced by local plans; for example, agriculture, flood defence, recreation, power generation, fisheries and nature conservation. Much of the water supply to water-resource sensitive European sites is therefore managed through specific consenting regimes that are independent of local plans. Increased housing growth (which is likely to be supported by a local plan) increases demand on public water supply abstractions, some of which are associated with European sites; however, the consenting regimes are subject to HRA and, importantly, water companies are required to produce 25-year Water Resource Management Plans (WRMPs) that take into account predicted population growth and protected sites when considering future water resource provision. It is therefore very unlikely that development within one local planning authority area could have direct and consequential effects on a European site if growth is in line with water company predictions, particularly as most water companies operate conjunctive-use systems that do not rely on single-source provision. This aspect is most typically managed through policy.
- **Water quality:** Most waterbodies and watercourses are affected to some extent by point or diffuse sources of pollutants, notably nitrates and phosphates. Point sources are usually discrete discharge points, such as Wastewater Treatment Works (WTW) outfalls, which are generally managed through specific consenting regimes that are independent of local plans. In contrast, diffuse pollution is derived from a range of sources (e.g. agricultural run-off; road run-off) that cannot always be easily traced or quantified. Development promoted or supported by local plans is likely to increase demand on WTW and potentially increase run-off which could indirectly affect downstream European sites – although there will inevitably be attenuation as distance from the source increases.

3.1.6. In addition, many European site interest features (particularly more mobile animal species) may use or be reliant on non-designated habitats outside of a European site during their life-cycle. All of the above aspects (recreation, water resources, etc.) can therefore also affect European site integrity indirectly through effects on ‘functional habitats’ beyond the designated site boundary.

3.1.7. It should be noted that the Council is completing various reports and studies to update the environmental baseline for the Local Plan, some of which will be relevant to the HRA. Where these have been updated since the Regulation 18 HRA, these have been taken into account:

- Strategic Flood Risk Assessment (2026).
- Open Space Strategy (adopted 2025).
- Canterbury Riverside Strategy 2023 – 2028 (2024).
- Tree, Woodland and Hedgerow Strategy (2024).
- Canterbury District Pollinator Action Plan (2023).
- Draft Canterbury District Nutrient Mitigation Strategy (2026).

- Natural Environment and Open Space Topic Paper (2026).

3.2 EUROPEAN SITE SUMMARIES

- 3.2.1. As noted, the HRA of the Local Plan will consider potential effects on:
- all European sites within 20km of the Council's administrative area (see Table 3.2);
 - any additional sites that may be hydrologically linked to the Local Plan's zone of influence; and
 - any additional sites identified by Natural England following the Issues and Options consultation.
- 3.2.2. Natural England confirmed in their 2024 Regulation 18 consultation response that *"the European sites as identified in Appendix A [of the 2024 HRA] are all those which we would expect to be in scope and considered through the HRA."* As such, the scope of European sites to be considered within this Regulation 19 HRA report matches that previously assessed and no additional European sites have been added. These sites are summarised below in **Table 3-2**.
- 3.2.3. With regard to downstream receptors, all of the European sites downstream of the Council area are identified in **Table 3-2**. It should be noted that the coastal and estuarine European sites that are down-catchment from the Council area²⁹ have not been identified as sites that are in unfavourable condition due to excessive nutrients in recent Natural England advice to LPAs³⁰ (such that nutrient neutrality³¹ is being deployed or considered as mitigation).

Table 3-2 - European sites within scope

Site	Location relative to the Council's administrative boundary
Blean Complex SAC	Woodland site within the Council area.
Stodmarsh Ramsar site	Wetland site within the Council area.
Stodmarsh SAC	Wetland site within the Council area.
Stodmarsh SPA	Wetland site within the Council area.
Tankerton Slopes and Swalecliffe SAC	Grassland site supporting moth species within the Council area.

²⁹ i.e. Thanet Coast and Sandwich Bay SPA / Ramsar site, The Swale SPA / Ramsar site, Outer Thames Estuary SPA, Thanet Coast SAC, Sandwich Bay SAC.

³⁰ Letter from NE to LPA Chief Executives and Heads of Planning, 16 March 2022; Re. Advice for development proposals with the potential to affect water quality resulting in adverse nutrient impacts on habitats sites.

³¹ Poor water quality due to nutrient enrichment from elevated nitrogen and phosphorus levels is one of the primary reasons for European sites being in unfavourable condition and substantial reductions are needed to achieve favourable conservation status. 'Nutrient neutrality' is a mitigation approach that potentially allows new developments to be approved provided that there is no net increase in nutrient loading within the catchments of the affected European site.

Site	Location relative to the Council's administrative boundary
Thanet Coast and Sandwich Bay Ramsar site	Large coastal site partly within the Council area at Swalecliffe and Herne Bay.
Thanet Coast and Sandwich Bay SPA	Large coastal site partly within the Council area at Swalecliffe and Herne Bay.
The Swale Ramsar site	Coastal and estuarine site partly within the Council area at Whitstable.
The Swale SPA	Coastal and estuarine site partly within the Council area at Whitstable.
Outer Thames Estuary SPA	Offshore site below MLW; partly within the Council area at Whitstable Harbour.
Wye and Crundale Downs SAC	Grassland site ~0.7km outside the south-western boundary.
Margate and Long Sands SAC	Marine SAC ~1.1km offshore north.
Parkgate Down SAC	Grassland site ~1.9km outside the southern boundary.
Thanet Coast SAC	Coastal site ~2.6km from the north-eastern boundary.
Lydden and Temple Ewell Downs SAC	Grassland site ~3.3km from the south-eastern boundary.
Sandwich Bay SAC	Coastal embankment ~7.3km east.
Folkestone to Etchinghill Escarpment SAC	Grassland site ~8.1km south.
Dover to Kingsdown Cliffs SAC	Grassland site ~11.1km south-east.
Dungeness, Romney Marsh and Rye Bay SPA	Coastal / offshore site ~13.9km south.
Medway Estuary and Marshes Ramsar site	Coastal/estuarine site ~14.2km north-west.
Medway Estuary and Marshes SPA	Coastal/estuarine site ~14.2km north-west.
Dungeness, Romney Marsh and Rye Bay Ramsar site	Coastal and wetland site ~17.2km south-west.
Essex Estuaries SAC	Coastal/estuarine site ~17.8km, across the Kent/Essex strait.
Foulness (Mid-Essex Coast Phase 5) Ramsar site	Coastal/estuarine site ~18.7km, across the Kent/Essex strait.
Foulness (Mid-Essex Coast Phase 5) SPA	Coastal/estuarine site ~18.7km, across the Kent/Essex strait.

Site	Location relative to the Council's administrative boundary
Thames Estuary and Marshes Ramsar site	Coastal/estuarine site ~19.2km north-west.
Thames Estuary and Marshes SPA	Coastal/estuarine site ~19.2km north-west.

3.2.4. The key data for these sites are set out in **Appendix A**. This provides a summary of the European sites within the scope, including:

- a contextual overview of each site;
- their interest features;
- their condition; and
- the current pressures and threats identified for each site³².

3.2.5. These are based on the citations, the Site Improvement Plans (SIPs), information on the condition of the underlying SSSIs, and any supplementary advice provided by Natural England³³.

CONSERVATION OBJECTIVES

3.2.6. The Conservation Objectives and Supplementary advice documents for the SACs and SPAs benchmark Favourable Conservation Status (FCS) for each feature. Guidance³⁴ from the UK Statutory Nature Conservation Bodies (SNCBs) provides a broad characterisation of FCS, stating that it “*relates to the long-term distribution and abundance of the populations of species in their natural range, and for habitats to the long-term natural distribution, structure and functions as well as the long-term survival of its typical species in their natural range. It describes a situation in which individual habitats and species are maintaining themselves at all relevant geographical scales and with good prospects to continue to do so in the future*”.

3.2.7. The conservation objectives for the sites noted above have been revised by Natural England in recent years to improve the consistency of assessment and reporting. As a result, the high-level conservation objectives for all sites are effectively the same:

³² The Natural England Site Improvement Plans (SIPs) identify ‘pressures’, which are factors that are known to be currently affecting a site, and ‘threats’ which are factors that may not be exerting a pressure at the moment but which have the potential to do so based on local site knowledge.

³³ NE has published ‘*Supplementary advice on conserving and restoring site features*’ for many of the European sites which describe in more detail the range of ecological attributes which are most likely to contribute to a site’s overall integrity and the targets each qualifying feature needs to achieve in order for the site’s conservation objectives to be met.

³⁴ JNCC (2018). *Favourable Conservation Status: UK Statutory Nature Conservation Bodies Common Statement* [online]. Available at: <https://data.jncc.gov.uk/data/b9c7f55f-ed9d-4d3c-b484-c21758cec4fe/FCS18-InterAgency-Statement.pdf>. [Accessed February 2026].

3.2.8. For SACs:

- *With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features'...), and subject to natural change; ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring [as applicable to each site];*
 - *The extent and distribution of the qualifying natural habitats;*
 - *The extent and distribution of the habitats of qualifying species;*
 - *The structure and function (including typical species) of the qualifying natural habitats;*
 - *The structure and function of the habitats of qualifying species;*
 - *The supporting processes on which the qualifying natural habitats rely;*
 - *The supporting processes on which the habitats of qualifying species rely;*
 - *The populations of qualifying species; and,*
 - *The distribution of qualifying species within the site.*

3.2.9. For SPAs:

- *With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features'...), and subject to natural change; ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:*
 - *The extent and distribution of the habitats of the qualifying features;*
 - *The structure and function of the habitats of the qualifying features;*
 - *The supporting processes on which the habitats of the qualifying features rely;*
 - *The population of each of the qualifying features; and*
 - *The distribution of the qualifying features within the site.*

3.2.10. The conservation objectives for Ramsar sites are taken to be the same as for the corresponding SACs / SPAs (where sites overlap). The conservation objectives are considered when assessing the potential effects of plans and policies on the sites. Information on the sensitivities of the interest features also informs the assessment. Links to the conservation objectives are provided in **Appendix A**.

3.2.11. As noted, Natural England has published 'Supplementary advice on conserving and restoring site features' for some European sites, which describe in more detail the range of ecological attributes which are most likely to contribute to a site's overall integrity, and the minimum targets each qualifying feature needs to achieve in order to meet the site's conservation objectives. These are considered at the screening and appropriate assessment stages, as necessary.

3.3 IN-COMBINATION PLANS AND PROJECTS

PLANS

3.3.1. The plans identified by the SA provide the basis for the assessment of in-combination effects with strategic plans and these are set out in **Appendix C**.

PROJECTS

- 3.3.2. The assessment currently takes into account the major projects listed in **Table 3-3** which have been identified by the Planning Inspectorate (PINS)³⁵ or otherwise identified within approximately 20km of the relevant European sites.

³⁵ <https://national-infrastructure-consenting.planninginspectorate.gov.uk/project-search>

Table 3-3 – Major Projects considered for potential in combination effects

Project	Summary	Status	European sites in Local Plan HRA scope potentially exposed to in-combination effects*
Manston Airport	Plans to reopen and develop Manston Airport into a dedicated air freight facility able to handle at least 10,000 air cargo movements.	Determined (2022). An appeal heard in the Court of Appeal was dismissed in May 2024.	■ Blean Complex SAC ■ Stodmarsh Ramsar site ■ Stodmarsh SAC ■ Stodmarsh SPA ■ Thanet Coast and Sandwich Bay Ramsar site ■ Thanet Coast and Sandwich Bay SPA ■ Outer Thames Estuary SPA ■ Margate and Long Sands SAC ■ Thanet Coast SAC ■ Sandwich Bay SAC Note, project HRA identified no LSE or no adverse effects for any European sites.
Sea Link	High Voltage Direct Current (HVDC) offshore cables from Suffolk to Pegwell Bay	Examination	■ Thanet Coast and Sandwich Bay Ramsar site ■ Thanet Coast and Sandwich Bay SPA ■ Outer Thames Estuary SPA ■ Margate and Long Sands SAC ■ Thanet Coast SAC ■ Sandwich Bay SAC ■ Essex Estuaries SAC ■ Foulness (Mid-Essex Coast Phase 5) Ramsar site ■ Foulness (Mid-Essex Coast Phase 5) SPA Note, project HRA identified no LSE or no adverse effects for any European sites.
Tilbury2	A new port facility acting alongside the existing Port of Tilbury. Extension of existing jetty facilities and the dredging of berth pockets in the River Thames.	Decided (2020)	■ Thames Estuary and Marshes Ramsar site ■ Thames Estuary and Marshes SPA Note, project HRA identified no adverse effects for any European sites

Project	Summary	Status	European sites in Local Plan HRA scope potentially exposed to in-combination effects*
Wheelabrator Kemsley Generating Station (K3) and Wheelabrator Kemsley North (WKN) Waste to Energy Facility	Power upgrade and increase in tonnage throughput to the existing Kemsley Generating Station (K3) to allow for generation of up to 75MW; and a new Wheelabrator Kemsley North (WKN) waste to energy facility	Decided (2021)	■ The Swale Ramsar site ■ The Swale SPA ■ Outer Thames Estuary SPA ■ Medway Estuary and Marshes Ramsar site ■ Medway Estuary and Marshes SPA ■ Thames Estuary and Marshes Ramsar site ■ Thames Estuary and Marshes SPA Note, project HRA identified no significant effects for any European sites
Lower Thames Crossing	New road crossing connecting Kent and Essex between Gravesham and East Tilbury.	Decided (2025)	■ Thames Estuary and Marshes Ramsar site ■ Thames Estuary and Marshes SPA Note, the project HRA identified no effect pathways for any other sites in the CCC LP HRA scope, including The Swale SPA/Ramsar site or the Medway Estuary and Marshes SPA/Ramsar site.
Cleve Hill Solar Park	Solar photovoltaic array, and electrical storage and connection infrastructure at Graveney Marshes, Faversham.	Decided (2020)	■ Blean Complex SAC ■ Thanet Coast and Sandwich Bay Ramsar site ■ Thanet Coast and Sandwich Bay SPA ■ The Swale Ramsar site ■ The Swale SPA ■ Outer Thames Estuary SPA Note, the project HRA identified no LSE for all sites except The Swale SPA/Ramsar site (no adverse effect for these sites concluded).

Project	Summary	Status	European sites in Local Plan HRA scope potentially exposed to in-combination effects*
Shepway Energy Park	A solar photovoltaic farm with an anticipated generating capacity circa 200 MW, together with a battery energy storage system (BESS), security perimeter fencing, ecological enhancements, below ground electrical cable connects, associated development and ancillary works.	Pre-application	■ Dungeness, Romney Marsh and Rye Bay SPA. ■ Dungeness, Romney Marsh and Rye Bay Ramsar site. Note that the Scoping Opinion received at pre-application stage agrees with the Scoping Report proposal to scope out impacts to European sites beyond 10km without mobile species due to unlikelihood of significant effects.
Stonestreet Green Solar	Solar photovoltaic array plus energy storage with associated infrastructure and grid connection, with a generating capacity greater than 50MW	Decided (2025)	■ Wye and Crundale Downs SAC. ■ Folkestone to Etchinghill Escarpment SAC. ■ Dungeness, Romney Marsh and Rye Bay Ramsar site. ■ Dungeness, Romney Marsh and Rye Bay SPA. ■ Stodmarsh SAC. ■ Stodmarsh SPA. ■ Stodmarsh Ramsar site. Note that the project HRA screened out LSE for all European sites apart from those at Stodmarsh. Adverse effects on water quality at Stodmarsh sites were ruled out following the commitments made within the project construction and operational environmental management plans.

Project	Summary	Status	European sites in Local Plan HRA scope potentially exposed to in-combination effects*
South Brookes Solar Farm	Solar electricity generating station of over 100MW comprising ground mounted solar photovoltaic modules and a BESS, supporting equipment such as inverters, transformers and switchgears, onsite substations, underground connection cabling to the National Grid, landscape and biodiversity enhancement measures, drainage and storage containers.	Pre-application	■ Dungeness, Romney Marsh and Rye Bay SPA. ■ Dungeness, Romney Marsh and Rye Bay Ramsar site.

* Note, this draws on any HRAs for these schemes that are publicly available; it is assumed that if a European site is not considered by the project-level screening then that project has 'no effect' on that site (and no possibility of in-combination effects with the Local Plan).

4 SCREENING

4.1 LOCAL PLAN SUMMARY

- 4.1.1. The Local Plan will set out the vision, objectives, planning policies and site allocations that will guide development in the local authority area to 2042/43³⁶. Together with the adopted Kent Minerals and Waste Local Plan, the South East Inshore Marine Plan (2022) and any made (adopted) Neighbourhood Plans, it will form the Development Plan for the area³⁷.
- 4.1.2. The Regulation 19 draft Local Plan is the final draft stage of preparation prior to submission for examination. It sets out the:
- Vision and Strategic Objectives;
 - preferred options in terms of the quantum of growth (housing, employment and retail development requirements) and distribution of growth (Spatial Strategy);
 - proposed sites allocations to deliver the spatial strategy and growth requirements; and
 - proposed strategic and development management policies.

DEVELOPMENT REQUIREMENTS AND SPATIAL STRATEGY

- 4.1.3. The Regulation 19 draft Local Plan sets out the following development requirements:
- a housing requirement that will deliver 1,215 houses per annum, equivalent to 23,085 dwellings between 2024 and 2043; and
 - a requirement for 123,705 sqm of employment floorspace and 4,416 sqm floorspace for comparison retail use.
- 4.1.4. The overall spatial strategy is as follows:
- Canterbury Urban Area as the principal focus for development in the district.
 - Whitstable and Herne Bay Urban Areas as the secondary focus, where development will be principally driven by the need for new infrastructure including schools and improved transport connectivity.
 - Proportionate development will be allocated at Rural Service Centres at a suitable scale which supports the function and character of the settlement.
 - A limited amount of growth will be allocated at Local Service Centres, where suitable sites are available, at a suitable scale which supports the function of the settlement.
- No residential development will be allocated in the countryside.

³⁶ The plan period formally covers 1 April 2024 to 31 March 2043, covering a 19-year plan period in total. References to 2024-2043 in this report should be taken as references to the full plan period.

³⁷ Note, HRAs for these plans have been completed (where required) by the relevant competent authorities and are accounted for as necessary by this HRA. These plans are also considered for their in-combination effects with the Local Plan.

4.1.5. To support the overall strategy for development, the Regulation 19 draft Local Plan sets out a range of policies to help guide new development across the following chapters:

- Spatial Strategy;
- Canterbury;
- Whitstable;
- Herne Bay;
- Rural Areas;
- District-wide Strategic Policies;
- Development Management Policies; and
- Carried Forward Policies.

4.1.6. These aspects could affect European sites on their own, through typical development-related mechanisms operating at the local scale in relation to specific allocations (e.g. noise, lighting, etc.; see Table 3-1) or collectively by exacerbating regional pressures (e.g. pressures on water supply or sewerage treatment).

4.2 REVIEW / INITIAL SCREENING OF PLAN COMPONENTS: POLICIES AND ALLOCATIONS

REVIEW OF POLICIES

4.2.1. When considering the likely effects of a policy, it is recognised that some policy 'types' cannot usually result in impacts on any European sites. Different guidance documents suggest various classification and referencing systems to help identify those policies that can be 'screened out' on that basis; the general characteristics of these policy types are summarised in Table 4-1.

Table 4-1 - Policy types that can usually be screened out

Broad Policy Type	Notes
General statements of policy / aspiration	The European Commission recognises* that plans or plan components that are general statements of policy or political aspirations cannot have significant effects; for example, general commitments to sustainable development. This may include policies that support development or other changes but which are too general (e.g. locations, scale, quantum etc. not specified below the geographical level of the plan) to allow any specific assessments of effects, provided that the type of development proposed is not such that significant effects would be unavoidable regardless of location etc.
General design / guidance criteria or policies that cannot lead to or trigger development	A general 'criteria based' policy expresses the tests or expectations of the plan-making body when it comes to consider proposals, or relates to design or other qualitative criteria which do not themselves lead to development (e.g. controls on building design; requirements for affordable homes; etc). However, policies with criteria relating to specific proposals or allocations should not be screened out.

Broad Policy Type	Notes
External plans / projects	Plans or projects that are proposed by other plans or permissions regimes and which are referred to in the plan being assessed for completeness (for example, Highways Agency road schemes; specific waste development proposals promoted by a County Minerals and Waste Plan; Development Consent Order (DCO) applications being advanced separately from the plan at hand); however, these would be considered as part of the plan-level 'in combination' assessment.
Environmental protection policies	Policies designed to protect the natural or built environment will not usually have significant or adverse effects (although they may often require modification if relied on to provide sufficient safeguards for other policies).
Policies which make provision for change but which could have no conceivable effect	Policies or proposals that cannot affect a European site (due to there being no impact pathways and hence no effect. For example, proposals for new cycle path several kilometres from the nearest European site; criteria for a development's appearance; etc.) or which cannot undermine the conservation objectives, either alone or in-combination, if impact pathways exist.

* European Commission (2000). Managing Natura 2000 sites: the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC

- 4.2.2. It must be noted that it is inappropriate to apply a policy classification tool (as in **Table 4-1**) to all policies of a certain type without due consideration. There will be some occasions when a policy or similar may have potentially significant effects, despite being of a type that would normally be screened out. Moreover, many policies will have a number of elements to them which may meet different criteria.
- 4.2.3. The descriptions in **Table 4-1** have been applied to a review of the policies within the Local Plan to identify the following broad policy groups:
- **'No effect'** policies: policies that will have no effect (i.e. policies that, if included as drafted, self-evidently would not have any effect on a European site due to the type of policy or its operation; for example, a policy controlling town centre shop signage or a policy setting out sustainable development criteria that developments must meet). Note that no effect policies cannot have in-combination effects.
 - **'No likely significant effect'** policies: policies where impact pathways exist but the effects will not be significant (alone or in-combination).
 - **'Likely significant effect'** policies: policies where the precise effects on European sites (either alone or in-combination) are uncertain or significant, or where measures have been incorporated into the policy to mitigate potential effects and hence require additional investigation (appropriate assessment). Note that further investigation will often demonstrate that there is no significant effect or allow the suitability of any incorporated mitigation measures to be confirmed.
- 4.2.4. Reflecting these policy groups, a colour coding system (see **Table 4-2**) has been used for the review and initial screening of the Local Plan policies in **Appendix B**.

Table 4-2 - Colour coding for screening of Local Plan policies

No LSE	No effect or no LSE – policy will not or cannot affect any European sites and can therefore be screened out (subject to a brief review of the final policy prior to adoption).
No LSE*	Policies with mitigating/moderating elements that do not have significant effects but which are relied on (at least in part) to ensure that significant or significant adverse effects from specific pathways do not occur; these are examined through appropriate assessment.
LSE/Uncertain	Policies that have potential pathways for effects that require examination through appropriate assessment. Note, this does not imply such policies will have adverse effects or even (potentially) significant effects, rather it is an assessment flag.

- 4.2.5. It should be noted that the inclusion of a policy in the yellow category does not mean that significant effects are inevitable since, in many instances, the assessments reflect uncertainties that need to be explored through further analysis (and it would be possible to undertake an appropriate assessment stage and still conclude (following a further screening) that there will be no significant effects).
- 4.2.6. The review considers the policies collectively and individually, and so takes the non-specific cross-cutting protective policies within the plan into account although cross-cutting or overarching policies are not relied on where specific mitigation for specific effects is considered necessary for the policy (this is particularly relevant for policies that provide broad or non-specific support for development but which are screened out because they do not define or direct particular developments or activities. In these instances, the plan's protective policies will form a key part of the overall decision-making process). The review also considers any internal tensions within the plan that may be relevant to HRA.
- 4.2.7. In summary, the vast majority of the planning policies contained in the Regulation 19 Draft Local Plan are categorised as 'no effect' or 'no significant effect' policies (see **Appendix B**). However, the policies relating to the overall quantum of development, and any policies with 'mitigating' elements that might be relied on to ensure adverse effects do not occur, are considered through appropriate assessment.

REVIEW OF PROPOSED SITE ALLOCATIONS

- 4.2.8. The allocation sites proposed by the Council have been reviewed to identify those which (if developed) could result in significant effects on a European site that are not obviously avoidable with the standard project-level measures that would be required to meet existing regulatory regimes. The assessment largely focuses on the identification of specific effects that might be associated with specific allocations (and which may therefore require the inclusion of allocation-specific mitigation

within the plan) rather than the broader ‘quantum of development’ effects³⁸. The risk of effects is obviously strongly dependent on how a particular development is implemented at the project stage and in most cases potential effects can be avoided using best-practice and standard scheme-level avoidance measures which do not necessarily need to be specified for each allocation.

4.2.9. In summary, with appropriate project-level measures as relevant, none of the proposed allocations will have significant effects alone due to their small size, the habitats affected, the absence of impact pathways, and their distance from the nearest European sites, with the possible exception of the following:

- The following allocations are within 500m of a European site:
 - Policy R6 Bread and Cheese Field allocates approximately 150 new dwellings within 165m of the Stodmarsh SAC, SPA and Ramsar site at its closest point.
 - Policy R7 Land at Hersden allocates approximately 18 new dwellings approximately 505m from the Stodmarsh SAC, SPA and Ramsar site at its closest point.
 - Policy HB4 Land at Beacon Road allocates approximately 20 new dwellings within approximately 260m of Thanet Coast & Sandwich Bay SPA and Ramsar site and 312m of Outer Thames Estuary SPA at its closest point.
 - W11 St Vincent's Centre allocates approximately 10 new dwellings within approximately 470m of Tankerton Slopes and Swalecliffe SAC at its closest point.
- Allocations that may affect ‘functionally linked land’ (FLL).
- Sites with air quality impacts.
- Sites with water quality impacts.

4.3 REVIEW / SCREENING OF EUROPEAN SITES

4.3.1. European sites or interest features within a study area can often be excluded from further assessment at an early stage in the assessment process (‘screened out’) because the plan or project will self-evidently have either no effect or no significant effect on these sites (i.e. the interest features are not sensitive to the environmental changes associated with the plan or project or will not be exposed to those changes due to the absence of any reasonable impact pathways) or, if both exposed and sensitive, the effects of the environmental changes will clearly be inconsequential to the achievement of the conservation objectives.

4.3.2. The following sections provide a brief summary of the screening of the European sites and their interest features based on the baseline data summarised in Section 3 and the policies and proposals of the Regulation 19 Draft Local Plan. It should be noted that this aspect of the screening process is a ‘low bar’ with sites, aspects or features only screened out if they will self-evidently be

³⁸ Effects due to the overall quantum of development are essentially a within-plan in-combination effect and are considered in relation to specific European sites in Section 4.3.

unaffected by the Local Plan (i.e. it is aiming to identify those aspects that will clearly have no effect or no significant effect (alone or in-combination) due to an absence of impact pathways). It does not attempt a detailed quantification if significant effects via a particular pathway cannot be simply or self-evidently excluded (this is completed at the appropriate assessment stage, where required, when mitigation is also accounted for).

- 4.3.3. When screening, it is appropriate to assume that all relevant lower-tier consents and permissions (etc.) will be correctly assessed and controlled, and that any activities directly or indirectly supported by the Local Plan will adhere to the relevant legislative and regulatory requirements and all normal best-practice (e.g. it would be inappropriate to assume that normal controls on, for example, the installation of a new discharge to a watercourse would not be correctly followed). The screening also recognises that there are some aspects over which the Local Plan will have no control (e.g. agricultural practices).

RECREATIONAL PRESSURE

- 4.3.4. Many European sites will be vulnerable to some degree of impact as a result of recreational pressure, although the effects of recreational pressure are complex and very much dependent on the specific conditions and interest features at each site. For example, some bird species are more sensitive to disturbance associated with walkers or dogs than others; some habitats will be more sensitive to trampling or mechanical disturbance than others; some sites will be more accessible than others.
- 4.3.5. The most typical mechanisms for recreational effects are through direct damage of habitats or disturbance of certain species. Damage will most often be accidental or incidental, but many sites are particularly sensitive to soil or habitat erosion caused by recreational activities and require careful management to minimise any effects (for example, through provision and maintenance of 'hard paths' (boardwalks, stone slabs etc.) and signage to minimise soil erosion along path margins).
- 4.3.6. Disturbance of species due to recreational activities can also be a significant problem at some sites, although the relationship (again) is highly variable and depends on a range of factors including the species, the time of year and the scale, type and predictability of disturbance. Most studies have focused on the effects on birds, either when breeding or foraging. For example, a long-term monitoring project by Natural England on the Thanet Coast has found that turnstones *Arenaria interpres* (a shoreline-feeding waterbird) are particularly vulnerable to disturbance from dogs, which interrupts their feeding behaviour and can prevent them from gaining sufficient body fat for overwintering or migration. Finney *et al.* (2005)³⁹, meanwhile, noted that re-surfacing the Pennine Way significantly reduced the impact of recreational disturbance on the distribution of breeding golden plover *Pluvialis apricaria*, by encouraging walkers to remain on the footpath.
- 4.3.7. In contrast, some species are largely unaffected by human disturbance (or even benefit from it) which can result in local or regional changes in the composition of the fauna. The scale, type and

³⁹ Finney, S. K., Pearce-Higgins, J. W. and Yalden, D. W. (2005) The effect of recreational disturbance on an upland breeding bird, the golden plover *Pluvialis apricaria*. *Biological Conservation* 121 (1): 53-63.

predictability of disturbance is also important; species can become habituated to some disturbance (e.g. noise), particularly if it is regular or continuous. Unpredictable disturbance is most problematic.

- 4.3.8. Most recreational activities with the potential to affect European sites are casual and pursued opportunistically (e.g. walking, walking dogs, riding) rather than structured (e.g. organised group activities or trips to specific discrete attractions), which means that it can be difficult to quantify or predict either the uptake or the impacts of these activities on European sites and (ultimately) harder to control or manage effects. It also means that it is difficult to explore in detail all of the potential aspects of visitor pressure at the strategy level. However, it is possible for plans and strategies to influence recreational use of European sites through the planning process, for example by increasing the amount of green space required within or near developments if potentially vulnerable European sites are located nearby.
- 4.3.9. Attempts to predict the effects of increased recreation on European sites that may be associated with development or allocations derived from strategic plans typically aim to identify the distance within which a certain percentage of visits originate. These are then used to identify 'buffer zones' or 'zones of influence' within which new development would be considered likely to have significant effects on a site.
- 4.3.10. However, it is important to note that there is no standard method for defining the zone of influence and a range of approaches have been adopted for different sites. For example, in a study for the Council, Fearnley *et al.* (2014)⁴⁰ suggested several possible options for a zone of influence around the Thanet Coast SAC, on which mitigation proposals could be based. These ranged from 4.9km (the distance within which 75% of all 'regular visitors'⁴¹ live) to 7.2km (the distance within which 90% of all 'regular visitors' live), to 9.8km (the distance within which 75% of all visitors live). Indeed, Fearnley *et al.* (2014)³⁶ note that "*The identification of a 'zone of influence' is really an exercise in identifying a boundary which seems pragmatic, representative of visitor patterns to the site, the physical features of the site, infrastructure, current housing distribution and the nature of the surrounding area*". The South-East Devon European Site Mitigation Strategy (Liley *et al.*, 2014)⁴² identifies several alternative approaches for determining the zone of influence around the Exe Estuary SPA (and hence the appropriate area for seeking developer contributions towards mitigation). These ranged from 7.8km from the SPA boundary to 14.3km, with a distance of 10km ultimately selected for the purposes of seeking developer contributions.
- 4.3.11. Probably the most common metric now used for buffer zones or zones of influence is the distance within which approximately 75% of visitors live. This is obviously strongly influenced by the location of the nearest large population centres (i.e. sites that are further from population centres will inevitably have larger 75% distances) but based on various surveys over recent years, the distance

⁴⁰ Fearnley, J., Liley, D. and Floyd, L. (2014). Thanet Coast and Sandwich Bay SPA Visitor Survey. Unpublished report for Canterbury City council.

⁴¹ People visiting at least once a week.

⁴² Liley, D., Hosking, R., Lake, S., Underhill-Day, J. and Cruickshanks, K. (2014). South-East Devon European Site Mitigation Strategy. Footprint Ecology.

within which 75% of visitors live is typically less than 7km (although coastal sites are often more attractive with larger distances). Some visitor surveys (particularly for sites that are regional attractions, hence likely to attract occasional visitors travelling relatively far) use the area within which 90% of 'regular visitors' (i.e. once a week or more) live; this results in smaller zones of influence (vs the 75% metric) that reflect the relatively greater impact of these users.

- 4.3.12. Visitor surveys have been previously undertaken for some sites within the scope, which provide a reasonable and robust basis for identifying locations within which residential development might result in significant effects alone or in combination.

Table 4-3 - Summary of European site screening in relation to recreational pressure

Site	Notes	Screen in?
Blean Complex SAC	Site is within district and within 7km of a number of the allocations.	Yes
Stodmarsh SAC	Visitor pressure / recreation is not identified as a pressure or threat in the Site Improvement Plan, nor within the supplementary advice on conservation objectives for the site. The wetland nature of the site and limited access ensures visitor pressure is appropriately controlled and managed. Increasing the population of Canterbury is likely to increase the number of visitors to this site, but the managed nature of access (including to the RSPB reserve) will ensure that this does not undermine the conservation objectives for the site. Considered in relation to specific allocations.	Yes
Stodmarsh SPA	As for Stodmarsh SAC	Yes
Stodmarsh Ramsar site	As for Stodmarsh SAC	Yes
Tankerton Slopes and Swalecliffe SAC	No Site Improvement Plan is available for this site, although it is noted within the supplementary advice on conservation objectives parts of the site are popular with dog walkers. The site is within the district and therefore may be subject to increased recreational disturbance because of the allocated sites.	Yes
Thanet Coast and Sandwich Bay SPA	The Thanet Coast "Strategic Access Management and Monitoring Plan" (SAMM) ⁴³ sets the ZOI for the Thanet section of the Thanet Coast and Sandwich Bay SPA at 7.2km, which covers 30 of the allocated sites.	Yes
Thanet Coast and Sandwich Bay Ramsar site	As per the Thanet Coast and Sandwich Bay SPA; the Zone of Influence (ZOI) for this site overlaps with the Council area.	Yes

⁴³ Available at: <https://www.thanet.gov.uk/wp-content/uploads/2018/03/Thanet-DC-SAMM-MAIN-REPORT-Final-21st-April-2016.pdf>

Site	Notes	Screen in?
The Swale SPA	The North Kent SAMM ⁴⁴ sets the ZOI for The Swale SPA, Medway Estuary and Marshes SPA and Thames Estuary and Marshes SPA at 6km. The ZOI for The Swale SPA covers 12 allocated sites.	Yes
The Swale Ramsar site	As per The Swale SPA.	Yes
Outer Thames Estuary SPA	The site is partly located within the district boundary at Whitstable Harbour. The Site Improvement Plan does not identify recreation as a pressure or a threat. While the supplementary advice on conservation objectives notes that the interest features (red throated diver <i>Gavia stellata</i> , common tern <i>Sterna hirundo</i> and little tern <i>Sternula albifrons</i>) are sensitive to disturbance caused by human activity, the noted drivers are not those associated with public recreation but rather industry (e.g. commercial fishing, shipping lanes, offshore windfarms etc). A breeding tern colony is noted at Scroby Sands sandbank within the designated site, but this is located in Norfolk, far outside of the district boundary. As such, notable disturbance impacts from increases to the local population on the interest features are very unlikely.	No
Wye and Crundale Downs SAC	Although much of the site is 'access land' recreation is not identified as a pressure or threat for this site in the SIP. There is no public parking close to the site and the closest allocations in the Council area are over 6km away. Potentially notable increases in visitor numbers as a result of the Council plan are very unlikely and significant effects (alone or in-combination) will not therefore occur.	No
Margate and Long Sands SAC	Recreation is not identified as a pressure or a threat for this site within the SIP. This marine SAC is approximately 1.1km offshore from the northern coast of the Council area and is designated for its sub-tidal sandbanks. Supplementary advice on conservation objectives for the site does not reference issues relating to public recreation and instead confirms that current survey evidence suggests the interest feature is in a 'good condition and/or currently unimpacted by anthropogenic activities'. As such, the site will not be exposed or sensitive to the likely effects of the allocated sites (no effects likely and so no potential for in-combination effects to occur).	No

⁴⁴ Available at: <https://northkent.birdwise.org.uk/about/>

Site	Notes	Screen in?
Parkgate Down SAC	There is no public access to this site and visitor pressure is not identified as a pressure or threat for this site in the SIP. Furthermore, there is no public parking close to the site making it undesirable as a recreational destination. There is one allocation (R15) located approximately 5.1km from the SAC, for 20 new dwellings, the rest are over 6km away. Potentially notable increases in visitor numbers as a result of the Council plan are very unlikely and significant effects (alone or in-combination) will not therefore occur.	No
Thanet Coast SAC	As per the Thanet Coast and Sandwich Bay SPA, the ZoI for this site overlaps with the Council area. The supplementary advice on conservation objectives confirms that the features of the site (reefs and submerged caves) are 'in a good condition and/or currently unimpacted by anthropogenic activities'. However, public access and disturbance is noted as a pressure in the North East Kent (Thanet) SIP for reef habitats, and increased population within the district associated with the allocated sites may result in damage from increased water sports and similar activities.	Yes
Lydden and Temple Ewell Downs SAC	Visitor pressure (notably dog-walking) is identified as a threat in the SIP. However, visitor surveys undertaken for the Dover District Local Plan in 2021 ⁴⁵ identified that 75% of visitors from home originated within 3km of the site; the closest allocation in the Council area is R22 – Barham Layby which is allocated for a Heavy Goods Vehicle (HGV) rest area and therefore unlikely to generate any recreational access to the SAC. The remaining allocations are all over 6km away. Potentially notable increases in visitor numbers as a result of the Council plan are very unlikely and significant effects (alone or in-combination) will not therefore occur.	No
Sandwich Bay SAC	The Dover District Council SAMM for the Thanet Coast and Sandwich Bay SPA ⁴⁶ sets the ZoI for the Thanet Coast and Sandwich Bay SPA and Sandwich Bay SAC at 9km from the entrance to the Sandwich Bay estate; this ZoI does not overlap with the Council area. The closest allocated site is approximately 11km away (R14). Potentially notable increases in visitor numbers as a result of the Council plan are very unlikely and significant effects (alone or in-combination) will not therefore occur.	No

⁴⁵ Blackwood Bayne Ltd (2021), Final Visitor Surveys: Lydden Temple Ewell SAC and Dover to Kingsdown Cliffs SAC July – August 2021. Available at: <https://www.doverdistrictlocalplan.co.uk/uploads/Submission-Documents/NEEB05-Lydden-Temple-Ewell-SAC-and-Dover-to-Kingsdown-Cliffs-SAC-Visitor-surveys.PDF>

available at: <https://moderngov.dover.gov.uk/documents/s48939/Appendix%20-%20Habitat%20Regulations%20Assessment.pdf>

⁴⁶ Available at: <https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/thanet-coast-and-sandwich-bay-spa-samm-evidence-report-sept-2022.pdf>

Site	Notes	Screen in?
Folkestone to Etchinghill Escarpment SAC	Much of the site is 'access land', but visitor pressure is not identified as a pressure or threat for this site in the SIP, although recent work for Dover District Local Plan has indicated that this may be affecting the site. No specific Zol is available for this site, although visitor surveys for Lydden and Temple Ewell Downs SAC, which shares similar interest features to this designated site, identified 75% of all visitors originating from within 3km of the site. The closest allocation in the Council area is 9.9km away (R22) and the closest housing allocation over 10km away (R15), with all remaining allocations over 13km away. Potentially notable increases in visitor numbers as a result of the Council plan are very unlikely and significant effects (alone or in-combination) will not therefore occur.	No
Dover to Kingsdown Cliffs SAC	Visitor pressure is not identified as a pressure or threat for this site in the SIP although recent work for Dover District Local Plan has indicated that this may be affecting the site. The SAC is predominantly managed by the National Trust who have committed to an extensive programme of on-site visitor management and access control measures to minimise impacts. Visitor surveys undertaken for the Dover District Local Plan in 2021 ⁴⁷ suggest a potentially substantial Zol for this site (up to 61.08km for 75% of all visitors) although this reflects the nature of the White Cliffs as a regional attraction; the '90% of regular visitors' metric is up to 15.98km, depending on location. The closest Council allocation to the site is the HGV layby (R22) approximately 11.9km away with the closest housing allocation a small (20 dwellings) site at Barham (R15) approximately 14.5km from the site. A second small (10 dwellings) allocation (R14) is approximately 15.5km from the SAC. All other allocations are over 16km away. Consequently, potentially notable increases in visitor numbers as a result of the Council plan are very unlikely and significant effects (alone or in-combination) will not therefore occur.	No
Dungeness, Romney Marsh and Rye Bay SPA	The closest areas of this site are the offshore areas designated for the foraging habitat that they provide for terns breeding on the shingle of the Dungeness peninsula; these areas will not be sensitive to recreational pressure. The closest terrestrial areas of the site are over 15km from the Council's administrative boundary (and over 20km from the nearest residential allocations). Potentially notable increases in visitor numbers as a result of the Council plan are very unlikely and significant effects (alone or in-combination) will not therefore occur.	No

⁴⁷ Reported in: LUC (2022). Dover District Local Plan (Reg 19) Habitats Regulations Assessment. Report for Dover District Council; available at: <https://moderngov.dover.gov.uk/documents/s48939/Appendix%20-%20Habitat%20Regulations%20Assessment.pdf>

Site	Notes	Screen in?
Medway Estuary and Marshes SPA	The North Kent SAMM ⁴⁸ sets the Zol for The Swale SPA, Medway Estuary and Marshes SPA and Thames Estuary and Marshes SPA at 6km. The Zol for this site does not overlap the Council area.	No
Medway Estuary and Marshes Ramsar site	As per Medway Estuary and Marshes SPA; the Zol for this site does not overlap with the Council area.	No
Dungeness, Romney Marsh and Rye Bay Ramsar site	As for Dungeness, Romney Marsh and Rye Bay SPA.	No
Foulness (Mid-Essex Coast Phase 5) SPA	The Essex Coast <i>Recreational disturbance Avoidance and Mitigation Strategy</i> (RAMS) ⁴⁹ defines different Zols for the SPAs associated with the Essex estuaries. The Zol for Foulness (Mid-Essex Coast Phase 5) SPA is 13km and does not overlap with the Council area (and in reality travel distance would be substantially greater to the Essex sites from the Council area, and the Essex Coast RAMS is not applied to LPAs south of the Thames).	No
Essex Estuaries SAC	As per Foulness (Mid-Essex Coast Phase 5) SPA; the Zol for this site does not overlap with the Council area.	No
Foulness (Mid-Essex Coast Phase 5) Ramsar site	As per Foulness (Mid-Essex Coast Phase 5) SPA; the Zol for this site does not overlap with the Council area.	No
Thames Estuary and Marshes SPA	As per Medway Estuary and Marshes SPA; the Zol for this site does not overlap with the Council area. Note that the Essex Coast RAMS ⁵⁰ sets the Zol for the Essex units of this site at 8.1km, although this is not applied to LPAs south of the Thames).	No
Thames Estuary and Marshes Ramsar site	As per Thames Estuary and Marshes SPA; the Zol for this site does not overlap with the Council area.	No

URBANISATION

- 4.3.13. Urbanisation is generally used as a collective term covering a suite of often disparate risks and impacts that occur due to increases in human populations near protected sites with effects more likely to occur the closer a development is. Typically, this would include aspects such as fly-tipping

⁴⁸ Available at: <https://northkent.birdwise.org.uk/about/>

⁴⁹ Available at: <https://www.chelmsford.gov.uk/media/uj2nfqpl/essex-coast-rams-habitats-regulations-assessment-strategy-document-2018-2038.pdf>

⁵⁰ Available at: <https://www.chelmsford.gov.uk/media/uj2nfqpl/essex-coast-rams-habitats-regulations-assessment-strategy-document-2018-2038.pdf>

or vandalism, although the effects of these aspects again depend on the interest features of the sites. For example, predation of some species by cats is known to be sizeable (Woods et al., 2003)⁵¹ and can be potentially significant for some European sites. These effects are considered separately to recreational pressure (discussed above) where people are more willing to travel greater distances.

- 4.3.14. Where sensitive sites are involved, development buffers of around 400m are typically used to minimise the effects of urbanisation. For example, Natural England has identified a 400m zone around the Chichester and Langstone Harbours SPA within which housing development should not be located due to the potential effects of urbanisation (particularly, the risk of chick predation by cats, which cannot be mitigated). Similarly, LPAs near the Thames Basin Heaths SPA have adopted a 400m zone around the SPA boundary where there is a presumption against new residential development as the impact on the SPA is considered likely to be adverse. For screening purposes, therefore, it is assumed that proximate urbanisation effects will not occur over 500m from a site.
- 4.3.15. It should be noted that bird species at European sites are particularly sensitive due to their breeding behaviours; the qualifying features of other sites may have a substantially lower exposure to potential effects due to their behavioural characteristics.
- 4.3.16. Four allocations are located within 500m of a European site:
 - Policy R6 Bread and Cheese Field allocates approximately 150 new dwellings within 165m of the Stodmarsh SAC, SPA and Ramsar site at its closest point.
 - Policy R7 Land at Hersden allocates approximately 18 new dwellings approximately 505m from the Stodmarsh SAC, SPA and Ramsar site at its closest point.
 - Policy HB4 Land at Beacon Road allocates approximately 20 new dwellings within approximately 260m of Thanet Coast & Sandwich Bay SPA and Ramsar site and 312m of Outer Thames Estuary SPA at its closest point.
 - Policy W11 St Vincent's Centre allocates approximately 10 new dwellings within approximately 470m of Tankerton Slopes and Swalecliffe SAC at its closest point.
- 4.3.17. The Outer Thames Estuary SPA is an offshore designation and therefore the interest features are not considered likely to experience effects of urbanisation. However, Stodmarsh SAC, SPA and Ramsar site, Thanet Coast & Sandwich Bay SPA and Ramsar site and the Swale SPA and Ramsar site are considered sensitive to urbanisation as a result of their interest features and the sites are therefore considered further.
- 4.3.18. There will be no significant effects of urbanisation, alone or in-combination, for any other European sites.

⁵¹ Woods, M., McDonald, R.A. and Harris, S. (2003). Predation of wildlife by domestic cats *Felis catus* in Great Britain. Mammal Review 33(2): 174-188

ATMOSPHERIC POLLUTION

- 4.3.19. A number of pollutants have a negative effect on air quality; however, the most significant and relevant to habitats and species (particularly plant species) are the primary pollutants nitrogen oxides (NO_x, mainly from vehicles), nitrogen (N) deposition and ammonia (NH₃, principally from agriculture, although catalytic converters are a significant source), which (together with secondary aerosol pollutants⁵²) are deposited as wet or dry deposits. These pollutants affect habitats and species mainly through acidification and eutrophication.
- 4.3.20. Acidification increases the acidity of soils, which can directly affect some organisms and which also promotes leaching of some important base chemicals (e.g. calcium), and mobilisation and uptake by plants of toxins (especially metals such as aluminium).
- 4.3.21. NO_x may directly enter a plant via the stomata (as NO or NO₂), where it can have phytotoxic effects. Lower plants such as lichens and bryophytes are particularly vulnerable to direct damage from NO_x concentrations, as they often receive the majority of their nitrogen inputs directly from the atmosphere; many of such species are adapted to living in low-nutrient habitats with no soil, such as on rocks or trees. NO_x can also deposit onto soil and, following transformation, enrich the soil as a nitrate, leading to eutrophication.
- 4.3.22. Air pollution contributes to eutrophication within ecosystems by increasing the amounts of available nitrogen (N)⁵³. This is a particular problem in low-nutrient habitats, where available nitrogen is frequently the limiting factor on plant growth, and results in slow-growing low-nutrient species being out-competed by faster growing species that can take advantage of the increased amounts of available N.
- 4.3.23. The negative effects of NH₃ on vegetation occur through direct damage and death of sensitive species, an increase in vulnerabilities to environmental conditions (drought, desiccation and frost) or pest and pathogen attack, and reduced root growth and mycorrhizal infection leading to reduced nutrient uptake. Ammonia can put under-storey species at risk (such as mosses and lichens) through shading from the increases in dominant over-storey nitrophiles. This is compounded as nitrogen enrichment favours fast growing, taller species with rapid N assimilation rates leading to changes in species assemblages to favour N loving species.
- 4.3.24. Overall, in the UK, there has been a significant decline in NO_x emissions in recent years and a consequential decrease in acid deposition. In England, NO_x has declined by 72% since 1970 (Defra, 2018) which is the result of a switch from coal to gas, nuclear and renewables for energy generation, and increased efficiency and emissions standards for cars. These emissions are generally expected to decline further in future years. In contrast, emissions of ammonia have remained largely

⁵² Secondary pollutants are not emitted, but are formed following further reactions in the atmosphere; for example, SO₂ and NO_x are oxidised to form SO₄²⁻ and NO₂⁻ compounds; ozone is formed by the reaction of other pollutants (e.g. NO_x or volatile organic compounds) with UV light; ammonia reacts with SO₄²⁻ and NO₂⁻ to form ammonium (NH₄⁺).

⁵³ Nitrogen that is in a form that can be absorbed and used by plants.

unchanged; they have declined by 10% in England since 1980 (Defra, 2018), but since 2008 have started to increase slightly.

- 4.3.25. The effect of NO_x decreases on ecosystems has been marked, particularly in respect of acidification. The key contributor to acidification is now thought to be deposited nitrogen, for which the major source (ammonia emissions) has not decreased significantly. Indeed, eutrophication from N-deposition (again, primarily from ammonia) is now considered the most significant air quality issue for many habitats.
- 4.3.26. In practice, the principal source of air pollution associated with the Local Plan will be related to changing patterns of vehicle use (including both changes in traffic distribution along roads and potential rises in traffic flows) due to the promotion of new development (since the Local Plan does not provide for any new significant point-sources).
- 4.3.27. Published guidance from Natural England⁵⁴ and the National Highways (formerly known as Highways England) Design Manual for Roads and Bridges (DMRB)⁵⁵ sets out an approach to determine the likelihood of potential significant effects of emissions from road schemes on designated sites. Potential significant effects requiring further quantitative assessment may arise where a European site (with relevant qualifying features/habitats sensitive to air pollution) is present within 200m of an affected road and the predicted change in annual average daily traffic (AADT) movements is over 1,000 trips, both alone and in-combination with other plans and projects (as per recent case law⁵⁶). Where there are no qualifying features sensitive to air quality within 200m of an affected road, or where the qualifying features are located at distances greater than 200m, it can be assumed that the contribution of vehicle emissions to local pollutant levels is unlikely to have a significant effect on European sites, and further assessment is not required.
- 4.3.28. Environment Agency (EA) guidance (EA, 2007) also states that “*Where the concentration within the emission footprint in any part of the European site(s) is less than 1% of the relevant long-term benchmark (EAL, Critical Level or Critical Load), the emission is not likely to have a significant effect alone or in combination irrespective of the background levels*”.
- 4.3.29. The CCC Regulation 18 HRA Screening Assessment identified all European sites and their component SSSIs within a 20km ZoI from CCC’s administrative boundary. Based on a review of the CCC Regulation 18 HRA report and traffic data, the following sites were screened in for the Regulation 19 air quality assessment: Blean Complex SAC, Stodmarsh SPA and Stodmarsh Ramsar site (along with their component SSSIs).
- 4.3.30. It should be noted that Stodmarsh SPA and Ramsar site were initially screened out at Regulation 18 as the proximate roads were not anticipated to experience a significant increase in traffic due to the

⁵⁴ Natural England, 2018, Natural England’s approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations

⁵⁵ National Highways (2025). Design Manual for Roads and Bridges (DMRB). Available at: <https://www.standardsforhighways.co.uk/tses/attachments/10191621-07df-44a3-892e-c1d5c7a28d90>

⁵⁶ Wealden District Council v. Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority [2017] EWHC 351.

Local Plan. However, during the review of the traffic data provided at Regulation 19 Draft Local Plan, the Stodmarsh SPA and Ramsar site were screened in given their proximity to roads where traffic changes associated with the Local Plan exceed 1,000AADT, either alone or in-combination. The Stodmarsh SAC remained screened out because the contribution of air pollutants to nutrient nitrogen on the habitat (rivers and streams) supporting the site's interest feature (Desmoulin's whorl snail) is imperceptible compared to the contribution from run off of agricultural soil, and no Critical Levels (CLEs) are defined for this habitat type. Therefore, despite the change in traffic flows of more than 1,000AADT within 200m of the site, further assessment was not required.

- 4.3.31. Furthermore, Lydden and Temple Ewell Downs SAC and Dover to Kingsdown Cliffs SAC had been screened in at Regulation 18 as major roads were located within 200m of sensitive features within these ecological sites. However, the Air Quality Assessments (Bureau Veritas, 2021⁵⁷; 2024⁵⁸), completed for the Dover Local Plan HRA found that significant effects at these habitat sites could be ruled out for NO_x, NH₃ and N deposition. Since the Dover Local Plan considered in-combination impacts associated with neighbouring local councils including the Council, it is unlikely that the Council Local Plan will result in a significant effect at Lydden and Temple Ewell Downs SAC and Dover to Kingsdown Cliffs SAC. Given that a detailed road traffic network was not available for Dover, the above assessment conclusions will not be revisited.
- 4.3.32. A separate Air Quality addendum report has been produced for the Regulation 19 Draft Local Plan which details the assessments undertaken and provides full detail on the screening and subsequent assessments. See **Appendix F**.

WATER RESOURCES

- 4.3.33. The exploitation and management of water resources is connected to a range of activities, most of which are not directly controlled or influenced by the Local Plan, for example, agriculture, flood defence, recreation, power generation, fisheries and nature conservation. Much of the water supply to water-resource sensitive European sites is managed through specific consenting regimes that are independent of the Local Plan.
- 4.3.34. Notwithstanding this, development supported or managed by the Local Plan is likely to increase demand for water, which could indirectly affect some European sites within the study area. Potable water in the Council area is supplied primarily by South East Water and Southern Water with a small area by Affinity Water. The broad characteristics of the supply areas (defined as Water Resource Zones (WRZ)) that coincide with the Council are summarised in **Table 4.3**.

Table 4-3 – CCC Water Resource Zones

⁵⁷ Bureau Veritas (2021) Dover district Council, Local Plan Air Quality Impacts Dispersion Modelling Assessment

⁵⁸ Bureau Veritas (2024) Dover District Council Local Plan Air Quality Impacts Dispersion Modelling Assessment - Ammonia

Supplier	WRZ	Summary
Southern Water	Eastern Area WRZ	Most of its supply from groundwater (75%) with the remainder from the River Medway, River Stour or pipeline transfer from the Kent Medway WRZ.
South East Water	WRZ8 (Ashford)	The zone is comprised of groundwater (various boreholes) and bulk transfers (from Southern Water).
Affinity Water	WRZ7 (Dour)	Abstracting of 90% of water supply from Chalk boreholes.

- 4.3.35. However, the supply network is complex and so direct and specific supply relationships cannot necessarily be made; it is rarely possible or appropriate to identify a particular 'source' for water supply to a specific area. Consequently, direct effects on specific European sites as a result of development within the Council area cannot necessarily be identified or quantified.
- 4.3.36. More importantly, the water resources planning process helps to ensure that growth in water demand does not affect European sites. The Water Industry Act 1991, as amended by the Water Act 2003 and Water Act 2014, requires that all water companies must publish a Water Resources Management Plan (WRMP) that sets out their strategy for managing water resources across their supply areas over the next 25 years and beyond. WRMPs use calculations of Deployable Output (DO) to establish supply/demand balances; this enables water companies to identify those WRZs with potential supply deficits over the planning period⁵⁹. The calculations account for any reductions in abstraction that are required to safeguard European sites⁶⁰ and so the WRMP process (with other regulations) helps ensure (as far as is achievable) that future changes in demand will not affect any European sites⁶¹.

⁵⁹ Forecasts are completed in accordance with the Water Resources Planning Guidelines (published by the Environment Agency) and take into account (inter alia) economic factors (economic growth, metering, pricing), behavioural factors (patterns of water use), demographic factors (population growth, inward and outward migration, changes in occupancy rate), planning policy (LPA land use plans), company policies (e.g. on leakage control and water efficiency measures) and environmental factors, including climate change. The WRMP therefore accounts for these demand forecasts based on historical trends, an established growth forecast model and through review of local and regional planning documents.

⁶⁰ For example, sustainability reductions required by the Review of Consents (RoC) or the Environment Agency's Restoring Sustainable Abstractions (RSA) programme. It should be noted that, under the WRMP process, the RoC changes (and non- changes to licences) are considered to be valid over the planning period. This means that the WRMP (and its underlying assumptions regarding the availability of water and sustainability of existing consents) is compliant with the RoC and so the WRMP can only affect European sites through any new resource and production-side options it advocates to resolves deficits, and not through the existing permissions regime.

⁶¹ Calculations of DO include for Target Headroom (precautionary 'over-capacity' in available water) to buffer any unforeseen variation in predicted future demand; the WRMP is also reviewed on a five-yearly cycle to ensure it is performing as expected and to account for any variations between predicted and actual demand.

- 4.3.37. South East Water, Southern Water and Affinity Water all published updated WRMPs in 2024 to set out their strategies for managing water supply areas over the next 25 years and beyond. The 2024 WRMPs were subject to HRA which concluded, at the plan level, that they would have no adverse effects on any European sites, including those water-resource sensitive sites and features within the Local Plan HRA study area. Within the South East Water WRMP there is uncertainty regarding option CTR-22 (Canterbury to Maidstone new company transfer) for which the design at the time of assessment would result in habitat loss to the Blean Complex SAC within the study area. This option if taken forward would require project level HRA to include necessary mitigation and/or compensation to meet regulatory requirements. It is noted that this option, if required, would be selected in 2039, towards the end of the lifecycle of the Draft Canterbury District Local Plan. Therefore, there is sufficient time and several Local Plan review cycles and WRMP cycles to allow for the design of this option to be reconsidered to avoid direct effects on the Blean Complex SAC. Additional options within these three WRMPs also feature residual uncertainties regarding detailed design elements that cannot be resolved at strategy level but would be subject to detailed project-specific HRA if taken forward.
- 4.3.38. The WRMPs provide the best estimate of future water resource demand, and therefore it is reasonable to assume that the growth predicted within the Local Plan can be accommodated without significant effects on any European sites due to PWS abstractions. Furthermore, since the WRMPs explicitly account for the growth predicted by the Council and other LPAs⁶², in-combination effects between the Local Plan and the WRMP on water resources will not occur. As it is not possible to identify specific effects on specific sites that are directly related to growth supported by the Local Plan (due to the integrated nature of the water network), the screening conclusion is not completed on a site-by-site basis.

WATER QUALITY

- 4.3.39. The majority of the Council area is in the River Stour catchment. The River Stour flows past (and is hydrologically linked to) Stodmarsh SAC, SPA and Ramsar site, and discharges to Sandwich Bay via the Sandwich Bay SAC and the Thanet Coast and Sandwich Bay SPA and Ramsar site. Minor watercourses on the north coast discharge to the Thanet Coast and Sandwich Bay SPA and Ramsar site and the Outer Thames Estuary SPA. A small area in the north west of the Council area drains to The Swale SPA and Ramsar site at Whitstable. These are the only sites potentially exposed to water quality changes as a result of the Local Plan.

⁶² Defra/ EA guidance on WRMPs requires that forecast population and property figures be based, wherever possible, upon plans published by local authorities (including 'adopted', 'emergent', 'consultation' and 'draft' local plans).

- 4.3.40. None of these sites, with the exception of Stodmarsh SAC, SPA and Ramsar site, have been identified as sites that are in unfavourable condition due to excessive nutrients (such that nutrient neutrality is being deployed or considered as mitigation) in recent NE advice to LPAs⁶³.
- 4.3.41. Most waterbodies and watercourses in the LPA area are affected to some extent by point or diffuse sources of pollutants, notably nitrates and phosphates from agriculture. Point sources are usually discrete discharge points, such as WTW outfalls, which are generally managed through specific consenting regimes that are independent of the Local Plan. Diffuse pollution is derived from a range of sources (e.g. agricultural run-off; road run-off) that cannot always be easily traced or quantified.
- 4.3.42. Development promoted or supported by the Local Plan is likely to increase demand on WTW and potentially increase non-agricultural run-off.
- 4.3.43. Sewerage and wastewater treatment for the Council area is provided by Southern Water. Wastewater from the Council area is treated at seven WTW:
- Canterbury (Sturry) WTW (Stour catchment);
 - Chartham WTW (Stour catchment);
 - Dambridge WTW (Stour catchment);
 - Herne Bay WTW (Thanet coast);
 - Newnham Valley Preston WTW (Stour catchment);
 - Swalecliffe WTW (Thanet coast); and
 - Westbere WTW (Stour catchment).
- 4.3.44. Drainage and Wastewater Management Plans (DWMP) set out how water companies intend to extend, improve and maintain a robust and resilient drainage and wastewater system. They take a long-term view, setting out a planning period that is appropriate to the risks, covering a period of at least 2025 to 2050. Southern Water has published its DWMP⁶⁴ setting out proposals to address identified drainage and wastewater risks in the area⁶⁵.
- 4.3.45. As with the WRMP, the DWMP modelling takes account of growth predicted by the Council and other LPAs. The DWMP indicates that:
- growth in the Council will increase the risk of non-compliance with Dry Weather Flow permits for the WwTWs at Canterbury, Herne Bay and Newnham Valley Preston; and

⁶³ Letter from Natural England to LPA Chief Executives and Heads of Planning, 16 March 2022; Re. Advice for development proposals with the potential to affect water quality resulting in adverse nutrient impacts on habitats sites.

⁶⁴ Available at: <https://www.southernwater.co.uk/dwmp>

⁶⁵ Current risks in the Stour catchment are outlined here: <https://www.southernwater.co.uk/dwmp/stour-catchment/problem-characterisation-stour>

- growth in the Council may result in the current permit for wastewater treatment quality being exceeded by 2050 without further investment at Westbere WwTW.

- 4.3.46. Run-off from impermeable surfaces can have considerable effects on waterbodies and watercourses and is a notable issue in both urban and rural areas. Development has traditionally sought to capture and divert rain and run-off to the nearest watercourse or treatment facility as quickly as possible, and extensive drainage networks have been developed to facilitate this. However, as developed areas have increased so have the total volumes and flow rates of run-off. This has two principal effects: firstly, impermeable surfaces provide very little resistance to the mobilisation and transport of pollutants within run-off; and secondly, flow rates and volumes often exceed the capacity of the receiving drains or watercourses, causing localised flooding or the operation of combined sewer overflows (CSOs)⁶⁶. The effect of run-off from developed areas can be mitigated or reduced by the use of SuDS and by increasing the area of permeable surfaces (both natural and artificial) within developed areas. These measures offer effective attenuation by reducing the volumes of surface run-off. They also increase the retention of pollutants and, in the case of some SuDS, can allow for treatment of pollutants.
- 4.3.47. With regard to European sites, the principal water quality concerns relate to the Stodmarsh SAC, SPA and Ramsar site, which have been identified as sites where nutrient neutrality is required for developments within the catchment, i.e. that developments can only proceed if they can demonstrate a zero net increase in nutrient levels within the catchments of the affected sites⁶⁷. However, it should also be recognised that the water quality effects of the Local Plan are ultimately either controlled by existing consents regimes (which must undergo HRA) or have diffuse in-combination effects that are difficult to quantify, and so the HRA process typically aims to ensure that suitable mitigating policy that will minimise the impacts of plan-supported development on water quality generally is provided.
- 4.3.48. **Table 4-4** sets out the European site screening in relation to water quality.

Table 4-4 - Summary of European site screening in relation to water quality

Site	Notes	Screen in?
Blean Complex SAC	Not exposed / sensitive to water quality changes associated with the Local Plan.	No

⁶⁶ All sewerage pipes have a certain capacity, determined by the size of the pipe and the receiving water treatment works. At times of high rainfall, this capacity can be exceeded, with the risk of uncontrolled bursts. CSOs provide a mechanism to prevent this, by allowing untreated sewerage to mix with surface water run-off when certain volumes are exceeded. This is then discharged to the nearest watercourse.

⁶⁷ Natural England (2022) Nutrient Neutrality: A summary guide and frequently asked questions. Available online <http://publications.naturalengland.org.uk/publication/6248597523005440>

Site	Notes	Screen in?
Stodmarsh SAC	Natural England May 2020 advice states that best available up-to-date evidence is that some of the designated site units are in unfavourable condition due to existing levels of nutrients (both phosphorus and nitrogen). Stodmarsh is a site for which achieving nutrient neutrality is required by Natural England.	Yes
Stodmarsh SPA	As per Stodmarsh SAC	Yes
Stodmarsh Ramsar site	As per Stodmarsh SAC	Yes
Tankerton Slopes and Swalecliffe SAC	Not exposed / sensitive to water quality changes associated with the Local Plan.	No
Thanet Coast and Sandwich Bay Ramsar site	The site is a downstream receptor although has not been identified as a site that is in unfavourable condition due to excessive nutrients (such that nutrient neutrality is being deployed or considered as mitigation) in recent Natural England advice to LPAs.	No
Thanet Coast and Sandwich Bay SPA	As per Thanet Coast and Sandwich Bay Ramsar site.	No
The Swale Ramsar site	Only a very small part of the Council area in the north west is within the catchment of this site. The site is a downstream receptor although has not been identified as a site that is in unfavourable condition due to excessive nutrients (such that nutrient neutrality is being deployed or considered as mitigation) in recent Natural England advice to LPAs.	No
The Swale SPA	Water quality not identified as a threat in the SIP; as per The Swale Ramsar site.	No
Outer Thames Estuary SPA	Not exposed / sensitive to water quality changes associated with the Local Plan.	No
Wye and Crundale Downs SAC	Not exposed / sensitive to water quality changes associated with the Local Plan.	No
Margate and Long Sands SAC	Not exposed / sensitive to water quality changes associated with the Local Plan.	No
Parkgate Down SAC	Not exposed / sensitive to water quality changes associated with the Local Plan.	No
Thanet Coast SAC	Some reef features are potentially sensitive to water quality changes, particularly if this results in eutrophication or smothering although the tidal fluxes attenuate local effects to some extent. Impacts from WwTW discharges are very unlikely (these enter the sea via long sea outfalls (LSOs)) and so effects on this feature are only really possible from diffuse pollution or local point sources such as CSOs or unconsented discharges	No
Lydden and Temple Ewell Downs SAC	Not exposed / sensitive to water quality changes associated with the Local Plan.	No

Site	Notes	Screen in?
Sandwich Bay SAC	Not exposed to water quality changes associated with the plan.	No
Folkestone to Etchinghill Escarpment SAC	Not exposed / sensitive to water quality changes associated with the Local Plan.	No
Dover to Kingsdown Cliffs SAC	Not exposed / sensitive to water quality changes associated with the Local Plan.	No
Dungeness, Romney Marsh and Rye Bay SPA	Not exposed / sensitive to water quality changes associated with the Local Plan.	No
Medway Estuary and Marshes Ramsar site	Not exposed / sensitive to water quality changes associated with the Local Plan.	No
Medway Estuary and Marshes SPA	Not exposed / sensitive to water quality changes associated with the Local Plan.	No
Dungeness, Romney Marsh and Rye Bay Ramsar site	Not exposed / sensitive to water quality changes associated with the Local Plan.	No
Essex Estuaries SAC	Not exposed / sensitive to water quality changes associated with the Local Plan.	No
Foulness (Mid-Essex Coast Phase 5) Ramsar site	Not exposed / sensitive to water quality changes associated with the Local Plan.	No
Foulness (Mid-Essex Coast Phase 5) SPA	Not exposed / sensitive to water quality changes associated with the Local Plan.	No
Thames Estuary and Marshes Ramsar site	Not exposed / sensitive to water quality changes associated with the Local Plan.	No
Thames Estuary and Marshes SPA	Not exposed / sensitive to water quality changes associated with the Local Plan.	No

FLOODING / WATER LEVEL MANAGEMENT

- 4.3.49. The implementation of the European Floods Directive (Directive 2007/60/EC) in England and Wales is being co-ordinated with the Water Framework Directive. Catchment Flood Management Plans (prepared by the EA), Shoreline Management Plans (prepared by coastal local authorities and the EA), River Basin District Flood Risk Management Plans (prepared by the EA) and Local Flood Risk Management Strategies set out long term policies for flood risk management. The delivery of the policies from these long-term plans will help to achieve the objectives of these plans and the River Basin Management Plans (RBMPs).
- 4.3.50. Development supported by the Local Plan is unlikely to significantly alter regional flood risk levels but may exacerbate the effects of local flooding. Run-off from impermeable surfaces can have considerable effects on waterbodies and watercourses, meaning that flow rates and volumes often

exceed the capacity of the receiving drains or watercourses. This can lead to local water quality impacts on European sites. The effect of run-off from developed areas can be reduced by the use of SuDS and by increasing the area of permeable surfaces (both natural and artificial) within developed areas.

- 4.3.51. Some sites and features may be dependent on water levels being maintained by surface water or groundwater inputs, which may in turn be affected by abstraction (see Water Resources sub-section above) or local development (e.g. through dewatering of excavations, which can be an issue for groundwater levels). However, these pathways (particularly dewatering) tend to only operate over relatively short distances and hence are predominantly addressed in relation to individual allocations. No European sites are considered to be exposed to potential changes in flood risk that may result from the Regulation 19 draft Local Plan as summarised in **Table 4-5** below.

Table 4-5 - Summary of European site screening in relation to flooding / water level management

Site	Notes	Screen in?
Blean Complex SAC	Not exposed / sensitive to this aspect.	No
Stodmarsh Ramsar site	Local Plan will not alter flood risk or water level management practices in this site.	No
Stodmarsh SAC	Local Plan will not alter flood risk or water level management practices in this site.	No
Stodmarsh SPA	Local Plan will not alter flood risk or water level management practices in this site.	No
Tankerton Slopes and Swalecliffe SAC	Not exposed / sensitive to this aspect.	No
Thanet Coast and Sandwich Bay Ramsar site	Not exposed to this aspect due to the Council plan.	No
Thanet Coast and Sandwich Bay SPA	Not exposed to this aspect due to the Council plan.	No
The Swale Ramsar site	Not exposed to this aspect due to the Council plan.	No
The Swale SPA	As per The Swale Ramsar site.	No
Outer Thames Estuary SPA	Not exposed / sensitive to this aspect.	No
Wye and Crundale Downs SAC	Not exposed / sensitive to this aspect.	No
Margate and Long Sands SAC	Not exposed / sensitive to this aspect.	No
Parkgate Down SAC	Not exposed / sensitive to this aspect.	No

Site	Notes	Screen in?
Thanet Coast SAC	Features not exposed / sensitive to this aspect.	No
Lydden and Temple Ewell Downs SAC	Not exposed / sensitive to this aspect.	No
Sandwich Bay SAC	Sand dune features not exposed to this aspect.	No
Folkestone to Etchinghill Escarpment SAC	Not exposed / sensitive to this aspect.	No
Dover to Kingsdown Cliffs SAC	Not exposed / sensitive to this aspect.	No
Dungeness, Romney Marsh and Rye Bay SPA	Not exposed / sensitive to this aspect.	No
Medway Estuary and Marshes Ramsar site	Not exposed / sensitive to this aspect.	No
Medway Estuary and Marshes SPA	Not exposed / sensitive to this aspect.	No
Dungeness, Romney Marsh and Rye Bay Ramsar site	Not exposed / sensitive to this aspect.	No
Essex Estuaries SAC	Not exposed / sensitive to this aspect.	No
Foulness (Mid-Essex Coast Phase 5) Ramsar site	Not exposed / sensitive to this aspect.	No
Foulness (Mid-Essex Coast Phase 5) SPA	Not exposed / sensitive to this aspect.	No
Thames Estuary and Marshes Ramsar site	Not exposed / sensitive to this aspect.	No
Thames Estuary and Marshes SPA	Not exposed / sensitive to this aspect.	No

EFFECTS ON FUNCTIONAL HABITATS OR SPECIES AWAY FROM EUROPEAN SITES

- 4.3.52. The provisions of the Habitats Regulations ensure that 'direct' (encroachment) effects on European sites as a result of a land use plan (i.e. the partial or complete destruction of a European site) are extremely unlikely under normal circumstances, and this will not occur as a result of the Local Plan. However, many European site interest features (particularly more mobile animal species) may use, or be reliant on, non-designated habitats outside of a European site during their life-cycle. Developments some distance from a European site can therefore have an effect on the site if its population of interest features is reliant on the habitats being affected by a development and

sufficient numbers are exposed to the environmental changes. All of the above aspects (recreation, water resources, etc.) can therefore also affect European site integrity indirectly through effects on functional habitats outside of the designated site boundary.

- 4.3.53. The 2025 SPA Review (Grady et al, 2025⁶⁸) identifies, inter alia, species for which *“the current UK SPA suite do not provide adequate provision for foraging”* including ones that are known to be associated with, or reliant on, cropped habitats and are relevant to the European sites identified in this assessment. With regard to the European sites within the scope, most functional land will be located relatively close to the site (e.g. less than 5km from the boundary), associated with foraging or roosting behaviours of the bird interest features. However, it is recognised that some areas of cropped lowland farmland may be important for certain wintering waterbirds typically associated with coastal and wetland SPAs (e.g. Mason & MacDonald 1999⁶⁹; Gillings 2003⁷⁰), and that this behaviour is under-recorded by the standard Wetland Bird Survey (WeBS) monitoring technique.
- 4.3.54. In particular, NE noted in its response to the Regulation 18 Draft Local Plan 2022 consultation that *“further information on functionally-linked land (FLL) used by bird populations of coastal Habitats Sites”* (i.e. Thanet Coast and Sandwich Bay SPA and Ramsar site and The Swale SPA and Ramsar site) may be required to complete the HRA, observing that *“Both of the above SPAs support species well documented to make use of functionally-linked land outside of designated site boundaries – in particular golden plover for the Thanet Coast and dark-bellied brent geese for The Swale”*.
- 4.3.55. Following the subsequent 2024 HRA consultation, Natural England provided further representations regarding the FLL assessment presented within that report. In particular, Natural England *“advise that the Swale Ramsar should consider functional linkages for curlew as well as dark-bellied Brent goose. In addition we advise that the Council should consider further functional linkages for other, non-avian, species which may be associated with the European sites. For instance, we advise that there is the potential for functional linkages with the Desmoulin’s whorl snail which is a notified feature of the Stodmarsh SAC.”* The screening assessment presented in **Table 4-6** accounts for these comments received from Natural England which were actioned within the 2025 Focused Consultation HRA to Natural England’s satisfaction.

Table 4-6 - Summary of European site screening in relation to functional land

⁶⁸ Grady, S., Anthony, S., Cohen, S., Douse, A., Lindley, P., Mountford, E. and Owens, R. (eds) – on behalf of the UK SPA & Ramsar Scientific Working Group. 2025. The status of UK SPAs in the 2000s: the Third Network Review (Phase 2) summary of advice and options. Version 1.0. JNCC, Peterborough. 133 pp. Available at: <https://data.jncc.gov.uk/data/5b816ab9-4268-4c48-bdc5-5241e4464d4b/third-uk-spa-review-phase-2-report-2025.pdf>

⁶⁹ Mason, C. E. and MacDonald, S. M. (1999) Habitat use by Lapwings and Golden Plovers in a largely arable landscape. Bird Study 46: 89–99.

⁷⁰ Gillings, S. (2003) Plugging the gaps – winter studies of Eurasian golden plovers and northern lapwings. Wader Study Group Bull. 100: 25-29

Site	Notes	Screen in?
Blean Complex SAC	Not exposed / sensitive to this aspect due to the absence of Annex II species that are a primary reason for site designation.	No
Stodmarsh Ramsar site	The Ramsar site features have relatively narrow and specific wetland habitat requirements that are met by the site habitats and management regimes; they are not therefore fundamentally dependent on non-designated functional land.	No
Stodmarsh SAC	The SAC feature, Desmoulin's whorl snail <i>Vertigo moulinsiana</i> has narrow and specific habitat requirements, as they are primarily associated with calcareous wetlands and within the site are found beside ditches within pasture on the floodplains of the River Stour. However, it is noted from supplementary advice on the site's conservation objectives that studies have shown the decline of species locally and, as such, there may be an increasing importance on suitable supporting habitat or functionally linked land outside of the designated site.	Yes
Stodmarsh SPA	The SPA features have relatively narrow and specific wetland habitat requirements that are met by the site habitats and management regimes; they are not therefore fundamentally dependent on non-designated functional land.	No
Tankerton Slopes and Swalecliffe SAC	Not exposed / sensitive to this aspect as the qualifying Annex II species, Fisher's estuarine moth <i>Gortyna borellii lunata</i> has a localised population distribution in the UK, noted specifically within the citation as only found on the north Essex coast and north Kent coast. None of the allocated sites fall within the SAC boundary.	No
Thanet Coast and Sandwich Bay Ramsar site	Site supports golden plover which can use inland areas for foraging.	Yes
Thanet Coast and Sandwich Bay SPA	Site supports golden plover which can use inland areas for foraging.	Yes
The Swale Ramsar site	Site supports dark-bellied Brent goose and curlew which can use inland areas for foraging.	Yes
The Swale SPA	Site supports dark-bellied Brent goose which and curlew can use inland areas for foraging.	Yes
Outer Thames Estuary SPA	Site supports breeding and foraging tern colonies, although none of the Focused Consultation allocated sites comprise suitable breeding or foraging habitat for terns.	No
Wye and Crundale Downs SAC	No specific non-designated areas of land outside the site boundary are identified as being functionally important to the maintenance of site integrity; Local Plan will not affect habitats that may be functionally linked to this site.	No
Margate and Long Sands SAC	Functional land not identified for site features (there are no Annex II species listed as Interest Features).	No

Site	Notes	Screen in?
Parkgate Down SAC	No specific non-designated areas of land outside the site boundary are identified as being functionally important to the maintenance of site integrity; Local Plan will not affect habitats that may be functionally linked to this site.	No
Thanet Coast SAC	Functional land not identified for site features (there are no Annex II species listed as Interest Features).	No
Lydden and Temple Ewell Downs SAC	Functional land not identified for site features (there are no Annex II species listed as Interest Features).	No
Sandwich Bay SAC	Functional land not identified for site features (there are no Annex II species listed as Interest Features).	No
Folkestone to Etchinghill Escarpment SAC	Functional land not identified for site features (there are no Annex II species listed as Interest Features).	No
Dover to Kingsdown Cliffs SAC	Functional land not identified for site features (there are no Annex II species listed as Interest Features).	No
Dungeness, Romney Marsh and Rye Bay SPA	Qualifying features include golden plover. Only two allocation sites (R15 and R22) are within 20km of this site, both of which are over 17km from Dungeness, Romney Marsh and Rye Bay SPA, and neither support habitat considered to constitute suitable functionally linked habitats.	No
Medway Estuary and Marshes Ramsar site	Features not exposed through this mechanism (distance to the Council's administrative boundary)	No
Medway Estuary and Marshes SPA	Features not exposed through this mechanism (distance to the Council's administrative boundary)	No
Dungeness, Romney Marsh and Rye Bay Ramsar site	Species will not be functionally dependent on land within the Council's administrative boundary.	No
Essex Estuaries SAC	Features not exposed through this mechanism (distance to the Council's administrative boundary)	No
Foulness (Mid-Essex Coast Phase 5) Ramsar site	Features not exposed through this mechanism (distance to the Council's administrative boundary)	No
Foulness (Mid-Essex Coast Phase 5) SPA	Features not exposed through this mechanism (distance to the Council's administrative boundary)	No
Thames Estuary and Marshes Ramsar site	Features not exposed through this mechanism (distance to the Council's administrative boundary)	No
Thames Estuary and Marshes SPA	Features not exposed through this mechanism (distance to the Council's administrative boundary)	No

4.4 SCREENING SUMMARY

4.4.1. Significant effects on the following sites are not anticipated, alone or in-combination; this is principally due to their distance from the Council area and/or the absence of reasonable pathways by which environmental changes associated with the Local Plan could undermine the conservation objectives for the sites:

- Outer Thames Estuary SPA
- Wye and Crundale Downs SAC
- Margate and Long Sands SAC
- Parkgate Down SAC
- Sandwich Bay SAC
- Folkestone to Etchinghill Escarpment SAC
- Dungeness, Romney Marsh and Rye Bay SPA
- Dungeness, Romney Marsh and Rye Bay Ramsar site
- Medway Estuary and Marshes Ramsar site
- Medway Estuary and Marshes SPA
- Essex Estuaries SAC
- Foulness (Mid-Essex Coast Phase 5) Ramsar site
- Foulness (Mid-Essex Coast Phase 5) SPA
- Thames Estuary and Marshes Ramsar site
- Thames Estuary and Marshes SPA
- Lydden & Temple Ewell Down SAC
- Dover to Kingsdown Cliff SAC

4.4.2. **Table 4-7** summarises the European sites and pathways for which significant effects, alone or in-combination, cannot be excluded.

Table 4-7 - European sites and pathways for which significant effects cannot be excluded

Site	Pathway
Blean Complex SAC	Recreational pressure Air quality
Stodmarsh SAC	Recreational pressure Urbanisation Water quality Functionally linked land
Stodmarsh SPA	Recreational pressure

Site	Pathway
	Urbanisation Air quality Water quality
Stodmarsh Ramsar site	Recreational pressure Urbanisation Air quality Water quality
Tankerton Slopes & Swalecliffe SAC	Recreational pressure
Thanet Coast & Sandwich Bay SPA	Recreational pressure Urbanisation Functionally linked land
Thanet Coast & Sandwich Bay Ramsar site	Recreational pressure Urbanisation Functionally linked land
The Swale SPA	Recreational pressure Urbanisation Functionally linked land
The Swale Ramsar site	Recreational pressure Urbanisation Functionally linked land
Thanet Coast SAC	Recreational pressure

- 4.4.3. There are residual uncertainties in relation the significance of some effects, and the Local Plan includes measures identified during its development that are intended to minimise or prevent significant or significant adverse effects occurring. These aspects are therefore examined through appropriate assessment in the following sections.
- 4.4.4. Note that these sites and pathways have notable overlaps (spatially, in interest features, and in environmental functioning and sensitivities). As such, they are grouped geographically in the following sections to simplify the report structure and to minimise repetition:
- **Section 5: Stodmarsh sites** (assesses effects on the site units and features of Stodmarsh SAC, Stodmarsh SPA and Stodmarsh Ramsar site);
 - **Section 6: Thanet Coast sites** (assesses effects on the site units and features of Thanet Coast and Sandwich Bay SPA, Thanet Coast and Sandwich Bay Ramsar site and Thanet Coast SAC);

- **Section 7: The Swale sites** (assesses effects on the site units and features of The Swale SPA and The Swale Ramsar site);
- **Section 8: Tankerton Slopes and Swalecliffe SAC.**
- **Section 9: Blean Complex SAC;**

5 STODMARSH SITES

5.1 OVERVIEW

- 5.1.1. The Stodmarsh sites that are screened in are Stodmarsh SAC, Stodmarsh SPA and Stodmarsh Ramsar site. The screening of the Preferred Options has indicated that the interest features of these sites may be vulnerable (i.e. exposed and sensitive) to environmental changes associated with the implementation of the Local Plan, particularly in relation to in-combination effects of recreational pressure, urbanisation, water quality and functionally linked land (SAC only) associated with the overall quantum of development.
- 5.1.2. The SSSI units of the Stodmarsh SSSI that underpin the above European sites are almost all at 'favourable' or 'unfavourable recovering' conservation status (the exceptions being some wetland areas of the site that are in 'unfavourable no change' due to land-management reasons or for failing water quality targets).

5.2 RECREATIONAL PRESSURE

SUMMARY OF PATHWAY

- 5.2.1. The Stodmarsh sites support qualifying wetland bird species and associated habitats, which are susceptible to impacts from recreational disturbance from activities such as walking and dog walking.
- 5.2.2. Fifty-six allocated sites are within 7km of the Stodmarsh sites, the closest of which is R6 – Bread and Cheese Field, within 165m.

BASELINE AND PREDICTED CHANGES

- 5.2.3. The SIP identifies several pressures and threats to site integrity, although these do not include recreational pressure. Similarly, no issues in relation to recreational pressure are identified in the Stodmarsh SSSI condition assessments.
- 5.2.4. Some of the site is 'access land' although this area is managed as a National Nature Reserve (NNR) with stewardship agreements and managed access, and dogs are not allowed on the sign-posted 'Short Circuit Nature Trail' and the 'Nature Trail Extension' within the NNR; elsewhere, leads are required. Access to the remainder of the site is restricted to PROWs.
- 5.2.5. Zols based on visitor survey data have not been set for the sites. However, visitor surveys undertaken in 2011 by the RSPB (reported in a HRA supporting planning permission for an adjacent site submitted to the Council in 2022) found that the vast majority of visitors to Stodmarsh were occasional day visitors and those with particular interest in birds and wildlife, with no visitors living within 2km of the site⁷¹.

⁷¹ RSPB (2011) North Kent Visitor Survey – Non-RSPB Site Report referenced in HRA supporting application ref: CA/22/01584 prepared by Aspect Ecology

- 5.2.6. Assuming a non-specific Zol of 7km, the Regulation 19 draft Local Plan makes provision for approximately 9,184 dwellings within 7km. With regard to other LPAs:
- The Thanet District Council (TDC) Local Plan is currently being reviewed, with revised housing numbers yet to be confirmed, although based on the previous plan it is unlikely that any large housing sites will be allocated within 7km.
 - The submitted Dover District Local Plan (2040) identifies residential site allocations in Preston, Wingham and Staple within 7km of these European sites, which comprise ~168 new housing units.

INCORPORATED MITIGATION

- 5.2.7. Recreational pressure is not identified as a specific issue for the Stodmarsh sites, and so strategic access mitigation plans or similar have not been developed or proposed for these sites. However, the Regulation 19 draft Local Plan includes policies that will moderate recreational pressure, notably Policy DS28 (Publicly accessible open space and sports) which sets out the open space requirements for developments.
- 5.2.8. In addition, project level HRAs are required under Policy DS20 for proposals that could affect European sites and Policy R6 requires provision of “...a landscape buffer in the form of natural and semi-natural open space to the south of the [Bread and Cheese] site” i.e. between the Stodmarsh sites and the Bread and Cheese allocation.

ASSESSMENT OF EFFECTS

- 5.2.9. Although part of the site is ‘access land’ most of this area is covered by the NNR and the associated management controls; elsewhere, the wetland nature of the site and limited access via PRoWs substantially restricts the area potentially exposed to disturbance by walkers or dogs. There is also limited access to the site from nearby roads. The site is not therefore a significant attraction for ‘casual’ recreation, and previous surveys indicate that the vast majority of visitors to Stodmarsh are those with particular interest in birds and wildlife (albeit that the survey relates to the NNR). A potentially notable uplift in recreational pressure as a result of the Regulation 19 draft Local Plan (such that specific site-based mitigation measures would be required) is not therefore expected.

RECREATIONAL PRESSURE RECOMMENDATIONS AND CONCLUSIONS

- 5.2.10. The incorporated policy measures will provide sufficient safeguards to ensure that recreational pressure does not adversely affect the Stodmarsh sites as a result of the Local Plan. No adverse effects alone or in-combination via this mechanism would be expected if the Regulation 19 draft Local Plan is adopted as currently drafted.

5.3 URBANISATION

SUMMARY OF PATHWAY

- 5.3.1. Two allocations are located within, or close to, 500m of the Stodmarsh sites, considered close enough that impacts such as cat predation could pose a significant risk to bird interest features:
- Policy R6 - Bread and Cheese Field allocates approximately 150 new dwellings within 165m of the Stodmarsh SAC, SPA and Ramsar site at its closest point.
 - Policy R7 Land at Hersden allocates approximately 18 new dwellings approximately 505m from the Stodmarsh SAC, SPA and Ramsar site at its closest point.

BASELINE AND PREDICTED CHANGES

- 5.3.2. The SIP identifies several pressures and threats to site integrity, although these do not include urbanisation. Similarly, no issues in relation to urbanisation effects are identified in the Stodmarsh SSSI condition assessments.
- 5.3.3. Access to the Stodmarsh sites from Sites R6 and R7 is significantly constrained by private properties (including the Westbere WwTW) and the Canterbury – Minster railway line. Consequently, the closest access point (a footpath across the railway at Westbere) is effectively over 750m from Bread and Cheese Field and 2.2km from Land at Hersden.
- 5.3.4. Furthermore, several planning applications have been granted for land parcels close to the Bread and Cheese Field allocation, including a development of 250 houses and various other uses which is located along the railway (Hoplands Farm)⁷². A HRA was undertaken for that application, with NE satisfied that the project-specific mitigation (including open space to the southern boundary) would ensure no adverse effects on the integrity of any of the Stodmarsh sites. In particular, the application noted that *“given the spatial separation of the Proposed Development from the SPA/Ramsar, the partial barrier formed to movement of cats by the railway line (which is fully fenced, together with an electrified rail present along the majority of its length), the low proportion of habitat within the SPA/Ramsar likely to be at risk of cat predation and the distribution and vulnerability of specific interest species within Stodmarsh, it is considered that the Proposed Development is unlikely to result in significant adverse effects on SPA/Ramsar species as a result of cat predation”*⁷³. Additionally, NE confirmed that it was satisfied cat predation was not likely to have a significant adverse effect on SPA bird interest⁷⁴.

INCORPORATED MITIGATION

- 5.3.5. Urbanisation is not identified as a specific issue for the Stodmarsh sites, and so no zone with a presumption against new development (as has been done for e.g. Thames Basin Heaths SPA) has been adopted. However, project level HRAs are required under Policy DS20 for proposals that could affect European sites and Policy R6 requires provision of *“...a landscape buffer in the form of natural and semi-natural open space to the south of the [Bread and Cheese] site”* i.e. between the Stodmarsh sites and the Bread and Cheese allocation.

ASSESSMENT OF EFFECTS

- 5.3.6. Given the constraints in accessing the Stodmarsh sites from the allocations within 500m, it is unlikely that urbanisation will be a significant issue. Furthermore, the inclusion of a requirement for a landscape buffer in Policy R6 and that similar measures have been previously found acceptable

⁷² CA//16/00404 Hoplands Farm Island Road Hersden Westbere CT3 4HQ Outline planning application for a neighbourhood extension for the creation of up to 250 houses including affordable housing, neighbourhood centre.

⁷³ Quinn Estates and Invicta Properties Ltd Hoplands Farm, Westbere Environmental Statement: Volume 1, Main Text

⁷⁴ Aspect Ecology for Quinn Estates Ecological Baseline Assessment ES Appendix 11.1

when considered at the project-level (i.e. for Hoplands Farm), it is reasonable to assume that these will be effective for preventing similar effects on the features of the Stodmarsh sites for the Bread and Cheese site also.

URBANISATION RECOMMENDATIONS AND CONCLUSION

- 5.3.7. The incorporated policy measures are likely to provide sufficient safeguards to ensure that the integrity of the Stodmarsh sites is not adversely affected as a result of urbanisation effects, alone or in-combination.

5.4 AIR QUALITY

SUMMARY OF PATHWAY

- 5.4.1. The Regulation 19 draft Local Plan may indirectly contribute to local air pollution and wider diffuse pollution. In practice, the principal source of air pollution associated with the Local Plan will be related to increased traffic flows and changes in traffic distribution due to the promotion of new development (since the Local Plan does not provide for any new significant power generation or industrial point-sources).
- 5.4.2. The Stodmarsh SPA and Ramsar site are within 200m of roads where traffic changes associated with the Local Plan exceed 1,000AADT, either alone or in-combination. Air pollution (impact of atmospheric nitrogen deposition) on the habitats supporting the SPA bird species is listed as a pressure in the Stodmarsh SIP.

BASELINE AND PREDICTED CHANGES

- 5.4.3. An air quality impact assessment has been completed for the Regulation 19 draft Local Plan through dispersion modelling of traffic emissions using the ADMS-Roads (version 5.1.0.2) atmospheric dispersion model and traffic data provided by the Jacobs Project Transport Planner (see **Appendix F**). Baseline conditions across the study area for NO_x and NH₃ concentrations and N Deposition were sourced from APIS⁷⁵ and compared to the relevant critical level (CLE) and critical load (CLO) values.
- 5.4.4. Total predicted concentrations of NO_x fall below the CLE at all receptor locations for the assessment of the Local Plan both alone and in-combination. The change in predicted annual mean concentrations does not exceed 1% of the lower CLE in both alone and in-combination scenarios. Therefore, no likely significant effects of NO_x concentrations have been identified for the Stodmarsh sites.
- 5.4.5. Total predicted concentrations of NH₃ fall below the lower CLE at all receptor locations for the assessment of the Local Plan both alone and in-combination. The change in predicted annual mean concentrations does not exceed 1% of the lower CLE in the alone scenario. However, in the in-combination scenario, the change exceeds the 1% threshold up to 30m within the Stodmarsh SPA

⁷⁵ [APIS - Air Pollution Information System | APIS](#)

and Ramsar site, beyond which it falls below the 1% threshold. Notwithstanding this, the contribution from the Local Plan alone is below $0.01 \mu\text{g}/\text{m}^3$ and is therefore considered de minimis.

- 5.4.6. The predicted background nitrogen deposition is already exceeding the lower CLo of $5\text{kgN}/\text{ha}/\text{year}$ in the 2019 Baseline and 2042 Do Minimum scenarios (without the Local Plan), and therefore also exceeds the predicted total nitrogen deposition in the 2042 Do Something scenarios with the Local Plan both alone and in-combination. Although, the change in predicted total nitrogen deposition does not exceed 1% of the lower CLo in the alone scenario. The change in predicted total nitrogen deposition exceeds 1% of the lower CLo in the in-combination scenario up to 40 m within the Stodmarsh SPA and Ramsar site, after which it falls below the 1% threshold. The N deposition contribution from the Local Plan alone is below $0.01 \mu\text{g}/\text{m}^3$ and is considered de minimis. Furthermore, given the ongoing improvements to UK road vehicle fleet, the background N deposition levels are expected to improve over time. The contribution of the draft Local Plan alone is likely to delay the N deposition improvements at the identified ecological receptors by less than one month. Future deposition is likely to be lower than baseline deposition levels, even when in-combination impacts are taken into account.

INCORPORATED MITIGATION

- 5.4.7. The potential for effects on European sites due to air quality is difficult for a Local Plan to specifically mitigate, since the decision to travel by car outside the LPA area is typically made in the context of regional and national travel conditions rather than local provision of sustainable travel options. However, the promotion of sustainable transport is woven throughout the Regulation 19 draft Local Plan, particularly via the following policies:

- Policy SS5 - Movement and Transportation Strategy for the district.
- Policy DS16 - Movement Hierarchy.
- Policy DS17 - Active and sustainable travel.
- Policy DS18 - Highways and parking.
- Policy DS19 - Air Quality.
- Policy DM5 – Parking Design.

- 5.4.8. These policy measures will help moderate the effects of the plan but will not necessarily mitigate or offset potential changes in air quality in their entirety.

ASSESSMENT OF EFFECTS

- 5.4.9. Given the results of the Air Quality modelling which identified no likely significant effects on the Stodmarsh SPA and Ramsar site for NO_x , a de minimis result for NH_3 and a less than one month delay in nitrogen deposition improvements at the sites, a potentially notable impact from air quality as a result of the Regulation 19 draft Local Plan (such that specific site-based mitigation measures would be required) is not therefore expected.

AIR QUALITY RECOMMENDATIONS AND CONCLUSION

- 5.4.10. The modelling has demonstrated that the allocations and policies within the Regulation 19 draft Local Plan are not likely to give rise to an increase in air quality impacts on the Stodmarsh SPA and Ramsar site and the incorporated policy measures will help moderate any residual risk. Policy additions are not considered essential to ensure this outcome, and no adverse effects alone or in-

combination via this mechanism would be expected if the Regulation 19 draft Local Plan is adopted as currently drafted.

5.5 WATER QUALITY

SUMMARY OF PATHWAY

- 5.5.1. Poor water quality due to nutrient enrichment from elevated nitrogen (N) and phosphorus (P) levels is one of the primary reasons for freshwater habitats and estuaries being in unfavourable condition. Typically, available P is the limiting factor on plant growth in freshwater aquatic systems (for which a significant source is treated wastewater), whereas in estuarine and marine systems available N is usually limiting (for which a significant source is agricultural run-off).
- 5.5.2. The principal concern in relation to the allocated sites is increased nutrient discharges from wastewater. The Stodmarsh SAC, SPA and Ramsar site has been identified by NE as a European site that it considers to be in unfavourable condition due to excessive nutrients⁷⁶. As noted, the majority of the CCC area is within the catchment of the River Stour.
- 5.5.3. Water quality, particularly nutrient neutrality, has been a key issue during the plan development process. The current position generally reflects that outlined by Natural England in its March 2022 letter to Chief Planning Officers⁷⁷. The Levelling Up and Regeneration Act 2023 (LURA) introduced a new statutory duty on water and sewerage companies in England to upgrade wastewater treatment works in nutrient neutrality catchments to the highest technically achievable limits (TAL) by 1 April 2030.
- 5.5.4. The TAL upgrade of the designated WTWs in the Stodmarsh Catchment will significantly reduce the nutrient loads affecting the Stodmarsh SAC, SPA and Ramsar site from existing and new development.

BASELINE AND PREDICTED CHANGES

- 5.5.5. The Natural England 2020⁷⁸ advice states that best available up-to-date evidence has identified that some of the designated site units are in unfavourable condition due to existing levels of nutrients (both P and N) and are therefore at risk from additional nutrient inputs. Several of the nature reserve lakes at Stodmarsh are in a state of eutrophication (an unfavourable conservation status).
- 5.5.6. The Council⁷⁹ has identified five WTWs that treat sewerage from the area that discharge to the River Stour catchment:

⁷⁶ November 2020 “Advice on Nutrient Neutrality for New Development in the Stour Catchment in Relation to Stodmarsh Designated Sites - For Local Planning Authorities”

⁷⁷ Letter from NE to LPA Chief Executives and Heads of Planning, 16 March 2022; Re. Advice for development proposals with the potential to affect water quality resulting in adverse nutrient impacts on habitats sites.

⁷⁸ <https://www.ashford.gov.uk/media/l3dgnfyu/stodmarsh-nutrient-neutral-methodology-november-2020.pdf>

⁷⁹ [Stodmarsh and Water Quality](#)

- Canterbury (Sturry) WTW;
- Herne Bay (Great Stour) WTW⁸⁰;
- Westbere WTW;
- Chartham WTW; and
- Newnham Valley Preston WTW.

- 5.5.7. All WTWs have discharge Dry Weather Flow (DWF) permits. The DWMP Baseline Risk and Vulnerability Assessment (BRAVA) identifies a risk of DWF permits being exceeded at Canterbury, Herne Bay, Newnham Valley Preston and Chartham. In addition, the Stour catchment is susceptible to diffuse agricultural pollution. However, modelling of source apportionment shows that the majority of the phosphorus load at permit is from WTWs whilst urban diffuse pollution in the catchment is larger than the total combined phosphorus loading from farming sources⁸¹.
- 5.5.8. The baseline and predicted changes are set out in detail in the technical reports completed for CCC, specifically the *Canterbury District Local Plan Nutrient Mitigation Plan*⁸² and *Stodmarsh Nutrient Mitigation: Draft Nutrient Mitigation Strategy*⁸³ (see **Appendix D**). The latter calculates a nutrient budget for the Council based on the existing allocations in the Canterbury District Local Plan adopted in 2017 and the Regulation 19 Draft Local Plan. It omits dwellings that have been granted full planning permission or have agreed on-site mitigation, proposed new developments that lie outside of the surface water catchment and those draining to a WwTW outside of the catchment. The assessment was therefore based on 15,898 new dwellings to 2042/43 (including windfall sites, gypsy and traveller pitches and hotel accommodation) which would be mitigated as set out in the draft Nutrient Mitigation Strategy.
- 5.5.9. The nutrient budget was calculated for each development site following the Generic Methodology produced by Natural England which provides a suitably precautionary approach. It calculated a total increase in nutrient loading up to 2045 of 5,330kg of Nitrogen and 646kg of Phosphorus which, when taking into account onsite mitigation measures such as foul water treatment for large developments and surface water treatment through the use of SuDS, reduced to a partially mitigated nutrient budget of 3,565kg of Nitrogen and 378kg of Phosphorus.
- 5.5.10. The draft Nutrient Mitigation Strategy recommends a range of options available to mitigate the nutrient budget including using the public and private nutrient credit markets, retrofitting housing stock, enacting land use change elsewhere within the district (referencing Policy R24 – Broad Oak Reservoir and Country Park) and establishing strategic constructed wetlands.

⁸⁰ The advice doesn't restrict new development on some sites in the villages to the south and east of Herne Bay.

⁸¹ <https://www.ashford.gov.uk/media/l3dgnfyu/stodmarsh-nutrient-neutral-methodology-november-2020.pdf>

⁸² Water Environment Limited (2022) *Canterbury District Local Plan Nutrient Mitigation Plan*. Document reference: 21160-NUT-RP-01-C01.

⁸³ Water Environment Limited (2026) *Stodmarsh Nutrient Mitigation: Draft Nutrient Mitigation Strategy*. Document reference: 21160-NUT-RP-02 | P06.

INCORPORATED MITIGATION

- 5.5.11. The provision of wastewater treatment capacity in the Stour catchments is a statutory obligation on Southern Water, and it is required to comply with all relevant discharge consents. Southern Water must upgrade the designated WTWs in the Stodmarsh Catchment to the new TAL standard no later than 1 April 2030.
- 5.5.12. The Local Plan contributes to the wastewater treatment planning process by providing certainty for Southern Water (through the allocations process) but does not (and cannot) directly influence or control Southern Water's plans for service delivery. The Local Plan adopts a policy-led mitigation approach to this aspect, to ensure that utilities capacity is appropriately considered at the site level when developments are brought forward.
- 5.5.13. However, the Regulation 19 draft Local Plan also includes specific policy measures relating to nutrient neutrality. In particular:
- The Council has developed a nutrient neutrality mitigation strategy (*Stodmarsh Nutrient Mitigation: Draft Nutrient Mitigation Strategy*⁸⁴, see **Appendix D**).
 - Policy DS20 sets expectations for water quality management and waste water treatment by developers, notably:
 - Proposals for more than 300 homes must provide high quality on-site regulated wastewater treatment facilities with permit levels set at Technically Achievable Limits (TAL), together with an on-site SuDS design which removes a minimum of 50% of P and N from the surface water.
 - Proposals for between 150 and 300 homes must examine all available opportunities for integrating high quality on-site regulated wastewater treatment facilities within the site to minimise the levels of P and N associated with foul water from the site. These developments must integrate an on-site SuDS design which removes a minimum of 50% of P and N from the surface water.
 - All other developments must integrate an on-site SuDS design which removes a minimum of 50% of P and N from the surface water, having regard for Policy DS24 (Flood Risk and Sustainable Drainage).
 - Identifies other safeguarded areas for the delivery of strategic wetlands (in addition to the allocated wetland at Policy R23) to mitigate the residual P and N generated by development.
 - Where new on-site WwTW have been proposed (policies C10, C15 and C16), acknowledgement has been made of the requirement to consider potential impacts to the Stodmarsh sites at the project stage, with additional mitigation measures potentially required should the wastewater treatment facilities discharge to the Lampden Stream which feeds into Stodmarsh.

⁸⁴ Water Environment Limited (2026) *Stodmarsh Nutrient Mitigation: Draft Nutrient Mitigation Strategy*. Document reference: 21160-NUT-RP-02 | P06.

5.5.14. In addition, several policies control the general risks associated with development and water management/drainage, treatment and quality, including:

- Policy DS23 (Flood Risk).
- Policy DS24 (Sustainable Drainage and Water Quality).

ASSESSMENT OF EFFECTS

Nutrient Neutrality

- 5.5.15. As noted, the issues for Stodmarsh relate to achieving nutrient neutrality. The Council has developed a Nutrient Mitigation Strategy in consultation with Natural England which sets out potential means to mitigate increases in nutrient loading from new development including nutrients contained in surface water runoff and an increase in wastewater flows to any of the WTW in the Stour catchment. The Strategy employs the Natural England Nutrient Budget Calculator⁸⁵ and associated guidance⁸⁶ for the Stour Management Catchment, with the methodology following the staged approach outlined by Natural England in its latest guidance. The nutrient budget has been calculated on the existing allocations and anticipated housing allocations of the Regulation 19 draft Local Plan.
- 5.5.16. The Council and Ashford Borough Council (ABC) have subsequently developed a joint venture company, Stour Environmental Credits (SEC), to develop nutrient mitigation projects and sell nutrient mitigation credits to offset new developments. The mitigation credits will be generated through a range of measures, including the replacement of existing poorly performing private septic tanks with advanced package treatment plants. The septic tank-derived mitigation provided through SEC will be additional to the mitigation detailed in the Nutrient Management Strategy.
- 5.5.17. Several private mitigation schemes are in development in the catchment. The draft Nutrient Mitigation Strategy excludes consideration of these schemes, because the quantum of credits hasn't yet been confirmed and legally secured. However, a supplier engagement exercise recently conducted by a large public sector developer for a development site in Canterbury identified that just one of the private mitigation schemes would generate 6,426kgTN and 303kgTP of permanent credits. This scheme alone would be sufficient to mitigate the entire nitrogen load and provide 80% of the phosphorus mitigation for the Local Plan to 2043.
- 5.5.18. With the WTW upgrades to TAL required by LURA, the application of the Nutrient Mitigation Strategy, and the mitigation credits available from SEC and private mitigation providers, it is considered that nutrient neutrality at a plan level is achievable.
- 5.5.19. Furthermore, the Regulation 19 draft Local Plan policies (notably DS20) provide assurance that development will not proceed unless nutrient neutrality is demonstrated.

⁸⁵ Natural England Nutrient Neutrality Budget Calculator – Stodmarsh SAC and Ramsar

⁸⁶ Natural England Nutrient Budget Calculator Guidance Document – Stodmarsh SAC and Ramsar – Issue 1 v1 March 2022

- 5.5.20. On this basis, it can be concluded that the Regulation 19 draft Local Plan will have no adverse effects on the integrity of the Stodmarsh SAC, Stodmarsh SPA or Stodmarsh Ramsar site due to increased nutrient loading, alone or in-combination.

Run-off and water management

- 5.5.21. There are broader in-combination risks associated with diffuse pollution. However, all developments supported by the Local Plan will incorporate SuDS to attenuate flows, provide nutrient treatment and contribute to achieving nutrient neutrality for each development. Consequently, adverse effects on the integrity of the Stodmarsh SAC, Stodmarsh SPA or Stodmarsh Ramsar site would not be expected through this mechanism.

WATER QUALITY RECOMMENDATIONS AND CONCLUSION

- 5.5.22. The incorporated policy measures, draft Nutrient Mitigation Strategy and availability of mitigation credits from SEC and multiple private providers are likely to provide sufficient safeguards to ensure that water quality changes do not adversely affect Stodmarsh SAC, Stodmarsh SPA or Stodmarsh Ramsar site as a result of the Regulation 19 draft Local Plan. While some uncertainty exists regarding the deliverability of the measures detailed in the draft Nutrient Mitigation Strategy and the nutrient load associated with the additional dwellings, the combined quantum of mitigation credits reasonably assessed to be available from SEC and multiple private providers is likely to exceed the demand for mitigation. Should the uncertainties be addressed, and the forecast mitigation supply be confirmed, no adverse effects alone or in-combination via this mechanism would be expected if the Local Plan is adopted as currently drafted.

5.6 FUNCTIONALLY LINKED LAND

SUMMARY OF PATHWAY

- 5.6.1. Functionally linked land (FLL) is generally taken to comprise habitats or features outside a European site boundary that are not located within the boundary of the designated site, but which are important or critical to the functional integrity of the site's habitats or its interest features. These might include, for example, specific features or habitats relied on by mobile Annex II species during their lifecycle (e.g. high-tide roosts for waders; areas that are critical for foraging or migration, etc), although it is not intended as a speculative catch-all covering any habitat that might be occasionally used by, or theoretically suitable for, a particular species.
- 5.6.2. With regard to the Stodmarsh SAC, the potential effect pathways comprise a single category based on the characteristics and habitat requirements of the qualifying elements:
- Desmoulin's whorl snail is primarily associated with calcareous wetland habitats including swamps, fens and marshes, or bordering lakes, rivers and ponds with a preference for reed-grass and sedge species. Therefore, allocated sites which provide these habitats within the floodplain of the river Stour may also provide FLL for this species.

BASELINE AND PREDICTED CHANGES

- 5.6.3. The Supplementary Advice on Conservation Objectives for the Stodmarsh SAC notes that "a sizeable population of Desmoulin's whorl snail *Vertigo moulinsiana* lives beside ditches within pasture on the floodplain of the River Stour, where reed sweet-grass *Glyceria maxima*, large sedges *Carex* spp. and sometimes common reed *Phragmites australis* dominate the vegetation. Stodmarsh is a south-eastern outlier of the main swathe of sites". Populations of the species within the SAC are

focused within areas of fen, reed and ditch networks across Units 1, 3 and 4 of the underlying SSSI. This region is considered to comprise the main distribution of the species within Kent, although a small number of records near Maidstone and Dover have also been identified (Abrehart Ecology, 2022).

- 5.6.4. As such, it is considered that wetland and ditch habitats within the Stour catchment are most likely to regularly support populations of Desmoulin's whorl snail outside of the Stodmarsh designated sites, although localised populations across the wider Council area are possible within suitable habitat.
- 5.6.5. There are 45 allocated sites within 20km of the Stodmarsh SAC. However, only three are within 1km, the closest of which is R6 – Bread and Cheese Field, approximately 165m away. The majority of allocations broadly comprise either urban or agricultural habitats which are unlikely to provide significant areas of high-quality wetland habitat. Aerial photography does not indicate any of the closer sites featuring onsite ditches.

INCORPORATED MITIGATION

- 5.6.6. Policy DS20 states that *“Where there is the potential for a site to be functionally linked land for species associated with a SPA, SAC and/or Ramsar, an assessment of the potential value of the site must be undertaken. Any development considered likely to have significant effects must follow the mitigation hierarchy: avoid, then mitigate and then, finally, compensate. Where mitigation measures are agreed by the council, the development will be required to fund and/or implement such mitigation measures.”*
- 5.6.7. Thirteen allocation specific policies (larger allocations and where previous HRA reports have highlighted the potential for them to act as FLL) require that *“The green and blue infrastructure strategy for the site should... assess the site's potential to be functionally linked land in line with Policy DS20”*.

ASSESSMENT OF EFFECTS

- 5.6.8. The Regulation 19 draft Local Plan could affect Desmoulin's whorl snail through environmental changes affecting associated functional habitat and favoured non-SAC areas due to the allocations themselves (i.e. direct loss of functional habitat), or through increased recreational pressure associated with developments.
- 5.6.9. A high-level assessment of the likely value of the allocated sites to Desmoulin's whorl snail is outlined in **Appendix E**. This is based on the generally accepted habitat preferences of the species with reference to supplementary advice on conservation objectives. Potential allocation sites were reviewed using freely available desk-study information including recent and historical aerial photographs and ecological data from existing planning applications locally.
- 5.6.10. In summary, the vast majority of the allocation sites have no or very low potential to support significant populations of Desmoulin's whorl snail (such that there is potential for the site to be considered FLL), due to their apparent lack of suitable wetland or ditch features. However, the following allocations are in relative proximity to the Stodmarsh SAC, appear to be hydrologically connected to the designated sites through the Lampen Stream, or the River Stour, and may feature ditches with suitable habitat within their boundaries:
 - Policy C15 - Land south of Littlebourne Road.
 - Policy C16 - Land south of Bekesbourne Lane.

- Policy C32 – Land at Wincheap Park and Ride
- Policy R3 - Chartham Paper Mill.

- 5.6.11. FLL for Desmoulin's whorl snail can be difficult to identify at plan level due to the species' preference for particular vegetation types and high humidity, as well as its dependence on the maintenance of existing local hydrological conditions (i.e. drought). Full assessment of this aspect must therefore necessarily be deferred to project-level, which the Regulation 19 draft Local Plan requires through its policy provisions.
- 5.6.12. In the landscape context, the allocations will not substantially reduce the non-designated habitat areas potentially available to Desmoulin's whorl snail within the study area. In addition, the mitigation set out within Policy DS20, and the specific reference to FLL within the relevant allocated sites policies provides sufficient plan-level safeguards to ensure that this aspect is fully assessed and mitigated at the appropriate level in the planning hierarchy; on this basis there will be no adverse effects on the integrity of the Desmoulin's whorl snail as a result of the Regulation 19 draft Local Plan.

FUNCTIONAL LAND RECOMMENDATIONS AND CONCLUSIONS

- 5.6.13. The incorporated policy measures will provide sufficient safeguards to ensure that the integrity of the Stodmarsh SAC is not adversely affected through effects on FLL. No adverse effects alone or in combination via this mechanism would be expected if the Local Plan is adopted, as the suitable references to Policy DS20 have been made within the required allocated sites policies.

6 THANET COAST SITES

6.1 OVERVIEW

- 6.1.1. The Thanet coast sites that are screened in are the Thanet Coast and Sandwich Bay SPA, Thanet Coast and Sandwich Bay Ramsar site and Thanet Coast SAC.
- 6.1.2. The screening has indicated that the interest features of these sites may be vulnerable (i.e. exposed and sensitive) to environmental changes associated with the implementation of the Local Plan, particularly in relation to in-combination effects of visitor pressure associated with the overall quantum of development. In addition, the qualifying features of the SPAs and Ramsar site may be vulnerable to urbanisation effects and / or exposed to development-related effects when outside the site boundary (i.e. functional land).
- 6.1.3. The SSSI units of the Sandwich Bay to Hacklinge Marshes SSSI and Thanet Coast SSSI that underpin the above European sites are almost all at 'favourable' or 'unfavourable recovering' conservation status (the exceptions being some fields associated with the Ramsar site south of Sandwich Bay that are in 'unfavourable no change' or 'unfavourable declining condition' for land-management reasons (note, these locations will not be exposed to the effects of the Local Plan)).

6.2 RECREATIONAL PRESSURE / URBANISATION

SUMMARY OF PATHWAY

- 6.2.1. The Thanet Coast sites support qualifying wetland bird species and associated habitats, as well as reef and submerged cave habitats associated with the SAC. Human activities might affect the qualifying bird species either directly (e.g. causing them to flee) or indirectly (e.g. through damaging the supporting habitats). Birds will also display a range of subtle behavioural responses that can have an energetic cost, through reduced food intake and/or increased energy expenditure. Disturbance can therefore result in reduced breeding success or increased mortality, which can be significant at the population scale.
- 6.2.2. The reef and submerged cave habitats associated with the Thanet Coast SAC may be subject to anthropogenic physical damage and disturbance from coastal recreational activities including sailing.

BASELINE AND PREDICTED CHANGES

- 6.2.3. The issue of region-wide in-combination recreational pressure on the European sites associated with the Thanet coast has been recognised for several years, and has been subject to a detailed mitigation strategy (The Thanet Coast "*Strategic Access Management and Monitoring Plan*" (SAMM)⁸⁷) which provides the context for the baseline and the assessment.

⁸⁷ Available at: <https://www.thanet.gov.uk/wp-content/uploads/2018/03/Thanet-DC-SAMM-MAIN-REPORT-Final-21st-April-2016.pdf>

- 6.2.4. The Thanet Coast SAMM defines a ZoI for the European sites associated with the Thanet coast, based on visitor surveys, which provide a reasonable and robust basis for identifying locations within which residential development might result in significant effects alone or in-combination. The ZoI for the Thanet coast sites is 7.2km. The Zols are used to identify areas within which developer contributions are levied to support the SAMM, and hence as a proxy for significant effects. Although originally developed in 2016 to cover predicted housing growth in the TDC area, the appropriateness of this document to subsequent revisions in local housing provision was reviewed and it was concluded that the measures therein were inherently scalable. As such, the SAMM is assumed to be an 'in perpetuity' provision.
- 6.2.5. The Regulation 19 draft Local Plan includes provision for approximately 2,686 homes within 7.2km of the Thanet coast sites across 30 allocations. The closest of these is HB4 - Land at Beacon Road, located within 260m of the Thanet Coast and Sandwich Bay SPA and Ramsar site which could also result in urbanisation effects. This is the only allocation located within 500m and is relatively small (up to 20 new homes), limiting the potential for urbanisation to result in adverse effects. The remaining sites are a consideration with regards to recreational pressure only.
- 6.2.6. Only one allocation is within 7.2km of the Thanet Coast SAC – HB13 - Hawthorn Corner located 6.3km away and not allocated for residential development. Recreational activities likely to impact the SAC habitats are largely specialist in nature (e.g. sailing, diving) and will therefore be likely to be undertaken by a smaller proportion of residents (as well as individuals travelling a further distance from outside of the district) than typical recreational activities such as walking.

INCORPORATED MITIGATION

- 6.2.7. The Regulation 19 draft Local Plan includes several mitigation measures designed to prevent adverse effects on the integrity of European sites due to recreational pressure. Pertinently for the Thanet Coast sites, the following is stated within Policy DS20:
- "All proposals for new residential development within the two identified Zones of Influence (Thanet Coast and Sandwich Bay SPA 7.2km and the Swale SPA 6km) will be required to comply with the relevant Strategic Access Management and Monitoring Strategy or Strategies (SAMMs) in order to mitigate against the likely in-combination effects of increased recreational disturbance from new development on the overwintering bird populations for which Thanet Coast and Sandwich Bay SPA or Ramsar and the Swale SPA or Ramsar are designated.*
- A financial contribution will be required in line with the tariff(s) towards the in-perpetuity Strategic Access Management and Monitoring Strategy or Strategies. This will be secured and collected via a S106 ahead of the commencement of the development.*
- Developments for holiday accommodation, hotels, camp/caravan sites, student accommodation, older person housing, houses of multiple occupation, gypsy and traveller accommodation or mobile/temporary dwellings that would increase recreational activity causing disturbance to qualifying species will be assessed on a case by case basis under the Habitats Regulations and may be required to make full or partial contributions towards one or both SAMMs if appropriate.*
- Proposals for new large scale residential development which is located within close proximity to the Thanet Coast and Sandwich Bay SPA or Ramsar and / or Swale SPA and Ramsar may also need to provide further mitigation measures, in addition to contributing to Bird Wise(s). Such proposals will*

be considered on a case-by-case basis by the council and Natural England. All mitigation measures will be provided prior to occupation of development and delivered in perpetuity.

Proposals for new large scale residential development outside of the Zones of Influence may also need to secure appropriate mitigation and avoidance measures to offset any potential adverse effects arising from increased recreational pressure on the Thanet Coast and Sandwich Bay SPA or Ramsar and / or Swale SPA and Ramsar (either 'alone' or 'in combination' with other relevant plans and proposals). This requirement will be determined in consultation with the council and Natural England."

6.2.8. The latter paragraphs address concerns expressed by NE in their May 2024 consultation response and August 2024 email specifically discussing recreational pressure, that mitigation measures above and beyond the relevant SAMMS ('SAMMS plus' approach) would be required for individual site allocations of over 500 new homes within the relevant Zols or where the cumulative impacts of multiple allocations in the same Zol are large.

6.2.9. In addition, Policies SS1 and DS28 relating to open space provision provide additional protections.

ASSESSMENT OF EFFECTS

6.2.10. The Regulation 19 draft Local Plan will increase the population within 7.2km of the Thanet Coast sites, which will increase the number of visits and visitors to the estuary which, in the absence of mitigation, may increase the risk of disturbance events having a significant effect on wintering waterbird populations and/or may result in damage or disturbance to the habitat interest features of the Thanet Coast SAC.

6.2.11. In considering the potential effects of increased recreational pressure on these sites due to the Regulation 19 draft Local Plan, the following aspects are relevant:

- The Regulation 19 draft Local Plan incorporates the agreed and accepted strategic mitigation for recreational effects on the European sites associated with the Thanet Coast, i.e. the SAMM and associated developer contributions, and SAMM plus approach where required.
- The SAMM is considered fundamentally scalable to address higher housing numbers, and extendable to cover the revised plan period. The SAMM is subject to regular monitoring, which will inform future amendments to ensure its continued effectiveness.
- The SAMM includes references to the Thanet Coastal Codes, voluntary codes of conduct for a range of recreational activities (including dog walking, powercraft activities, angling) to appropriately manage recreational risks for Thanet Coast sites, including the Thanet Coast SAC. The codes are regularly reviewed by stakeholders and local individuals and clubs are encouraged to abide by them.

6.2.12. With regard to monitoring the effectiveness of the SAMM, provision is made within the SAMM for annual monitoring. There is evidence of the effectiveness of the measures (notably ranger provision)

from similar programmes such as that associated with the Solent⁸⁸ which have reported significant differences in measures of disturbance.

- 6.2.13. On this basis, it can be concluded that the Regulation 19 draft Local Plan will have no adverse effects on the integrity of the Thanet Coast and Sandwich Bay SPA, Thanet Coast and Sandwich Bay Ramsar site, or Thanet Coast SAC due to recreational pressure or urbanisation effects, alone or in-combination.

RECREATIONAL PRESSURE / URBANISATION RECOMMENDATIONS AND CONCLUSION

- 6.2.14. The incorporated policy measures will provide sufficient safeguards to ensure that recreational pressure / urbanisation does not adversely affect the Thanet Coast sites as a result of the Regulation 19 draft Local Plan. No adverse effects alone or in-combination via this mechanism would be expected if the Local Plan is adopted as currently drafted.

6.3 FUNCTIONALLY LINKED LAND

SUMMARY OF PATHWAY

- 6.3.1. The description of this pathway is as that described for the Stodmarsh sites in Section 5.
- 6.3.2. With regard to the Thanet Coast and Sandwich Bay SPA or Thanet Coast and Sandwich Bay Ramsar site, the potential effect pathways fall into two principal categories based on the characteristics and habitat requirements of the qualifying features:
- Turnstone and little tern are essentially coastal species and so only likely to be exposed to environmental changes associated with potential allocations that are in close proximity to their preferred coastal habitats. Whilst no allocated sites are situated in close proximity to the coast, the broad location W2 – Whitstable Harbour, has been identified as a key area for sensitive regeneration over the longer term. There is a turnstone roost within the Harbour and it has been identified as a hotspot for the species.
 - Golden plover is less dependent on the coastal SPA habitats than turnstone or little tern, and several studies suggest that some areas of lowland farmland may be as important for this species as the habitats of the coastal and wetland SPAs typically associated with wintering waders (e.g. Mason & MacDonald 1999⁸⁹; Gillings 2003⁹⁰), and perhaps even more so. Therefore, potential allocation sites that are inland may also provide FLL for this species.

⁸⁸ Available at: https://solent.birdaware.org/media/33773/Disturbance-Monitoring-Report-Winter-2018-2020/pdf/Disturbance_Monitoring_Report_Winter_2018-19_and_2019-20.pdf

⁸⁹ Mason, C. E. and MacDonald, S. M. (1999) Habitat use by Lapwings and Golden Plovers in a largely arable landscape. Bird Study 46: 89–99.

⁹⁰ Gillings, S. (2003) Plugging the gaps – winter studies of Eurasian golden plovers and northern lapwings. Wader Study Group Bull. 100: 25-29

- 6.3.3. The Ramsar Criterion 2 wetland invertebrate assemblage is understood to be principally associated with the terrestrial wetland habitats of the Pegwell Bay and Lydden Valley sections of the Ramsar site and is not functionally linked to non-designated habitats at or near potential allocation sites within the Council area. This feature is not considered further.

BASELINE AND PREDICTED CHANGES

Whitstable Harbour Mixed Use Broad Location

- 6.3.4. Whitstable Harbour has been identified as a broad location for mixed use development over the period of the Local Plan. Policy W2 does not specify any scale, type or quantum of development for the harbour, only noting that the council will produce a Supplementary Planning Document (SPD) informed by the Whitstable Harbour Strategic Plan (WHSP 2024)⁹¹ to masterplan and facilitate regeneration and redevelopment; and that appropriate development (which might include fishing, commercial, business, employment, leisure, parking and residential, and walking / cycling improvements) would need to be compatible with the maintenance of an operational harbour. The Whitstable Harbour Strategic Plan (which was not subject to HRA) does not provide further clarity on the scale or quantum of development that may arise at the site. There is consequently little information on the potential development at the site, and so limited scope for meaningful (i.e. not entirely speculative) assessment of effect pathways at the plan-level⁹².
- 6.3.5. The harbour is a relatively high disturbance environment, with activities currently including “*the berthing of fishing vessels and the accommodation of both operational and pleasure craft*” and associated activities including processing of fish and shellfish, and marine products (WHSP 2024).

Little Tern

- 6.3.6. Little tern colonies in the SPA were historically present on Shell Ness (at the mouth of the Great Stour in Pegwell Bay) and at Plumpudding Island (on the north coast near Minnis Bay) until the 1990s. However, little tern now appear to be absent from the SPA as a regular breeding species⁹³. There is no evidence of little tern using Whitstable harbour, or nearby locations that might be exposed to environmental changes associated with development at Whitstable harbour (i.e. within

⁹¹ Available at: <https://www.canterbury.gov.uk/sites/default/files/2024-09/Whitstable%20Harbour%20Strategic%20Plan%202024%20to%202034.pdf>

⁹² Note, the SPD would necessarily be subject to HRA also; this is likely to provide more opportunities for a meaningful and specific HRA, given the non-specific nature of Policy W2.

⁹³ The SIP notes that “*previous attempts at habitat conservation and management to encourage this species to breed within the site again have been unsuccessful*”; Kent Wildlife Trust (2012) note that “*breeding little terns abandoned the site in the 1990s*”. Surveys for projects (e.g. for the Richborough grid connection project (National Grid 2016)) have not recorded little tern breeding at Shell Ness; the Sandwich Bay Bird Observatory (SBBO) identifies them as ‘migrants’ rather than breeders in its sightings list. Occasional breeding attempts by individual pairs may still occur, but there do not appear to currently be any significant little tern colonies within the site.

1km), for breeding and so the allocation of this site would not affect FLL that may be used by this feature⁹⁴.

Turnstone

- 6.3.7. Wintering turnstone utilise a range of coastal habitats including estuaries, sand or shingle beaches, and rocky shores (Brown & Grice 2005)⁹⁵, although they tend to favour foreshores that are stony, rocky or seaweed-covered for foraging and often use similar artificial features such as groynes, seawalls or harbours. They typically forage during the day in small groups, searching for a variety of food items under stones, seaweed and strand-line detritus, before moving to coastal roost sites (to which they tend to have a high degree of fidelity) overnight or at high-tide (although their foraging strategy typically allows foraging to continue throughout the tidal cycle).
- 6.3.8. Studies have shown that turnstones are particularly vulnerable to disturbance from dogs, which interrupt their feeding behaviour so affecting their ability to gain sufficient body fat for overwintering or migration; this has been identified as a particular problem in the northern section of Sandwich Bay, although other activities such as walking, bait digging, and kite surfing may have local impacts. They are also vulnerable at roost sites, although may be locally tolerant of human activity⁹⁶. Sandwich Bay Bird Observatory Trust (Walton & Hodgson 2018)⁹⁷ note that *“the high incidence of dogs off leads continues to be the main cause of Turnstone disturbance in Thanet and is likely to be a significant factor in the decline of the wintering Turnstone population of the Thanet and Sandwich Bay SPA”*.
- 6.3.9. Surveys in 2019 (Saunders & Liley, 2019)⁹⁸ identified a turnstone roost (35 – 44 birds recorded) at Whitstable harbour (precise location or characteristics are not provided in the report), and previous surveys by the Sandwich Bay Bird Observatory Trust⁹¹ identified hotspots for the species *“close to Whitstable harbour and in front of the beach huts below Valkyrie Ave.”*. The section of coast at Long Rock between Whitstable and Herne Bay (which is part of the SPA and Ramsar site) has also been

⁹⁴ Note that little tern are a feature of the Outer Thames Estuary SPA, which is immediately adjacent to Whitstable harbour. This site provides foraging habitat for common and little tern colonies associated with SPAs in Kent, Essex, Suffolk and Norfolk; however, there will be no effects from the allocation of Whitstable harbour on little terns associated with the Outer Thames Estuary SPA due to the distance to the nearest colonies (i.e. Whitstable harbour is substantially beyond the max-mean foraging range for this species (~6km (Woodward *et al.*, 2019)).

⁹⁵ Brown, A. & Grice, P. (2005) Birds in England

⁹⁶ The Thanet Coast Strategic Access Management and Monitoring Plan (2016) notes that *“Turnstones may be becoming more tolerant of disturbance and feeding regularly in proximity to human activity especially around Whitstable harbour and fishermen”*.

⁹⁷ Walton, S. & Hodgson, I. (2018) Thanet Coast Turnstone (*Arenaria interpres*) Monitoring: January-February 2019. Unpublished report by the Sandwich Bay Observatory Trust for Natural England and Thanet Coast Project (Thanet Council).

⁹⁸ Saunders, P. & Lily, D (2019) Thanet Coast & Sandwich Bay SPA bird and visitor surveys (January to February 2019). Unpublished report by Footprint Ecology

identified as being particularly important for roosting and foraging turnstone^{91, 92}, although this location is over 2km from W2.

- 6.3.10. With regard to potential effects, it should be recognised that Whitstable harbour is an operational harbour with relatively high levels of anthropogenic activity compared to other sectors of the coast. However, there is some anecdotal evidence that turnstone are less sensitive to the types of activity that currently predominate at the harbour.

Golden Plover

- 6.3.11. Recent surveys (Walton & Hodgson, 2018⁹⁹; Saunders & Lily, 2019¹⁰⁰; SBBOT, 2020¹⁰¹) did not record any golden plover at or near Whitstable harbour, and the coastal habitats in this location are likely to be of limited value to this species. SBBOT (2020)⁹⁵ note that *“the coastal areas, particularly the shingle and rocky habitats along the Thanet coastline, are not always the favoured habitat for this species with large flocks often found inland on arable land (Henderson & Sutherland, 2017¹⁰²)”*. Consequently, this species is not considered to be exposed the likely environmental changes that may result from the allocation of Whitstable harbour.

Inland Allocation Sites (Golden Plover)

Context

- 6.3.12. Several studies suggest that some areas of lowland farmland may be as important for golden plover as the habitats of the coastal and wetland SPAs typically associated with wintering waders (e.g. Mason & MacDonald 1999¹⁰³; Gillings 2003¹⁰⁴), and perhaps even more so. Broadly, it appears that golden plover retain an association with wetland or coastal sites, typically remaining within a few kilometres of these (except where significant regional movements of flocks occur in response to (for example) weather conditions), but will often spend several tidal cycles (or more) foraging and roosting in farmland, both during the day and night.
- 6.3.13. However, whilst there is evidence of regional site fidelity (i.e. birds associated with the Thanet Coast and Sandwich Bay SPA will predominantly use available habitats within a few kilometres of the site),

⁹⁹ Walton, S. & Hodgson, I. (2018) Thanet Coast Turnstone (*Arenaria interpres*) Monitoring: January-February 2019. Unpublished report by the Sandwich Bay Observatory Trust for Natural England and Thanet Coast Project (Thanet Council).

¹⁰⁰ Saunders, P. & Lily, D (2019) Thanet Coast & Sandwich Bay SPA bird and visitor surveys (January to February 2019). Unpublished report by Footprint Ecology

¹⁰¹ Sandwich Bay Bird Observatory Trust (2020) Wading Bird Monitoring of the Thanet Coast SPA in Jan/Feb 2020. A Report to Bird Wise Kent (Thanet Coast and Sandwich Bay SAMMS).

¹⁰² Henderson, A. & Sutherland, M. (2017). Numbers and distribution of Golden Plovers in the Thanet Coast and Sandwich Bay SPA during the winter of 2016/2017. A report for Natural England in March 2017

¹⁰³ Mason, C. E. and MacDonald, S. M. (1999) Habitat use by Lapwings and Golden Plovers in a largely arable landscape. Bird Study 46: 89–99

¹⁰⁴ Gillings, S. (2003) Plugging the gaps – winter studies of Eurasian golden plovers and northern lapwings. Wader Study Group Bull. 100: 25-29

the species' use of farmland appears variable according to cropping patterns and rotations, with limited field fidelity from year to year (Mason & MacDonald 1999¹⁰⁵) except where favoured habitats are consistently or intentionally maintained.

- 6.3.14. There is evidence that certain crops may be favoured, and larger fields (i.e. over 10 – 15 ha.) are favoured over smaller ones, but distributions will often be variable from year to year. Gillings et al. (2007)¹⁰⁶ found that flocks occupied only a fraction of the available fields in a given area, concentrating mostly in large fields with open boundaries and where manure had been applied. Mason & MacDonald (1999)¹⁰⁰ found that fields over 15 ha. were favoured by golden plover, with fields of less than 10 ha. being used less often than their proportion in the study area and fields greater than 15 ha being used more often.
- 6.3.15. It must also be noted that virtually all surveys and datasets are based on diurnal surveys, whereas there is evidence that these do not reliably predict nocturnal habitat choice (Gillings et al. 2007)¹⁰². The available data for the region therefore has some limitations.
- 6.3.16. When considering thresholds for significance, 1% of the relevant population is typically used. Within their consultation response to the 2024 HRA, NE advised *“that the population size described within the citation for the SPA should be used as a baseline for determining significance”*. As such, the citation population of 411 individuals is used within this assessment, with populations of c. four birds (i.e. 1%) considered to be potentially notable as functionally linked land such that significant effects could potentially occur.

Regional Distribution Patterns

- 6.3.17. The majority of the birds associated with the SPA (over 80%, based on EN (2004)) appear to use areas of permanent pasture within and immediately outside the SPA to the south of the Great Stour, associated with Sandwich Bay and Pegwell Bay (i.e. some distance from the Council's administrative boundary). However, other ad hoc surveys and records, including Kent Ornithological Society sightings data and surveys reported for the Richborough Grid Connection project (National Grid (2016)) indicate areas close to or partly within the CCC area where potentially notable numbers of golden plover are regularly recorded (or have been recorded historically), including:
- the fields and marshes associated with the former Wensum Channel (particularly Ash Level (predominantly south east of the CCC area) and the fields and marshes west of St Nicholas at Wade);
 - the fields and marshes between Reculver and Birchington (several hundred birds recorded in most years); and
 - the fields and marshes at Seasalter (west of Whitstable).

¹⁰⁵ Mason, C. E. and MacDonald, S. M. (1999) Habitat use by Lapwings and Golden Plovers in a largely arable landscape. *Bird Study* 46: 89–99.

¹⁰⁶ Gillings, S., Fuller, R. J., and Sutherland, W. (2007) Winter field use and habitat selection by Eurasian golden plover *Pluvialis apricaria* and northern lapwing *Vanellus vanellus* on arable farmland. *INIS* 149(3): 509-520

- 6.3.18. Fields in these areas appear more likely to regularly support potentially significant aggregations of golden plover than agricultural areas in general, based on the available data and the characteristics of the fields and topography in these areas.
- 6.3.19. Urbanisation or disturbance effects are typically considered likely if development takes place within around 400m of a designated site¹⁰⁷. Although not directly applicable to functional land¹⁰⁸, the Council allocations are all over 2km from the broad areas noted above, and so are likely to have a relatively lower risk of affecting potentially notable FLL both directly and indirectly.

INCORPORATED MITIGATION

- 6.3.20. Policy DS20 states that *“Where there is the potential for a site to be functionally linked land for species associated with a SPA, SAC and/or Ramsar, an assessment of the potential value of the site must be undertaken. Any development considered likely to have significant effects must follow the mitigation hierarchy: avoid, then mitigate and then, finally, compensate. Where mitigation measures are agreed by the council, the development will be required to fund and/or implement such mitigation measures.”*
- 6.3.21. Thirteen allocation specific policies (larger allocations and where previous HRA reports have highlighted the potential for them to act as FLL) require that “The green and blue infrastructure strategy for the site should...assess the site’s potential to be functionally linked land in line with Policy DS20”.

ASSESSMENT OF EFFECTS

Whitstable Harbour Mixed Use Broad Location

- 6.3.22. As noted, there is no evidence of little tern using Whitstable harbour, or nearby locations that might be exposed to environmental changes associated with development at Whitstable harbour (i.e. within 1km), for breeding and so the identification of a broad location would not affect FLL that may be used by this feature ¹⁰⁹.

¹⁰⁷ For example, 400m has been identified as the distance from the Thames Basin Heaths SPA and the Solent and Harbours SPAs within which development should not occur due to the risk of significant effects on the SPAs themselves.

¹⁰⁸ SPAs typically support higher value and more unique habitats where concentrations of (usually dependent) species are found; agricultural land is more ubiquitous and so pressure on, say, an individual field would not typically carry the same degree of risk as pressure on an equivalent area of an SPA.

¹⁰⁹ Note that little tern are a feature of the Outer Thames Estuary SPA, which is immediately adjacent to Whitstable harbour. This site provides foraging habitat for common and little tern colonies associated with SPAs in Kent, Essex, Suffolk and Norfolk; however, there will be no effects from the allocation of Whitstable harbour on little terns associated with the Outer Thames Estuary SPA due to the distance to the nearest colonies (i.e. Whitstable harbour is substantially beyond the max-mean foraging range for this species (~6km (Woodward *et al.*, 2019)).

- 6.3.23. With regard to turnstone, the proposals for the site are not defined by Policy W2 in sufficient detail to allow a meaningful assessment of likely effects, or the identification of development-specific mitigation measures. Furthermore, not allocating the site would not prevent future development at the site. Development at the harbour clearly has the potential to affect its value as a roost for turnstone although it is recognised that:
- the continued presence of turnstone at this location suggests that typical harbour activities are not fundamentally inconsistent with the maintenance of roosting opportunities;
 - turnstone frequently utilise artificial structures for roosting;
 - there is no presumption for any scale, type or quantum of development at Whitstable harbour in Policy W2; and
 - opportunities to maintain the value of the harbour as a roost site are consequently available and can be precisely defined through the SPD and associated masterplan (which would arguably not be available as control mechanisms if the site were not allocated in the plan).
- 6.3.24. The mitigation provided by Policy W2 will however provide sufficient plan-level safeguards to ensure that this aspect is fully assessed and mitigated at the appropriate level in the planning hierarchy; on this basis there will be no adverse effects on the integrity of the turnstone population as a result of the Local Plan.

Allocation Sites

- 6.3.25. Sites could potentially affect golden plover through environmental changes affecting associated functional habitat and favoured non-SPA areas due to the allocations themselves (direct loss of functional habitat) or through increased recreational pressure associated with developments.
- 6.3.26. A high-level assessment of the likely value of the allocation sites to golden plover as FLL is outlined in **Appendix E**. This is based on the generally accepted habitat preferences of the species in winter, and the typical characteristics of known areas of FLL elsewhere. Potential allocation sites were reviewed using freely available desk-study information including recent and historical aerial photographs and ecological data from existing planning applications locally. Ornithological records were also purchased from Kent and Medway Biological Records Centre for sites which, from a high-level pre-screening exercise, appeared to support habitat of a suitable size and type, within a reasonable proximity to the designated site.
- 6.3.27. In summary, the majority of the potential allocation sites are urban with no or very low potential to support significant aggregations of golden plover (such that there is potential for the site to be considered FLL). However, the following allocations utilise some relatively large fields (i.e. >10 ha) and/or are relatively close to the SPA (within 10km); or have potentially suitable fields immediately adjacent to the potential allocation site; or have cumulative potential as FLL:
- Policy C10 - Land at Merton Park.
 - Policy C15 - Land south of Littlebourne Road.
 - Policy C16 - Land south of Bekesbourne Lane.
 - Policy W4 - Land at Brooklands Farm
 - Policy W5 - Land South of Thanet Way
 - Policy W6 - Land at Golden Hill.

- Policy W7 - Bodkin Farm
- Policy W8 - Land to the southwest of Joseph Wilson Business Park.
- Policy W9 - Land lying to the west of Golden Hill.
- Policy HB5 - Land to the West of Thornden Wood Road
- Policy HB9 - Land at Home Farm Strode Park.
- Policy HB10 - Land to the west of Bullockstone Road.
- Policy HB11 - Altira
- Policy R24 - Broad Oak Reservoir and Country Park

- 6.3.28. FLL for golden plover can be a difficult to identify at the plan level as regional distributions and the use of many fields will vary year to year according to local and regional conditions and cropping patterns. Furthermore, this variability and transience creates a risk of potential effects that cannot be avoided by simply excluding certain fields or sites in the allocation process, and it is possible that some allocation areas will, in the future, become valuable for this species. Full assessment of this aspect must therefore necessarily be undertaken at the project-level, which the Regulation 19 draft Local Plan requires through its policy provisions.
- 6.3.29. However, it is recognised that the allocations in the Council plan will not substantially reduce the non-designated habitat areas potentially available to golden plover within the Council area. The Regulation 19 draft Local Plan does not therefore introduce a systematically unavoidable risk of effects on FLL for golden plover that might affect population integrity, and the mitigation provides sufficient plan-level safeguards to ensure that this aspect is fully assessed and mitigated at the appropriate level in the planning hierarchy; on this basis there will be no adverse effects on the integrity of the golden plover population as a result of the local plan.

FUNCTIONALLY LINKED LAND RECOMMENDATIONS AND CONCLUSION

- 6.3.30. The incorporated policy measures will provide sufficient safeguards to ensure that the integrity of Thanet Coast and Sandwich Bay SPA and Thanet Coast and Sandwich Bay Ramsar site is not adversely affected through effects on FLL. Policy additions are not considered essential to ensure this outcome, and no adverse effects alone or in-combination via this mechanism would be expected if the Local Plan is adopted as currently drafted.

7 THE SWALE SITES

7.1 OVERVIEW

- 7.1.1. The Swale sites that are screened in are The Swale SPA and The Swale Ramsar site.
- 7.1.2. The screening has indicated that the interest features of these sites may be vulnerable (i.e. exposed and sensitive) to environmental changes associated with the implementation of the Local Plan, particularly in relation to in-combination effects of visitor pressure associated with the overall quantum of development and urbanisation and the qualifying features of the SPA and Ramsar site may be exposed to development-related effects when outside the site boundary (i.e. functional land).
- 7.1.3. The SSSI units of The Swale SSSI that underpin the above European sites are almost all at 'favourable' conservation status (the exceptions being grasslands and ditch systems associated with Seasalter Levels, which are in 'unfavourable no change' condition for land-management reasons).

7.2 RECREATIONAL PRESSURE / URBANISATION

SUMMARY OF PATHWAY

- 7.2.1. The pathway for effects on the interest features of the Swale SPA and Ramsar site is essentially as per the Thanet Coast sites (see Section 6.2), i.e. through effects on the qualifying bird species either directly (e.g. through causing them to flee) or indirectly (e.g. through damaging the supporting habitats).

BASELINE AND PREDICTED CHANGES

- 7.2.2. The issue of region-wide in-combination recreational pressure on the European sites associated with The Swale has been recognised for several years and has been subject to a detailed mitigation strategy (The North Kent Marshes "Strategic Access Management and Monitoring Strategy" (SAMMS)¹¹⁰). This strategy therefore provides the context for the baseline and the assessment.
- 7.2.3. The Thames, Medway and Swale Estuaries SAMMS defines ZoIs for the European sites associated with the North Kent Marshes (including The Swale SPA and Ramsar site), based on visitor surveys, which provide a reasonable and robust basis for identifying locations within which residential development might result in significant effects alone or in-combination. The ZoI for The Swale SPA and Ramsar site is 6km. The ZoIs are used to identify areas within which developer contributions are levied to support the SAMMS, and hence also function as a proxy for the zone in which significant effects may otherwise occur as a result of development.
- 7.2.4. The Regulation 19 draft Local Plan includes provision for approximately 2,120 homes within 6km of the SPA and Ramsar site across 12 allocations. The closest of these is W10 - Land at Beresford Road, located approximately 520m from the Swale SPA and Ramsar site.

¹¹⁰ Available at: <https://swale.gov.uk/news-and-your-council/publications/planning-and-planning-policy/strategic-access-management-and-monitoring-strategy-samms>

INCORPORATED MITIGATION

- 7.2.5. The Regulation 19 draft Local Plan includes several mitigation measures designed to prevent adverse effects on the integrity of European sites due to recreational pressure. Pertinently for the Swale sites, the following is stated within Policy DS20:

“All proposals for new residential development within the two identified Zones of Influence (Thanet Coast and Sandwich Bay SPA 7.2km and the Swale SPA 6km) will be required to comply with the relevant Strategic Access Management and Monitoring Strategy or Strategies (SAMMs) in order to mitigate against the likely in-combination effects of increased recreational disturbance from new development on the overwintering bird populations for which Thanet Coast and Sandwich Bay SPA or Ramsar and the Swale SPA or Ramsar are designated.

A financial contribution will be required in line with the tariff(s) towards the in-perpetuity Strategic Access Management and Monitoring Strategy or Strategies. This will be secured and collected via a S106 ahead of the commencement of the development.

Developments for holiday accommodation, hotels, camp/caravan sites, student accommodation, older person housing, houses of multiple occupation, gypsy and traveller accommodation or mobile/temporary dwellings that would increase recreational activity causing disturbance to qualifying species will be assessed on a case by case basis under the Habitats Regulations and may be required to make full or partial contributions towards one or both SAMMs if appropriate.

Proposals for new large scale residential development which is located within close proximity to the Thanet Coast and Sandwich Bay SPA or Ramsar and / or Swale SPA and Ramsar may also need to provide further mitigation measures, in addition to contributing to Bird Wise(s). Such proposals will be considered on a case-by-case basis by the council and Natural England. All mitigation measures will be provided prior to occupation of development and delivered in perpetuity.

Proposals for new large scale residential development outside of the Zones of Influence may also need to secure appropriate mitigation and avoidance measures to offset any potential adverse effects arising from increased recreational pressure on the Thanet Coast and Sandwich Bay SPA or Ramsar and / or Swale SPA and Ramsar (either ‘alone’ or ‘in combination’ with other relevant plans and proposals). This requirement will be determined in consultation with the council and Natural England.”

- 7.2.6. The latter paragraphs address concerns expressed by Natural England in their May 2024 consultation response and August 2024 email specifically discussing recreational pressure, that mitigation measures above and beyond the relevant SAMMS (‘SAMMS plus’ approach) would be required for individual site allocations of over 500 new homes within the relevant Zols or where the cumulative impacts of multiple allocations in the same Zol are large.

- 7.2.7. In addition, Policies SS1 and DS28 relating to open space provision provide additional protections.

ASSESSMENT OF EFFECTS

- 7.2.8. The Regulation 19 draft Local Plan will increase the population within 6km of the SPA and Ramsar site, which will increase the number of visits and visitors to the estuary, which may increase the risk of disturbance events having a significant effect on wintering waterbird populations.

- 7.2.9. In considering the potential effects of increased recreational pressure on these sites due to the Regulation 19 draft Local Plan, the following aspects are relevant:

- The Regulation 19 draft Local Plan incorporates the agreed and accepted strategic mitigation for recreational effects on the European sites associated with The Swale SPA and Ramsar site, i.e. the SAMMS and associated developer contributions and SAMMS plus approach.
- The SAMMS is considered fundamentally scalable to address higher housing numbers, and extendable to cover the revised plan period. The SAMMS is subject to regular monitoring, which will inform future amendments to ensure its continued effectiveness.

7.2.10. With regard to monitoring the effectiveness of the SAMMS, provision is made within the SAMMS for annual monitoring. There is evidence of the effectiveness of the measures (notably ranger provision) from similar programmes such as that associated with the Solent¹¹¹ which have reported significant differences in measures of disturbance.

7.2.11. On this basis, it can be concluded that the Regulation 19 draft Local Plan will have no adverse effects on the integrity of The Swale SPA or The Swale Ramsar site due to recreational pressure or urbanisation effects, alone or in combination.

RECREATIONAL PRESSURE RECOMMENDATIONS AND CONCLUSION

7.2.12. The incorporated policy measures will provide sufficient safeguards to ensure that recreational pressure does not adversely affect The Swale sites as a result of the Local Plan. Policy additions are not considered essential to ensure this outcome, and no adverse effects alone or in-combination via this mechanism would be expected if the Regulation 19 draft Local Plan is adopted as currently drafted.

7.3 FUNCTIONALLY LINKED LAND

SUMMARY OF PATHWAY

7.3.1. With regard to The Swale SPA and The Swale Ramsar site the only features likely to be reliant on FLL outside the designated site boundaries is Dark-bellied brent goose and curlew, which are known to forage in agricultural fields at low and high tide, some of which will be outside the designated site boundaries.

7.3.2. The remaining features of the SPA and Ramsar site are more fundamentally associated with the habitats of the designated sites themselves (e.g. intertidal mudflats, saltmarsh, grazing marsh) and are not typically considered reliant on FLL away from the coast. These features are not considered further.

7.3.3. The following sections summarise the anticipated exposure of Dark-bellied brent goose and curlew associated with The Swale SPA and Ramsar site to the allocations in the Council plan.

BASELINE AND PREDICTED CHANGES

7.3.4. Dark-bellied brent geese typically winter on coastal mudflats, where they feed on eelgrass (*Zostera* spp.) and marine algae. However, the species in the UK has diversified its foraging preferences to

¹¹¹ Available at: https://solent.birdaware.org/media/33773/Disturbance-Monitoring-Report-Winter-2018-2020/pdf/Disturbance_Monitoring_Report_Winter_2018-19_and_2019-20.pdf

include farmland with arable or pasture, and sometimes amenity grassland, which is thought to be a response to reductions in natural terrestrial habitats. The species shows significant site fidelity.

- 7.3.5. The Solent Waders and Brent Goose Strategy project has developed the Solent Waders and Brent Goose Network¹¹² which identifies FLL around the Solent. Virtually all sites identified through this process are within 2 – 3km of the coast, reflecting the relative importance of this proximity aspect. In addition to proximity to the coast, Whitfield (2020) notes that favoured sites are typically large, low-lying and flat.
- 7.3.6. Wintering curlew typically frequent open coasts, estuaries, saltmarshes and inland grazing marshes, as sites with abundant mud or soil invertebrate prey for foraging. Large areas of open terrain, free from obstructions around roosting and feeding areas are preferred, with clear sightlines to detect predators (Natural England, 2020)¹¹³. Research suggests a strong preference for coastal habitats, particularly intertidal mudflats, during the wintering period, with alternative sites only being used when primary preferences are no longer available (e.g. due to prey availability or high competition) although inland habitats such as meadows and croplands (Donnez *et al.*, 2023)¹¹⁴. In general, curlew is considered to show high fidelity to wintering sites between years. Similarly to dark-bellied brent geese, proximity to the coast is likely to be important.
- 7.3.7. With regard to the potential allocations, sites that are over 5km from the SPA are considered very unlikely to provide FLL for the SPA populations of dark-bellied brent geese and curlew. This effectively excludes all sites except for:
- Policy W4 - Land at Brooklands Farm
 - Policy W5 - Land South of Thanet Way
 - Policy W6 - Land at Golden Hill
 - Policy W7 - Bodkin Farm
 - Policy W8 - Land to the southwest of Joseph Wilson Business Park
 - Policy W9 - Land lying to the west of Golden Hill
 - Policy W10 - Land at Beresford Road (although this site comprises solely urban habitats, and is not considered suitable to support the qualifying species)
 - Policy W11 - St Vincent's Centre
 - Policy HB5 - Land to the West of Thornden Wood Road

¹¹² <https://hiwwt.maps.arcgis.com/>

¹¹³ Natural England (2020) Definition of Favourable Conservation Status for Curlew.

¹¹⁴ Donnez, M., Schwemmer, P., Fort, J., Garthe, S., Boschert, M., Duttmann, H., Elts, J., Fartmann, T., Fiedler, W., Franks, S., Jiguet, F., Kampfer, S., Korniluk, M., Kruckenburg, H., Krupinski, D., Marja, R., Mercker, M., Obloza, P., Jan Ottens, H., Piha, M., Robin, F., Rousseau, P., Rupprecht, V. and Bocher, P. (2023). Small space but high diversity: Spatial and temporal habitat use by endangered Eurasian curlew at wintering sites throughout Europe. *Wetlands* 43(7): 80

- 7.3.8. Site-specific baseline survey data from associated planning applications or desk study records obtained from Kent and Medway Biological Records Centre are considered in **Appendix E** where available. More generally, there are known areas of FLL for dark-bellied brent geese associated with The Swale sites immediately adjacent to the Council's administrative boundary at Graveney, Cleve and Nagden Marshes (note, this area forms part of the Cleve Hill Solar Farm which has received DCO permission).

INCORPORATED MITIGATION

- 7.3.9. Policy DS20 states that *"Where there is the potential for a site to be functionally linked land for species associated with a SPA, SAC and/or Ramsar, an assessment of the potential value of the site must be undertaken. Any development considered likely to have significant effects must follow the mitigation hierarchy: avoid, then mitigate and then, finally, compensate. Where mitigation measures are agreed by the council, the development will be required to fund and/or implement such mitigation measures."*
- 7.3.10. Thirteen allocation specific policies (larger allocations and where previous HRA reports have highlighted the potential for them to act as FLL) require that "The green and blue infrastructure strategy for the site should...assess the site's potential to be functionally linked land in line with Policy DS20".

ASSESSMENT OF EFFECTS

- 7.3.11. A high-level assessment of the likely value of the allocation sites to dark-bellied brent goose and curlew as FLL is outlined in **Appendix E**. This is based on the generally accepted habitat preferences of the species in winter, and the typical characteristics of known areas of FLL elsewhere. Potential allocation sites were reviewed using freely available desk-study information including recent and historical aerial photographs and ecological data from existing planning applications locally. Ornithological records were also purchased from Kent and Medway Biological Records Centre for sites which, from a high-level pre-screening exercise, appeared to support habitat of a suitable size and type, within a reasonable proximity to the designated site.
- 7.3.12. In summary, none of the proposed allocation sites are considered likely to provide FLL for the SPA populations of dark-bellied brent geese or curlew due to their fundamental characteristics (e.g. size, distance, habitats present, topography). Notwithstanding this, the policy-based mitigation provides sufficient plan-level safeguards to ensure that this aspect is fully assessed and mitigated at the appropriate level in the planning hierarchy. On this basis there will be no adverse effects on the integrity of the dark-bellied brent goose or curlew populations as a result of the Regulation 19 draft Local Plan.

FUNCTIONALLY LINKED LAND RECOMMENDATIONS AND CONCLUSION

- 7.3.13. The incorporated policy measures will provide sufficient safeguards to ensure that the integrity of The Swale SPA and The Swale Ramsar site is not adversely affected through effects on FLL. Policy additions are not considered essential to ensure this outcome, and no adverse effects alone or in combination via this mechanism would be expected if the Regulation 19 draft Local Plan is adopted as currently drafted.

8 TANKERTON SLOPES AND SWALECLIFFE SAC

8.1 OVERVIEW

- 8.1.1. Tankerton Slopes and Swalecliffe SAC is a small site comprising two units of coastal grassland east of Whitstable designated for its population of Fisher's estuarine moth, which is dependent on hogs-fennel as its larval food plant.
- 8.1.2. The screening of the Regulation 19 draft Local Plan has indicated that the interest features of this site may be vulnerable (i.e. exposed and sensitive) to environmental changes associated with the implementation of the Local Plan, particularly in relation to in-combination effects of visitor pressure associated with the overall quantum of development.
- 8.1.3. The SSSI units of the Thanet Coast SSSI and Tankerton Slopes SSSI that underpin the site are in 'favourable' condition.

8.2 RECREATIONAL PRESSURE

SUMMARY OF PATHWAY

- 8.2.1. The site is located in an urban area and so is potentially vulnerable to changes in recreational pressure that may damage the site habitats (particularly those locations where hogs-fennel is present). The site is noted within the supplementary advice on conservation objects as being popular with dog walkers and is vulnerable to under-management.

BASELINE AND PREDICTED CHANGES

- 8.2.2. The SSSI units underpinning the SAC are in favourable condition. There is no SIP specifically for this site, although supplementary advice on conserving and restoring site features is available from Natural England¹¹⁵.
- 8.2.3. The Ramsgate to Whitstable Access and Sensitive Features Appraisal for the England Coastal Path¹¹⁶ notes the following:
 - The area is currently well accessed with both the Oyster Bay Trail walking route and a Regional Cycle Route through and alongside the sites.
 - Walkers and dog walkers use both sites largely on established routes.
 - The Tankerton Slope SSSI unit is steep with limited accessibility.
 - The Thanet Coast SSSI unit has characteristics (marshy, thick vegetation, shingle, cut off by tides) that concentrate usage of the site on the existing surfaced trails.

¹¹⁵ Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030378.pdf>

¹¹⁶ Available at: <https://assets.publishing.service.gov.uk/media/5a805d6940f0b62305b8ab9a/ramsgate-whitstable-sensitive-features-appraisal.pdf>

- *“Local authorities in the area have developed strategic solutions to ensure that their housing allocations (which would otherwise have a likely significant effect) also have no likely significant effect on the SPA [sic] – which would also address any potential concerns over [this] SAC”*

8.2.4. The site is also actively managed by the Council.

8.2.5. No ZoI has been identified for this SAC, although it is likely to be relatively small (i.e. the vast majority of visitors will almost certainly live in Whitstable or Herne Bay, given the size and nature of the site units). Allocations in Whitstable may therefore increase recreational pressure on these areas. The closest allocation is approximately 470m from the site (W11 – St Vincent’s Centre) which is allocated for mixed use development, including 10 new homes. Two other allocations are present within 1km (W7 and W2), with the remainder located over 1.1km away.

INCORPORATED MITIGATION

8.2.6. The Regulation 19 draft Local Plan includes several mitigation measures designed to prevent adverse effects on the integrity of European sites due to recreational pressure; these include:

- Policy DS20 - Habitats of international importance (requires compliance with the Thanet Coast SAMM and financial contributions in line with the relevant tariffs).
- Policies relating to open space provision (e.g. SS1 and DS28).

8.2.7. The SAMM was adopted by the Council in 2017 (with adoption of the current Local Plan) and currently covers the period to 2031, although the mitigation delivered by the SAMM is considered fundamentally scalable and extendable to address higher housing numbers and future planning periods; this is consistent with NE’s position on other strategic mitigation schemes (for example, in relation to the Thames Basin Heaths SPA, or the SPAs associated with the Solent and nearby harbours).

8.2.8. The measures noted in the SAMM apply to the Thanet Coast SSSI unit of Tankerton Slopes and Swalecliffe SAC.

ASSESSMENT OF EFFECTS

8.2.9. The Regulation 19 draft Local Plan site allocations will increase the population within 6km of the SAC, although as noted above the actual zone of interest for the site is likely to be significantly smaller than 6km. Given the limited accessibility, both to the site itself from the allocation sites (through urban Whitstable), and within the site (due to the site characteristics, especially when compared with the well-maintained paths and amenity grassland adjacent to the site), it is unlikely that this would result in notable increases in usage of the site. Recreation is not identified as a pressure for the underlying SSSIs, nor is it referenced in the supplementary advice on conservation objectives for the site, and the condition of the SSSI features relevant to the SAC designation (long coarse grassland which supports the larval foodplant for Fisher’s estuarine moth) are deemed to be in favourable condition with no adverse effects of public access currently noted.

8.2.10. In considering the potential effects of increased recreational pressure on this site due to the Regulation 19 draft Local Plan, the following aspects are relevant:

- The Regulation 19 draft Local Plan incorporates the agreed and accepted strategic mitigation for recreational effects on the European sites associated with the Thanet Coast, i.e. the SAMM and associated developer contributions.

- The SAMM is considered fundamentally scalable to address higher housing numbers, and extendable to cover the revised plan period. The SAMM is subject to regular monitoring, which will inform future amendments to ensure its continued effectiveness.
- The SAMM measures are applicable to this site also.
- The provision of open space commensurate with planned growth and allocations will reduce any additional effects on these sites.

8.2.11. Policy DS25 will support green infrastructure provision whilst Policy DS28 will provide policy provisions to ensure open space, including natural and semi-natural open space, is provided commensurate with new development proposed, which will ensure broader open space needs linked to new development within the district will be met. Allocation policies include provision for the inclusion of open space with standards.

8.2.12. In summary, given the relative inaccessibility of the site and the small number of allocations within close proximity, visitor use is not expected to increase substantially, with further safeguards provided by the measures incorporated into the Regulation 19 draft Local Plan, which will ensure that adverse effects on the integrity of this site via this mechanism will not occur.

RECREATIONAL PRESSURE RECOMMENDATIONS AND CONCLUSION

8.2.13. The incorporated policy measures will provide sufficient safeguards to ensure that recreational pressure does not adversely affect Tankerton Slopes and Swalecliffe SAC as a result of the Local Plan. Policy additions are not considered essential to ensure this outcome, and no adverse effects alone or in-combination via this mechanism would be expected if the Regulation 19 draft Local Plan is adopted as currently drafted.

9 BLEAN COMPLEX SAC

9.1 OVERVIEW

- 9.1.1. Blean Complex SAC comprises three woodland blocks (Church Woods SSSI, Ellenden Wood SSSI, and East Blean SSSI) that support the Sub-Atlantic and medio-European oak or oak-hornbeam forests of the *Carpinion betuli* feature (hereafter 'Oak-hornbeam forests'). The SSSI units underpinning the SAC are all in 'favourable' or 'unfavourable recovering' condition, with the exception of one unit in East Blean SSSI where invasive periwinkle *Vinca minor* exceeds the target for the unit. The SIP¹¹⁷ identifies air pollution as the only threat to site integrity.
- 9.1.2. The screening of the Regulation 19 draft Local Plan has indicated that the interest features of these sites may be vulnerable (i.e. exposed and sensitive) to environmental changes associated with the implementation of the Local Plan, particularly in relation to in-combination effects of air quality changes associated with the overall quantum of development. Recreational pressure may also increase as a result of the Local Plan.

9.2 RECREATIONAL PRESSURE

SUMMARY OF PATHWAY

- 9.2.1. Woodland habitats can be susceptible to disturbance from recreational activities through a range of mechanisms, including compaction of soil (particularly around ancient and veteran trees), damage to trees and other vegetation, introduction of invasive species, or (depending on habitat) eutrophication from faeces.
- 9.2.2. The SSSIs that comprise Blean Complex SAC are typically several kilometres from the nearest allocations, although the closest is only approximately 598m away (R19 – Land at Church Farm, allocated for a mixed-use development including 17 new homes).

BASELINE AND PREDICTED CHANGES

- 9.2.3. The SIP does not identify recreational pressure as a threat or pressure. Similarly, no issues in relation to recreational pressure are identified in the relevant SSSI condition assessments. The Supplementary Advice¹¹⁸ notes that "*Recreation levels at Blean Complex SAC will need to be monitored, but it is not currently a particular concern, due to the current access management and educational programme on this site*". As a result, Zols based on visitor surveys have not been identified for the site. Sixty-four site allocations are located within 7km of the SAC, contributing 9,650 new homes.

¹¹⁷ [141222FINALv1 Blean Complex.pdf](#)

¹¹⁸ <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0013697.pdf>

INCORPORATED MITIGATION

- 9.2.4. The Regulation 19 draft Local Plan includes several mitigation measures designed to prevent adverse effects on the integrity of European sites due to recreational pressure or moderate incidental effects; these include:
- Policy DS27 – Blean Woodland Complex (sets requirements for the safeguarding and enhancement of the Blean Woodland Complex which includes the SAC plus other designated and undesignated woodland blocks (i.e. non-SAC) that will contribute to the overall woodland resource and hence integrity of the SAC).
 - Policies relating to open space provision within developments (SS1 and DS28).

ASSESSMENT OF EFFECTS

- 9.2.5. As noted, recreational pressure is not identified as either a pressure or a threat for the site. Recent correspondence between CCC and NE (2024) has confirmed this position, and the expectation that this will not change as a result of the Local Plan. The effects of the Local Plan and population growth on the features of the SAC are therefore considered nominal, and arguably not significant (i.e. the screening test) as the conservation objectives are not likely to be undermined.
- 9.2.6. In addition, Policy DS25 will support green infrastructure provision whilst Policy DS28 includes policy provisions to ensure open space, including natural and semi-natural open space, is provided commensurate with new development proposed, which will ensure that the broader open space needs linked to new development within the district will be met. Allocation policies include provision for the inclusion of open space with standards. These measures will help moderate the residual risk of increased recreational pressure affecting areas of the SAC.
- 9.2.7. More importantly, Policy DS27 (with DS20) will (a) ensure that the integrity of the SAC is not adversely affected by development within the Council's administrative boundary and (b) help ensure maintenance and/or improvement of the SAC conservation status by improving the overall condition of the Blean woodland complex generally (i.e. including non-SAC areas) which will increase the resilience to environmental change.

RECREATIONAL PRESSURE RECOMMENDATIONS AND CONCLUSION

- 9.2.8. The SAC site has a relatively low sensitivity to recreational pressure, and recreational activity at the site is currently well-managed as part of the broader management of the site (and there is no reason to assume that this will change). The incorporated policy measures will help moderate the residual risk of increased recreational pressure due to population growth and contribute to the SAC achieving and/or maintaining 'favourable' conservation status. Policy additions are not considered essential to ensure this outcome, and no adverse effects alone or in-combination via this mechanism would be expected if the Regulation 19 draft Local Plan is adopted as currently drafted.

9.3 AIR QUALITY

SUMMARY OF PATHWAY

- 9.3.1. The Regulation 19 draft Local Plan may indirectly contribute to local air pollution and wider diffuse pollution. In practice, the principal source of air pollution associated with the Local Plan will be related to increased traffic flows and changes in traffic distribution due to the promotion of new

development (since the Local Plan does not provide for any new significant power generation or industrial point-sources).

- 9.3.2. The Blean Complex SAC is within 200m of the A290 (north of Canterbury) which is a strategic road and has the potential to experience significant traffic impacts as a result of the Local Plan. Furthermore, approximately 6.7ha of Ellenden Wood SSSI and Church Wood, Blean SSSI are within 200m of the A290.

BASELINE AND PREDICTED CHANGES

- 9.3.3. An air quality impact assessment has been completed for the Regulation 19 draft Local Plan through dispersion modelling of traffic emissions using the ADMS-Roads (version 5.1.0.2) atmospheric dispersion model and traffic data provided by the Jacobs Project Transport Planner (WSP, 2026). The full report and results can be found in **Appendix D**. Baseline conditions across the study area for NO_x and NH₃ concentrations and N Deposition were sourced from APIS¹¹⁹ and compared to the relevant critical level (CLE) and critical load (CLo) values.
- 9.3.4. Total predicted concentrations of NO_x fall below the CLE at all receptor locations for the assessment of the Local Plan both alone and in-combination. The change in predicted annual mean concentrations does not exceed 1% of the lower CLE in both alone and in-combination scenarios. Therefore, no likely significant effects of NO_x concentrations have been identified for the Blean Complex SAC.
- 9.3.5. Total predicted concentrations of NH₃ fall below the lower CLE at all receptor locations for the assessment of the Local Plan both alone and in-combination. The change in predicted annual mean concentrations does not exceed 1% of the lower CLE in both alone and in-combination scenarios. Therefore, no likely significant effects of NH₃ concentrations have been identified for the Blean Complex SAC.
- 9.3.6. The predicted background nitrogen deposition is already exceeding the lower CLo in the 2019 Baseline and 2042 Do Minimum scenarios (without the Local Plan), and therefore also exceeds the predicted total nitrogen deposition in the 2042 Do Something scenario with the Local Plan both alone and in-combination. However, the change in predicted total nitrogen deposition does not exceed 1% of the lower CLo in both the alone and in-combination scenarios.

INCORPORATED MITIGATION

- 9.3.7. The potential for effects on European sites due to air quality is difficult for a Local Plan to specifically mitigate, since the decision to travel by car outside the LPA area is typically made in the context of regional and national travel conditions rather than local provision of sustainable travel options. However, the promotion of sustainable transport is woven throughout the Regulation 19 draft Local Plan, particularly via the following policies:

- Policy SS5 - Movement and Transportation Strategy for the district.

¹¹⁹ [APIS - Air Pollution Information System | APIS](#)

- Policy DS16 - Movement Hierarchy.
- Policy DS17 - Active and sustainable travel.
- Policy DS18 - Highways and parking.
- Policy DS19 - Air Quality.
- Policy DS27 – Blean Woodland Complex.
- Policy DM5 – Parking Design.

9.3.8. These policy measures will help moderate the effects of the plan but will not necessarily mitigate or offset potential changes in air quality in their entirety.

ASSESSMENT OF EFFECTS

9.3.9. Given the results of the Air Quality modelling which identified no likely significant effects on the Blean Complex SAC for NO_x and NH₃ and that the change in predicted total nitrogen deposition does not exceed 1% of the lower CLo in both the alone and in-combination scenarios, a potentially notable impact from air quality as a result of the Regulation 19 draft Local Plan (such that specific site-based mitigation measures would be required) is not therefore expected.

AIR QUALITY RECOMMENDATIONS AND CONCLUSION

9.3.10. The modelling has demonstrated that the allocations and policies within the Regulation 19 draft Local Plan are not likely to give rise to an increase in air quality impacts on the Blean Complex SAC and the incorporated policy measures will help moderate any residual risk. Policy additions are not considered essential to ensure this outcome, and no adverse effects alone or in-combination via this mechanism would be expected if the Regulation 19 draft Local Plan is adopted as currently drafted.

10 SUMMARY AND CONCLUSIONS

10.1 SUMMARY

- 10.1.1. Canterbury City Council (CCC) has decided to prepare a new Local Plan to ensure it remains fit for purpose, reflects national planning guidance, delivers local priorities, and meets future needs whilst restoring a five-year supply of deliverable housing sites. The Council is currently consulting on the Regulation 19 draft Local Plan to 2042/3.
- 10.1.2. Regulation 105 of the Habitats Regulations states that if a land-use plan is “(a) *is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects); and (b) is not directly connected with or necessary to the management of the site*” then the plan-making authority must “...*make an appropriate assessment of the implications for the site in view of that site’s conservation objectives*” before the plan is given effect. The process by which Regulation 105 is met is known as HRA. An HRA determines whether there will be any ‘likely significant effects’ (LSE) on any European site as a result of a plan’s implementation (either on its own or in-combination with other plans or projects) and, if so, whether these effects will result in any adverse effects on the site’s integrity. The Council has a statutory duty to prepare the Local Plan and is therefore the Competent Authority for an HRA.
- 10.1.3. There is no statutory requirement for HRA to be undertaken on draft plans or similar developmental stages (e.g. issues and options; preferred options). However, it is accepted best-practice for the HRA of strategic planning documents to be run as an iterative process alongside plan development, with the emerging policies or options reviewed during development to ensure that potentially adverse effects on European sites can be identified at an early stage and avoided or mitigated through the plan development process.
- 10.1.4. The assessment completed to date indicates that the majority of the Regulation 19 draft Local Plan policies and proposed site allocations will have no effect (either alone or in-combination) on any European sites, typically because either they are policy types that do not make provision for changes or because they relate to sites that are a considerable distance from the European sites (with no known pollutant or effect pathway).
- 10.1.5. The HRA of the Regulation 19 draft Local Plan has considered potential effects on:
- all European sites within 20km of the Council’s administrative boundary (see Table 3.2);
 - any additional sites that may be hydrologically linked to the Local Plan’s zone of influence; and
 - any additional sites identified by Natural England following the Regulation 18 Draft Local Plan consultations.
- This is considered to be a suitably precautionary starting point for the assessment of the Local Plan.
- 10.1.6. The initial ‘screening’ assessment has concluded that significant effects on the following sites are not anticipated, alone or in-combination; this is principally due to their distance from the Council’s administrative boundary and the absence of reasonable pathways by which environmental changes associated with the Local Plan could undermine the conservation objectives for the sites:
- Outer Thames Estuary SPA
 - Wye and Crundale Downs SAC

- Margate and Long Sands SAC
- Parkgate Down SAC
- Sandwich Bay SAC
- Folkestone to Etchinghill Escarpment SAC
- Dungeness, Romney Marsh and Rye Bay SPA
- Dungeness, Romney Marsh and Rye Bay Ramsar site
- Medway Estuary and Marshes Ramsar site
- Medway Estuary and Marshes SPA
- Essex Estuaries SAC
- Foulness (Mid-Essex Coast Phase 5) Ramsar site
- Foulness (Mid-Essex Coast Phase 5) SPA
- Thames Estuary and Marshes Ramsar site
- Thames Estuary and Marshes SPA
- Lydden and Temple Ewell Downs SAC
- Dover to Kingsdown Cliffs SAC

10.1.7. Further examination of potential effects through an appropriate assessment stage was completed for the following sites and pathways:

- Stodmarsh Ramsar site:
 - Recreational Pressure
 - Urbanisation
 - Air Quality
 - Water Quality
- Stodmarsh SAC:
 - Recreational Pressure
 - Urbanisation
 - Water Quality
 - Functional Land (Desmoulin's whorl snail)
- Stodmarsh SPA:
 - Recreational Pressure
 - Urbanisation
 - Air Quality
 - Water Quality
- Tankerton Slopes and Swalecliffe SAC:
 - Recreational Pressure
- Thanet Coast SAC:

- Recreational Pressure
- Thanet Coast and Sandwich Bay Ramsar site:
 - Recreational Pressure / Urbanisation
 - Functional Land (golden plover)
- Thanet Coast and Sandwich Bay SPA:
 - Recreational Pressure / Urbanisation
 - Functional Land (golden plover)
- The Swale Ramsar site:
 - Recreational Pressure
 - Functional Land (dark-bellied brent goose and curlew)
- The Swale SPA:
 - Recreational Pressure
 - Functional Land (dark-bellied brent goose and curlew)
- Blean Complex SAC:
 - Recreational Pressure
 - Air Quality

10.1.8. These aspects have been examined through an appropriate assessment stage to ensure that proposals coming forward under the Local Plan either avoid affecting European sites entirely (no significant effect) or will not adversely affect site integrity where potential effect pathways remain. Site integrity (in HRA terms) is “*the coherent sum of the site’s ecological structure, function and ecological processes, across its whole area, which enables it to sustain the habitats, complex of habitats and/or populations of species for which the site is designated*” (EC Guidance ‘Managing Natura 2000’ (2018)).

10.1.9. In summary:

- **Visitor/Recreational Pressures:** The Regulation 19 draft Local Plan will have no adverse effects, along or in-combination, on sites sensitive to visitor pressure (i.e. the Stodmarsh sites, Tankerton Slopes and Swalecliffe SAC, Thanet Coast sites, Swale sites and Blean Complex SAC) due to the adoption of the relevant SAMMs. This conclusion accounts for measures included within policy relating to open-space provision although these are not relied on to ensure adverse effects do not occur and the option to adopt a SAMMs plus approach if deemed required.
- **Urbanisation:** The Regulation 19 draft Local Plan will not adversely affect the integrity of any European sites through an urbanisation effect, alone or in-combination. This is primarily due to the nature of the allocations in proximity to European sites and the policy provision providing adequate protection.
- **Air Quality:** Transport and air quality assessments have demonstrated that there will be no adverse effect on the integrity of any air quality sensitive European sites as a result of the Regulation 19 draft Local Plan proposals, alone or in-combination.

- **Water quality:** Development of the allocated sites within the Council's administrative boundary is not expected to result in adverse effects on any water quality sensitive sites (notably Stodmarsh SAC, SPA and Ramsar site) alone or in-combination due to safeguarding measures relating to SuDS and wastewater treatment capacity provision included within the plan, and the development and implementation of the Nutrient Mitigation Strategy including the availability of credits through SEC and private providers.
- **Functional Land:** no potential areas of functionally-linked land have been identified that may be critical to the integrity of the qualifying species populations.

10.2 CONCLUSIONS

- 10.2.1. Overall, the assessment of the Regulation 19 draft Local Plan has concluded that most aspects of the plan will have no significant effects on any European sites, alone or in-combination due to the absence of effect pathways.
- 10.2.2. Appropriate assessments have been undertaken for those aspects where effect pathways are present (in-combination water quality, air quality and visitor pressure effects, and effects on species away from the sites), taking into account specific and cross-cutting policy-based mitigation and avoidance measures that have been incorporated into the plan. These appropriate assessments have employed additional analyses and data to resolve uncertainties present at the initial screening and have concluded that (as currently drafted) the Regulation 19 draft Local Plan will have no adverse effects on the integrity of any European sites, alone or in-combination.

Appendix A

EUROPEAN SITE SUMMARIES



APPENDIX A – EUROPEAN SITE SUMMARIES

Notes

The following proformas provide a summary of the European sites in the scope and/or provide hyperlinks to these data where publicly available.

These data are derived from (where available / relevant):

- the most recent JNCC-hosted GIS datasets;
- the Standard Data forms for SACs and SPAs and Information Sheets for Ramsar sites;
- Article 12 and 17 reporting;
- the published site Conservation Objectives;
- Supplementary Advice to the conservation objectives (SACO) where available;
- Site Improvement Plans (SIPs);
- the supporting Site of Special Scientific Interest's favourable condition tables where relevant and where no SACOs applicable to the features are available.

Note:

- For SPAs, the qualifying features are taken as those identified on the most recent JNCC datasets and citations or NE conservation objectives sheets, where these post-date the 2nd SPA Review (i.e. it will be assumed that any amendments suggested by the SPA review have been made) unless otherwise identified to us by NE; any site-specific issues relating to the SPA Review can be addressed in the screening and appropriate assessment of the preferred options (see below).
- The conservation objectives for Ramsar sites are taken to be the same as for the corresponding SACs / SPAs (where sites overlap); SSSI Definition of Favourable Condition (FCTs) are used for those Ramsar features not covered by SAC/SPA designations.

Note also that SPA feature lists are derived from the JNCC datasets and so may include species that are only designated as part of the assemblage; the qualifying species identified by the Natural England conservation objective documents are in **bold**.

Where possible the site data is used to identify other features that may be relevant to site integrity, particularly '**typical species**' (for SACs), **within-site supporting habitats**, and designated or non-designated '**functional habitats**' where these are identified in the available documentation (or otherwise well-known), although it should be noted that the tables are intended to provide an overview of these aspects only and not a detailed or exhaustive account for the site or all features.

BLEAN COMPLEX SAC	
Site Code	UK0013697
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0013697.pdf
Conservation Objectives	Available at: http://publications.naturalengland.org.uk/publication/5635542456729600?category=6528471664689152
Site Improvement Plan	Available at: http://publications.naturalengland.org.uk/publication/5635542456729600?category=6528471664689152
Supplementary advice	Available at: https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0013697.pdf
Associated SSSIs	Church Woods, Blean SSSI; East Blean Woods SSSI; Ellenden Wood SSSI
Site Overview	This site comprises an area of ancient broadleaved woodland situated on London Clay across three SSSIs (Church Woods SSSI, Ellenden Wood SSSI, and East Blean SSSI) within the Canterbury City Council (CCC).
Qualifying Features / Ramsar criteria	- H9160: Sub-Atlantic and medio-European oak or oak-hornbeam forests of the <i>Carpinion betuli</i>
Other interest features (SAC typical species, SPA supporting habitats, etc.)	The 'supplementary advice' indicates that the 'typical species' of the site include: ■ The constant and preferential plant species associated with the relevant National Vegetation Classification (NVC) communities. ■ Flora: Great wood-rush <i>Luzula sylvatica</i> and greater stitchwort <i>Stellaria holostea</i>. ■ Fauna: Heath fritillary butterfly <i>Mellicta athalea</i>, Nightingale <i>Luscinia megarhynchos</i>, Black Cap <i>Sylvia atricapilla</i>, Chiff chaff <i>Phylloscopus collybita</i>, Willow warbler <i>Phylloscopus trochilus</i>, Great spotted woodpecker <i>Dendrocopos major</i>, Garden warblers <i>Sylvia borin</i>, Green woodpecker <i>Picus viridis</i>, Lesser-spotted woodpecker <i>Dryobates minor</i>, Nightjar <i>Caprimulgus europaeus</i>, Dormouse <i>Muscardinus avellanarius</i>, and Money spider <i>Walckenaeria mitrata</i>
Functional Land	There are areas of deciduous woodland, good quality semi-improved grassland and ancient woodland adjacent to the SAC. The importance of habitat 'corridors' and habitat patches to the overall functional integrity of this feature is noted.

BLEAN COMPLEX SAC

Condition, Pressures, Threats

The SSSIs units underpinning the SAC are in 'favourable' or 'unfavourable recovering' condition. The SIP identifies air pollution as the only threat to site integrity (principally in relation to the oak-hornbeam forests).

DOVER TO KINGSDOWN CLIFFS SAC

Site Code	UK0030330
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0030330.pdf
Conservation Objectives	Available at: http://publications.naturalengland.org.uk/publication/4785841763254272?category=6528471664689152
Site Improvement Plan	Available at: http://publications.naturalengland.org.uk/publication/4785841763254272?category=6528471664689152
Supplementary advice	Available at: https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030330.pdf
Associated SSSIs	Dover to Kingsdown Cliffs SSSI
Site Overview	Dover to Kingsdown Cliffs SAC includes chalk cliffs, cliff-top grasslands and broad shingle beach as habitats. Supports different grassland species and some nationally rare plants such as early spider orchid <i>Ophrys sphegodes</i> and oxtongue broomrape <i>Orobancha artemisiae-campestris</i> . The invertebrate fauna is rich and there are numerous breeding sea birds along the cliffs. The site is approximately 11.1km south-east of the CCC area and has no hydrological connectivity with the CCC area.
Qualifying Features / Ramsar criteria	- H1230: Vegetated sea cliffs of the Atlantic and Baltic Coasts - H6210: Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites)
Other interest features (SAC typical species, SPA supporting habitats, etc.)	The 'supplementary advice' indicates that the 'typical species' of the site include: ■ For the Vegetated sea cliffs of the Atlantic and Baltic Coasts feature: - NVC types: MC1 - Crithmum maritimum -spergularia rupicola, MC4 - Brassica oleracea, MC8 - Festuca rubra - Armeria maritime, MC11 - Festuca rubra – Daucus carota sudsp gummiifer. ■ For the Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites) feature: - NVC types: CG4 Brachypodium pinnatum and CG5 Bromus erectus -Brachypodium pinnatum.

DOVER TO KINGSDOWN CLIFFS SAC

- Vascular plant assemblage: Early Spider Orchid *Ophrys sphegodes*, Ox-tongue broomrape *Orobanche artemisiae-campestris*, Meadow Clary *Salvia pratensis*, Nottingham Catchfly *Silene nutans*, Slender Bedstraw *Galium pumilum* and Burnt Orchid *Orchis ustulate*.

Functional Land

No specific non-designated areas of land outside the site boundary are identified as being functionally important to the maintenance of site integrity, although the need to maintain or restore the connectivity of the site to its wider landscape through features such as habitat patches, hedges, watercourses and verges is noted.

Condition, Pressures, Threats

The SSSI unit underpinning the SAC is in 'favourable' condition; however, the SIP identifies several pressures and threats to site integrity, the following of which may be potentially influenced by the Local Plan:

- Inappropriate scrub control (private areas insufficiently managed);
- Undergrazing (private areas insufficiently grazed);
- Air pollution (atmospheric nitrogen deposition).

DUNGENESS, ROMNEY MARSH AND RYE BAY SPA

Site Code	UK9012091
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012091.pdf
Conservation Objectives	Available at: http://publications.naturalengland.org.uk/publication/5208885390475264?category=6528471664689152
Site Improvement Plan	Available at: http://publications.naturalengland.org.uk/publication/5208885390475264?category=6528471664689152
Supplementary advice	Available at: https://designatedsites.naturalengland.org.uk/Marine/MarineSiteDetail.aspx?SiteCode=UK9012091
Associated SSSIs	Dungeness, Romney Marsh and Rye Bay SSSI; Hastings Cliffs to Pett Beach SSSI
Site Overview	The site comprises a large area of coastal and marine landscape, forming a barrier of extensive coastal shingle beaches and sand dunes across an area of intertidal mud and sand flats. Is located approximately 13.9km south of the CCC area and has no hydrological connectivity with the CCC area.
Qualifying Features / Ramsar criteria	- A021w: Great bittern <i>Botaurus stellaris</i> - A037w: Tundra swan <i>Cygnus columbianus bewickii</i> - A056w: Northern shoveler <i>Anas clypeata</i> - A081r: Eurasian marsh harrier <i>Circus aeruginosus</i> - A082w: Hen harrier <i>Circus cyaneus</i> - A132r: Pied avocet <i>Recurvirostra avosetta</i> - A140w: European golden plover <i>Pluvialis apricaria</i> - A151w: Ruff <i>Philomachus pugnax</i> - A176r: Mediterranean gull <i>Larus melanocephalus</i> - A191r: Sandwich tern <i>Sterna sandvicensis</i> - A193r: Common tern <i>Sterna hirundo</i> - A195r: Little tern <i>Sterna albifrons</i> - A294c: Aquatic warbler <i>Acrocephalus paludicola</i> - WATR: Waterbird assemblage

DUNGENESS, ROMNEY MARSH AND RYE BAY SPA

Other interest features (SAC typical species, SPA supporting habitats, etc.)

The supplementary advice¹²⁰ indicates that the within-site **supporting habitats** for the qualifying features are:

- Aquatic warbler: Coastal reedbeds and Freshwater and coastal grazing marsh.
- Avocet: Atlantic salt meadows (*Glauco-Puccinellietalia maritima*), Coastal lagoons, Freshwater and coastal grazing marsh, Intertidal coarse sediment, Intertidal mixed sediments, Intertidal mud, Intertidal sand and muddy sand, Mediterranean and thermo-Atlantic halophilous scrubs (*Sarcocornetea fruticosi*), *Salicornia* and other annuals colonising mud and sand, *Spartina* swards (*Spartinion maritima*).
- Bewick's swan: freshwater and coastal grazing marsh.
- Bittern: Coastal lagoons, Coastal reedbeds and Freshwater and coastal grazing marsh.
- Common tern: Atlantic salt meadows (*Glauco-Puccinellietalia maritima*), Coastal lagoons, Freshwater and coastal grazing marsh, Intertidal mixed sediments, Intertidal sand and muddy sand.
- Golden plover: Atlantic salt meadows (*Glauco-Puccinellietalia maritima*), Coastal lagoons, Freshwater and coastal grazing marsh, Intertidal coarse sediment, Intertidal mixed sediments, Intertidal mud, Intertidal rock, Intertidal sand and muddy sand, Intertidal seagrass beds, *Salicornia* and other annuals colonising mud and sand, *Spartina* swards (*Spartinion maritima*).
- Hen harrier: Atlantic salt meadows (*Glauco-Puccinellietalia maritima*), Coastal lagoons, Coastal reedbeds, Freshwater and coastal grazing marsh, Intertidal coarse sediment, Intertidal mixed sediments, Intertidal rock, Intertidal sand and muddy sand, Mediterranean and thermo-Atlantic halophilous scrubs (*Sarcocornetea fruticosi*), *Salicornia* and other annuals colonising mud and sand, *Spartina* swards (*Spartinion maritima*).
- Little tern: Coastal lagoons, Intertidal mixed sediments, Intertidal sand and muddy sand.

¹²⁰ [Designated Sites View \(naturalengland.org.uk\)](https://naturalengland.org.uk)

DUNGENESS, ROMNEY MARSH AND RYE BAY SPA

- Marsh harrier: Atlantic salt meadows (*Glauco-Puccinellietalia maritima*), Coastal lagoons, Coastal reedbeds, Freshwater and coastal grazing marsh, Intertidal coarse sediment, Intertidal mixed sediments, Intertidal rock, Intertidal sand and muddy sand, Mediterranean and thermo-Atlantic halophilous scrubs (*Sarcocornetea fruticosi*), *Salicornia* and other annuals colonising mud and sand, *Spartina* swards (*Spartinion maritima*).
- Mediterranean gull: Atlantic salt meadows (*Glauco-Puccinellietalia maritima*), Coastal lagoons, Freshwater and coastal grazing marsh, Infralittoral rock, Intertidal biogenic reef: mussel beds, Intertidal mixed sediments, Intertidal mud, Intertidal sand and muddy sand, Intertidal stony reef, *Spartina* swards (*Spartinion maritima*).
- Ruff: Atlantic salt meadows (*Glauco-Puccinellietalia maritima*), Coastal lagoons, Freshwater and coastal grazing marsh, Intertidal coarse sediment, Intertidal mixed sediments, Intertidal mud, Intertidal rock, Intertidal sand and muddy sand, *Salicornia* and other annuals colonising mud and sand, *Spartina* swards (*Spartinion maritima*).
- Sandwich tern: Atlantic salt meadows (*Glauco-Puccinellietalia maritima*), Coastal lagoons, Intertidal coarse sediment, Intertidal mixed sediments, Intertidal sand and muddy sand, Mediterranean and thermo-Atlantic halophilous scrubs (*Sarcocornetea fruticosi*).
- Shoveler: Atlantic salt meadows (*Glauco-Puccinellietalia maritima*), Coastal lagoons, Coastal reedbeds, Freshwater and coastal grazing marsh, Intertidal mixed sediments, Intertidal mud, Intertidal sand and muddy sand, *Spartina* swards (*Spartinion maritima*).
- Waterbirds assemblage: intertidal rock, Intertidal coarse sediment, Intertidal sand and muddy sand, Intertidal mud, Intertidal mixed sediments, Intertidal seagrass beds, Intertidal biogenic reef: mussel beds, Intertidal stony reef, Coastal lagoons, Freshwater and coastal grazing marsh and Saltmarsh, which comprises of the following features: *Salicornia* and other annuals colonising mud and sand, *Spartina* swards (*Spartinion maritima*), and Atlantic salt meadows (*Glauco-puccinellietalia maritima*).

Functional Land

With regard to ‘**functional habitats**’, no specific area of functional land is identified; however:

- The foraging range of Common tern is known to extend up to 30 kilometres from their nest sites.
- The foraging range of Little tern is known to extend up to 11 kilometres from their nest sites.
- The foraging range of the Mediterranean gull is known to extend up to 20 kilometres from their nest sites.

DUNGENESS, ROMNEY MARSH AND RYE BAY SPA

- The foraging range of the Sandwich tern is known to extend up to 54 kilometres from their nest sites.

Condition, Pressures, Threats

The SSSIs units underpinning the SPA and Ramsar are in 'favourable', 'favourable-recovering', 'unfavourable-no change' and 'unfavourable-declining' condition. Threats identified include:

- Vehicles: disturbance to bird species (wintering) from illicit vehicle use.
- Invasive species: Garden escapees, Crassula and Red Valerian can outcompete and smother native species.
- Inappropriate scrub control: On natural pit wetlands on the shingle ridges (within RSPB reserve) would result in a loss of fen species due to overshadowing of the wetlands. Reduce suitable nesting and foraging habitat.
- Public access/disturbance (boating and watersports, dog walking and fishing);
- Inappropriate water levels: Water levels across the grazing marsh areas potentially impact habitats supporting birds using the site. Feeding and roosting areas in Winter. Breeding areas for waders, reedbed birds and sea birds.

DUNGENESS, ROMNEY MARSH AND RYE BAY RAMSAR SITE	
Site Code	UK11023
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/RIS/UK11023.pdf
Conservation Objectives	As per associated SAC / SPA, or underpinning SSSI(s)
Site Improvement Plan	As per associated SAC / SPA, or underpinning SSSI(s)
Supplementary advice	As per associated SAC / SPA, or underpinning SSSI(s)
Associated SSSIs	Dungeness, Romney Marsh and Rye Bay SSSI; Hastings Cliffs to Pett Beach SSSI
Site Overview	The site comprises a large area of coastal and marine landscape, forming a barrier of extensive coastal shingle beaches and sand dunes across an area of intertidal mud and sand flats. Is located approximately 13.9km south of the CCC area and has no hydrological connectivity with the CCC area.
Qualifying Features / Ramsar criteria	- Crit. 1 - sites containing representative, rare or unique wetland types - Crit. 2 - supports vulnerable, endangered, or critically endangered species or threatened eco. communities - Crit. 5 - regularly supports 20,000 or more waterbirds - Crit. 6 - regularly supports 1% of the individuals in a population of one species/subspecies of waterbirds
Other interest features (SAC typical species, SPA supporting habitats, etc.)	As per features of the associated SPA and SAC.
Functional Land	With regard to ' functional habitats ', no specific area of functional land is identified.

DUNGENESS, ROMNEY MARSH AND RYE BAY RAMSAR SITE

Condition, Pressures, Threats

The SSSIs units underpinning the SPA and Ramsar are in 'favourable', 'favourable-recovering', 'unfavourable-no change' and 'unfavourable-declining' condition. Threats identified include:

- Vehicles: disturbance to bird species (wintering) from illicit vehicle use.
- Invasive species: Garden escapees, Crassula and Red Valerian can outcompete and smother native species.
- Inappropriate scrub control: On natural pit wetlands on the shingle ridges (within RSPB reserve) would result in a loss of fen species due to overshadowing of the wetlands. Reduce suitable nesting and foraging habitat.
- Public access/disturbance (boating and watersports, dog walking and fishing);
- Inappropriate water levels: Water levels across the grazing marsh areas potentially impact habitats supporting birds using the site. Feeding and roosting areas in Winter. Breeding areas for waders, reedbed birds and sea birds.

ESSEX ESTUARIES SAC	
Site Code	UK0013690
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0013690.pdf
Conservation Objectives	Available at: http://publications.naturalengland.org.uk/publication/4781199427895296?category=6581547796791296
Site Improvement Plan	Available at: http://publications.naturalengland.org.uk/publication/4781199427895296?category=6581547796791296
Supplementary advice	Available at: https://designatedsites.naturalengland.org.uk/Marine/MarineSiteDetail.aspx?SiteCode=UK0013690
Associated SSSIs	Blackwater Estuary SSSI; Colne Estuary SSSI; Crouch and Roach Estuaries SSSI; Dengie SSSI; Foulness SSSI
Site Overview	Essex Estuaries comprises the major estuaries of Colne, Blackwater, Crouch and Roach rivers, which consist in a coastal plain estuarine system with associated open coast mudflats and sandbanks. The site is approximately 17.8km from the CCC area across the Kent/Essex strait and has no hydrological connectivity with the CCC area.
Qualifying Features / Ramsar criteria	- H1110: Sandbanks which are slightly covered by sea water all the time - H1130: Estuaries - H1140: Mudflats and sandflats not covered by seawater at low tide - H1310: <i>Salicornia</i> and other annuals colonizing mud and sand - H1320: <i>Spartina</i> swards (<i>Spartinion maritimae</i>) - H1330: Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>) - H1420: Mediterranean and thermo-Atlantic halophilous scrubs (<i>Sarcocornetea fruticosi</i>)
Other interest features (SAC typical species, SPA supporting habitats, etc.)	The 'supplementary advice' indicates that the 'typical species' of the site include: ■ For the <i>Salicornia</i> and other annuals colonizing mud and sand feature: Flora: Sea Aster <i>Aster tripolium</i>, Common saltmarsh-grass <i>Puccinellia maritima</i>, Glasswort <i>Salicornia</i> species, Herbaceous seepweed <i>Suaeda maritima</i>, Sea purslane <i>Halimione portulacoides</i>, Ephemeral salt-marsh vegetation with <i>Sagina maritima</i>. ■ For the <i>Spartina</i> swards (<i>Spartinion maritimae</i>) feature: Flora: Small cordgrass <i>Spartina maritima</i>, Smooth cord grass <i>S. alterniflora</i> and <i>Arthrocnemum perenne</i>. ■ For the Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>) feature: Flora: Transitional low-marsh vegetation with <i>Puccinellia maritima</i> annual <i>Salicornia</i> species and <i>Suaeda maritima</i>; and <i>Eleocharis uniglumis</i> salt-marsh community.

ESSEX ESTUARIES SAC

- For the Mediterranean and thermo-Atlantic halophilous scrubs (*Sarcocornetea fruticosi*) feature: Flora: Shrubby sea-blite *Suaeda vera*, Chickenclaws *Sarcocornia perennis*, Sea lavender *Limonium* species and saltbush *Atriplex* species.

Functional Land

No specific non-designated areas of land outside the site boundary are identified as being functionally important to the maintenance of site integrity, although the need to maintain or restore the connectivity of estuarine features to surrounding rivers, freshwater, marine and coastal habitats is noted.

Condition, Pressures, Threats

The SSSIs units underpinning the SAC are predominantly in 'favourable' or 'unfavourable recovering' condition. Units in 'unfavourable no change' or 'unfavourable declining' condition are categorised as such primarily due to local land management issues (birds population declining). The SIP identifies several pressures and threats to site integrity, the following of which may be potentially influenced by the Local Plan:

- Coastal squeeze (rising sea levels);
- Public access/disturbance (land- and water-based activities);
- Fisheries: commercial marine and estuarine (commercial fishing activities and Bottom towed fishing gear);
- Planning permission: general;
- Changes in species distribution (decline in waterbird species may be due to climate change);
- Invasive species (Pacific oyster, American whelk tingle, Slipper limpet and *Spartina* sp.);
- Fisheries: recreational marine and estuarine (Recreational bait digging);
- Air pollution (atmospheric nitrogen deposition).

FOLKESTONE TO ETCHINGHILL ESCARPMENT SAC

Site Code	UK0012835
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012835.pdf
Conservation Objectives	Available at: http://publications.naturalengland.org.uk/publication/6261005457817600?category=6528471664689152
Site Improvement Plan	Available at: http://publications.naturalengland.org.uk/publication/6261005457817600?category=6528471664689152
Supplementary advice	Available at: https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0012835.pdf
Associated SSSIs	Folkestone to Etchinghill Escarpment SSSI
Site Overview	Folkestone to Etchinghill Escarpment SAC is a chalk grassland area, hosting the priority habitat type 'orchid rich sites', an assemblage of rare plants species and a diverse insect fauna including a number of nationally rare flies, moths and butterflies. Part of the site is important also for its fossil remains. This site is approximately 8.1km south of the CCC area and has no hydrological connectivity with the CCC area.
Qualifying Features / Ramsar criteria	- H6210: Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites)
Other interest features (SAC typical species, SPA supporting habitats, etc.)	The 'supplementary advice' identifies that the 'typical species' of the site are: ■ NVC communities: CG4 Tor-grass <i>Brachypodium pinnatum</i> and CG5 <i>Bromus erectus</i> -<i>Brachypodium pinnatum</i>. ■ Important orchid assemblage: early spider-orchid <i>Ophrys sphegodes</i>, late spider-orchid <i>O. fuciflora</i> and burnt-tip orchid <i>Orchis ustulate</i>. ■ Fauna: Adonis Blue <i>Polyommatus bellargus</i>.
Functional Land	The supplementary advice notes the importance of additional areas of lowland calcareous grassland, good quality semi-improved grassland, and areas of deciduous woodland that are connected to the SAC, for the maintenance of SAC integrity (Dover to Kingsdown Cliffs SAC, Lydden and Temple Ewell Downs SAC, Folkestone Warren SSSI, Alkham, Lydden and Swingfields Woods, Lympe Escarpment SSSI, Otterpool Quarry SSSI and Great Shuttlesfield SSSI).

FOLKESTONE TO ETCHINGHILL ESCARPMENT SAC

Condition, Pressures, Threats

The SSSI unit underpinning the SAC is in 'favourable' condition; however, the SIP identifies several pressures and threats to site integrity, the following of which may be potentially influenced by the Local Plan:

- Undergrazing (Scrub/woodland encroachment and a dominance of Tor grass);
- Inappropriate scrub control (existing incentives insufficient);
- Air pollution (atmospheric nitrogen deposition).

FOULNESS (MID-ESSEX COAST PHASE 5) SPA

Site Code	UK9009246
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9009246.pdf
Conservation Objectives	Available at: http://publications.naturalengland.org.uk/publication/5131941422563328?category=6581547796791296
Site Improvement Plan	Available at: http://publications.naturalengland.org.uk/publication/5131941422563328?category=6581547796791296
Supplementary advice	Available at: https://designatedsites.naturalengland.org.uk/Marine/MarineSiteDetail.aspx?SiteCode=UK9009246
Associated SSSIs	Foulness SSSI
Site Overview	The site comprises estuaries and intertidal sand and silt flats including several islands, shingle and shell beaches and extensive areas of saltmarsh. It supports nationally rare plants, as well as nationally and internationally important populations of various species of breeding, migratory and wintering waterbirds.
Qualifying Features / Ramsar criteria	- A082w: Hen harrier <i>Circus cyaneus</i> - A130w: Eurasian oystercatcher <i>Haematopus ostralegus</i> - A132w: Pied avocet <i>Recurvirostra avosetta</i> - A132r: Pied avocet <i>Recurvirostra avosetta</i> - A137r: Ringed plover <i>Charadrius hiaticula</i> - A141w: Grey plover <i>Pluvialis squatarola</i> - A143w: Red knot <i>Calidris canutus</i> - A157w: Bar-tailed godwit <i>Limosa lapponica</i> - A162w: Common redshank <i>Tringa totanus</i> - A191r: Sandwich tern <i>Sterna sandvicensis</i> - A193r: Common tern <i>Sterna hirundo</i> - A195r: Little tern <i>Sterna albifrons</i> - A675w: Dark-bellied brent goose <i>Branta bernicla bernicla</i> - WATR: Waterbird assemblage

FOULNESS (MID-ESSEX COAST PHASE 5) SPA

Other interest features (SAC typical species, SPA supporting habitats, etc.)

The supplementary advice documents indicate that the within-site supporting habitats for the qualifying features include: Atlantic salt meadows (*Glauco-Puccinellietalia maritima*), Freshwater and coastal grazing marsh, Intertidal coarse sediment, Intertidal mixed sediments, Intertidal mud, Intertidal sand and muddy sand, Intertidal seagrass beds, Mediterranean and thermo-Atlantic halophilous scrubs (*Sarcocornetea fruticosi*), *Salicornia* and other annuals colonising mud and sand, *Spartina* swards (*Spartinion maritima*), Subtidal seagrass beds, Intertidal biogenic reef: mussel beds, Intertidal stony reef, cockle banks

Functional Land

With regard to 'functional habitats', specific areas of functional land are identified:

- Dark-bellied brent goose: Access to functionally-linked non-SPA grassland and agricultural land may be important.
- Hen harrier: for the species, the habitat to feed is grassland/grazing marsh, but is not within this site, so this feature is reliant on a mosaic of habitats including grazing marsh, grassland with scattered scrub, rough margins and saltmarsh available throughout the suite of SPAs that make up the Mid-Essex coastal sites and functionally-linked arable land.
- Ringed plover: Breeding ringed plover use shingle, pebble and cockle shell beaches/spits for breeding, and saltmarsh and intertidal areas for feeding. In this site, these habitats are located in close proximity and suitable habitat is also available for the feature to feed, nest and roost offsite within adjacent SPAs

Condition, Pressures, Threats

The SSSIs units underpinning the SPA are in 'favourable', 'unfavourable-recovering', 'unfavourable-no change' and 'unfavourable-declining' condition. The SIP¹²¹ identifies several pressures and threats to site integrity, the following of which may be potentially influenced by the Local Plan:

- Coastal squeeze (rising sea levels);
- Public access/disturbance (land- and water-based activities);
- Fisheries: commercial marine and estuarine (commercial fishing activities and Bottom towed fishing gear);
- Planning permission: general;

¹²¹ [SIP150401FINALv1.0 Essex Estuaries \(2\).pdf](#)

FOULNESS (MID-ESSEX COAST PHASE 5) SPA

- Changes in species distribution (decline in waterbird species may be due to climate change);
- Invasive species (Pacific oyster, American whelk tingle, Slipper limpet and *Spartina* sp.);
- Fisheries: recreational marine and estuarine (Recreational bait digging);
- Air pollution (atmospheric nitrogen deposition).

FOULNESS (MID-ESSEX COAST PHASE 5) RAMSAR SITE

Site Code	UK11026
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/RIS/UK11026.pdf
Conservation Objectives	As per associated SAC / SPA, or underpinning SSSI(s)
Site Improvement Plan	As per associated SAC / SPA, or underpinning SSSI(s)
Supplementary advice	As per associated SAC / SPA, or underpinning SSSI(s)
Associated SSSIs	Foulness SSSI
Site Overview	The site comprises estuaries and intertidal sand and silt flats including several islands, shingle and shell beaches and extensive areas of saltmarsh. It supports nationally rare plants, as well as nationally and internationally important populations of various species of breeding, migratory and wintering waterbirds.
Qualifying Features / Ramsar criteria	- Crit. 1 - sites containing representative, rare or unique wetland types - Crit. 2 - supports vulnerable, endangered, or critically endangered species or threatened eco. communities - Crit. 3 - supports populations of plant/animal species important for maintaining regional biodiversity - Crit. 5 - regularly supports 20,000 or more waterbirds - Crit. 6 - regularly supports 1% of the individuals in a population of one species/subspecies of waterbirds
Other interest features (SAC typical species, SPA supporting habitats, etc.)	The supplementary advice documents indicate that the within-site supporting habitats for the qualifying features include: Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>), Freshwater and coastal grazing marsh, Intertidal coarse sediment, Intertidal mixed sediments, Intertidal mud, Intertidal sand and muddy sand, Intertidal seagrass beds, Mediterranean and thermo-Atlantic halophilous scrubs (<i>Sarcocornetea fruticosi</i>), <i>Salicornia</i> and other annuals colonising mud and sand, <i>Spartina</i> swards (<i>Spartinion maritimae</i>), Subtidal seagrass beds, Intertidal biogenic reef: mussel beds, Intertidal stony reef, cockle banks

FOULNESS (MID-ESSEX COAST PHASE 5) RAMSAR SITE

Functional Land

With regard to 'functional habitats', specific areas of functional land are identified:

- Dark-bellied brent goose: Access to functionally-linked non-SPA grassland and agricultural land may be important.
- Hen harrier: for the species, the habitat to feed is grassland/grazing marsh, but is not within this site, so this feature is reliant on a mosaic of habitats including grazing marsh, grassland with scattered scrub, rough margins and saltmarsh available throughout the suite of SPAs that make up the Mid-Essex coastal sites and functionally-linked arable land.
- Ringed plover: Breeding ringed plover use shingle, pebble and cockle shell beaches/spits for breeding, and saltmarsh and intertidal areas for feeding. In this site, these habitats are located in close proximity and suitable habitat is also available for the feature to feed, nest and roost offsite within adjacent SPAs

Condition, Pressures, Threats

The SSSIs units underpinning the SPA are in 'favourable', 'unfavourable-recovering', 'unfavourable-no change' and 'unfavourable-declining' condition. The SIP identifies several pressures and threats to site integrity, the following of which may be potentially influenced by the Local Plan:

- Coastal squeeze (rising sea levels);
- Public access/disturbance (land- and water-based activities);
- Fisheries: commercial marine and estuarine (commercial fishing activities and Bottom towed fishing gear);
- Planning permission: general;
- Changes in species distribution (decline in waterbird species may be due to climate change);
- Invasive species (Pacific oyster, American whelk tingle, Slipper limpet and *Spartina* sp.);
- Fisheries: recreational marine and estuarine (Recreational bait digging);
- Air pollution (atmospheric nitrogen deposition).

LYDDEN AND TEMPLE EWELL DOWNS SAC

Site Code	UK0012834
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012834.pdf
Conservation Objectives	Available at: http://publications.naturalengland.org.uk/publication/5024513766981632?category=6528471664689152
Site Improvement Plan	Available at: http://publications.naturalengland.org.uk/publication/5024513766981632?category=6528471664689152
Supplementary advice	Available at: https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0012834.pdf
Associated SSSIs	Lydden and Temple Ewell Downs SSSI
Site Overview	Lydden and Temple Ewell Downs SAC comprises chalk grassland, with assemblages of plants and invertebrates and broad-leaved deciduous woodland. The site is approximately 3.3km from the south-eastern boundary of the CCC area and has no hydrological connectivity with the CCC area.
Qualifying Features / Ramsar criteria	- H6210: Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites)
Other interest features (SAC typical species, SPA supporting habitats, etc.)	The 'supplementary advice' identifies that the 'typical species' of the site are: ■ characteristic of the following National Vegetation Classification (NVC) communities: CG4 Brachypodium pinnatum grassland and CG5 Bromus erectus-Brachypodium pinnatum grassland. ■ Vascular plant assemblage including: Early Spider Orchid <i>Ophrys sphegodes</i>, Musk Orchid <i>Herminium monorchis</i>, Burnt-tip Orchid <i>Orchis ustulata</i>, Fragrant Orchid <i>Gymnadenia conopsea</i>, Autumn Ladies-tresses <i>Spiranthes spiralis</i>, Slender Bedstraw <i>Galium pumilum</i>. ■ Fauna: Silver spotted Skipper <i>Hesperia comma</i> and Wart-biter Bush Cricket <i>Decticus verrucivorus</i>.
Functional Land	No specific non-designated areas of land outside the site boundary are identified as being functionally important to the maintenance of site integrity, although the need to maintain or restore the connectivity of the site to its wider landscape through features such as habitat patches, hedges, watercourses and verges is noted.

LYDDEN AND TEMPLE EWELL DOWNS SAC

Condition, Pressures, Threats

The SSSI underpinning the SAC is in 'favourable' condition; however, the SIP identifies several pressures and threats to site integrity, the following of which may be potentially influenced by the Local Plan:

- Overgrazing (rabbits);
- Public access/ disturbance (dog walking);
- Air pollution (atmospheric nitrogen deposition).

MARGATE AND LONG SANDS SAC

Site Code	UK0030371
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0030371.pdf
Conservation Objectives	Available at: http://publications.naturalengland.org.uk/publication/6706064372269056?category=6528471664689152
Site Improvement Plan	Available at: http://publications.naturalengland.org.uk/publication/6706064372269056?category=6528471664689152
Supplementary advice	Available at: https://designatedsites.naturalengland.org.uk/Marine/MarineSiteDetail.aspx?SiteCode=UK0030371
Associated SSSIs	n/a
Site Overview	Margate and Long Sands SAC comprises a number of sandbanks slightly covered by seawater at all times, with mud and gravel sediments, and the upper crests of some of the larger banks dry out at low tide. This site is approximately 1.1km offshore from the northern CCC boundary.
Qualifying Features / Ramsar criteria	- H1110: Sandbanks which are slightly covered by sea water all the time
Other interest features (SAC typical species, SPA supporting habitats, etc.)	Specific typical species are not identified in the SACO. Natural England has included an attribute for the abundance of key structural and influential species for habitat features. Structural species are those that form part of the habitat structure or help to define a key biotope. Influential species are those that are likely to have a key role affecting the structure and function of the habitat (such as bioturbators (mixers of sediment), grazers, surface borers, predators or other species with a significant functional role linked to the habitat).
Functional Land	Functionally associated land is not identified.
Condition, Pressures, Threats	The SIP identifies one pressure to site integrity, commercial fishing activities.

MEDWAY ESTUARY AND MARSHES SPA

Site Code	UK9012031
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012031.pdf
Conservation Objectives	Available at: http://publications.naturalengland.org.uk/publication/6672791487119360?category=6528471664689152
Site Improvement Plan	Available at: http://publications.naturalengland.org.uk/publication/6672791487119360?category=6528471664689152
Supplementary advice	Available at: https://designatedsites.naturalengland.org.uk/Marine/MarineSiteDetail.aspx?SiteCode=UK9012031
Associated SSSIs	Medway Estuary and Marshes SSSI
Site Overview	The site is a wetland comprising grazing marshes, intertidal flats and saltmarshes. Provides habitat for important assemblages of wildfowls and waders, plants and invertebrates. The site is approximately 14.2km north-west of the CCC area and has no hydrological connectivity with the CCC area
Qualifying Features / Ramsar criteria	- A001w: Red-throated diver <i>Gavia stellata</i> - A005w: Great crested grebe <i>Podiceps cristatus</i> - A017w: Great cormorant <i>Phalacrocorax carbo</i> - A037w: Tundra swan <i>Cygnus columbianus bewickii</i> - A048w: Common shelduck <i>Tadorna tadorna</i> - A050w: Eurasian wigeon <i>Anas penelope</i> - A052w: Eurasian teal <i>Anas crecca</i> - A053w: Mallard <i>Anas platyrhynchos</i> - A054w: Northern pintail <i>Anas acuta</i> - A056w: Northern shoveler <i>Anas clypeata</i> - A059w: Common pochard <i>Aythya ferina</i> - A082w: Hen harrier <i>Circus cyaneus</i> - A098w: Merlin <i>Falco columbarius</i> - A130w: Eurasian oystercatcher <i>Haematopus ostralegus</i> - A132r: Pied avocet <i>Recurvirostra avosetta</i> - A132w: Pied avocet <i>Recurvirostra avosetta</i>

MEDWAY ESTUARY AND MARSHES SPA

- A137w: Ringed plover *Charadrius hiaticula*
- A141w: Grey plover *Pluvialis squatarola*
- A143w: Red knot *Calidris canutus*
- A160w: Eurasian curlew *Numenius arquata*
- A162w: Common redshank *Tringa totanus*
- A164w: Common greenshank *Tringa nebularia*
- A169w: Ruddy turnstone *Arenaria interpres*
- A193r: Common tern *Sterna hirundo*
- A195r: Little tern *Sterna albifrons*
- A616w: Black-tailed godwit *Limosa limosa islandica*
- A672w: Dunlin *Calidris alpina alpina*
- A675w: Dark-bellied brent goose *Branta bernicla bernicla*
- BBA: Breeding bird assemblage
- WATR: Waterbird assemblage

Other interest features (SAC typical species, SPA supporting habitats, etc.)

The supplementary advice documents indicate that the within-site supporting habitats for the qualifying features include: intertidal mud, intertidal sand and muddy sand, salt marsh, grazing marsh, arable fields, grassland habitats, freshwater and coastal grazing marsh, Coastal lagoons, Intertidal mixed sediments, Intertidal coarse sediment and Intertidal rock.

Functional Land

With regard to 'functional habitats', no specific areas of functional land are identified; however a permeable landscape and habitat linkages to facilitate movement of birds between the SPA and any off-site supporting habitat is considered critical to the breeding success and to adult fitness and survival.

Condition, Pressures, Threats

The SSSI unit underpinning the SAC is in 'Unfavourable-recovering' condition; however, the SIP identifies several pressures and threats to site integrity, the following of which may be potentially influenced by the Local Plan:

- Public access/disturbance (boating and watersports, walking and fishing);
- Air pollution (atmospheric nitrogen deposition).

MEDWAY ESTUARY AND MARSHES RAMSAR SITE

Site Code	UK11040
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/RIS/UK11040.pdf
Conservation Objectives	As per associated SAC / SPA, or underpinning SSSI(s)
Site Improvement Plan	As per associated SAC / SPA, or underpinning SSSI(s)
Supplementary advice	As per associated SAC / SPA, or underpinning SSSI(s)
Associated SSSIs	Medway Estuary and Marshes SSSI
Site Overview	The site is a wetland comprising grazing marshes, intertidal flats and saltmarshes. Provides habitat for important assemblages of wildfowls and waders, plants and invertebrates. The site is approximately 14.2km north-west of the CCC area and has no hydrological connectivity with the CCC area
Qualifying Features / Ramsar criteria	- Crit. 2 - supports vulnerable, endangered, or critically endangered species or threatened eco. communities - Crit. 5 - regularly supports 20,000 or more waterbirds - Crit. 6 - regularly supports 1% of the individuals in a population of one species/subspecies of waterbirds
Other interest features (SAC typical species, SPA supporting habitats, etc.)	The supplementary advice documents indicate that the within-site supporting habitats for the qualifying features include: intertidal mud, intertidal sand and muddy sand, salt marsh, grazing marsh, arable fields, grassland habitats, freshwater and coastal grazing marsh, Coastal lagoons, Intertidal mixed sediments, Intertidal coarse sediment and Intertidal rock.
Functional Land	With regard to 'functional habitats', no specific areas of functional land are identified; however a permeable landscape and habitat linkages to facilitate movement of birds between the SPA and any off-site supporting habitat is considered critical to the breeding success and to adult fitness and survival.

MEDWAY ESTUARY AND MARSHES RAMSAR SITE

Condition, Pressures, Threats

The SSSI unit underpinning the Ramsar is in 'Unfavourable-recovering' condition; however, the SIP identifies several pressures and threats to site integrity, the following of which may be potentially influenced by the Local Plan:

- Public access/disturbance (boating and watersports, walking and fishing);
- Air pollution (atmospheric nitrogen deposition).

OUTER THAMES ESTUARY SPA

Site Code	UK9020309
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9020309.pdf
Conservation Objectives	Available at: http://publications.naturalengland.org.uk/publication/4927106139029504?category=6528471664689152
Site Improvement Plan	Available at: http://publications.naturalengland.org.uk/publication/4927106139029504?category=6528471664689152
Supplementary advice	Available at: https://designatedsites.naturalengland.org.uk/Marine/MarineSiteDetail.aspx?SiteCode=UK9020309
Associated SSSIs	Benfleet and Southend Marshes SSSI; Corton Cliffs SSSI; Crouch and Roach Estuaries SSSI; Dengie SSSI; Foulness SSSI; Great Yarmouth North Denes SSSI; Minsmere-Walberswick Heaths and Marshes SSSI; Pakefield to Easton Bavents SSSI; The Cliff, Burnham-On-Crouch SSSI
Site Overview	The site contains areas of shallow and deeper water, with high tidal current streams and a range of mobile sediments, including several shallow sandbanks, are underpinned by a network of eleven SSSIs; designated for the foraging habitat it provides for wintering and breeding birds.
Qualifying Features / Ramsar criteria	- A001w: Red-throated diver <i>Gavia stellata</i> - A193r: Common tern <i>Sterna hirundo</i> - A195r: Little tern <i>Sterna albifrons</i>
Other interest features (SAC typical species, SPA supporting habitats, etc.)	The supplementary advice documents indicate that the within-site supporting habitats for the qualifying features include: subtidal sand, subtidal coarse sediment, subtidal mixed sediments, subtidal mud, circalittoral rock and water column, shallow subtidal waters and on land, islands, beaches and inland bodies of freshwater.
Functional Land	No specific area of functional land are identified; however a permeable landscape and habitat linkages to facilitate movement of birds between the SPA and any off-site supporting habitat is considered critical to the breeding success and to adult fitness and survival.

OUTER THAMES ESTUARY SPA

Condition, Pressures, Threats

The SSSIs units underpinning the SPA are predominantly in 'favourable' or 'unfavourable recovering' condition. Units in 'unfavourable no change' or 'unfavourable declining' condition are categorised as such primarily due to local land management issues (undergrazing of grasslands or water pollution). The pressures and threats typically relate to local land management issues that will not be influenced by the Local Plan.

PARKGATE DOWN SAC

Site Code	UK0030338
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0030338.pdf
Conservation Objectives	Available at: http://publications.naturalengland.org.uk/publication/5786073259048960?category=6528471664689152
Site Improvement Plan	Available at: http://publications.naturalengland.org.uk/publication/5786073259048960?category=6528471664689152
Supplementary advice	Available at: https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030338.pdf
Associated SSSIs	Parkgate Down SSSI
Site Overview	Parkgate Down SAC comprises grassland, a wide range of typical chalk downland plants and an assemblage of orchids in a broad-leaved deciduous woodland. The site is approximately 1.9km outside the southern boundary of the CCC area and has no hydrological connectivity with the CCC area.
Qualifying Features / Ramsar criteria	- H6210: Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites)
Other interest features (SAC typical species, SPA supporting habitats, etc.)	The 'supplementary advice' indicates that the 'typical species' of the site include Tor-grass <i>Brachypodium pinnatum</i> , Erect brome <i>Bromus erectus</i> , Monkey orchid <i>Orchis simia</i> , Late Spider Orchid <i>Ophrys fuciflora</i> , Lady Orchid <i>Orchis purpurea</i> , Musk Orchid <i>Herminium monorchis</i> and Slender bedstraw <i>Galium pumilum</i> .
Functional Land	No areas of 'functional land' are identified in relation to this site, and the site does not support interest features (including mobile species) that will be functionally dependent on habitats outside the site boundary.

PARKGATE DOWN SAC

Condition, Pressures, Threats

The SSSI underpinning the SAC is in 'favourable' condition; however, the SIP identifies several threats to site integrity, the following of which may be potentially influenced by the Local Plan:

- Habitat fragmentation (small size and relative isolation);
- Air pollution (atmospheric nitrogen deposition).

SANDWICH BAY SAC	
Site Code	UK0013077
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0013077.pdf
Conservation Objectives	Available at: http://publications.naturalengland.org.uk/publication/5132828329115648?category=6528471664689152
Site Improvement Plan	Available at: http://publications.naturalengland.org.uk/publication/5132828329115648?category=6528471664689152
Supplementary advice	Available at: https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0013077.pdf
Associated SSSIs	Sandwich Bay to Hacklinge Marshes SSSI
Site Overview	3.2.74 Sandwich Bay SAC comprises an extensive fixed dune grassland, with a rare species such as fragrant evening-primrose <i>Oenothera stricta</i> , bedstraw broomrape <i>Orobanche caryophyllacea</i> , sand catchfly <i>Silene conica</i> and lizard orchid <i>Himantoglossum hircinum</i> ; and in the seaward edge has embryonic shifting dune communities, with strandline species on the seaward edge and sand-binding grasses inland.
Qualifying Features / Ramsar criteria	- H2110: Embryonic shifting dunes - H2120: Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes") - H2130: Fixed coastal dunes with herbaceous vegetation ("grey dunes") - H2170: Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>) - H2190: Humid dune slacks
Other interest features (SAC typical species, SPA supporting habitats, etc.)	The 'supplementary advice' indicates that the 'typical species' of the site include: ■ For the embryonic shifting dunes feature: Flora: <i>Cakile maritima</i> –<i>Honckenya peploides</i> (strandline) and <i>Elytrigia juncea</i> (embryo dune). ■ For the Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes") feature: Flora: Marram grass <i>Ammophila arenaria</i>. ■ For the Fixed coastal dunes with herbaceous vegetation ("grey dunes") feature: NVC community types: <i>Ammophila arenaria</i>-<i>Festuca rubra</i>, <i>Festuca rubra</i>-<i>Galium verum</i>, <i>Carex arenaria</i>-<i>Cornicularia aculeata</i>, <i>Carex arenaria</i>-<i>Festuca ovina</i>-<i>Agrostis capillaris</i>; Vascular plant assemblage: Narrow leaved birds foot trefoil, Divided sedge, Long bracted

SANDWICH BAY SAC

sedge, Fragrant evening primrose, Sand catchfly *Silene conica*; Lizard orchid *Himantoglossum hircinum*; Bedstraw broomrape *Orobanche caryophyllacea*.

- For the Dunes with *Salix repens* ssp. *Argentea* (*Salicion arenariae*) and Humid dune slacks features: NVC community types: *Salix repens*-*Bryum pseudotriquetrum*, *Salix repens*-*Campylium stellatum*, *Salix repens*-*Calliergon cuspidatum*, *Salix repens*-*Holcus lanatus* and *Potentilla anserina*-*Carex nigra*.

Functional Land

No specific non-designated areas of land outside the site boundary are identified as being functionally important to the maintenance of site integrity, although the need to maintain or restore the connectivity of the site to its wider landscape through features such as habitat patches, hedges, watercourses and verges, as well as soft eroding cliffs, dunes and offshore sandbanks is noted.

Condition, Pressures, Threats

The SSSI underpinning the SAC is in 'favourable' condition; however, the SIP identifies several pressures and threats to site integrity, the following of which may be potentially influenced by the Local Plan:

- Changes in species distributions (decline in the overwintering turnstone);
- Public access/disturbance (dog walkers);
- Air pollution (atmospheric nitrogen deposition);
- Water pollution (insufficiently treated Sewage Treatment Works discharges)

STODMARSH SAC	
Site Code	UK0030283
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0030283.pdf
Conservation Objectives	Available at: http://publications.naturalengland.org.uk/publication/5199409650335744?category=6528471664689152
Site Improvement Plan	Available at: http://publications.naturalengland.org.uk/publication/5199409650335744?category=6528471664689152
Supplementary advice	Available at: https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030283.pdf
Associated SSSIs	Stodmarsh SSSI
Site Overview	Stodmarsh is a wetland that lies within the natural floodplain of Great Stour River and contains a wide range of habitats including open water, extensive reedbeds, scrub and alder carr. It is hydrologically linked to the adjacent Great Stour River.
Qualifying Features / Ramsar criteria	- S1016: Desmoulin's whorl snail <i>Vertigo moulinsiana</i>
Other interest features (SAC typical species, SPA supporting habitats, etc.)	The 'supplementary advice' identifies the 'typical species' associated with the qualifying habitats; these are generally those species that are constants and/or characteristic of the relevant National Vegetation Communities (NVC); no specific fauna are identified.
Functional Land	No specific areas of functional land are identified, and the qualifying features are very unlikely to be dependent on non-designated habitats due to their narrow and specific habitat requirements.
Condition, Pressures, Threats	The SSSI units underpinning the SPA, Ramsar and SAC are in 'favourable', 'unfavourable recovering' and 'unfavourable - No change' condition; however, the SIP identifies several pressures and threats to site integrity, the following of which may be potentially influenced by the Local Plan: ■ Water pollution (high nitrogen and orthophosphate levels); ■ Air pollution (atmospheric nitrogen deposition).

STODMARSH SAC

- The remaining pressures and threats typically relate to local land management issues that will not be influenced by the Regulation 19 Draft Local Plan (overgrazing, scrub control, ditch management, etc.).

STODMARSH SPA	
Site Code	UK9012121
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012121.pdf
Conservation Objectives	Available at: http://publications.naturalengland.org.uk/publication/6543516511502336?category=6528471664689152
Site Improvement Plan	Available at: http://publications.naturalengland.org.uk/publication/6543516511502336?category=6528471664689152
Supplementary advice	Available at: https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK9012121.pdf
Associated SSSIs	Stodmarsh SSSI
Site Overview	Stodmarsh is a wetland that lies within the natural floodplain of Great Stour River and contains a wide range of habitats including open water, extensive reedbeds, scrub and alder carr. It is hydrologically linked to the adjacent Great Stour River.
Qualifying Features / Ramsar criteria	- A021w: Great bittern <i>Botaurus stellaris</i> - A050w: Eurasian wigeon <i>Anas penelope</i> - A051r: Gadwall <i>Anas strepera</i> - A051w: Gadwall <i>Anas strepera</i> - A053w: Mallard <i>Anas platyrhynchos</i> - A056w: Northern shoveler <i>Anas clypeata</i> - A059w: Common pochard <i>Aythya ferina</i> - A061w: Tufted duck <i>Aythya fuligula</i> - A082w: Hen harrier <i>Circus cyaneus</i> - A118w: Water rail <i>Rallus aquaticus</i> - A142w: Northern lapwing <i>Vanellus vanellus</i> - A153w: Common snipe <i>Gallinago gallinago</i> - A394w: Greater white-fronted goose <i>Anser albifrons albifrons</i> - BBA : Breeding bird assemblage

STODMARSH SPA

Other interest features (SAC typical species, SPA supporting habitats, etc.)

The supplementary advice indicates that the within-site supporting habitats for the qualifying features include:

- Bittern: scrub-free areas of reed-bed habitat.
- Gadwall: ditches and bank-side habitats, with an optimal depth <0.25m deep water.
- Shoveler: poorly drained treeless meadows interspersed with eutrophic shallow, stagnant freshwater pools and lakes, rivers with undisturbed creeks and muddy bottoms usually processing lush emergent and floating vegetation.
- Hen harrier: reedbeds and an optimal mix of vegetation.

Functional Land

No specific areas of functional land are identified; however a permeable landscape and habitat linkages to facilitate movement of birds between the SPA and any off-site supporting habitat is considered critical to the breeding success and to adult fitness and survival.

Condition, Pressures, Threats

The SSSI units underpinning the SPA, Ramsar and SAC are in 'favourable', 'unfavourable recovering' and 'unfavourable - No change' condition; however, the SIP identifies several pressures and threats to site integrity, the following of which may be potentially influenced by the Local Plan:

- Water pollution (high nitrogen and orthophosphate levels);
- Air pollution (atmospheric nitrogen deposition).
- The remaining pressures and threats typically relate to local land management issues that will not be influenced by the Regulation 19 Draft Local Plan (overgrazing, scrub control, ditch management, etc.).

STODMARSH RAMSAR SITE	
Site Code	UK11066
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/RIS/UK11066.pdf
Conservation Objectives	As per associated SAC / SPA, or underpinning SSSI(s)
Site Improvement Plan	As per associated SAC / SPA, or underpinning SSSI(s)
Supplementary advice	As per associated SAC / SPA, or underpinning SSSI(s)
Associated SSSIs	Stodmarsh SSSI
Site Overview	Stodmarsh is a wetland that lies within the natural floodplain of Great Stour River and contains a wide range of habitats including open water, extensive reedbeds, scrub and alder carr. It is hydrologically linked to the adjacent Great Stour River.
Qualifying Features / Ramsar criteria	- Crit. 2 - supports vulnerable, endangered, or critically endangered species or threatened eco. Communities (Six British Red Data Book wetland invertebrates. Two nationally rare plants, and five nationally scarce species. A diverse assemblage of rare wetland birds).
Other interest features (SAC typical species, SPA supporting habitats, etc.)	As per associated SPA/SAC
Functional Land	As per associated SPA/SAC

STODMARSH RAMSAR SITE

Condition, Pressures, Threats

The SSSI units underpinning the SPA, Ramsar and SAC are in 'favourable', 'unfavourable recovering' and 'unfavourable - No change' condition; however, the SIP identifies several pressures and threats to site integrity, the following of which may be potentially influenced by the Local Plan:

- Water pollution (high nitrogen and orthophosphate levels);
- Air pollution (atmospheric nitrogen deposition).
- The remaining pressures and threats typically relate to local land management issues that will not be influenced by the Regulation 19 Draft Local Plan (overgrazing, scrub control, ditch management, etc.).

TANKERTON SLOPES AND SWALECLIFFE SAC

Site Code	UK0030378
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0030378.pdf
Conservation Objectives	Available at: http://publications.naturalengland.org.uk/publication/5658609703714816?category=6528471664689152
Site Improvement Plan	Available at: http://publications.naturalengland.org.uk/publication/5658609703714816?category=6528471664689152
Supplementary advice	Available at: https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030378.pdf
Associated SSSIs	Tankerton Slopes SSSI; Thanet Coast SSSI
Site Overview	Tankerton Slopes and Swalecliffe SAC is a small site comprising two units of coastal grassland east of Whitstable designated for its population of Fisher's estuarine moth, which is dependent on hogs-fennel for its larval food plant.
Qualifying Features / Ramsar criteria	- S4035: Fisher's estuarine moth <i>Gortyna borelii lunata</i>
Other interest features (SAC typical species, SPA supporting habitats, etc.)	The supporting habitats for this feature are rough grassland with an abundance of Hog's-fennel above upper areas of saltmarsh. The 'supplementary advice' does not identify any specific 'typical species' considered to be associated with the site but notes that long coarse grasses species like Cock's-foot (<i>Dactylis glomerata</i>), Couch (<i>Elytrigia</i> spp.) and False Oat grass (<i>Arrhenatherum elatius</i>), are required to fulfil the moth's egg laying requirements.
Functional Land	No specific non-designated areas of land outside the site boundary are identified as being functionally important to the maintenance of site integrity, although the need to maintain or restore the connectivity of the site to its wider landscape through features such as habitat patches, hedges, watercourses and verges is noted.
Condition, Pressures, Threats	The SSSI unit that forms the SAC is in favourable condition but is heavily used by dog walkers and is vulnerable to under-management

THAMES ESTUARY AND MARSHES SPA

Site Code	UK9012021
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012021.pdf
Conservation Objectives	Available at: http://publications.naturalengland.org.uk/publication/4698344811134976?category=6581547796791296
Site Improvement Plan	Available at: http://publications.naturalengland.org.uk/publication/4698344811134976?category=6581547796791296
Supplementary advice	Available at: https://designatedsites.naturalengland.org.uk/Marine/MarineSiteDetail.aspx?SiteCode=UK9012021
Associated SSSIs	Mucking Flats and Marshes SSSI, South Thames Estuary and Marshes SSSI
Site Overview	Thames Estuary and Marshes is a wetland comprising intertidal habitats, saltmarsh, coastal grazing marshes, saline lagoons and chalk pits. The site provides support to different wetland birds, plants and invertebrates species. The site is approximately 19.2km north-west of the CCC area and has no hydrological connectivity with the CCC area.
Qualifying Features / Ramsar criteria	- A082w: Hen harrier <i>Circus cyaneus</i> - A132w: Pied avocet <i>Recurvirostra avosetta</i> - A137c: Ringed plover <i>Charadrius hiaticula</i> - A141w: Grey plover <i>Pluvialis squatarola</i> - A143w: Red knot <i>Calidris canutus</i> - A162w: Common redshank <i>Tringa totanus</i> - A616w: Black-tailed godwit <i>Limosa limosa islandica</i> - A672w: Dunlin <i>Calidris alpina alpina</i> - WATR: Waterbird assemblage
Other interest features (SAC typical species, SPA supporting habitats, etc.)	The supplementary advice indicates that the within-site supporting habitats for the qualifying features are principally: coastal lagoons, coastal reedbeds, freshwater and coastal grazing marsh, intertidal mixed sediments, intertidal sand and muddy sand, <i>Salicornia</i> and other annuals colonising mud and sand, <i>Spartina</i> swards (<i>Spartinion maritimae</i>).
Functional Land	Specific areas of functional land are identified for Black-tailed godwit (Holehaven Creek SSSI).

THAMES ESTUARY AND MARSHES SPA

Condition, Pressures, Threats

The SSSIs units underpinning the SPA and Ramsar are in 'favourable', 'favourable-recovering', 'unfavourable-no change' and 'unfavourable-declining' condition. The SIP identifies several pressures and threats to site integrity, the following of which may be potentially influenced by the Local Plan:

- Public access/disturbance (boating and watersports, walking and fishing);
- Air pollution (atmospheric nitrogen deposition).

THAMES ESTUARY AND MARSHES RAMSAR SITE

Site Code	UK11069
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/RIS/UK11069.pdf
Conservation Objectives	As per associated SAC / SPA, or underpinning SSSI(s)
Site Improvement Plan	As per associated SAC / SPA, or underpinning SSSI(s)
Supplementary advice	As per associated SAC / SPA, or underpinning SSSI(s)
Associated SSSIs	Mucking Flats and Marshes SSSI, South Thames Estuary and Marshes SSSI
Site Overview	Thames Estuary and Marshes is a wetland comprising intertidal habitats, saltmarsh, coastal grazing marshes, saline lagoons and chalk pits. The site provides support to different wetland birds, plants and invertebrates species. The site is approximately 19.2km north-west of the CCC area and has no hydrological connectivity with the CCC area.
Qualifying Features / Ramsar criteria	- Crit. 2 - supports vulnerable, endangered, or critically endangered species or threatened eco. communities - Crit. 5 - regularly supports 20,000 or more waterbirds - Crit. 6 - regularly supports 1% of the individuals in a population of one species/subspecies of waterbirds
Other interest features (SAC typical species, SPA supporting habitats, etc.)	The supplementary advice indicates that the within-site supporting habitats for the qualifying features are principally: coastal lagoons, coastal reedbeds, freshwater and coastal grazing marsh, intertidal mixed sediments, intertidal sand and muddy sand, <i>Salicornia</i> and other annuals colonising mud and sand, <i>Spartina</i> swards (<i>Spartinion maritimae</i>).
Functional Land	Specific areas of functional land are identified for Black-tailed godwit (Holehaven Creek SSSI).
Condition, Pressures, Threats	The SSSIs units underpinning the SPA and Ramsar are in 'favourable', 'favourable-recovering', 'unfavourable-no change' and 'unfavourable-declining' condition. The SIP identifies several pressures and threats to site integrity, the following of which may be potentially influenced by the Local Plan: ■ Public access/disturbance (boating and watersports, walking and fishing); ■ Air pollution (atmospheric nitrogen deposition).

THANET COAST AND SANDWICH BAY SPA	
Site Code	UK9012071
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012071.pdf
Conservation Objectives	Available at: http://publications.naturalengland.org.uk/publication/6009926887407616?category=6528471664689152
Site Improvement Plan	Available at: http://publications.naturalengland.org.uk/publication/6009926887407616?category=6528471664689152
Supplementary advice	Available at: https://designatedsites.naturalengland.org.uk/Marine/MarineSiteDetail.aspx?SiteCode=UK9012071
Associated SSSIs	Sandwich Bay to Hacklinge Marshes SSSI Thanet Coast SSSI
Site Overview	The Thanet Coast has the longest continuous stretch of coastal chalk in Britain (23 km). The intertidal reef, together with the mudflats and sandflats which characterise the remainder of the coastline in North East Kent, provide valuable feeding grounds and roosting areas at low water for wintering waders.
Qualifying Features / Ramsar criteria	- A140w: European golden plover <i>Pluvialis apricaria</i> - A169w: Ruddy turnstone <i>Arenaria interpres</i> - A195r: Little tern <i>Sterna albifrons</i>
Other interest features (SAC typical species, SPA supporting habitats, etc.)	The supplementary advice does not identify specific within-site supporting habitats for the qualifying features of the SPA / Ramsar but these are assumed to be the key habitats of the site, i.e. intertidal mud and sandflats, arable fields, grazing marsh, sand and shingle shores, shallow coastal waters and chalk shores
Functional Land	No specific areas of functional land are identified; however the SACO identifies the need for a permeable landscape and habitat linkages to facilitate movement of birds between the SPA and any off-site supporting habitat is considered critical to the breeding success and to adult fitness and survival. Golden plover are known to use non-designated agricultural land some distance from the European site.

THANET COAST AND SANDWICH BAY SPA

Condition, Pressures, Threats

The SSSI underpinning the SPA, SAC and Ramsar site is in 'favourable' condition; however, the SIP identifies several pressures and threats to site integrity, the following of which may be potentially influenced by the Local Plan:

- Changes in species distribution (anthropogenic disturbance);
- Public access/disturbance (dog walkers and vehicles);
- Air pollution (atmospheric nitrogen deposition);
- Water Pollution (insufficiently treated Sewage Treatment Works discharges);

The remaining pressures and threats typically relate to local land management issues that will not be influenced by the Local Plan. In this case, some non-native species are increasing, including the Pacific oyster *Crassostrea gigas*, common mussel and the native oyster *Ostrea edulis*; evidence of bait-digging and suggestions by local people of large-scale removal of cockles and oysters.

THANET COAST AND SANDWICH BAY RAMSAR SITE

Site Code	UK11070
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/RIS/UK11070.pdf
Conservation Objectives	As per associated SAC / SPA, or underpinning SSSI(s)
Site Improvement Plan	As per associated SAC / SPA, or underpinning SSSI(s)
Supplementary advice	As per associated SAC / SPA, or underpinning SSSI(s)
Associated SSSIs	Sandwich Bay to Hacklinge Marshes SSSI Thanet Coast SSSI
Site Overview	The Thanet Coast has the longest continuous stretch of coastal chalk in Britain (23 km). The intertidal reef, together with the mudflats and sandflats which characterise the remainder of the coastline in North East Kent, provide valuable feeding grounds and roosting areas at low water for wintering waders.
Qualifying Features / Ramsar criteria	- Crit. 2 - supports vulnerable, endangered, or critically endangered species or threatened eco. communities - Crit. 6 - regularly supports 1% of the individuals in a population of one species/subspecies of waterbirds
Other interest features (SAC typical species, SPA supporting habitats, etc.)	The supplementary advice does not identify specific within-site supporting habitats for the qualifying features of the SPA / Ramsar but these are assumed to be the key habitats of the site, i.e. intertidal mud and sandflats, arable fields, grazing marsh, sand and shingle shores, shallow coastal waters and chalk shores
Functional Land	No specific areas of functional land are identified; however the SACO identifies the need for a permeable landscape and habitat linkages to facilitate movement of birds between the SPA and any off-site supporting habitat is considered critical to the breeding success and to adult fitness and survival. Golden plover are known to use non-designated agricultural land some distance from the European site.

THANET COAST AND SANDWICH BAY RAMSAR SITE

Condition, Pressures, Threats

The SSSI underpinning the SPA, SAC and Ramsar site is in 'favourable' condition; however, the SIP identifies several pressures and threats to site integrity, the following of which may be potentially influenced by the Local Plan:

- Changes in species distribution (anthropogenic disturbance);
- Public access/disturbance (dog walkers and vehicles);
- Air pollution (atmospheric nitrogen deposition);
- Water Pollution (insufficiently treated Sewage Treatment Works discharges);

The remaining pressures and threats typically relate to local land management issues that will not be influenced by the Local Plan. In this case, some non-native species are increasing, including the Pacific oyster *Crassostrea gigas*, common mussel and the native oyster *Ostrea edulis*; evidence of bait-digging and suggestions by local people of large-scale removal of cockles and oysters.



THANET COAST SAC	
Site Code	UK0013107
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0013107.pdf
Conservation Objectives	Available at: http://publications.naturalengland.org.uk/publication/5766780467281920?category=6528471664689152
Site Improvement Plan	Available at: http://publications.naturalengland.org.uk/publication/5766780467281920?category=6528471664689152
Supplementary advice	Available at: https://designatedsites.naturalengland.org.uk/Marine/MarineSiteDetail.aspx?SiteCode=UK0013107
Associated SSSIs	Sandwich Bay to Hacklinge Marshes SSSI Thanet Coast SSSI
Site Overview	The Thanet Coast has the longest continuous stretch of coastal chalk in Britain (23 km) representing about 20% of UK coastal chalk and 12% of the coastal exposure in Europe. The chalk cliff face, cave and tunnel habitats and communities here are very uncommon in Europe and therefore important internationally.
Qualifying Features / Ramsar criteria	- H1170: Reefs - H8330: Submerged or partially submerged sea caves
Other interest features (SAC typical species, SPA supporting habitats, etc.)	The supplementary advice does not identify typical species for the SAC.
Functional Land	No specific areas of functional land are identified.

THANET COAST SAC

Condition, Pressures, Threats

The SSSI underpinning the SPA, SAC and Ramsar site is in 'favourable' condition; however, the SIP identifies several pressures and threats to site integrity, the following of which may be potentially influenced by the Local Plan:

- Water Pollution (insufficiently treated Sewage Treatment Works discharges);

The remaining pressures and threats typically relate to local land management issues that will not be influenced by the Local Plan. In this case, some non-native species are increasing, including the Pacific oyster *Crassostrea gigas*, common mussel and the native oyster *Ostrea edulis*; evidence of bait-digging and suggestions by local people of large-scale removal of cockles and oysters.

THE SWALE SPA	
Site Code	UK9012011
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012011.pdf
Conservation Objectives	Available at: http://publications.naturalengland.org.uk/publication/5745862701481984?category=6528471664689152
Site Improvement Plan	Available at: http://publications.naturalengland.org.uk/publication/5745862701481984?category=6528471664689152
Supplementary advice	Available at: https://designatedsites.naturalengland.org.uk/Marine/MarineSiteDetail.aspx?SiteCode=UK9012011
Associated SSSIs	The Swale SSSI
Site Overview	The site is a wetland comprising intertidal mudflats, shell-beaches, saltmarshes and extensive grazing marshes. The saltmarshes and mudflats support a high species diversity of plants and invertebrates, including several nationally rare species and is an important habitat for an assemblage of wintering waterfowls and notable breeding bird species. The site is within the CCC area at Whitstable and there is no surface water hydrological connectivity, and so effects on the sites are likely to be weak
Qualifying Features / Ramsar criteria	- A051w: Gadwall <i>Anas strepera</i> - A052w: Eurasian teal <i>Anas crecca</i> - A130w: Eurasian oystercatcher <i>Haematopus ostralegus</i> - A137w: Ringed plover <i>Charadrius hiaticula</i> - A141w: Grey plover <i>Pluvialis squatarola</i> - A160w: Eurasian curlew <i>Numenius arquata</i> - A162w: Common redshank <i>Tringa totanus</i> - A672w: Dunlin <i>Calidris alpina alpina</i> - A675w: Dark-bellied brent goose <i>Branta bernicla bernicla</i> - BBA: Breeding bird assemblage - WATR: Waterbird assemblage

THE SWALE SPA

Other interest features (SAC typical species, SPA supporting habitats, etc.)

Within-site supporting habitats for the qualifying features include: intertidal mud, intertidal sand and muddy sand, saltmarsh, grazing marsh, seagrass beds, grassland, arable fields and intertidal mussel beds.

Functional Land

No specific areas of functional land are identified; however dark-bellied brent geese are known to use nearby areas of agricultural land (typically within 5km of the SPA), including at Graveney Marshes / Seasalter. A permeable landscape and habitat linkages to facilitate movement of birds between the SPA and any off-site supporting habitat is considered critical to the breeding success and to adult fitness and survival.

Condition, Pressures, Threats

The SSSI underpinning the SPA is in 'favourable' condition; however, the SIP identifies several pressures and threats to site integrity, the following of which may be potentially influenced by the Local Plan:

- Coastal squeeze (sea level rise);
- Public access/disturbance (boating and watersports, walking and fishing);
- Air pollution (atmospheric nitrogen deposition).

THE SWALE RAMSAR SITE

Site Code	UK11071
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/RIS/UK11071.pdf
Conservation Objectives	As per associated SAC / SPA, or underpinning SSSI(s)
Site Improvement Plan	As per associated SAC / SPA, or underpinning SSSI(s)
Supplementary advice	As per associated SAC / SPA, or underpinning SSSI(s)
Associated SSSIs	The Swale SSSI
Site Overview	The site is a wetland comprising intertidal mudflats, shell-beaches, saltmarshes and extensive grazing marshes. The saltmarshes and mudflats support a high species diversity of plants and invertebrates, including several nationally rare species and is an important habitat for an assemblage of wintering waterfowls and notable breeding bird species. The site is within the CCC area at Whitstable and there is no surface water hydrological connectivity, and so effects on the sites are likely to be weak
Qualifying Features / Ramsar criteria	- Crit. 2 - supports vulnerable, endangered, or critically endangered species or threatened eco. communities - Crit. 5 - regularly supports 20,000 or more waterbirds - Crit. 6 - regularly supports 1% of the individuals in a population of one species/subspecies of waterbirds
Other interest features (SAC typical species, SPA supporting habitats, etc.)	Within-site supporting habitats for the qualifying features include: intertidal mud, intertidal sand and muddy sand, saltmarsh, grazing marsh, seagrass beds, grassland, arable fields and intertidal mussel beds.
Functional Land	No specific areas of functional land are identified; however dark-bellied brent geese are known to use nearby areas of agricultural land (typically within 5km of the SPA), including at Graveney Marshes / Seasalter. A permeable landscape and habitat linkages to facilitate movement of birds between the SPA and any off-site supporting habitat is considered critical to the breeding success and to adult fitness and survival.

THE SWALE RAMSAR SITE

Condition, Pressures, Threats

The SSSI underpinning the SPA is in 'favourable' condition; however, the SIP identifies several pressures and threats to site integrity, the following of which may be potentially influenced by the Local Plan:

- Coastal squeeze (sea level rise);
- Public access/disturbance (boating and watersports, walking and fishing);
- Air pollution (atmospheric nitrogen deposition).

WYE & CRUNDALE DOWNS SAC

Site Code	UK0012831
Standard data form	Available at: https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012831.pdf
Conservation Objectives	Available at: https://publications.naturalengland.org.uk/publication/5065822208786432
Site Improvement Plan	Available at: https://publications.naturalengland.org.uk/publication/5065822208786432
Supplementary advice	Available at: https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0012831.pdf
Associated SSSIs	Wye & Crundale Downs SSSI
Site Overview	The site contains a mosaic of different habitats including species-rich grassland, neutral grasslands, scrub and woodland on chalk and calcareous fen-meadow on the Gault Clay. The grassland and woodland support an outstanding assemblage of rare and scarce plants, two of which are specially protected. It supports an outstanding assemblage of invertebrates including one of only two British populations of black veined moth. It is located just outside of the CCC administrative boundary, to the southwest.
Qualifying Features / Ramsar criteria	- H6210 Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) (*important orchid sites)
Other interest features (SAC typical species, SPA supporting habitats, etc.)	Typical species for this SAC are listed in the SACO as: Constant and preferential plant species of CG4 <i>Brachypodium pinnatum</i> ; calcareous grassland and CG5 <i>Bromus erectus</i> - <i>Brachypodium pinnatum</i> ; and calcareous grassland which forms part of the H6210 feature on this SAC. Vascular plant assemblage including: late spider orchid <i>Ophrys fuciflora</i> ; early spider orchid <i>Ophrys sphegodes</i> ; dwarf milkwort <i>Polygala amarella</i> ; lady orchid <i>Orchis purpurea</i> ; man orchid <i>Aceras anthropophorum</i> ; burnt-tip orchid <i>Orchis ustulata</i> ; musk orchid <i>Herminium monorchis</i> ; and greater broom-rape <i>Orobancha rapum</i> .

WYE & CRUNDALE DOWNS SAC

Functional Land

No specific areas of functional land are identified; however associated semi-natural vegetation types within the SAC's immediate surrounds may contribute to the functioning of the site feature.

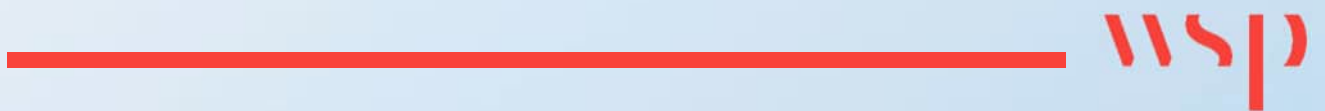
Condition, Pressures, Threats

The SSSI underpinning the SPA is in 'favourable' and 'unfavourable-recovering' condition; however, the SIP identifies several pressures and threats to site integrity, the following of which may be potentially influenced by the Local Plan:

- Air pollution (atmospheric nitrogen deposition).

Appendix B

SUMMARY OF INITIAL SCREENING OF DRAFT POLICIES



APPENDIX B – POLICY REVIEW

Key

No LSE	No effect or no LSE – policy will not or cannot affect any European sites and can therefore be screened out (subject to a brief review of the final policy prior to adoption).
No LSE*	Policies with mitigating/moderating elements that do not have significant effects but which are relied on (at least in part) to ensure that significant or significant adverse effects from specific pathways do not occur; these are examined through AA.
LSE/Uncertain	Policies that have potential pathways for effects that require examination through appropriate assessment; note, this does not imply such policies will have adverse effects or even (potentially) significant effects; rather it is an assessment flag.

Policy	HRA Summary	Notes
Policy SS1 Environmental Strategy for the district	No LSE	The policy sets out the strategic approach to the protection and enhancement of the environment, including indicating the range of open spaces to be provided, the protection of green and blue infrastructure, and the achievement of 20% biodiversity net gain on eligible major developments and 10% biodiversity net gain on eligible non-major developments. Strictly the policy is a 'no LSE' policy as it does not itself trigger development although the policy includes 'mitigating' elements / criteria that would need to be met in relation to habitats which are intended to minimise effects on designated sites and which have therefore been considered as part of the AA.
Policy SS2 Sustainable Design Strategy for the district	No LSE	The policy sets out the strategic approach to ensuring sustainable communities within the district. General statement of policy / general design / guidance criteria or policies that cannot lead to or trigger development.
Policy SS3 Development Strategy for the district	Uncertain	The policy will set the overall scale of housing development to be provided within the period 2024/25 to 2042/43 and provides general criteria relating to the distribution of development and its location. There are in-combination issues in relation to nutrient neutrality, air quality and recreational pressure which are being examined through appropriate assessment.

Policy	HRA Summary	Notes
Policy SS4 Economic Strategy for the district	Uncertain	This policy sets out the strategic approach for economic growth in the district. It establishes a minimum amount of office, industrial, warehouse and retail development required over the plan period, with it being possible for the district to create more as needed. There are in-combination issues in relation to nutrient neutrality, air quality and recreational pressure which are being examined through appropriate assessment.
Policy SS5 Movement and Transportation Strategy for the district	No LSE*I m	The policy sets out overall approach to delivering movement and transport strategy and transport infrastructure improvements.
Policy SS6 Infrastructure Strategy for the district	No LSE*	The policy sets out the strategic approach to the provision of infrastructure protection including the range of open spaces to be provided, and a reservoir at Broad Oak. Strictly the policy is a 'no LSE' policy as it does not itself trigger development although the policy includes 'mitigating' elements / criteria that would need to be met in relation to habitats which are intended to minimise effects on designated sites and which have therefore been considered as part of the AA.
Policy SS7 Local Plan Review	No LSE	The policy sets out the commitment to review the Local Plan within five years of adoption. General policy that does not of itself lead to or trigger development.
Policy C1 Canterbury City Centre Strategy	No LSE	The policy sets out objectives that development within City Centre should be consistent with and criteria for development. General statement of policy / General design / guidance criteria or policies that cannot lead to or trigger development.
Policy C2 43 to 45 St George's Place	Uncertain (i/c)	Proposed allocation. The policy sets out criteria for development of the site. Allocation could affect sites through recreational pressure, air quality changes or water quality changes in combination with other allocations; potential effects on functional land also require consideration.
Policy C3 Land at Hawk's Lane	Uncertain (i/c)	As per C2
Policy C4 Millers Field car park	Uncertain (i/c)	As per C2
Policy C5 Land north of Canterbury West Station	Uncertain (i/c)	As per C2

Policy	HRA Summary	Notes
Policy C6 Land at Station Road East	Uncertain (i/c)	As per C2
Policy C7 Becket House	Uncertain (i/c)	As per C2
Policy C8 Nackington Police Station	Uncertain (i/c)	As per C2
Policy C9 Canterbury Urban Area Strategy	No LSE	The policy sets out objectives that development within the Urban Area should be consistent with and criteria for development. General statement of policy / General design / guidance criteria or policies that cannot lead to or trigger development.
Policy C10 Land at Merton Park	Uncertain (i/c)	As per C2
Policy C11 Land at Langton Lane	Uncertain (i/c)	As per C2
Policy C12 Nackington Police Station	Uncertain (i/c)	As per C2
Policy C14 Milton Manor House	Uncertain (i/c)	As per C2
Policy C15 Land south of Littlebourne Road	Uncertain (i/c)	As per C2
Policy C16 Land south of Bekesbourne Lane	Uncertain (i/c)	As per C2
Policy C17 Land at Seotamot	Uncertain (i/c)	As per C2
Policy C18 Wincheap Commercial Area	Uncertain (i/c)	As per C2
Policy C19 Land at Military Road	Uncertain (i/c)	As per C2
Policy C20 Land at Sussex Avenue	Uncertain (i/c)	As per C2
Policy C21 Land at Suffolk Road	Uncertain (i/c)	As per C2
Policy C22 Land at the Former Chaucer Technology School	Uncertain (i/c)	As per C2
Policy C23 Land South of the Spitfire Ground, St Lawrence	Uncertain (i/c)	As per C2

Policy	HRA Summary	Notes
Policy C24 Land at Whitehall Close	Uncertain (i/c)	As per C2
Policy C25 Land at St Stephen's Road	Uncertain (i/c)	As per C2
Policy C26 Land at Long Meadow Way	Uncertain (i/c)	As per C2
Policy C27 Land at Bawden Close	Uncertain (i/c)	As per C2
Policy C28 Land at Copinger Close	Uncertain (i/c)	As per C2
Policy C29 Land at Jesuit Close	Uncertain (i/c)	As per C2
Policy C30 Land at Folly Farm	Uncertain (i/c)	As per C2
Policy C31 Land on the eastern side of Shelford Landfill	Uncertain (i/c)	As per C2
Policy C32 Land at Wincheap Park and Ride	Uncertain (i/c)	As per C2
Policy C33 Canterbury Urban Area Regeneration Opportunity Areas	No LSE	The policy sets out the intention to explore opportunities for longer-term regeneration. It identifies the potential opportunity areas but no specific allocations or delivery requirements. It states that detailed development briefs will be prepared. General statement of policy / general design / guidance criteria or policies that cannot lead to or trigger development.
Policy W1 Whitstable Town Centre Strategy	No LSE	The policy sets out objectives that development within Whitstable Town Centre should be consistent with and criteria for development. General statement of policy / general design / guidance criteria or policies that cannot lead to or trigger development.
Policy W2 Whitstable Harbour	Uncertain (i/c)	As per C2
Policy W3 Whitstable Urban Area	No LSE	The policy sets out objectives that development within the Whitstable Urban Areas should be consistent with and criteria for development.
Policy W4 Land at Brooklands Farm	Uncertain (i/c)	As per C2
Policy W5 Land south of Thanet Way	Uncertain (i/c)	As per C2

Policy	HRA Summary	Notes
Policy W6 Land at Golden Hill	Uncertain (i/c)	As per C2
Policy W7 Bodkin Farm	Uncertain (i/c)	As per C2
Policy W8 Land to the south west of Joseph Wilson Business Park	Uncertain (i/c)	As per C2
Policy W9 Land lying to the west of Golden Hill	Uncertain (i/c)	As per C2
Policy W10 Land at Beresford Road	Uncertain (i/c)	As per C2
Policy W11 St Vincent's Centre	Uncertain (i/c)	As per C2
Policy HB1 Herne Bay Town Centre Strategy	No LSE	The policy sets out objectives that development within Herne Bay Town Centre should be consistent with and criteria for development. General statement of policy / general design / guidance criteria or policies that cannot lead to or trigger development.
Policy HB2 Herne Bay Town Centre Regeneration Opportunity Areas	No LSE	Sets out broad areas for regeneration Herne Bay Town Centre.
Policy HB3 Herne Bay Urban Area Strategy	No LSE	The policy sets out objectives that development within the Herne Bay Urban Areas should be consistent with and criteria for development.
Policy HB4 Land at Beacon Road	Uncertain (i/c)	As per C2
Policy HB5 Land to the West of Thornden Wood Road	Uncertain (i/c)	As per C2
Policy HB6 Land comprising Nursery Industrial Units and former Kent Ambulance Station	Uncertain (i/c)	As per C2
Policy HB7 Herne Bay Golf Course Driving Range	Uncertain (i/c)	As per C2
Policy HB8 Land to the east of Bullockstone Road	Uncertain (i/c)	As per C2

Policy	HRA Summary	Notes
Policy HB9 Land at Home Farm, Strode Park	Uncertain (i/c)	As per C2
Policy HB10 Land to the west of Bullockstone Road	Uncertain (i/c)	As per C2
Policy HB11 Altira	Uncertain (i/c)	As per C2
Policy HB12 Moyne	Uncertain (i/c)	As per C2
Policy HB13 Hawthorn Corner	Uncertain (i/c)	As per C2
Policy HB14 Eddington Business Park	Uncertain (i/c)	As per C2
Policy R1 Rural Service Centres	Uncertain (i/c)	The policy will set the overall scale of housing and employment development to be provided within the plan period until 2042/43 and provides general criteria relating to the distribution of development and its location. There are 'in combination' issues in relation to nutrient neutrality, air quality and recreational pressure which are being examined through appropriate assessment.
Policy R2 Great Pett Farmyard	Uncertain (i/c)	As per C2
Policy R3 Chartham Paper Mill	Uncertain (i/c)	As per C2
Policy R4 Land at Ashford Road (west)	Uncertain (i/c)	As per C2
Policy R5 Land at Ashford Road (east)	Uncertain (i/c)	As per C2
Policy R6 Bread and Cheese Field	Uncertain	Proposed allocation. The policy sets out criteria for development of the site. The associated site is within 400m of the Stodmarsh SAC/SPA/Ramsar
Policy R7 Land at Hersden	Uncertain (i/c)	As per C2
Policy R8 Land at the former Spires Academy	Uncertain (i/c)	As per C2
Policy R9 The Hill, Littlebourne	Uncertain (i/c)	As per C2
Policy R10 Land north of Court Hill	Uncertain (i/c)	As per C2

Policy	HRA Summary	Notes
Policy R11 Land north of Popes Lane	Uncertain (i/c)	As per C2
Policy R12 Land at The Paddocks, Shalloak Road	Uncertain (i/c)	As per C2
Policy R13 Local Service Centres	Uncertain (i/c)	The policy will set the overall scale of housing and employment development to be provided within the plan period until 2042/43 and provides general criteria relating to the distribution of development and its location. There are 'in combination' issues in relation to nutrient neutrality, air quality and recreational pressure which are being examined through appropriate assessment.
Policy R14 Land west of Cooting Lane and south of Station Road	Uncertain (i/c)	As per C2
Policy R15 Land adjacent to Valley Road	Uncertain (i/c)	As per C2
Policy R16 Land at Goose Farm, Shalloak Road	Uncertain (i/c)	As per C2
Policy R17 Land at Shalloak Road	Uncertain (i/c)	As per C2
Policy R18 Land fronting Mayton Lane	Uncertain (i/c)	As per C2
Policy R19 Land at Church Farm	Uncertain (i/c)	As per C2
Policy R20 Countryside	Uncertain (i/c)	As per SS3
Policy R21 Land at Canterbury Business Park	Uncertain (i/c)	As per C2
Policy R22 Barham Layby	Uncertain (i/c)	As per C2
Policy R23 Land to the south of Sturry Road	Uncertain (i/c)	As per C2
Policy R24 Broad Oak Reservoir and Country Park	No LSE	External project to the plan. Project level AA has confirmed that this will have no adverse effect on any European sites; project is not proposed by the CCC plan and this policy primarily provides development control.

Policy	HRA Summary	Notes
Policy DS1 Affordable housing	No LSE	The policy sets out the requirements for affordable housing in terms of the overall level of provision, location within new development, and tenure. General statement of policy / general design / guidance criteria or policies that cannot lead to or trigger development.
Policy DS2 Housing mix	No LSE	The policy sets out the requirements for housing mix and dwelling size and types. General statement of policy / general design / guidance criteria or policies that cannot lead to or trigger development.
Policy DS3 Estate regeneration	No LSE	The policy supports regeneration of existing areas where they would result in a benefit to the local community, providing a mix of new homes and an improved local environment with to meet local needs.
Policy DS4 Rural housing	No LSE	Residential development designed to meet the identified housing needs of local people unable to meet their own needs in the housing market will be permitted on areas adjacent to Urban Area, Rural Service Centre or Local Service Centre. The policy sets out criteria for relevant proposals. General statement of policy / general design / guidance criteria or policies that cannot lead to or trigger development.
Policy DS5 Specialist housing provision	No LSE	The policy sets out criteria relating to the provision of specialist accommodation. General statement of policy / general design / guidance criteria or policies that cannot lead to or trigger development.
Policy DS6 Gypsy and Traveller Accommodation	Uncertain (i/c)	The policy sets out criteria for permitting intensification and/or regularisation of eight identified sites and additional criteria for proposal of new sites for Gypsy and Traveller accommodation. There are 'in combination' issues in relation to nutrient neutrality, air quality and recreational pressure which are being examined through appropriate assessment.
Policy DS7 Business and Employment development	No LSE	Support for employment in existing business and employment locations identified. General statement of policy / general design / guidance criteria; no pathway for effects.
Policy DS8 Education and associated development	No LSE	The policy sets out general planning principles that will be applicable to education establishment, including the University of Kent, Canterbury Chris Church, and University of Creative Arts campus. General statement of policy / general design / guidance criteria; no pathway for effects.

Policy	HRA Summary	Notes
Policy DS9 Town centres and community facilities	No LSE	The policy sets out general retail planning principles that will be applicable across the district. The policy sets out the hierarchy of centres within the district. The policy sets out criteria for managing development within centres and for managing proposals for proposals outside of City/Town Centres. General statement of policy / general design / guidance criteria; no pathway for effects.
Policy DS10 Tourism development	No LSE	The policy sets out general criteria for proposals for tourism related uses in the district. General statement of policy / general design / guidance criteria; no pathway for effects.
Policy DS11 Rural economy	No LSE	The policy sets out general criteria for proposals for economic uses in the rural area. General statement of policy / General design / guidance criteria; no pathway for effects.
Policy DS12 Net zero carbon ready and water efficiency	No LSE	The policy sets out the requirements for new residential developments to meet net zero carbon ready design standards and water efficiencies. It sets out the standards that must be met. General statement of policy / general design / guidance criteria; no pathway for effects.
Policy DS13 Sustainable design	No LSE	The policy sets out a range of requirements for qualifying new developments relating to sustainable design and construction. General statement of policy / general design / guidance criteria; no pathway for effects.
Policy DS14 Digital Infrastructure	No LSE	The policy sets out the requirements for providing high speed broadband and improving mobile data coverage. General statement of policy / general design / guidance criteria; no pathway for effects.
Policy DS15 Infrastructure delivery	No LSE	The policy sets out the approach to the delivery of a wide range of infrastructure, including transport, utility services, community and health facilities. General statement of policy / general design / guidance criteria or policies that cannot lead to or trigger development.
Policy DS16 Movement Hierarchy	No LSE*	The policy sets out the Council's Movement Hierarchy to prioritise active and sustainable travel in new development. General statement of policy / general design / guidance criteria; no pathway for effects.

Policy	HRA Summary	Notes
Policy DS17 Active and sustainable travel	No LSE*	The policy sets out the Council's intention to promote walking and cycling which is consistent with the Council's Movement Hierarchy. Strictly the policy is a 'no LSE' policy as it does not itself trigger development although the policy includes 'mitigating' elements / criteria that would need to be met in relation to shifts from car use that may be relied on to minimise effects on air quality sensitive sites and which have therefore been considered as part of the AA.
Policy DS18 Highways and parking	No LSE*	The policy sets out general criteria for highways and parking provision. Strictly the policy is a 'no LSE' policy as it does not itself trigger development although the policy includes 'mitigating' elements / criteria that would need to be met in relation to shifts from car use that may be relied on to minimise effects on air quality sensitive sites and which have therefore been considered as part of the AA.
Policy DS19 Air quality	No LSE*	The policy sets out general criteria for the avoidance of pollution and protection of air quality. Strictly the policy is a 'no LSE' policy as it does not itself trigger development although the policy includes 'mitigating' elements / criteria that would need to be met in relation to air quality and which are intended to minimise effects on designated sites and which have therefore been considered as part of the AA.
Policy DS20 Habitats of international importance	No LSE*	The policy requires new development which may have a significant effect on the ecological integrity of Special Area of Conservation (SAC), Special Protection Area (SPA) or Ramsar to clearly demonstrate that any potential adverse effects are fully mitigated. The policy requires new residential development within the two identified Zones of Influence (Thanet Coast and Sandwich Bay SPA 7.2km and the Swale SPA 6km) to comply with the relevant Strategic Access Management and Monitoring Strategy or Strategies (SAMMs). The policy requires new development to not have an adverse effect on the integrity of Stodmarsh SAC/SPA/Ramsar site and requires applicants to comply with Nutrient Mitigation Strategies and to demonstrate that the requirements of the Habitats Regulations will be met, such as by applying the advice on Nutrient Neutrality issued by Natural England.
Policy DS21 Habitats and landscapes of national importance	No LSE	The policy seeks to avoid material harm to biodiversity and/or geodiversity or secure mitigation where this is not possible. The policy also protects the integrity of designated and proposed designated sites, including nationally designated sites. Protective policy.

Policy	HRA Summary	Notes
Policy DS22 Habitats, landscapes and sites of local importance	No LSE	The policy sets out protection of local landscapes, sites and habitats of importance, including Green Gaps. Protective policy.
Policy DS23 Flood risk	No LSE	The policy sets out criteria for managing development within flood risk areas and attenuation of flood risk. General statement of policy / general design / guidance criteria; no pathway for effects.
Policy DS24 Sustainable Drainage and Water Quality	No LSE	The policy sets out the requirement for use of SuDS. General statement of policy / general design / guidance criteria; no pathway for effects.
Policy DS25 Supporting biodiversity recovery	No LSE*	The policy seeks to protect existing green and blue infrastructure and ensure that major development delivers new green infrastructure and non-major developments incorporate blue and green infrastructure proportionately. The policy requires a 20% biodiversity net gain on eligible major developments and 10% biodiversity net gain on eligible non-major developments plan to demonstrate how this will be achieved in new development. Protective policy; no pathway for effects. Strictly the policy is a 'no LSE' policy as it does not itself trigger development although the policy includes 'mitigating' elements / and which are intended to minimise effects which have therefore been considered as part of the AA.
Policy DS26 Landscape Character	No LSE	The policy sets out general criteria for the protection of landscape character. Safeguarding policy that cannot lead to or trigger development. General design / guidance criteria.
Policy DS27 The Blean Woodland Complex	No LSE*	The policy seeks to protect the Blean Woodland Complex from harmful development and to secure enhancement of the landscape, ecology or setting of the Blean Woodland Complex. Protective policy; no pathway for effects. Strictly the policy is a 'no LSE' policy as it does not itself trigger development although the policy includes 'mitigating' elements / and which are intended to minimise effects on the Blean Woodland Complex and which have therefore been considered as part of the AA.
Policy DS28 Publicly accessible open space and sports	No LSE*	The policy sets out standards for the provision of open space within new development. General statement of policy / general design / guidance criteria; no pathway for effects. Strictly the policy is a 'no LSE' policy as it does not itself trigger development although the policy includes 'mitigating' elements / criteria which are intended to ensure appropriate open space provision that could minimise effects and which have therefore been considered as part of the AA.

Policy	HRA Summary	Notes
Policy DS29 Renewable and low carbon energy	No LSE	The policy sets out criteria for proposals relating to renewable and low carbon energy generation. It does not allocate specific areas for such development. General statement of policy / general design / guidance criteria; no pathway for effects.
Policy DS30 Historic environment and archaeology	No LSE	The policy sets out criteria for development affecting designated or non-designated heritage assets and/or their settings. General statement of policy / general design / guidance criteria; no pathway for effects.
Policy DM1 Conversion of existing rural buildings	No LSE	The policy sets out criteria relating to the conversion of existing rural buildings. General statement of policy / general design / guidance criteria or policies that cannot lead to or trigger development.
Policy DM2 Residential garden land	No LSE	The policy sets out criteria relating to the proposals for development of domestic gardens. General statement of policy / general design / guidance criteria; no pathway for effects.
Policy DM3 Housing in multiple occupation (HMOs)	No LSE	The policy sets out criteria relating to the HMOs. General statement of policy / general design / guidance criteria or policies that cannot lead to or trigger development.
Policy DM4 Reducing waste and supporting the circular economy	No LSE	The policy sets out criteria relating to waste generation from new development. General statement of policy / general design / guidance criteria or policies that cannot lead to or trigger development.
Policy DM5 Parking design	No LSE	The policy sets out criteria relating to parking provision. General statement of policy / general design / guidance criteria or policies that cannot lead to or trigger development.
Policy DM6 Extensions and alterations to existing buildings	No LSE	The policy sets out criteria relating to extensions and alteration to existing buildings. General statement of policy / general design / guidance criteria or policies that cannot lead to or trigger development.
Policy DM7 Health and Crime Impact Assessments	No LSE	The policy sets out criteria relating to undertaking health and crime impact assessments. General statement of policy / general design / guidance criteria or policies that cannot lead to or trigger development.
Policy DM8 Shopfronts	No LSE	The policy sets out criteria relating to the design of shopfronts. General statement of policy / general design / guidance criteria or policies that cannot lead to or trigger development.
Policy DM9 Advertisements	No LSE	The policy sets out criteria relating to control of advertisements. General statement of policy / general design / guidance criteria or policies that cannot lead to or trigger development.

Policy	HRA Summary	Notes
Policy DM10 Residential annexes and ancillary accommodation	No LSE	The policy sets out criteria relating to the design of residential annexes and ancillary accommodation. General statement of policy / general design / guidance criteria or policies that cannot lead to or trigger development.
Policy DM11 Residential design	No LSE	The policy sets out criteria relating to the design of residential development. General statement of policy / general design / guidance criteria or policies that cannot lead to or trigger development.
Policy DM12 Non-residential design	No LSE	The policy sets out criteria relating to the design of non-residential development. General statement of policy / general design / guidance criteria or policies that cannot lead to or trigger development.
Policy DM13 Biomass technology	No LSE	The policy sets out criteria relating to biomass criteria. General statement of policy / general design / guidance criteria or policies that cannot lead to or trigger development.
Policy DM14 Noise, odour and dust pollution	No LSE	The policy sets out criteria for integration of noise insulation and reducing noise pollution, significant odour and dust. General statement of policy / general design / guidance criteria or policies that cannot lead to or trigger development.
Policy DM15 Light pollution and dark skies	No LSE	The policy sets out criteria for light pollution and dark skies. General statement of policy / general design / guidance criteria or policies that cannot lead to or trigger development.
Policy DM19 Contamination and unstable land	No LSE	The policy sets out criteria for development on sites which may have contamination. General statement of policy / general design / guidance criteria or policies that cannot lead to or trigger development.
Policy CF1 Strategic Site Allocations	Uncertain (i/c)	Policy sets out over quantum of development; allocations could affect sites through recreational pressure, air quality changes or water quality changes in combination; potential effects on functional land also require consideration.
Policy CF2 Housing Allocations	Uncertain (i/c)	Policy sets out over quantum of development; allocations could affect sites through recreational pressure, air quality changes or water quality changes in combination; potential effects on functional land also require consideration.
Policy CF3 Pedestrian and Cycle Routes	No LSE	Plans or projects that are proposed by other plans or permissions regimes and which are referred to in the plan being assessed for completeness

Policy	HRA Summary	Notes
Policy CF4 Sturry Road Park and Ride	No LSE	Plans or projects that are proposed by other plans or permissions regimes and which are referred to in the plan being assessed for completeness
Policy CF5 New Dover Road Park and Ride	No LSE	Plans or projects that are proposed by other plans or permissions regimes and which are referred to in the plan being assessed for completeness
Policy CF6 A2 Bridge Interchange	No LSE	Plans or projects that are proposed by other plans or permissions regimes and which are referred to in the plan being assessed for completeness
Policy CF7 Herne Relief Road	No LSE	Plans or projects that are proposed by other plans or permissions regimes and which are referred to in the plan being assessed for completeness
Policy CF8 Sturry Relief Road	No LSE	Plans or projects that are proposed by other plans or permissions regimes and which are referred to in the plan being assessed for completeness
Policy CF9 A28/A257 Barracks Link Road	No LSE	Plans or projects that are proposed by other plans or permissions regimes and which are referred to in the plan being assessed for completeness
Policy CF10 Swalecliffe	No LSE	General statement of policy
Policy CF11 Kent and Canterbury Hospital	No LSE	General statement of policy

Appendix C

REVIEW OF PLANS AND PROGRAMMES

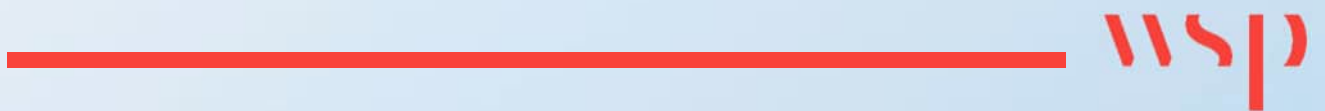


Table C-1 - Plans and programmes considered for potential ‘in-combination’ effects with the Draft Canterbury District Local Plan

Plan	Summary	Plan HRA conclusions	Potential for i/c effects?	Notes / Assessment
Dover District Local Plan to 2040 (Adopted October 2024)	The Local Plan sets out strategic, site allocation and development management policies to meet and manage the District’s housing, employment and other land use needs, as well as protect and conserve the District’s natural, cultural and historic assets up to 2040. The Local Plan sets out a requirement for 10,998 homes to 2040.	Regulation 19 HRA suggest ‘No adverse effects’ provided that identified safeguards and measures in relation to functional land, recreational pressure and construction mitigation measures are adhered to.	Yes	Plan has been examined. Appropriate Assessment ruled out adverse effects on Stodmarsh SPA and Ramsar site, Thanet Coast and Sandwich Bay SPA and Ramsar site, Thanet Coast SAC, Blean Complex SAC in relation to recreational pressures. The AA also ruled out adverse effects on the integrity of Thanet Coast and Sandwich Bay SPA and Ramsar site in relation to air quality. The CCC HRA at this stage demonstrates that there will be no adverse effects ‘in combination’.
Thanet Local Plan (2020)	The Local Plan guides development and regeneration decisions and investment over the period 2018 to 2031. It seeks to deliver a minimum of 5,000 jobs across the District during the Plan period to 2031.	No adverse effects	Yes	The HRA screening found that significant effects on the Thanet Coast and Sandwich Bay SPA, Thanet Coast and Sandwich Bay Ramsar and (to a lesser extent) Sandwich Bay SAC could not be screened out due to recreation pressure on Thanet Coast and Sandwich Bay SPA and Thanet Coast and Sandwich Bay Ramsar. The HRA concluded that the Thanet Coast Strategic Access Management and Monitoring Plan (SAMM) will ensure the plan will not adversely affect site integrity. It concludes that there will be no adverse effects on any European sites as a result of the Thanet plan, alone or in combination. The CCC HRA at this stage demonstrates that there will be no adverse effects ‘in combination’.

Plan	Summary	Plan HRA conclusions	Potential for i/c effects?	Notes / Assessment
Thanet Local Plan Review (in preparation)	In preparation; not yet consulted on.	-	Yes	There is potential to interact with the new TDC plan although this cannot be assessed at this stage (no information on the TDC plan available); however, assuming that the TDC plan adopts similar plan-level mitigation to the 2020 plan then no adverse effects would occur.
Swale Borough Publication Draft Local Plan (2017)	The Regulation 19 draft Local Plan for the period 2022 to 2038 is currently under review. The adopted Local Plan set out the requirement for 14,966 dwellings in the period 2014-2031. The Regulation 19 draft Local Plan sets out the requirement to allocate an additional 6,290 dwellings in the period 2022-2038.	No adverse effects	Yes	The Appropriate Assessment for the Regulation 19 draft local plan concluded no adverse effect on the integrity of Swale SPA and Ramsar with regard to the requirement to comply with the Bird Wise North Kent SAMM and the requirement for site specific project HRAs for particular land allocations. The screening concluded no LSE on Blean Complex with regard to air quality. The CCC HRA demonstrates that there will be no adverse effects 'in combination'. There is potential to interact with the new SBC plan although this cannot be assessed at this stage (no information on the SBC plan available); however, assuming that the SBC plan adopts similar plan-level mitigation to the 2017 plan then no adverse effects would occur.

Plan	Summary	Plan HRA conclusions	Potential for i/c effects?	Notes / Assessment
Ashford Draft Local Plan 2024 (Adopted Local Plan 2019)	The Regulation 19 draft Local Plan for the period 2024 - 2042 is currently at Regulation 18 consultation stage. The adopted Local Plan sets out the vision objectives and policies to support development up to 2030. The plan makes provision for 16,872 new dwellings between 2011 and 2030 and 63ha of employment land between 2014 and 2030.	No significant effects	Yes	The HRA report concludes that there will be no likely significant effects on the assessed European sites either alone or in combination and further appropriate assessment is not required. There is potential to interact with the new Ashford Draft Local Plan although this cannot be assessed at this stage (no HRA has been conducted yet). However, assuming that it adopts similar plan-level mitigation to the 2019 plan then no adverse effects would occur.
Folkestone & Hythe Core Strategy Review (2022)	The Local Plan sets out the spatial vision, objectives, development strategy and a series of over-arching strategic policies that will guide the scale, location and type of development in the District until 2037. The Local Plan sets out a housing requirement of 13,284.	No significant effects	Yes	The HRA Appropriate Assessment considered found no adverse effects in relation to air pollution and recreational on Folkestone and Etchinghill Escarpment SAC, and in relation to recreational pressure and functional offsite loss on Dungeness SAC, SPA, or Ramsar.

Plan	Summary	Plan HRA conclusions	Potential for i/c effects?	Notes / Assessment
Southern Water Resources Management Plan	Water companies in England and Wales are required to produce a Water Resources Management Plan that sets out how they aim to maintain water supplies over a 25-year period. The Southern Water WRMP demonstrates how, in the medium to long term, it is intended to develop new resources, tackle leakage and use water sensibly through metering and water efficiency campaigns. The long term strategy is to increase the robustness of the water resources network to climate change. The plan is required to be updated every five years with the next update in 2024. Southern Water are currently engaging with customers and stakeholders as they prepare to update their plan for 2024.	No significant effect	No	Southern Water's WRMP for the next 25 years explicitly accounts for any reductions in abstraction that are required to safeguard European sites (see Section 3) and for the growth predicted by CCC and other LPAs in its forecasting. Therefore, the future water resource requirements of Canterbury are factored into the abstraction regime, such that they will not affect European sites (i.e. the growth provided for by the Canterbury Local Plan is in line with SW predictions and will not increase water resources pressure on any European sites, alone or in combination). Potential for in combination effects from Broad Oak Reservoir relating to functionally linked land for qualifying features of the Stodmarsh sites, Thanet Coast sites and Swale sites requires further baseline information to be brought forward in future revisions of the WRMP, but currently adverse effects are considered unlikely provided sufficient mitigation is provided through WRMP. No likely significant effects for Policy R17 Broad Oak Reservoir and Country Park have been concluded, due to the project-level HRA which ruled out adverse effects.

Plan	Summary	Plan HRA conclusions	Potential for i/c effects?	Notes / Assessment
Southeast River Basin District: River Basin Management Plan (2022).	A RBMP is a strategic plan which gives everyone concerned with the river basin district a measure of certainty about the future of water management in that district. It will include objectives for each water body and a summary of the programme of measures necessary to reach those objectives. The RBMP is a high level plan that identifies potential measures for river basin management but does not identify precisely where and how the programme of measures will be implemented.	No significant effect	No	The plans will be complementary and the policies within both plans do not create a scenario where there is insufficient flexibility at the project stage to allow significant effects to be avoided.

Plan	Summary	Plan HRA conclusions	Potential for i/c effects?	Notes / Assessment
Water Resources Southeast Final Regional Plan (2025)	WRSE is an alliance of the six water companies which cover the Southeast of England (Affinity Water, Portsmouth Water, SES Water, Southern Water, South East Water and Thames Water). WRSE has produced a regional plan to assess future water needs with a set of options to secure long-term regional water resilience. The options proposed include construction of new reservoirs (including Broad Oak, Canterbury) and provision of water recycling and ground water storage schemes,	Screening only completed as part of regional plan. AA is undertaken by member organisations as part of constituent WRMPs.	Yes	As detailed in South East Water WRMP HRA, there is the potential for in-combination effects relating to functionally linked land from the construction of Broad Oak Reservoir, although adverse effects are currently considered unlikely on the provision of appropriate design measures being incorporated following more detailed ongoing surveys. No likely significant effects for Policy R17 Broad Oak Reservoir and Country Park have been concluded, due to the project-level HRA which ruled out adverse effects.
Local Transport Plan 4: Delivering Growth without Gridlock (2016-2031)	The LTP sets KCCs vision for its transport network and services.	No significant effects	No	The CCC reflects the transport plan; landscape or strategy-level effects will not occur; effects of individual projects will be prevented by policy controls within both documents.

Plan	Summary	Plan HRA conclusions	Potential for i/c effects?	Notes / Assessment
Kent Minerals and Waste Local Plan 2024-29 (2025)	Includes a spatial vision, spatial strategy, strategic objectives, and core policies which set out the key principles to guide the future winning and working of minerals and the form of waste management development. The Local Plan sets out the long term Spatial Vision and Strategic Objectives for Kent's minerals and waste; the delivery strategy; two areas where strategic mineral and waste development is likely to occur; and the DM policies that will be used when the County Council makes decisions on planning applications; the framework to enable annual monitoring of the policies within the Plan.	No significant effects	No	The Minerals Plan HRA did not identify LSEs, alone or in combination with other plans or projects for any sites with the exception of effects on Dungeness, Romney Marsh & Rye Bay SPA & Ramsar site. The HRA confirms that only one policy was screened in, and on the basis of these findings it is concluded that the additional operations permitted under the proposed revisions to Policy CSW17, either alone or in combination with other ongoing de-commissioning operations, coast protection operations and other development are unlikely to have an adverse effect on the integrity of the Dungeness, Romney Marsh and Rye Bay SPA and the populations of its qualifying bird species as a result of noise or visual disturbances. No likely significant effects possible.

Appendix D

NUTRIENT MANAGEMENT STRATEGY

STODMARSH NUTRIENT MITIGATION

DRAFT NUTRIENT MITIGATION STRATEGY

CANTERBURY CITY COUNCIL

DOCUMENT REFERENCE:

21160-NUT-RP-02 | P06



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Authorisation and Version Control

Water Environment was commissioned by Canterbury City Council to develop a “Draft Nutrient Mitigation Strategy” to address concerns raised by Natural England regarding the nutrient loading from proposed development within the Stour Catchment and the potential adverse effects on the Stodmarsh Special Area of Conservation, Special Protection Area, Ramsar, and Site of Special Scientific Interest. This version of the report has been produced to address changes in the draft site allocations and new relevant legislation.

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Document Version History

Rev	Date	Comments	Auth	Chck	Appr
C01	06/10/2022	Final issue	FR	GL	GL
C02	21/01/2024	Update to draft allocations and legislation	GS	GL	GL
C03	02/04/2024	Minor amendments to treatment levels	GS	GL	GL
P05	07/01/2026	Update to draft allocations and legislation	CP	GL	GL
P06	18/02/2026	Further update to draft allocations	CP	GL	GL

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EXECUTIVE SUMMARY

In the Stour Valley River catchment in East Kent, developments could adversely affect the Stodmarsh complex, which is designated a Site of Special Scientific Interest, Special Protection Area, Special Area of Conservation and Ramsar site. Several of the nature reserve lakes at Stodmarsh are in a state of eutrophication (an unfavourable conservation status) and it has been found that the nutrients of highest significance in terms of water quality in Stodmarsh are nitrogen and phosphorus.

The nutrient loading from new developments is due to the nutrients contained in surface water runoff and the increase in wastewater flows to any of the Wastewater Treatment Works in the Stour catchment. A nutrient budget has been calculated for Canterbury City Council based on the existing allocations in the Canterbury District Local Plan adopted in 2017 and the emerging New Local Plan to 2042/43.

Dwellings that have been granted a full planning permission at the time of writing, or have agreed on-site mitigation, are omitted from the following analysis. Moreover, proposed new dwellings both lying outside of the surface water catchment and draining to a Wastewater Treatment Works outside of the catchment have been omitted from the analysis.

Following the omission of the relevant dwellings due to either planning status or location, the total number of dwellings which will form the basis for the nutrient budget within the adopted Canterbury District Local Plan and New Local Plan to 2042/43 is 15,898 (including windfall sites, gypsy and traveller pitches and hotel accommodation).

The nutrient budget has been calculated for each development site following the Generic Methodology produced by Natural England. A total increase in nutrient loading up to 2045 has been calculated as **5,330 kg of Nitrogen and 646 kg of Phosphorus**. The updates to the housing allocations, together with refinement of the assumptions made for a district-wide nutrient budget means that, since the last version of this report, the nitrogen budget has increased and the phosphorus budget has decreased.

Upgrades of Wastewater Treatment Works to Technically Achievable Limits by 2030, as stipulated in the Levelling Up and Regeneration Act, have been included in the calculation of the baseline nutrient budget. These upgrades are not considered a mitigation but will instead reduce the future baseline by reducing the concentration of nutrients reaching the Stodmarsh.

Considering onsite mitigation measures such as foul water treatment for large developments and surface water treatment through the use of SuDS, a partially mitigated nutrient budget has been further calculated as **3,565kgN and 378 kgP**. Since through onsite mitigation it is not possible to achieve nutrient neutrality, other offsetting measures such as: retrofitting the Canterbury City Council housing stock with water saving devices to reduce consumption, land use change and environmental enhancement elsewhere in the Stour catchment including nutrient treatment wetlands are discussed herein. Other mitigation measures will be considered as and when they are considered sufficiently robust to quantify potential nutrient reductions.

Principally, strategic constructed nutrient treatment wetlands have been established as an efficient large scale offsetting solution to the nutrient problem, with wetlands already operational in the catchment. The calculation of the wetland area in this report is based on the mitigated budget calculated after the use of onsite mitigation measures. It has been estimated that up to approximately 31 ha of wetland will need to be constructed along the Stour river corridor to fully offset the nutrient budget up to 2045, with 14 ha of wetland required to offset the budget to 2030, in the absence of other mitigation measures. In reality it is anticipated that other forms of mitigation will be implemented over the time period of the draft Local Plan and therefore it is unlikely that this area of constructed wetland will be required, however, sufficient land for wetlands has been allocated or safeguarded as precautionary measure.

ABBREVIATIONS

Acronym	Definition
AA	Appropriate Assessment
ABC	Ashford Borough Council
CCC	Canterbury City Council
EDDM	Enhanced Drainage Ditch Management
EDP	Environmental Delivery Plans
FWS	Free Water Surface
HRA	Habitat Regulations Assessment
KCC	Kent County Council
LURA	Levelling UP and Regeneration Act
NE	Natural England
NEGM	Natural England Generic Methodology
PTP	Package Treatment Plant
SAC	Special Area of Conservation
SEC	Stour Environmental Credits
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
SW	Southern Water
TP	Total Phosphorus
TN	Total Nitrogen
WwTW	Wastewater Treatment Works

1 INTRODUCTION – “THE PROBLEM”

- 1.1 A Habitats Regulations Assessment (HRA) refers to the several distinct stages of assessment which must be undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 to determine if a plan or project may affect the protected features of a designated site (any site which would be included within the definition at Regulation 8 of the Conservation of Habitats and Species Regulations 2017) before deciding whether to undertake, permit or authorise it. A risk or a possibility of such an effect is enough to warrant the need for an Appropriate Assessment (AA) to be carried out by the competent authority (in this case, Canterbury City Council, CCC). An AA must contain complete, precise, and definitive findings and conclusions to ensure that there is no reasonable scientific doubt as to the effects of the proposed plan or project.
- 1.2 In 2018, the European Court of Justice refined in the so-called ‘Dutch case’ the definition of plans and projects and ruled that mitigation needs to be in place to ensure that there will be no adverse effect on the conservation status of European designated sites.
- 1.3 In the Stour Valley River catchment in East Kent, developments could adversely affect the Stodmarsh complex, which is designated a Site of Special Scientific Interest (SSSI), Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar site. Several of the nature reserve lakes at Stodmarsh are in a state of eutrophication (an unfavourable conservation status) and therefore the ruling of the Dutch Case applies. It has been found that the nutrients of highest significance in terms of water quality in Stodmarsh are nitrogen and phosphorus.
- 1.4 The practical implication of The Dutch Case across the Stour catchment is the necessity to mitigate increases in nutrient loading from new development including nutrients contained in surface water runoff and an increase in wastewater flows to any of the WWTW in the Stour catchment. Moreover, the ability to develop strategic growth plans in order to meet housing targets is impacted by uncertainty over the provision of mitigation within the catchment to offset increases in nutrient load in the River Stour resulting from development. This is constrained by the potential limited ability on certain sites to provide on-site mitigation due to spatial and technical constraints.
- 1.5 Water Environment Ltd have been commissioned by CCC to support the development of a Stodmarsh Mitigation Plan to address Natural England (NE) concerns regarding the future impact of new housing development on Stodmarsh.
- 1.6 Through this work, CCC have committed to developing a holistic framework to provide larger-scale mitigation by reducing the nutrient loading from future development through different mitigation strategies including measures such as land use change and constructed wetlands to treat water. Net reductions in nutrient loading on strategic mitigation sites can then be used to offset increases in nutrient loading due to future development within the district. Such mitigation sites must fall within the Stour catchment area to provide benefits in relation to the downstream impacts of human activity on the Stodmarsh.
- 1.7 This report outlines the process by which the CCC Stodmarsh Nutrient Mitigation Framework has been developed and the scale of required mitigation calculated. Key assumptions made during this process are noted.
- 1.8 A more detailed Nutrient Mitigation Plan report has been produced¹ which contains additional background on Stodmarsh, Nutrient Neutrality Methodology, Wastewater Treatment Works (WwTW), mitigation options and case studies. This Nutrient Mitigation Strategy report

¹ Water Environment Limited (July 2022) Canterbury District Local Plan Nutrient Mitigation Plan. Document reference: 21160-NUT-RP-01-C01

summarises the key findings of the strategy and reports on the latest nutrient budget calculations in accordance with the Natural England March 2022 Generic Methodology and Stodmarsh calculator.

2 NUTRIENT NEUTRALITY – “THE CONCEPT”

- 2.1 In December 2019, NE issued methodology² surrounding nutrient neutrality for new development in the Stour Valley catchment, which was updated in July 2020³ and again in November 2020⁴. This methodology lays out the process of calculation and provides a worked example for a single development.
- 2.2 This methodology has been superseded by a Generic Methodology produced by NE⁵ which provides generic national methodology on achieving nutrient neutrality. The latest update of the Generic Methodology was made available in September 2025⁶.
- 2.3 This NE Generic Methodology (NEGM) is supplemented by a specific Nutrient Budget Calculator⁷ and associated Guidance Document⁸ for the Stodmarsh SAC and Ramsar site which provides an updated calculation for developments within the Stour catchment. This NEGM has been followed throughout the calculations.
- 2.4 The key measurement, with respects to nitrogen levels, is the amount of Total Nitrogen (TN). This includes organic and inorganic forms of nitrogen, both of which are available for plant growth and can contribute to algal blooming. TN is the sum of inorganic forms of nitrogen (nitrate-nitrogen (NO₃-N), nitrate nitrogen (No₂-N) and ammonia) and organically bonded nitrogen. Similarly, in respects to phosphorous levels, the key measurement is the amount of Total Phosphorous (TP). TP includes all phosphorous components: phosphates, dissolved organic phosphorous, particulate phosphorous in algal and bacterial cells, and includes mineral particles such as clay.
- 2.5 Stage 1 of the calculation is to calculate the nutrient load from the additional wastewater that will be generated by the development. This stage specifically only includes new overnight stays in the development, as it is assumed that any additional wastewater generated by diurnal use would be accounted for elsewhere. The NEGM recommends a water usage of 110 litres per person per day (l/p/d), plus an additional 10 l/p/d for any future changes to water fixtures.
- 2.6 Stage 2 of the calculation is to consider the existing land use on the site. Using the ADAS Farmscoper tool⁹, loading factors are determined for all different agriculture uses within the catchment. These loading factors are further separated by the underlying soil drainage conditions in the NEGM.
- 2.7 For non-agricultural uses, it is assumed in the NEGM that the land-use would not leach phosphorus except in the case of urban land-uses. Greenspace, woodlands, and similar were all therefore conservatively assigned a loading factor of 0.02 kgTP/ha/year – which, in some studies, was the lowest detectable loading factor. Urban loading factors are modelled using an assumed¹⁰ concentration of TP for rainfall events, and therefore this varies with the rainfall.
- 2.8 Using these loading factors, and the areas of various land-uses on the site, the existing nutrient load from diffuse sources can be calculated.

² Natural England (December 2019) Advice on Nutrient Neutrality for New Development in the Stour Valley Catchment in Relation to Stodmarsh Designated Sites – For Local Planning Authorities

³ Natural England (July 2020) Advice on Nutrient Neutrality for New Development in the Stour Valley Catchment in Relation to Stodmarsh Designated Sites – For Local Planning Authorities

⁴ Natural England (November 2020), Advice on Nutrient Neutrality for New Development in the Stour Valley Catchment in Relation to Stodmarsh.

⁵ Natural England Nutrient Neutrality Generic Methodology – Issue 1: February 2022

⁶ Natural England Nutrient Neutrality Generic Methodology – Issue 1: November 2022 (September 2025 Update)

⁷ Natural England Nutrient Neutrality Budget Calculator – Stodmarsh SAC and Ramsar

⁸ Natural England Nutrient Budget Calculator Guidance Document – Stodmarsh SAC and Ramsar – Issue 1 v1 March 2022

⁹ <https://www.adas.uk/Service/farmscoper>

¹⁰ Mitchell, G (2005) does not disclose how he calculated the event mean concentrations listed in his paper

- 2.9 Stage 4 of the calculation is the final stage. At this point, the totals from Stage 1 and Stage 3 are added together, and the total from Stage 2 is subtracted. If there is a surplus (i.e., the proposed total is higher than the existing total), a buffer (factor of safety) of 20% is added on to the total, and this is then referred to as 'the nutrient budget'. If the nutrient budget comes out as less than or equal to zero, then the development has achieved nutrient neutrality.
- 2.10 NE has provided a calculator for the Stour catchment in the form of a Microsoft Excel spreadsheet which incorporates all elements listed above. This calculator has been referenced throughout this report.
- 2.11 The methodology has been used in this case to calculate the nutrient budget for all development within the district.

What types of development require mitigation?

- 2.12 The NEGM covers all areas within the Stour Valley river catchment. A map of the catchment is shown in Figure 1. The Stour Valley catchment covers large areas of the district, including Canterbury City.

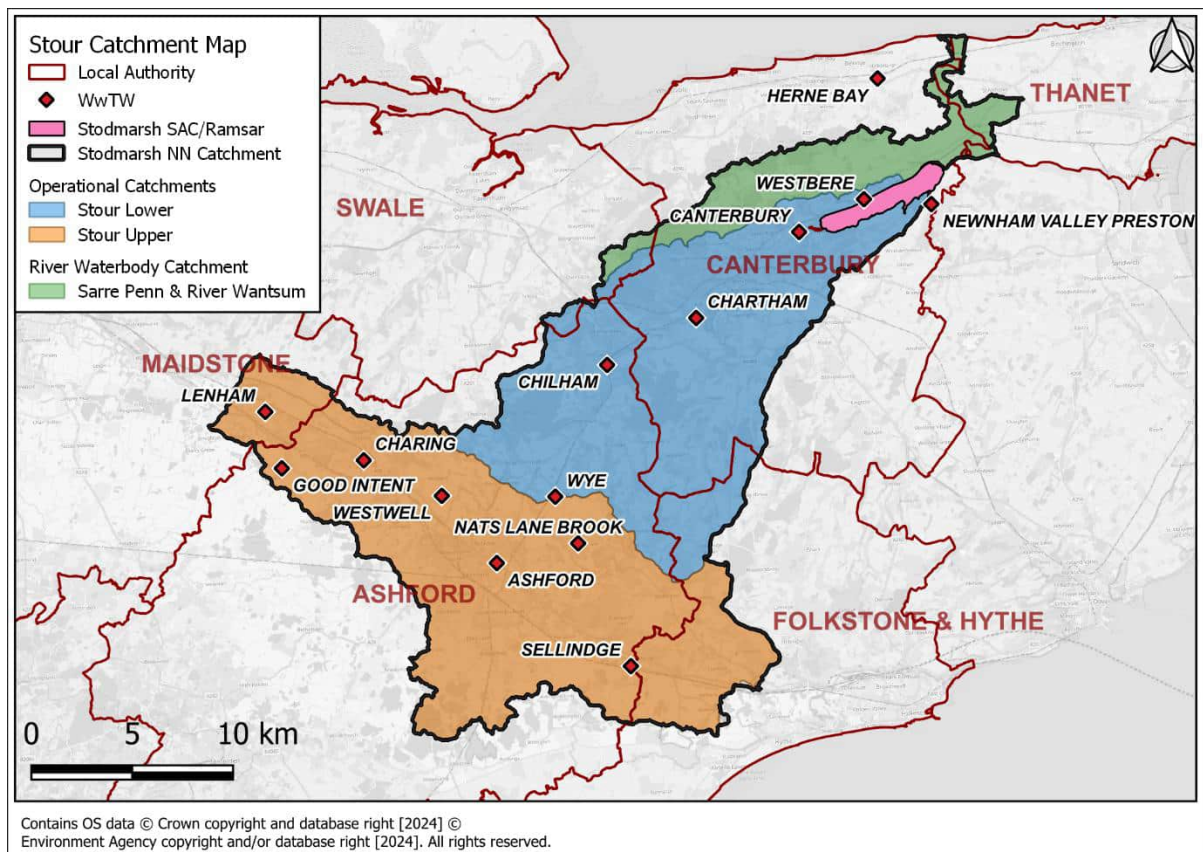


Figure 1: Nutrient Neutrality Context

- 2.13 New developments within the Canterbury district may impact Stodmarsh if one or both of the following are true:
- Treated effluent from the development discharges into a water course that ultimately reaches Stodmarsh (including via tidal or storm overtopping); or
 - The surface water runoff from the development discharges into a water course that ultimately reaches the Stodmarsh (including via tidal or storm overtopping).

- 2.14 The watercourses that discharge to Stodmarsh belong to the Stour Management Catchment. Within the Canterbury district area, the Operational Catchments of interest are the Lower Stour and part of the Stour Marshes (Sarre Penn and River Wantsum). The Lower Stour (and Upper Stour, although not directly relevant in this case) is part of the upstream 'fluvial' catchment draining in an easterly direction through Stodmarsh, whereas the Sarre Penn and River Wantsum catchment discharges into the tidal section of the River Stour downstream and has a backwater effect in a westerly direction through Stodmarsh due to the tides. The Little Stour and Wingham catchment was previously included in the Stodmarsh catchment, but modelling carried out for Dover District Council¹¹ demonstrated that there was no "likely significant effect" on the Stodmarsh from nutrient discharge in the Little Stour and Wingham catchment, and it was therefore excluded from the Nutrient Neutrality Catchment by Natural England in 2023.
- 2.15 In addition, the outfall of Herne Bay WwTW is hydraulically connected to Stodmarsh (downstream and in the tidal section), and therefore wastewater from dwellings which are served by Herne Bay WwTW will contribute to the nutrient loading on the Stodmarsh, although this area lies outside the Nutrient Neutrality catchment so surface water runoff does not. However, modelling carried out on behalf of Canterbury City Council¹² demonstrated that only 0.13% of effluent discharged from Herne Bay WwTW will reach the Stodmarsh. Therefore wastewater nutrient loading from dwellings served by Herne Bay WwTW will be multiplied by 0.13%. This modelling has been published on the CCC website¹³. In accordance with the NEGM, the types of new development which require mitigation include new homes, student accommodation, tourism attractions and tourist accommodation.
- 2.16 Other commercial development, which does not involve overnight accommodation, will generally be exempt from the mitigation strategy unless it has other (non-sewerage) water quality implications. It is recommended that any promoters of high-water use developments engage with Natural England, through their Discretionary Advice Service.
- 2.17 Proposals which would have otherwise been within the scope of the NEGM but which already have full planning permission may proceed without needing to undertake any additional assessment exercise. However, Reserved Matters applications are subject to the NEGM and require mitigation. The council also considers that existing planning applications within the scope of the advice and either undetermined by the council or with a resolution/delegated decision to grant permission subject to the prior completion of a Section 106 Agreement or other matters, are subject to the NEGM. Existing planning applications within the scope of the NEGM and currently the subject of an appeal to the Secretary of State/Planning Inspectorate are also subject to the NEGM.

¹¹ APEM (2022), Stodmarsh Water Quality Modelling for Dover District County Council Report no. P0006031 September 2022

¹² APEM (2023). Stodmarsh Grove Ferry Modelling Report for Canterbury City Council Report no. P00010901 December 2023

¹³ <https://www.canterbury.gov.uk/planning-and-building/how-planning-applications-are-affected-stodmarsh-water-quality>

3 CANTERBURY CITY COUNCIL NUTRIENT BUDGET

- 3.1 In order to establish an estimate for the scale of mitigation required, a nutrient budget has been calculated for CCC based on the existing allocations in the Canterbury District Local Plan 2017 and the emerging New Local Plan 2042/43 (with projections to 2045).
- 3.2 The current Local Plan (2011-2031) plans for 16,000 new homes and as of April 2023, 7,575 homes have been completed. The draft Local Plan (2020-2042/43) covers some of the same time-period as the current Local Plan and therefore, there is overlap in the need and supply. Including allocations in the current Local Plan, which are being carried forward, the draft Local Plan (2020-2042/43) plans for around 15,989 dwellings.
- 3.3 The remaining need is met by the supply components: existing permissions for housing, student and older persons housing (701), saved allocations from the 2017 Local Plan (3,574), draft proposed allocations (9,427), and an annual windfall site allowance of 170. In addition, there are allocations for 44 gypsy and traveller pitches and 140 hotel bedrooms. This data was provided by CCC to facilitate the nutrient mitigation strategy.
- 3.4 Dwellings that have been granted a full planning permission at the time of writing, or have agreed on-site mitigation, are omitted from the following analysis. All other proposals, including those with reserved matters and/or outline granted permissions are to be included in the analysis.
- 3.5 As parts of the district, including some WwTWs, do not lie within the Stour Valley river catchment, a geographic analysis of the proposed developments in the district has been undertaken. Proposed new dwellings both lying outside of the surface water catchment and draining to a WwTW outside of the catchment can be omitted from the analysis.

Table 1: Dwellings Considered for the Nutrient Budget

Catchment	2025-2030	2025-2035	2025-2040	2025-2045
Lower Stour	802	5688	8352	9211
Sarre Penn	178	730	880	880
Herne Bay	45	574	574	574
Outside Catchment	172	1660	2370	2450
TOTAL	1197	8652	12176	13115
Including Windfall Sites	1586	10061	14265	15714
Including Gypsy and Traveller and Hotel	1770	10,245	14449	15898

Note, all figures are cumulative.

- 3.6 Following the omission of the relevant dwellings due to either planning status or location, the total number of dwellings which will form the basis for the nutrient budget is 3,480 for the current Local Plan including non-completed applications and 6,669 (plus 531 single occupation units for older persons accommodation) for the New Local Plan to 2042/43. 140 hotel bedrooms and 8 gypsy and traveller pitches are also included in the New Local Plan. A windfall allowance of 136 (80% of the total allowance¹⁴) is added annually resulting in a grand total of dwellings to mitigate of 13,448 to 2045.
- 3.7 The nutrient budget has been calculated for each development site within the adopted Canterbury District Local Plan and New Local Plan (for a grand total of 13,448 dwellings, including

¹⁴ For future windfall sites it is assumed that the proportion of new dwellings at each WwTW in the catchment is as follows: 40% to Canterbury WwTW, 20% rural sites, all assumed to discharge to Canterbury WwTW, 20% to Herne Bay WwTW and 20% in Whitstable and therefore outside catchment.

windfall sites). Calculations have been performed for each operational catchment on an annual basis, and summarised on a 5-year basis, as shown in Table 1.

3.8 The budgets from each individual development have been summed to establish a nutrient budget for the entire district in each Local Plan scenario. The following assumptions have been made in the calculation of the initial budget:

- All new development in the Canterbury district area will be expected to achieve a maximum water use standard of 110 litres per person per day (l/p/d). An additional 10 litres have been added to this figure in accordance with the NEGM.
- Additional populations have been calculated using the following occupancy rates:
 - 2.32 people per dwelling for standard housing, figure provided by CCC;
 - 1 person per dwelling for older persons housing;
 - 1.62 people per pitch for gypsy and traveller allocations, based on 2021 census data;
 - 1.75 per room for hotel, based on Ashford Borough Council occupancy rates.
- When designating the current land use of a development site, satellite imagery was reviewed. For development sites on active farmland a judgment has been made on the type of farming and the appropriate leaching coefficients used.
- In determining the soil type of a development site, the Soilsclapes¹⁵ webtool has been used in accordance with the NEGM. In cases where a development site is shown to have varying soil types, the soil type which covers the majority of the site has been assumed. For cases where the site is split approximately 50/50 in terms of soil types, the type with the lowest leaching rate has been selected as a precautionary measure.
- For windfall sites, a conservative assumption has been made that these will all be developed on freely draining sites.
- In determining the average annual rainfall at each site, the greenfield runoff estimation tool on the HR Wallingford Website¹⁶ has been used. This is in accordance with the latest NEGM.
- For Strategic Sites (Sites N1, N2, N3 and CF1), CCC has provided data for the areas of open space, as required for the council's Open Space Standards, and this has been classified as "Greenspace". With the exception of these sites, sites with greater than or equal to 300 dwellings have been assumed to include 30% "Greenspace", and for smaller sites the future land use has been set as entirely "Residential Urban".
- All development sites have been assumed to connect to their nearest / most appropriate WwTW. This has been established using shapefiles provided by Southern Water (SW) showing the catchment area of each WwTW. Although some developments will undoubtedly be located in non-sewered areas and therefore require a separate private treatment system, the vast majority of developments are expected to connect to their local WwTW and as such this approach is considered to be robust.

¹⁵ Available at: <http://www.landis.org.uk/soilsclapes/#> [Accessed on 08/2024]

¹⁶ Available at: uksuds.com

- The calculations incorporate the relevant provisions contained within the Levelling Up and Regeneration Act (LURA)¹⁷: specifically the requirements for upgrading relevant WwTWs with a Population Equivalent of > 2000 in the catchment to the Technically Achievable Limits (TAL) by 2030.
- For future windfall sites it is assumed that the proportion of new dwellings at each WwTW in the catchment is as follows: 40% to Canterbury WwTW, 20% rural sites (all assumed to discharge to Canterbury WwTW), 20% to Herne Bay WwTW and 20% in Whitstable and therefore outside catchment.
- For sites where the existing nutrient load exceeds the proposed nutrient load, the nutrient budget is applied as an offset to other sites in the strategy on the basis that there is a market for selling nutrient credits and developers will want to sell nutrient surpluses as a form of revenue. A sensitivity test has been carried out to assess the effect of this method (Section 5).
- The surface loading for each site has been allocated at the beginning of construction, i.e. the first year when houses are built. This is precautionary and reasonable as sites are usually cleared for development but may not always be the case, especially on larger sites.
- The nutrient loading from new gypsy and traveller pitches and new hotel bedrooms has been allocated at the beginning of the New Local Plan, i.e. in 2025. This is a precautionary approach, as more precise phasing data was not available for these. The Golden Hill site is phased in 2030/31 but lies outside the catchment so is not included in the nutrient budget calculation.

3.9 Following the 4-stage calculation process outlined in the NEGM for each identified development site within the district, a total increase in **nutrient loading has been calculated for the current Local Plan and New Local Plan to 2042/43 combined as 5330 kg of Nitrogen and 646 kg of Phosphorus.**

3.10 Table 2 shows the phased nutrient budget calculations subdivided by catchments.

Table 2: Nutrient Budget

	2025-2030		2025-2035		2025-2040		2025-2045	
Catchment	TN	TP	TN	TP	TN	TP	TN	TP
Lower Stour	935.94	387.11	-288.82	443.90	2554.10	514.98	3341.62	534.80
Sarre Penn	-63.17	161.73	27.25	34.19	237.73	39.45	237.73	39.45
Herne Bay	0.25	0.00	0.66	0.02	0.71	0.02	0.71	0.02
TOTAL	873.01	548.84	-260.91	478.11	2792.54	554.44	3580.06	574.26
Including Windfall Sites	1512.76	593.10	415.46	500.03	3932.93	591.40	4998.86	620.24
Including Gypsy and Traveller and Hotel	1844.20	618.75	746.90	525.68	4264.37	617.05	5330.30	645.90

¹⁷ Levelling-up and Regeneration Act 2023 (legislation.gov.uk)

3.11 A full set of calculations is included in the Appendix.

4 MITIGATING THE NUTRIENT BUDGET – “THE SOLUTION”

- 4.1 This mitigation strategy brings together a range of methods intended to first reduce development nutrient loading as far as practicable using onsite measures, then to offset the remaining nutrient load by implementing mitigation schemes which reduce nutrient loading elsewhere in the catchment. Together, these schemes form a district-wide strategy to mitigate the potential for harm to the Stodmarsh designated site from development included within the draft local plan.

Improvements to WwTWs

- 4.2 Water companies operate in 5 year Asset Management Periods (AMP) for delivery of infrastructure, including environmental improvements related to the provision of wastewater treatment facilities and sewerage. Improvements were committed as part of AMP7 (2020 – 2024) which have been taken into account in the nutrient budget calculations. These upgrades are not considered a mitigation measure but instead change the baseline by reducing the concentration of nutrients reaching the Stodmarsh.
- 4.3 The upgrade of WwTWs to TAL by 2030 (committed in the current AMP8 to achieve the requirements set out in the LURA and as agreed through the WINEP¹⁸) will substantially reduce nutrient loading thereafter, especially as Canterbury WwTW (as the largest WwTW in the Canterbury District) currently has Total Phosphorus permit limit of 2.0mg/l (which will reduce to 0.25mg/l) and no Total Nitrogen limit (which will become 10mg/l). As above, these upgrades are not considered a mitigation but will change the future baseline by reducing the concentration of nutrients reaching the Stodmarsh.
- 4.4 These improvements to WwTWs have been included in the calculation of the nutrient budget in Table 2.

Onsite Mitigation

- 4.5 The nutrient budget has been developed by considering the nutrient contribution from the increased residential occupancy and the change in land use predicted to occur as a result of proposed new development within the Stour Catchment in the Canterbury district area, or from development outside the catchment which is known to discharge foul sewage to a WwTW within the catchment. An allowance has been included for larger developments achieving some level of onsite foul treatment reduction and for all sites deemed as ‘Major’ to utilise SuDS for nutrient removal.
- 4.6 Large development sites often have the scope, budget, and available space to deliver on-site mitigation to reduce the future nutrient loading from the development. This has been proven through several nutrient neutrality assessments submitted with planning applications to CCC and other districts within the catchment.
- 4.7 Therefore, a key component of the mitigation framework is the enforcement through the planning system that larger sites must undertake the maximum achievable level of onsite mitigation. This mitigation is expected to be delivered both in respect of foul water and surface water. With an assumed level of onsite mitigation achieved on larger sites, the nutrient budget has been refined to provide an estimate of the scale of nutrient offsetting required.

¹⁸ <https://www.gov.uk/government/publications/developing-the-environmental-resilience-and-flood-risk-actions-for-the-price-review-2024/water-industry-national-environment-programme-winep-methodology>

Foul Water Treatment for Large Developments

- 4.8 The following assumptions have been made in order to calculate the reduction in nutrient loading from additional foul water from large developments:
- Large sites are considered to be sites which aim to deliver more than 300 dwellings.
 - It is assumed that sites of this size will be able to implement additional foul sewage infrastructure in the form of an onsite treatment works. It is assumed that foul sewage will be able to be treated to a level of 10mgN/l and 0.1mgP/l. This represents the realistic limit of sewage treatment using available technologies and is lower than the current Technically Achievable Limit (TAL) as defined in the LURA.
- 4.9 It has been found that, of the proposed dwellings considered under the existing Local Plan, 2,904 dwellings are expected to be delivered on large sites (more than 300 dwellings)¹⁹. The remaining dwellings would be delivered on other incomplete allocation sites with a capacity of 300 or less. In terms of the draft allocations, 4,959 dwellings are anticipated to be delivered on large sites. These large sites contribute significantly to the nutrient budget for the district. The focus of this section is on the potential for large sites to deliver mitigation with respect to foul water drainage, in particular, the potential for large sites to install onsite WwTWs operated by Ofwat (Water Services Regulation Authority) regulated New Appointments and Variations (NAVs), which would discharge to surface waters or to ground.
- 4.10 It was originally considered as part of the Nutrient Mitigation Plan that large sites would be able to achieve nutrient neutrality via on-site solutions and would therefore not require any additional offsetting through any CCC mitigation scheme. However, through our experience using the new NE calculator it is proving difficult even for larger sites to achieve complete neutrality onsite in the district (primarily due to the soil types in this part of the catchment), with most schemes still potentially requiring some level of off-site offsetting in order to achieve neutrality. Therefore, a precautionary approach has been taken in assuming that larger sites should be included in the determination of the scale of mitigation offsetting. Offsetting through any CCC scheme will be made available to large sites provided a site-specific mitigation strategy showing a significant reduction in nutrient loading from the development has been submitted and approved.

Surface Water Treatment (SuDS)

- 4.11 The updated NE guidance has increased the assumed leaching rate from residential urban land from 0.83 kgP/ha/year to a value that varies according to soil type and average annual rainfall for the area. Across CCC, the Phosphorus leaching rate varies between 1.1 kgP/ha/year to 1.45 kgP/ha/year. From our discussions with NE, this is to represent more accurately an 'unmitigated' scenario, and sites are expected to reduce their leaching rates significantly through the use of Sustainable Drainage (SuDS) systems.
- 4.12 The draft Local Plan requires that all developments will be required to implement SuDS with a minimum of 50% removal of Nitrogen and Phosphorus²⁰. As a precautionary measure, Nitrogen and Phosphorus reductions have been applied only to 'Major' developments when calculating the mitigated nutrient budget. Within the context of this strategy and for the calculations, a 'Major' site comprises ten dwellings or more or the development is carried out on an area of one hectare or more.
- 4.13 Therefore, it is a key aspect of the mitigation strategy to enforce 'Major' development sites to significantly reduce their surface water nutrient loading through the implementation of SuDS and

¹⁹ Draft Policy DS20 8a

²⁰ Draft Policy DS20 8a – 8c

other measures such as on-site wetlands. It is assumed for the purpose of this calculation, that all sites will be able to achieve a reduction in leaching rates of 30%.

- 4.14 There is significant variation in the nutrient removal rates which can be achieved through SuDS. Under CIRIA's guidance for TP removal through SuDS (C808)²¹, all TP discharged to ground is assumed to not impact the designated site. Alternatively, removal rates for treatment trains which discharge to surface water can vary between 0-84%.
- 4.15 CIRIA's guidance on TN removal rates (C815)²² suggests that a maximum TN removal rate of 30% can be achieved using a SuDS treatment train which combines standing water with a filtration element. Direct discharge to ground without pre-treatment will not remove nitrogen. C815 states that "*where both nitrogen and phosphorus are being targeted, nitrogen management should take precedent because of the risk of pollution is greater*".
- 4.16 30% removal for both nitrogen and phosphorus is therefore considered to be a reasonable (i.e. precautionary but not excessively precautionary) estimate for the average reduction in nutrient loading that will be achieved across all SuDS schemes.
- 4.17 A sensitivity analysis regarding the SuDS removal rate has been included in Section 10345021.
- 4.18 The benefit due to SuDS for each site has been allocated at the beginning of construction, i.e. the first year when houses are built, at the same time as the surface water loading is allocated. This reflects the fact that the construction site will need drainage even if formal SuDS are not yet fully implemented for the entire development.

Summary

- 4.19 The mitigated nutrient budget has been calculated for each development site within the adopted Canterbury District Local Plan and New Local Plan to 2042/43. Calculations have been performed for each operational catchment and on an annual basis. Table 3 shows a 5-yearly summary. The full calculations are available in the Appendix.
- 4.20 Including onsite mitigation at the level described, both for foul and surface water, **a mitigated nutrient budget has been calculated as 3565 kgN and 378 kgP for the current Local Plan and New Local Plan to 2042/43**. This represents a 33% reduction in the nitrogen budget and a 42% reduction in the phosphorus budget. The onsite mitigation does not apply to windfall sites.

Table 3: Mitigated Nutrient Budget

	2025-2030		2025-2035		2025-2040		2025-2045	
Catchment	TN	TP	TN	TP	TN	TP	TN	TP
Lower Stour	902.86	89.81	1828.96	257.51	1013.95	286.17	1800.46	294.83
Sarre Penn	590.39	8.55	197.31	9.01	13.18	11.11	13.18	11.11
Herne Bay	0.25	0.00	0.66	0.02	0.71	0.02	0.71	0.02

²¹ Bradley, J (2024) *Using SuDS to reduce phosphorus in surface water runoff*. C808F, CIRIA, London, UK (ISBN: 978-0-86017-952-8)

²² Bradley, J (2022) *Using SuDS to reduce nitrogen in surface water runoff*. C815, CIRIA, London, UK (ISBN: 978-0-86017-962-7)

TOTAL	- 149 3.00	98.36	- 2025.6 0	266.53	1027.85	297.30	1814.35	305.96
Including Windfall Sites	- 853. 26	142.63	- 1349.2 3	288.45	2168.23	334.26	3233.15	351.94
Including Gypsy and Traveller and Hotel	- 521. 82	168.28	- 1017.7 9	314.10	2499.68	359.91	3564.59	377.59

4.21 This makes clear the significance of onsite nutrient mitigation measures in reducing the nutrient budget and that strategic measures should not be relied upon solely to deliver mitigation.

4.22 It should be noted that mitigation on large sites are the main contributors to the noticeable reductions in the nutrient budget.

Offsetting from Other Projects

4.23 As it is not possible for all sites to wholly mitigate the nutrient budget through onsite mitigation to achieve nutrient neutrality, other solutions within the district and wider catchment must be found to ensure no adverse impact on Stodmarsh from the proposed development in the draft Local Plan.

4.24 There are multiple options for nutrient mitigation within the district and wider catchment as follows.

Catchment-wide Stodmarsh Nutrient Mitigation Strategy to achieve Nutrient Neutrality

4.25 As 'catchment coordinator' Kent County Council (KCC) have developed and published a catchment-wide Stodmarsh Nutrient Mitigation Strategy²³ which sets out the strategy for achieving Nutrient Neutrality and deliver housing over the next 15 years. The strategy is based on the following key components:

- Large developments of over 300 properties will be required to provide mitigation on site, likely in the form of on-site wastewater treatment works. There is also an opportunity for large developments to over deliver on nutrient mitigation, which can then be used to generate credits and offset nutrients produced by small developments;
- A catchment wide approach to provide nutrient mitigation for small developments. Where off-site mitigation options are viable, opportunity to deliver nature recovery, public access and biodiversity net gain should be sought alongside nutrient neutrality.

4.26 These aims have been applied in formulating relevant policies in the draft Local Plan.

Public and private nutrient credit markets

4.27 Public and private sector nutrient mitigation schemes are emerging in the catchment, including, for example, Pleasant Forest referred to in paragraph 4.39.

4.28 Stour Environment Credits (SEC)²⁴ is a not-for-profit organisation formed through the collaboration of Ashford Borough Council and Canterbury City Council. SEC has secured funding from KCC through the Local Nutrient Mitigation Fund (LNMF). SEC has entered into a contract

²³ 24-00122 - Stodmarsh Nutrient Mitigation Strategy.pdf

²⁴ <https://www.stourenvironmentalcredits.co.uk/>

with Norfolk Rivers Consortium to provide nutrient mitigation through the upgrade of inefficient septic tanks with more modern Package Treatment Plants (PTPs) which remove more nutrients. This contract is progressing well, and permanent credits for phosphorus and nitrogen are expected to be available in the first quarter of 2026.

- 4.29 In addition, private sector mitigation schemes have secured technical approval from Natural England and credits are expected to become available early in 2026 subject to signing legal agreements to secure the mitigation in perpetuity. The schemes known at the time of writing will produce substantial nutrient credits, including P and N, through temporary and permanent measures. Schemes include:
- Land use change from agriculture to greenspace, either temporarily (fallowing) or permanently (creation of meadows or woodland);
 - Environmental improvement of ditches based on the NA Enhanced Drainage Ditch Management (EDDM) guidance²⁵;
 - 'Dosing' of treated effluent from WwTWs to remove additional TP and TN beyond the requirements of the water companies;
 - Upgrade of existing septic tank with PTPs (not only by SEC)
- 4.30 All these public and private schemes are still subject to HRA/AA and therefore as a precautionary measure, none have been quantified as part of this strategy as it cannot be certain at this stage that the district-wide nutrient budget will be reduced through these schemes.

Retrofitting Housing Stock

- 4.31 A direct connection has been made by NE, through their NEGM, between domestic water usage and nutrient levels in the effluent at WwTWs. Therefore, retrofitting existing homes with water saving measures can reduce the overall nutrient load at the outfall of WwTWs within the catchment, and this can be used to offset new development. Canterbury has a significant General Needs housing (4,159 of which 3,505 are within the catchment) along with leasehold housing, sheltered housing and hostels which could all be converted.
- 4.32 There are different methods for reducing water consumption, with flow control devices considered the most robust. LPAs in the Sussex North Water Resource Zone (SNWRZ) have agreed a Water Neutrality mitigation strategy based on Control Flow devices following a successful pilot study of 100 dwellings in Crawley²⁶. A similar pilot study has been carried on Canterbury District, also of 100 homes.
- 4.33 The Control Flow HL2024 device has been validated by Natural England to give an average annual saving of 27 litres per person per day²⁷. Ashford Borough Council have already implemented such a scheme within their district.
- 4.34 As a precautionary measure, the benefits from a scheme in Canterbury district are not included in the mitigation calculations until such time as the scheme is confirmed. However, as a first estimate, using an occupancy of 2.32 persons per dwelling, a water saving of 27 litres per person per day and the WwTW limits of TAL (i.e. 10 mgN/l and 0.25 mgP/l) would generate a **nutrient benefit of 721.73 kgN/year and 18.04 kgP/year (post-2030) which equates to 20% and 5% of the partially mitigated budgets respectively.**

²⁵ [NECR590 Edition 1 Enhanced Drainage Ditch Management: A framework approach for nutrient neutrality - NECR590](#)

²⁶ Cenergist presentation to Crawley Borough Council *Control Flow HL2024*

²⁷ <https://www.controlflow.co.uk/resources/natural-england-validation>

- 4.35 Nutrient reductions are therefore meaningful in terms of the nutrient budget which needs to be offset and retrofitting existing dwellings to reduce water consumption has multiple sustainability benefits in terms of reducing water consumption and lowering household bills.

Land Use Change Elsewhere

- 4.36 There is significant potential within the district to reduce nutrient loadings further through changes in land use, either specifically for the purpose of nutrient reduction or through other schemes or programs designed for other purposes but which will also provide a reduction in nutrient loading. These schemes may not have nutrient offsetting as their main function, but this may arise as a secondary benefit from other ecological or amenity enhancement programs within the district.
- 4.37 For example, South East Water have plans for a significant new water supply reservoir in Broad Oak (Figure 2) (draft LP Policy R24 - Broad Oak Reservoir and Country Park).

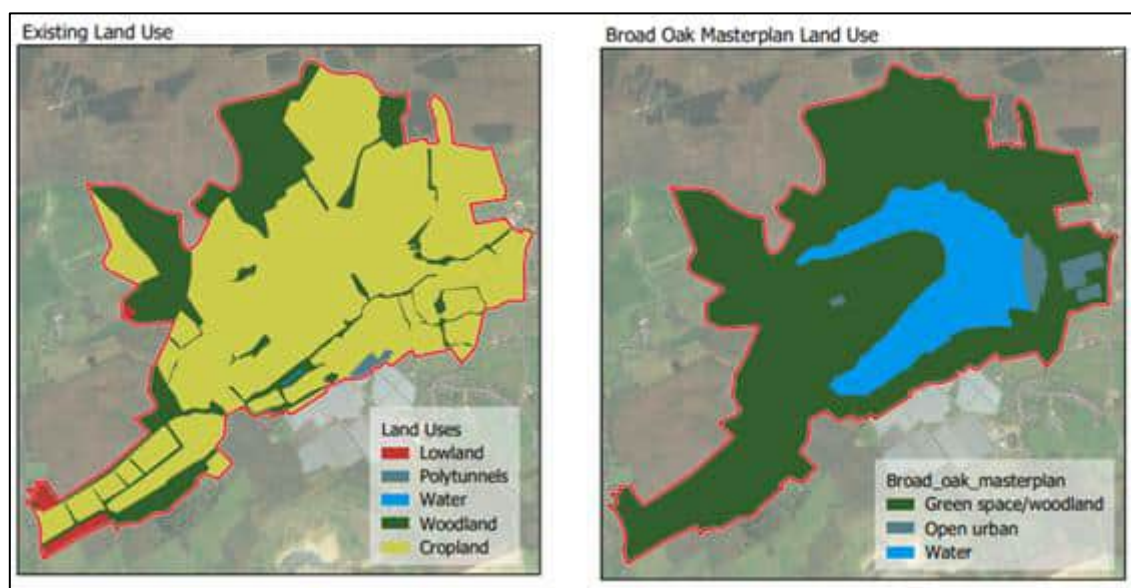


Figure 2: Broad Oak Reservoir

- 4.38 The land is currently agricultural and on 'Impeded drainage' (as defined by NEGM), with a correspondingly relatively high likely nutrient load. Therefore, creation of the reservoir biodiversity enhancement at the site, if implemented correctly, could have a potential beneficial effect on reducing nutrient loading in the downstream catchment. The proposals include a number of different uses including the reservoir top water level outline, main dam and secondary embankments, Water Treatment Works and pump house, 2 x car parks and river diversion, and will be constructed on varying land use types including arable, fruit, pasture, woodland and 'urban' (dwellings/structures). In addition, the NEGM for determining nutrient leaching rates from different land uses depends on the underlying soil classification which is not consistent across the area. A preliminary calculation based on high level information has been undertaken to broadly estimate the nutrient reductions from the reservoir development, as 145kg TP/year and 5,617kg TN/year. A detailed study will be required to determine the nutrient reduction, but it will be meaningful in the context of the nutrient mitigation framework. It is important to note that any nutrient reductions resulting from the scheme will most likely only count towards offsetting nutrient increases from development also within the Wantsum and Sarre Penn sub catchment due the different hydrology between the upstream and downstream Stour catchments. It is recommended that further work is conducted on this with South East Water.

- 4.39 Generally, woodland planting can complement other wider strategies such as provision of public amenity as well as contributing to other ecological and environmental goals. An example of this type of scheme is active within the catchment at Pleasant Forest through Forestry England²⁸. Woodlands have very low leaching rates, therefore any land use change to woodlands results in offsetting the nutrient load from surface water and can contribute towards offsetting the District nutrient budget. The exact amount of offsetting is variable and depends on the prior land use, the soil characteristics, and the average rainfall at the woodland location. As a reference, in a 600mm to 900mm average rainfall area, 10ha of woodlands can offset between 0.2kg and 9.5kg of Phosphorus per year depending on the soil type.
- 4.40 In general, any small scheme, although having a limited total level of nutrient offsetting, will form a key part of the offsetting strategy as these nutrient reductions can potentially be realised much faster than a large-scale strategic offsetting scheme.
- 4.41 A potential example is environmental enhancement of land in the district and in CCC's ownership. The land is currently scrubland and could be enhanced to provide habitat creation and nutrient mitigation in the form of floodplain meadows and wetlands to treat surface water runoff from the Southern Water sewer network which outfalls into ditches through the site. A feasibility study suggests that environmental enhancement of the land could reduce Phosphorus loading by up to 20kg/yr and Nitrogen by up to 200kg/yr.

Wetland Treatment

- 4.42 Strategic constructed wetlands have been established as an efficient large scale offsetting solution to the nutrient problem. Wetlands can remove a proportion of nutrients from incoming nutrient-rich water through, sedimentation, plant growth and denitrification among other processes. Many studies have quantified this effect. For the purpose of this strategy, in line with NE guidance, median removal rates from the Land et al. wetland metastudy²⁹ will be used. The study found that the median values for TN and TP removal were 93g/m²/year and 1.2g/m²/year, respectively, and that wetlands remove TN and TP with a median efficiency of 37% and 46%, respectively.
- 4.43 The majority of the offsetting is to be delivered through the creation of strategic wetlands located adjacent to the Great Stour River. It is proposed to create a series of Free Water Surface (FWS) Wetlands. These wetlands have areas of open water, floating vegetation, and emergent plants, and are similar in appearance to natural marshes. As water flows through the wetland, nitrogen and phosphorus are removed by the processes of sedimentation, filtration, oxidation, reduction, adsorption, and precipitation. As FWS constructed wetlands closely mimic natural wetlands, it is known that they attract a wide variety of wildlife, namely insects, molluscs, fish, amphibians, reptiles, birds, and mammals.
- 4.44 Applying a precautionary principle and in the absence of sufficient certainty regarding other offsetting projects (as described at the section above, "Offsetting from Other Projects") the calculation of the wetland area is based on the mitigated budget as shown in Table 3. Other offsetting projects will continue to be investigated and once there is further certainty on them these measures will be incorporated within the strategy.
- 4.45 Based on the median removal rates quoted in the Land et al. wetland metastudy, it has been estimated that up to **approximately 31.5 ha of wetland will need to be constructed along this river corridor to fully offset the nutrient budget up to 2045**. A wetland, or series of wetlands, of this size would be expected to remove a minimum of 29,295 kgN and

²⁸

https://www.forestryengland.uk/sites/default/files/documents/Pleasant%20Farm%20nutrient%20neutrality%20scheme_0.pdf

²⁹ Land et al. (2016), How effective are created or restored freshwater wetlands for nitrogen and phosphorus removal? A systematic review

378 kgP. This is a conservative assumption as it is known that wetlands specifically designed for the purpose of nutrient removal can achieve nutrient removal rates higher than the median values used.

- 4.46 The amount of wetland required to offset the nutrient budget varies according to the number of sites developed in 5-year periods, is shown in Table 4.

Table 4: Wetland Area Requirements (based on mitigated budget)

	2025-2030	2025-2035	2025-2040	2025-2045
Total dwellings	1,770	10,245	14,449	15,898
Wetland size (ha)	14	26	30	31.5

- 4.47 The size of wetland required to mitigate the cumulative nutrient budget between 2025 to 2030 is 14 ha. This is due to the proposed 1,770 dwellings within the five-year period. The area required to successfully mitigate the nutrient budget up to 2035 is 26 ha; this is just over double the area required by 2030 despite the number of new dwellings increasing fivefold. This is due to the upgrades to WwTWs which will be implemented in 2030. The required wetland area increased gradually between 2035 and 2045 due to the increased proposed development. The nutrient budget up to 2045 can be mitigated by 31 ha of surface water treatment wetlands based on published theoretical wetland efficiency rates.
- 4.48 It should be noted that the NEGM recommends a 20% buffer is added to nutrient budget calculations. A 20% buffer has not been included in the calculations at this stage. Rather than use an arbitrary factor of safety, a precautionary approach has been taken throughout the calculations. The mitigation strategy will remain adaptive and flexible through the design of the strategic wetlands and the accumulation of other offsetting projects within the district. This will allow the strategy to respond to housing delivery and adjustments can be made as necessary throughout the lifetime of the strategy to ensure that the required level of offsetting is delivered.

High-level screening

- 4.49 In order to demonstrate the feasibility of creating sufficient new wetlands to offset the mitigated budget, Water Environment have produced a detailed River Corridor Nutrient Mitigation Strategy³⁰, in which the entire River Stour Catchment that falls within the jurisdiction of CCC was assessed using flood and soil type mapping.
- 4.50 41 potential sites were identified and assessed ranked using a RAG (Red-Amber-Green) rating system for their suitability to accommodate a FWS wetland. Of these, 18 sites were rated green (suitable for a FWS wetland), 15 sites were rated amber (worthy of further investigation) and 8 were rated red (not suitable). Figure 3 below shows the locations of the potential sites.
- 4.51 The recently approved and constructed Conningbrook wetland in Ashford has been verified to remove 1,636.68 kgN/yr and 48.32 kgP/yr, which equates to 452.12 kgN/ha/yr and 13.35 kgP/ha/yr. These rates were calculated using the method laid out in the manual for treatment wetlands by Kadlec and Wallace (2012)³¹. These rates may be more indicative of the total nutrient removal capacity of wetlands built within the Stour River corridor than the more general rates found in Land et al. (2016).

³⁰ Water Environment Limited (December 2024) Draft River Corridor Nutrient Mitigation Strategy. Document reference: 21160-NUT-RP-03-C01

³¹ Kadlec and Wallace (2012), *Treatment Wetlands 2nd Edition*

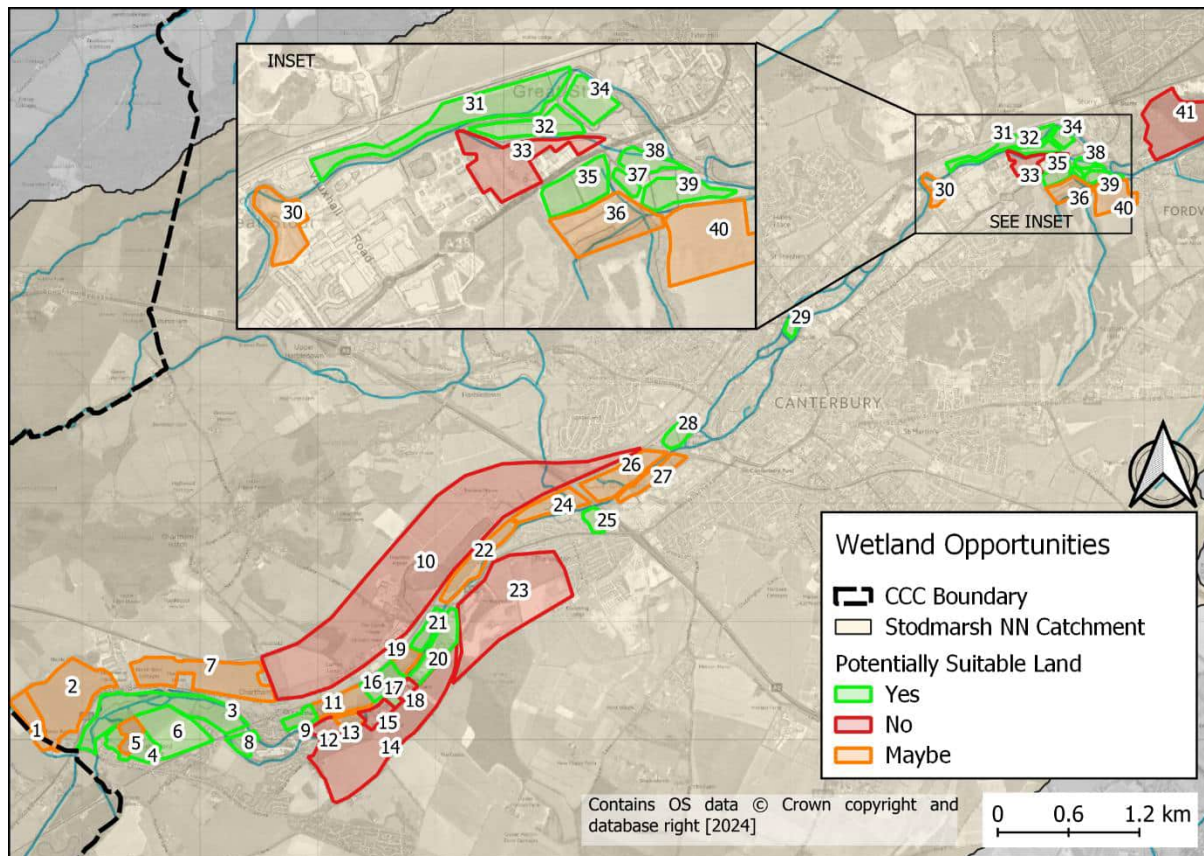


Figure 3: Wetland Opportunities Within CCC

- 4.52 In line with the precautionary principle, the lower removal rates – i.e. 452.12 kgN/ha/yr and 12 kgP/ha/yr – from the two sets of data (Land et al. and Conningbrook wetland) have been used for estimates of nutrient removal capacity in the Draft River Corridor Nutrient Mitigation Study.
- 4.53 Under the assumption that all of the green (18 sites) and amber (15) sites are converted to wetland and including a highly precautionary 20% confidence factor under the Constructed Wetlands Framework³² (see Draft River Corridor Mitigation Strategy for details), the total number of nutrient credits available through this strategy is 20,787.57 kgN/year and 551.74 kgP/year.
- 4.54 This shows that the wetland sites identified can deliver the mitigation required to offset the nutrient budget of 3565 kgN/year and 378 kgP/year.
- 4.55 During the detailed design phase, it will be possible to improve the confidence factor so the nutrient removal rates will be much higher. Furthermore, these figures are based on abstraction wetlands – which take water from the River Stour – but there are at least two opportunities for “end-of-pipe” wetlands, treating effluent from Chartham and Canterbury WwTWs which could produce significantly higher nutrient reductions than for abstraction wetlands.

Detailed analysis

- 4.56 NE commissioned feasibility studies for an ‘End-of-pipe’ wetland on the cluster of sites 35, 37, 38, 39 which would take treated effluent from Canterbury WwTW on Sturry Road and pass it through a series of wetland cells to remove nutrients. Although the scheme has not progressed at this stage, studies showed that a wetland on these sites could remove approximately 100kgP/year and 3,600kgN/year.

³² McInnes et al. (2022) *Framework Approach for Responding to Wetland Mitigation Proposals*, prepared for Natural England

4.57 In addition, similar detailed studies have been carried out on the four most promising sites and clusters of sites identified in the river corridor strategy, selected due to their suitability for use as wetlands given their location and size. They are as follows:

- Chartham Cluster (sites 3, 4, 5, 6 and 8)³³;
- Canterbury Cluster (sites 31, 32 and 34)³⁴;
- Chartham WwTW end-of-pipe (site 20)³⁵; and
- Canterbury Electric Pylons (site 30)³⁶.

4.58 The calculations were carried out in line with NE's Constructed Wetland Framework, using the approved PKC* method. As a more detailed approach was taken compared to the previous high-level screening, a confidence factor of 80% can be used, substantially increasing the calculated nutrient benefit.

Table 5: Nutrient removal by four proposed wetland sites.

	Wetland type	Wetland area (ha)	TN removal (kgN/year)	TP removal (kgP/year)
Sturry Cluster	End-of-pipe	3.9	3600	100
Chartham Cluster	Abstraction	17.3	6996.4	124.8
Canterbury Cluster	Abstraction	7.75	4301.9	100.8
Chartham WwTW	End-of-pipe	5.15	2495.7	75.1
Canterbury Electric Pylons	Abstraction	0.57	428.6	10.8
Total		30.77	17822.6	411.5

4.59 This analysis shows that these five sites can provide more than enough TP and TN removal to offset the mitigated nutrient budget up to 2045 thereby achieving nutrient neutrality for the draft Local Plan in combination with onsite measures covered in the draft Local Plan policies. None of the other potential wetland sites would be required, and no other offsite mitigation schemes would be needed.

4.60 The strategy of allocating and safeguarding land for wetlands is therefore highly precautionary.

The Planning and Infrastructure Act and Environmental Delivery Plans

4.61 All the mitigation options discussed thus far relate to achieving Nutrient Neutrality – providing solutions to reduce nutrient loading from development sites, and provide mitigation from schemes to offset additional nutrient loadings which cannot be reduced to zero on site. These

³³ Water Environment Limited (December 2024) Chartham Cluster Wetland Mitigation Outline Assessment. Document reference: 21160-NUT-TN-04-P01

³⁴ Water Environment Limited (December 2024) Canterbury Cluster Wetland Mitigation Outline Assessment. Document reference: 21160-NUT-TN-05-P01

³⁵ Water Environment Limited (December 2024) Chartham End-of-Pipe Wetland Mitigation Outline Assessment. Document reference: 21160-NUT-TN-03-P01

³⁶ Water Environment Limited (December 2024) Pylons Wetland Mitigation Outline Assessment. Document reference: 21160-NUT-TN-06-C01

measures will ensure that development does not increase nutrient burdens at designated sites but do not contribute to the recovery of the designated sites.

- 4.62 The Planning and Infrastructure Act requires NE to prepare Environmental Delivery Plans (EDPs) to identify and deliver strategic conservation measures that address wider ranging environmental impact of development on designated sites. The EDPs include mitigation for new development but also measures to restore designated sites. Developers can choose to carry out site specific analysis and provide mitigation to achieve Nutrient Neutrality, or pay a levy to meet these legal obligations associated with impacts addressed by the EDP. Therefore once an EDP is published for Stodmarsh and the fund set is set up, NE will also be delivering nutrient mitigation in the catchment and developers will have another option for addressing any excess nutrient burden arising from development.

5 SENSITIVITY ANALYSIS

Banking negative budgets

- 5.1 The calculations as presented include some development sites which have significant negative nutrient budgets, primarily as a result of the change in land use through the development of agricultural sites which reduces the amount of Nitrogen (in particular) running off the sites. These nutrient reductions have been included in the total nutrient budget, i.e. allowing the negative budget to offset some of the positive budget from other sites, referred to herein as “banking” the credits.
- 5.2 This approach is reasonable as developers are likely to sell their excess nutrients as credits to other developments as an additional revenue stream and not simply lose the value of nutrient credits.
- 5.3 A more precautionary approach would be to exclude negative nutrient budgets, assuming that negative budgets are lost and credits are not resold, only summing the budgets from sites with positive budgets. To understand the potential impact of this strategy, the nutrient budgets have been recalculated excluding the negative budgets.

Unmitigated budget

Table 6: Unmitigated Nutrient Budget (without “banking”)

	2025-2030		2025-2035		2025-2040		2025-2045	
Catchment	TN	TP	TN	TP	TN	TP	TN	TP
Lower Stour	1327.36	387.11	2113.53	443.90	2923.65	514.98	3547.69	534.80
Sarre Penn	27.74	161.73	65.39	34.19	239.89	39.45	239.89	39.45
Herne Bay	0.25	0.00	0.66	0.02	0.71	0.02	0.71	0.02
TOTAL	1355.35	548.84	2179.58	478.11	3164.24	554.44	3788.28	574.26
Including Windfall Sites	1995.09	593.10	2855.96	500.03	4304.63	591.40	5207.08	620.24
Including Gypsy and Traveller and Hotel	2326.53	618.75	3187.40	525.68	4636.07	617.05	5538.52	645.90

- 5.4 The unmitigated nitrogen budget is slightly larger by 2045 compared to the budget calculated with “banking”, but not by a significant amount. This is because few sites have negative nitrogen budgets – where land use change results in a negative budget this is usually outweighed by the increase in wastewater loading.
- 5.5 There is, however, a very large change in the budget by 2035 – this is because a number of very large sites begin development in 2031/2032 – these have significant negative budgets due to land use change which is applied in year one of build out, and the wastewater loading (which is always positive) is added throughout the following years as the site is built out, gradually eroding the negative budget.

The unmitigated phosphorus budget does not change, as no sites have a negative budget for phosphorus.

Mitigated budget

Table 7: Mitigated Nutrient Budget (without “banking”)

	2025-2030		2025-2035		2025-2040		2025-2045	
Catchment	TN	TP	TN	TP	TN	TP	TN	TP
Lower Stour	739.68	89.81	1696.33	269.02	2426.12	294.14	2679.03	302.80
Sarre Penn	23.52	8.55	56.54	9.01	56.54	11.11	56.54	11.11
Herne Bay	0.25	0.00	0.66	0.02	0.71	0.02	0.71	0.02
TOTAL	763.44	98.36	1753.54	278.05	2483.37	305.27	2736.29	313.93
Including Windfall Sites	1403.18	142.63	2429.91	299.97	3623.76	342.23	4155.08	359.91
Including Gypsy and Traveller and Hotel	1734.62	168.28	2761.35	325.62	3955.20	367.88	4486.52	385.57

5.6 The mitigated nitrogen budget is 26% larger than the mitigated budget calculated with “banking”. This is because where larger sites implement onsite treatment works, which significantly reduces the wastewater loading and it is these large sites - which are being built on agricultural land - that have the negative nutrient loading due to land use change. SuDS will also apply to these sites, further increasing the negative budgets. As with the unmitigated budget, there is a temporarily significant change in the budget to 2035 due to the land use change of some very large sites.

5.7 There is only a very small change for the mitigated phosphorus budget as only a very small number of sites have a negative phosphorus budget (and this is only after the application of SuDS – there are no negative phosphorus budgets in the unmitigated scenario).

Table 8: Wetland Area Requirements (based on mitigated budget, with and without banking)

	2025-2030	2025-2035	2025-2040	2025-2045
Total dwellings	1,770	10,245	14,449	15,898
Wetland size (ha), with “banking”	14	26	30	31
Wetland size (ha), without “banking”	14	27	31	32

5.8 The relevance of this test lies in the mitigation required to offset the nutrient budgets up to 2045. As shown in Table 8, the area of wetland required to offset the nutrient budget does not change significantly. This is because the wetland area is driven by the phosphorus budget which has not changed significantly and the changes in the nitrogen budget, although large, do not affect the area of wetland required.

5.9 Therefore, the effect of “banking” the negative nutrient budgets, or excluding them from the calculations, is negligible and reductions in nutrient budgets on development sites does not affect the fundamentals of the mitigation strategy.

SuDS removal rates

- 5.10 The calculations as presented include a 30% removal rate for both Nitrogen and Phosphorus due to SuDS strategies for developments classed as 'Major'. According to CIRIA's guidance on TN removal rates (C815), the maximum removal rate for Nitrogen is 30%. C815 gives three examples of how this could be achieved:
- Ponds, followed by bioremediation devices,
 - Lined infiltration devices, followed by a pond,
 - Manufactured sediment devices and/or ponds, followed by media filtration.
- 5.11 This will be easier to achieve on larger developments which have space available for ponds and other SuDS features, but is also achievable using filtration devices which could be underground if space is limited. Therefore 30% removal is considered a reasonable estimate. However, 30% is the maximum achievable according to C815.
- 5.12 Phosphorus removal rates are much more varied than for nitrogen. CIRIA's guidance for TP removal through SuDS (C808) allows a removal rate of 100% for all TP discharged to ground (direct discharge to ground would give a removal rate of 0% for nitrogen), or 39% for permeable paving. A treatment train using filtration elements could be designed to remove 30% of nitrogen (in line with C815) and also 44% of phosphorus (e.g. a lined tree pit followed by a pond).
- 5.13 50% removal (as required by the draft Local Plan) would be achievable with proper design. Although it is precautionary to assume not all site will achieve this, a sensitivity analysis has been carried out to illuminate the effects of enhanced phosphorus removal. For this analysis, a phosphorus removal rate of 50% for 'Major' sites has been used.

Table 9: Nutrient budget with 50% phosphorus removal due to SuDS

	2025-2030		2025-2035		2025-2040		2025-2045	
Catchment	TN	TP	TN	TP	TN	TP	TN	TP
Lower Stour	-902.86	50.36	1828.96	164.42	1013.95	193.08	1800.46	201.67
Sarre Penn	-590.39	-2.42	-197.31	-2.56	13.18	-0.46	13.18	-0.46
Herne Bay	0.25	0.00	0.66	0.02	0.71	0.02	0.71	0.02
TOTAL	1493.00	47.95	2025.60	161.87	1027.85	192.64	1814.35	201.23
Including Windfall Sites	-853.26	92.21	1349.23	183.79	2168.23	229.60	3233.15	247.21
Including Gypsy and Traveller and Hotel	-521.82	117.86	1017.79	209.44	2499.68	255.25	3564.59	272.86

- 5.14 The phosphorus budget to 2045 is reduced by 28%, making this a significant change.
- 5.15 There is no change to the nitrogen budget as the SuDS removal rates for nitrogen have not been changed.

Table 10: Wetland Area Requirements (based on mitigated budget, with 30% and 50% TP removal due to SuDS)

	2025-2030	2025-2035	2025-2040	2025-2045
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Total dwellings	1,770	10,245	14,449	15,898
Wetland size (ha), with 30% TP removal due to SuDS	14	26	30	31
Wetland size (ha), 50% TP removal due to SuDS	10	17	21	23

- 5.16 The relevance of this test lies in the mitigation required to offset the nutrient budgets up to 2045. As shown in Table 10, the area of wetland required to offset the nutrient budget reduces significantly, as phosphorus mitigation is the driving factor for the required wetland area. This indicates that, although it is not precautionary to include 50% phosphorus removal in the calculation of the nutrient budget, requirements for higher phosphorus removal for developments where this can be achieved will make a significant impact on the overall mitigation requirement in the future.

6 CONCLUSIONS

- 6.1 This report seeks to provide an outline of the methodology followed in the calculation of the nutrient budget for the proposed projected growth based on the Canterbury adopted Local Plan and draft allocations under the emerging Local Plan to 2042/43 (with projections to 2045, including windfall development). This methodology follows the clear staged approach outlined by NE in their latest guidance document on the matter. This report has provided details of the key assumptions made when scaling up the NE methodology, which has been written with single developments in mind, to a much larger proposed housing stock.
- 6.2 It has been demonstrated that there is significant potential to reduce the nutrient budget for the district by implementing planning policies to ensure that sites include nutrient reduction measures into their development plans (parallels can be drawn with SuDS which are required for new developments). Large sites are expected to reduce their nutrient loading with respect to both surface water and foul water drainage, and smaller sites are expected to deliver significant reductions in terms of surface water loading.
- 6.3 Furthermore, this note has given an outline to the role of small offsetting projects within the district and the role these can play in reducing the overall nutrient budget.
- 6.4 Following the inclusion of onsite mitigation, an overall nutrient budget has been calculated to the year 2045 at **3565 kgN and 378 kgP**.
- 6.5 Strategic constructed wetlands have been established as an efficient large-scale solution to help offset this budget. Potential sites for abstraction and end-of-pipe wetland have been identified, and high-level calculations indicate that there is enough land available to offset the nutrient budget using construction wetlands. More detailed calculations carried out regarding the five most promising sites indicate that these sites could provide sufficient nutrient removal to offset the nutrient budget up to 2045.
- 6.6 Opportunities will therefore be taken to reduce, and mitigate the nutrient budget, including the potential for retrofitting existing council housing stock to reduce water usage, and other projects within the district which will reduce the nutrient loading from surface water runoff (e.g. Broad Oak Reservoir).
- 6.7 The Stour Environmental Credits (SEC) credit bank can be used to collate nutrient credit schemes as they are brought forward. A wide variety of schemes were proposed at the soft testing stage, including land use charge, ditch enhancement, septic tank upgrades, wetlands and retrofitting water savings measures. This shows that there are several different mitigation options within the catchment and it will not be necessary to rely on constructed wetlands alone.
- 6.8 In addition to SEC, private nutrient credit providers are emerging who will provide mitigation to offset new qualifying development and it will not be necessary for CCC to rely entirely on constructed wetlands to deliver the Local Plan.
- 6.9 The mitigation framework will be phased with short-, medium- and long-term solutions to allow the released of nutrient credits as quickly as possible whilst also considering the full scale of the Local Plan delivery.
- 6.10 The Stodmarsh mitigation strategy will continue to be adaptive, responding to changes in guidance, housing delivery, the market and as opportunities for offsetting through the district arise. CCC will continue to liaise with neighbouring authorities, as well as all relevant regulators to develop a holistic nutrient mitigation framework.

7 NEXT STEPS

7.1 Next steps include:

- Ongoing identification of land use change projects within the District/Stour catchment;
- Further detailed viability assessment for retrofitting housing stocks for water saving measures;
- Populate credit bank (Stour Environmental Credits Ltd) with suitable mitigation schemes;
- Develop an Action Plan.

7.2 Figure 4 below is a flowchart describing the process to secure wetlands as a mitigation measure.

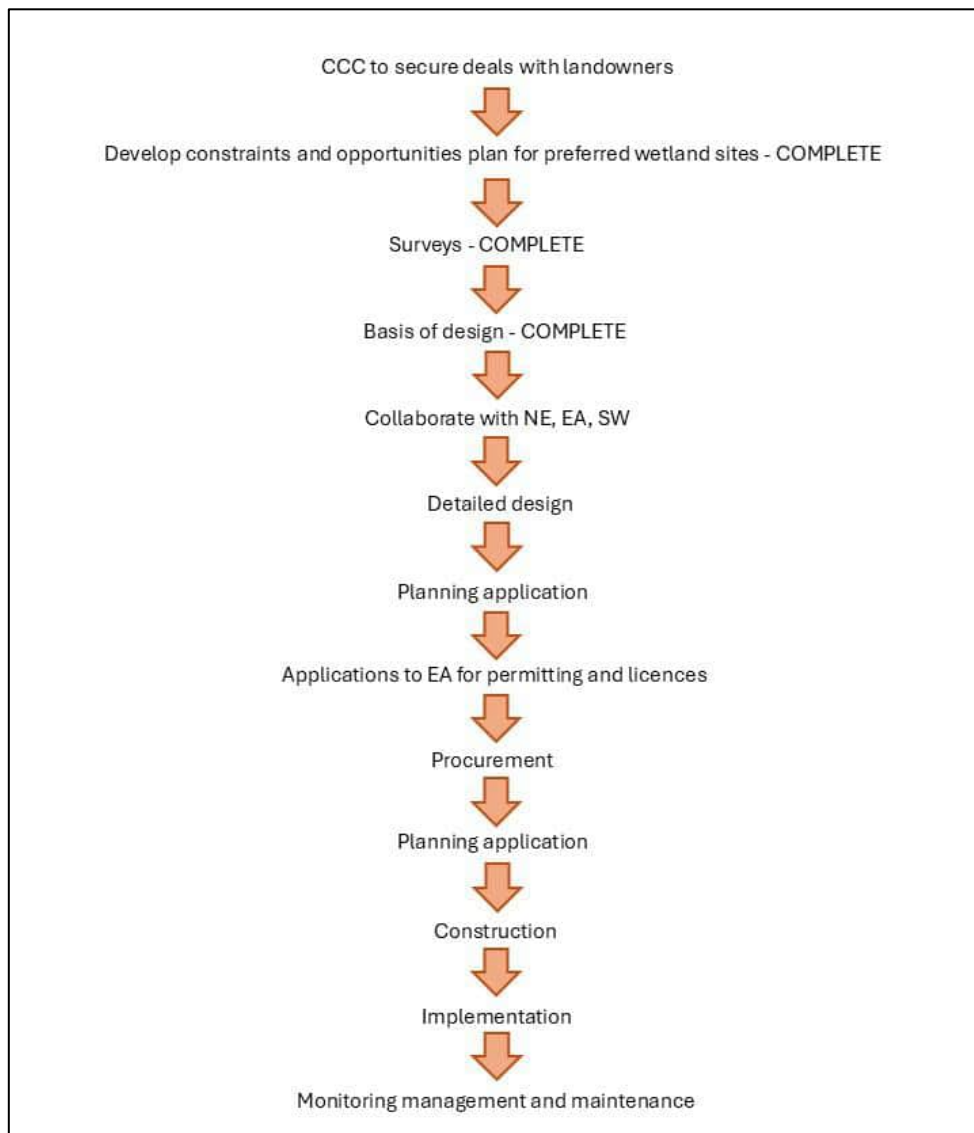


Figure 4: Wetland Flowchart

APPENDIX A: CALCULATIONS

Appendix E

FUNCTIONALLY LINKED LAND ASSESSMENT

APPENDIX E – FUNCTIONAL LAND REVIEW SUMMARY

Notes

Table E-1 below provides an initial assessment of the potential for the possible allocation sites to provide FLL for golden plover, dark-bellied brent goose, curlew and Desmoulin's whorl snail. This is based on:

- European site information available from NE or the JNCC, including:
 - The most recent JNCC-hosted GIS datasets;
 - The Standard Data forms for SACs and SPAs and Information Sheets for Ramsar sites;
 - Article 12 and 17 reporting;
 - The published site Conservation Objectives;
 - Supplementary Advice to the conservation objectives (SACO), where available;
 - Natural England Conservation Advice for Marine Protected Areas, where available;
 - Site Improvement Plans (SIPs); and
 - The supporting Site of Special Scientific Interest's favourable condition tables where relevant and where no SACOs applicable to the features are available.
- Grey literature sources, including EIAs and previous planning applications that have required HRA related to these European sites and functional land.
- A review of the habitats and characteristics of the potential allocation sites based on freely available aerial photography (recent and historical).
- GIS data on field sizes.
- Ornithological data within 1km of selected site allocations purchased from Kent and Medway Biological Records Centre, for sites which from a high-level pre-screening exercise were deemed to contain suitable habitat (from a review of aerial imagery), were of a sufficient size and/or were in a reasonable proximity to the designated sites.

The assessment has not included any allocation-specific field surveys beyond those available as part of previous planning applications.

The 'FLL Potential' is based on the site and the immediately adjacent land parcels, and categorised as follows:

- None – site and adjacent land parcels have and will have no value as FLL (e.g. very small sites within urban areas).
- Very low – site in isolation may have some limited suitability to support relevant species based on the habitat present but is small and a substantial distance from the designated sites, with no ecological connectivity.
- Low – site has some characteristics that may not deter species (e.g. field size >10 ha for birds, or suitable water features for Desmoulin's) or is immediately adjacent to such areas, but is typically a substantial distance from the designated sites.

- Moderate – site has several characteristics that may be attractive to bird species (e.g. field size >15 ha) or Desmoulin's (e.g. presence of watercourses) or is immediately adjacent to such areas, and is typically within 5km of the coast / designated sites boundary (or has hydrological connectivity to these, for Desmoulin's).
- High – site meets most of the criteria typically expected for FLL and is located within or close to recognised core areas for the species in the region.

Note, all sites over 5km from the boundary of The Swale SPA/Ramsar site are assumed to be unsuitable as FLL for dark-bellied brent goose associated with this site, based on existing studies and data from similar sites in the UK (e.g. the Solent habitats sites; Crouch and Roach Estuary SPA/Ramsar sites).

As described in Sections 5.6, 6.3 and 7.3, the high-level criteria/characteristics used to determine suitability comprised:

- Desmoulin's whorl snail: presence/potential for suitable calcareous wetland habitats including swamps, fens and marshes or bordering lakes, rivers and ponds with preferences for reed-grass and sedge species in the floodplains of the River Stour.
- Golden plover: large, open agricultural fields, particularly arable and coastal grasslands with clear sightlines to detect predators.
- Dark bellied brent goose: large, open farmland with arable or pasture and amenity grasslands with clear sightlines to detect predators. Within 5km of the Swale / Ramsar site.
- Curlew: large, open farmland with arable or pasture and amenity grasslands with clear sightlines to detect predators. Within 5km of the Swale / Ramsar site.

Table E-1 – Functionally linked land assessment

Site Name			Characteristics	Golden Plover		Dark-bellied brent goose and curlew		Desmoulin’s whorl snail	
	Area (ha.)	SLAA Ref.		FLL potential	Notes	FLL potential	Notes	FLL potential	Notes
C2 – 43-45 St George’s Place	0.15	SLAA099	Urban site comprising hard standing and buildings in central Canterbury.	None	Not suitable (existing land-use and characteristics).	None	Not suitable (existing land-use and characteristics).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
C3 - Land at Hawk’s Lane	0.09	SLAA373	Small hardstanding car park in central Canterbury.	None	Not suitable (existing land-use and characteristics).	None	Not suitable (existing land-use and characteristics).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
C4 - Millers Field Car Park	0.13	SLAA360	Small hardstanding car park in central Canterbury.	None	Not suitable (existing land-use and characteristics).	None	Not suitable (existing land-use and characteristics).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
C5 – Land north of Canterbury West Station	0.78	SLAA318	Part of a railway station in central Canterbury.	None	Not suitable (existing land-use and characteristics).	None	Not suitable (existing land-use and characteristics).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
C6 – Land at Station Road East	0.36	SLAA156	Urban site comprising hard standing and buildings within the city centre with a railway line along the southern boundary.	None	Not suitable (existing land-use and characteristics).	None	Not suitable (existing land-use and characteristics).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
C7 – Becket House	1.11	SLAA239	Disused office building and hard standing to the southeast of Canterbury city centre.	None	Not suitable (existing land-use and characteristics).	None	Not suitable (existing land-use and characteristics).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.

Site Name			Characteristics	Golden Plover		Dark-bellied brent goose and curlew		Desmoulin's whorl snail	
	Area (ha.)	SLAA Ref.		FLL potential	Notes	FLL potential	Notes	FLL potential	Notes
C10 - Land at Merton Park	83.9	SLAA151	A large site comprising large arable fields and several fields with fruit trees, and sports pitches associated with the Canterbury Rugby Football Club, located south of Canterbury adjacent to the A2. This allocation was previously part of site allocation C6: Merton Park under the 2022/ draft Local Plan and the Regulation 18 Draft Local Plan to 2024, now (and in the Regulation 18 draft Local Plan focused consultation in 2025) excluding an area of land to the northeast comprising additional arable fields and a large car park.	Low	This site is situated within 10km (approximately 8.8km away) from the Thanet Coast SPA and Ramsar and is of a sufficiently large size. However, much of the site will not be attractive to the species due to the current cropping (notably areas used for fruit farming) and/or relatively small field size / nature of the boundary habitats. There is however one large arable field that may be objectively suitable, although this is some distance from the SPA and core areas known to be used by this species in Kent. Note that surveys for this species were not previously required by NE in relation to the nearby Coking / Thanington developments. Ornithological records within 1km of this site held by the Kent Ornithological Society were purchased from Kent and Medway Biological Records Centre (KMBRC) but no records of golden plover were returned.	None	Very unlikely to comprise FLL based on the habitats, species' preferences and distance to The Swale SPA (approximately 8.8km). Ornithological records within 1km of this site held by the Kent Ornithological Society were purchased from Kent and Medway Biological Records Centre (KMBRC) but no records of dark-bellied brent goose or curlew were returned.	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
C11 - Land at Langton Lane	0.63	SLAA128	A small corner of arable land immediately bounded to the south and east by school and hospital developments.	Very low	Although covering a small area, the site is connected to a network of larger agricultural fields which may be suitable to support golden plover. However, the site itself is located over 10km from the Thanet Coast SPA and Ramsar site and is immediately bounded by developed areas associated with the Chaucer Hospital and Simon Langton Grammar School for Boys.	None	Very unlikely to comprise FLL based on the habitats, species' preferences and distance to The Swale SPA (over 10km).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
C12 – Nackington Police Station	0.75	SLAA309	Former police station with buildings and hardstanding and the A2 along the southern boundary.	None	Not suitable (existing land-use and characteristics).	None	Not suitable (existing land-use and characteristics).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.

Site Name			Characteristics	Golden Plover		Dark-bellied brent goose and curlew		Desmoulin's whorl snail	
	Area (ha.)	SLAA Ref.		FLL potential	Notes	FLL potential	Notes	FLL potential	Notes
C13 – Land to North of Cockerling Road	1.92	SLAA137B	A small site comprising grass / scrubland, currently subject to a planning application. Habitats immediately adjacent have similar mixed characteristics, or are currently being developed for housing as part of the Cockerling Road / Thanington Park developments.	Very low	This site is just over 10km from the Thanet Coast SPA and Ramsar site. The distance from the SPA and core areas, combined with the small size and scrub habitat mean it is very unlikely to comprise FLL. Bird surveys undertaken for the ongoing Cockerling Road/Thanington Park developments have not recorded the species (although targeted golden plover surveys were not undertaken).	None	Very unlikely to comprise FLL based on the habitats, species' preferences and distance to The Swale SPA (over 7km). Bird surveys undertaken for the ongoing Cockerling Road/Thanington Park developments have not recorded either species (although targeted dark-bellied brent goose and curlew surveys were not undertaken).	None	The site is over 6km from Stodmarsh SAC, does not contain any suitable habitat and lacks any apparent hydrological connectivity with the SAC.
C14 – Milton Manor House	8.00	SLAA090	Georgian manor house with tree lined drive and formal gardens (modified grassland) / parkland. The site is bounded by woodland and surrounded by farmland beyond that.	Very Low	This site is situated just over 11km from the Thanet Coast SPA and Ramsar site. Whilst it is connected to surrounding farmland, intervening woodland information interferes with sightlines and much of the surrounding area is in the process of being developed. Information to support a previous planning application for the site (CA/23/01766) included species records purchased from Kent and Medway Biological Records Centre (KMBRC) but no records of golden plover were highlighted.	None	Very unlikely to comprise FLL based on the habitats, species' preferences and distance to The Swale SPA (over 8km). Information to support a previous planning application for the site (CA/23/01766) included species records purchased from Kent and Medway Biological Records Centre (KMBRC) but no records of dark-bellied brent goose or curlew were highlighted.	None	The site is over 6km from Stodmarsh SAC, does not contain any suitable habitat and lacks any apparent hydrological connectivity with the SAC.
C15 - Land south of Littlebourne Road	77.3	SLAA122	A large site comprising multiple connected arable fields and several small areas of pasture.	Low	This site is situated just over 10km from the Thanet Coast SPA and Ramsar site but is of a sufficiently large size to provide suitability. However, areas of the site will not be attractive to the species due to the current cropping (notably the areas used for fruit farming). There are several large fields and small pasture areas which may be objectively suitable, although this is some distance from the SPA and core areas known to be used by this species in Kent. Ornithological records within 1km of this site held by the Kent Ornithological Society were purchased from Kent and Medway Biological Records Centre (KMBRC) but no records of golden plover were returned.	None	Very unlikely to comprise FLL based on the habitats, species' preferences and distance to The Swale SPA (over 10km). Ornithological records within 1km of this site held by the Kent Ornithological Society were purchased from Kent and Medway Biological Records Centre (KMBRC) but no records of dark-bellied brent goose or curlew were returned.	Moderate	The site is within 1.8km of Stodmarsh SAC and incorporates the Lampen Stream which is hydrologically connected to the SAC.

Site Name			Characteristics	Golden Plover		Dark-bellied brent goose and curlew		Desmoulin's whorl snail	
	Area (ha.)	SLAA Ref.		FLL potential	Notes	FLL potential	Notes	FLL potential	Notes
C16 - Land south of Bekesbourne Lane	43.3	SLAA302	A large site comprising areas of fruit tree crops, pasture with hedgerows, and woodland.	Low	This site is situated just over 10km from the Thanet Coast SPA and Ramsar, but is of a sufficiently large size to provide suitability. The large pasture fields may provide suitability, although these are some distance from the SPA and core areas known to be used by this species in Kent. Ornithological records within 1km of this site held by the Kent Ornithological Society were purchased from Kent and Medway Biological Records Centre (KMBRC) but no records of golden plover were returned.	None	Very unlikely to comprise FLL based on the habitats, species' preferences and distance to The Swale SPA (over 10km). Ornithological records within 1km of this site held by the Kent Ornithological Society were purchased from Kent and Medway Biological Records Centre (KMBRC) but no records of dark-bellied brent goose or curlew were returned.	Moderate	The site is within 2.4km of Stodmarsh SAC and incorporates ditches which may connect to the Lampen Stream, which is hydrologically connected to the SAC.
C17 - Land at Seotamot	1.17	SLAA346	A small private residential plot with adjoining fields.	None	Very unlikely to be attractive to this species (land-use; field size / shape; poor sight-lines and distance from the designated sites).	None	Very unlikely to comprise FLL based on the habitats, species' preferences and distance to The Swale SPA (over 10km).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
C18 – Wincheap Commercial Area	14.96	-	Existing industrial estate in urban area comprising hardstanding and buildings.	None	Not suitable (existing land-use and characteristics).	None	Not suitable (existing land-use and characteristics).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
C19 - Land at Military Road	2.88	SLAA368	Urban buildings	None	Not suitable (existing land-use and characteristics).	None	Not suitable (existing land-use and characteristics).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
C20 - Land at Sussex Avenue	0.29	SLAA372	Local community centre and parking within residential housing estate.	None	Not suitable (existing land-use and characteristics).	None	Not suitable (existing land-use and characteristics).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
C21 - Land at Suffolk Road	0.11	SLAA369	Garage units in residential housing estate	None	Not suitable (existing land-use and characteristics).	None	Not suitable (existing land-use and characteristics).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.

Site Name	Area (ha.)	SLAA Ref.	Characteristics	Golden Plover		Dark-bellied brent goose and curlew		Desmoulin's whorl snail	
				FLL potential	Notes	FLL potential	Notes	FLL potential	Notes
C22 – Land at the Former Chaucer Technology School	1.66	SLAA102	Car park and small field associated with a former school in an urban area. A railway line runs along the southern boundary.	None	Not suitable (existing land-use and characteristics).	None	Not suitable (existing land-use and characteristics).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
C23 - Land south of the Spitfire Ground	1.64	SLAA337	Amenity greenspace and hardstanding alongside cricket stadium, within a developed area.	None	Not suitable (existing land-use and characteristics).	None	Not suitable (existing land-use and characteristics).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
C24 - Land at Whitehall Close	0.10	SLAA371	Garage units in residential housing estate	None	Not suitable (existing land-use and characteristics).	None	Not suitable (existing land-use and characteristics).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
C25 - Land at St Stephen's Road	0.19	SLAA370	Existing block of flats and small garden space.	None	Not suitable (existing land-use and characteristics).	None	Not suitable (existing land-use and characteristics).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
C26 - Land at Long Meadow Way	0.06	SLAA362	Garage units in residential housing estate	None	Not suitable (existing land-use and characteristics).	None	Not suitable (existing land-use and characteristics).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
C27 - Land at Bawden Close	0.06	SLAA363	Small plot of parkland with trees in residential housing estate	None	Not suitable (existing land-use and characteristics).	None	Not suitable (existing land-use and characteristics).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
C28 - Land at Copinger Close	0.08	SLAA364	Small plot of parkland with trees in residential housing estate	None	Not suitable (existing land-use and characteristics).	None	Not suitable (existing land-use and characteristics).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
C29 - Land at Jesuit Close	0.09	SLAA365	Garage units in residential housing estate	None	Not suitable (existing land-use and characteristics).	None	Not suitable (existing land-use and characteristics).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.

Site Name	Area (ha.)	SLAA Ref.	Characteristics	Golden Plover		Dark-bellied brent goose and curlew		Desmoulin's whorl snail	
				FLL potential	Notes	FLL potential	Notes	FLL potential	Notes
C30 – Land at Folly Farm	0.62	SLAA162	Small section of a larger rough grassland field, bordered by developed areas and woodland.	None	Very unlikely to be attractive to this species given the small size of the field, location and poor sight lines due to surrounding areas, plus distance from the Thanet Coast sites (just under 8km).	None	Very unlikely to comprise FLL based on the habitats, species' preferences and distance to The Swale SPA (over 7km).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
C31 – Land on the eastern side of Shelford Landfill	7.27	SLAA056	A small rough grassland field and hardstanding area bordered by trees, associated with an existing landfill site. Surrounding land parcels are landfill, woodland, industrial units.	None	Very unlikely to be attractive to this species given the small size of the field, nature of the grassland, location and poor sight lines due to surrounding areas, plus distance from the Thanet Coast sites (over 7km).	None	Very unlikely to comprise FLL based on the habitats, species' preferences and distance to The Swale SPA (over 8km).	None	Whilst the site is only 1.66km from the Stodmarsh SAC there is no apparent suitable habitat present and no hydrological connectivity to the SAC.
C32 – Land at Wincheap Park and Ride	5.59	SLAA387	Rough grassland, scrub and woodland area on the edge of hard standing comprising the existing park and ride in an urban area. Footpaths run through it and it is bounded by the Great Stour River and the A2.	None	Very unlikely to be attractive to this species given the small size of the area, the predominance of scrub/woodland and distance from the Thanet Coast sites (over 10km). Furthermore, species records purchased from Kent and Medway Biological Records Centre (KMBRC) for a previous planning application at the site (CA/23/02167) returned no records of golden plover.	None	Very unlikely to comprise FLL based on the habitats, species' preferences and distance to The Swale SPA (over 8km). Furthermore, species records purchased from Kent and Medway Biological Records Centre (KMBRC) for a previous planning application at the site (CA/23/02167) returned no records of either species.	Low	The site is located 5.13km from the Stodmarsh SAC and the habitats predominantly on site do not appear suitable for the species. However, the Great Stour River is located at the north west boundary providing hydrological linkage to the Stodmarsh SAC and the potential for suitable habitat. Furthermore, a small pond is also present in the north of the site.

Site Name			Characteristics	Golden Plover		Dark-bellied brent goose and curlew		Desmoulin's whorl snail	
	Area (ha.)	SLAA Ref.		FLL potential	Notes	FLL potential	Notes	FLL potential	Notes
W4 – Land at Brooklands Farm	79.13	SLAA104	A large site comprising arable fields predominantly managed for cereal crops but also grazing (modified grassland). The fields are bounded by ditches and hedgerows. A narrow strip of ancient woodland (Longtye Wood) runs through the centre of the site and the south east boundary comprises mixed scrub along the A299. A stream runs through the site which also supports a network of ditches. The site is subject to a current planning application (CA/25/00779).	High	The site is within 1.76km of the Thanet Coast sites and the habitats on site are suitable. Wintering bird surveys undertaken for the current outline planning application have recorded golden plover on site during dusk transects (peak count 52). The citation for the Thanet Coast and Sandwich Bay SPA states a baseline 5-year mean count of 1,980. The peak golden plover count for W4 therefore represents more than 1% of this baseline and as such the site could be considered to be FLL. It is noted that the applicant's ecologist has assessed these birds as originating from the Swale Estuary SPA (given that recent surveys at the Thanet Coast and Sandwich Bay SPA give a 5-year average of four golden plover and the Swale SPA is approximately 2km from the site). Furthermore, they contend that as this population is less than 1% of the 5-year mean count for the Swale, the site does not classify as FLL for either designated site.	Moderate	The site is just over 2km from the Swale sites and habitats on site are considered to be suitable for both bird species. Wintering bird surveys undertaken for the current outline planning application have recorded curlew on site (peak count 10 during vantage point surveys) but not dark-bellied brent goose.	Very low	The site is located 6.63km from the Stodmarsh SAC. Whilst it contains a stream and network of drainage ditches, the habitats on site are not particularly suitable for the species, neither are there any obvious hydrological links to the SAC.

Site Name			Characteristics	Golden Plover		Dark-bellied brent goose and curlew		Desmoulin's whorl snail	
	Area (ha.)	SLAA Ref.		FLL potential	Notes	FLL potential	Notes	FLL potential	Notes
W5 – Land south of Thanet Way	14.04	SLAA132	Relatively large arable fields with partially vegetated field boundaries. Located directly adjacent to W6 Land South of Thanet Way and close to W9 Land lying to the west of Golden Hill.	Moderate	The site is located 1.6km to the southeast of the SPA. The intrinsic merits of the site are low based on proximity of developed areas including residential areas on the outskirts of Whitstable (with associated effects on sightlines etc) though parcel is a reasonable size and when taken in the context of further adjoining suitable habitat may have relatively greater contextual value than would otherwise be the case. Limited wintering bird surveys completed in winter 2022 for a mixed-use development at the site (CA/23/00379) did not record the presence of golden plover. Ornithological records within 1km of this site held by the Kent Ornithological Society were purchased from KMBRC but no records of golden plover were returned.	Very low	Intrinsic merits of the site are very low based on proximity of developed areas and preferences of these species. However, the fields are close to a unit of the SPA (within 2.9km) and so may have relatively greater contextual value than would otherwise be the case, as adjacent land parcels may also be suitable. Limited wintering bird surveys completed in winter 2022 for a mixed-use development at the site (CA/23/00379) did not record the presence of dark-bellied brent geese or curlew. Kent Ornithological Society records purchased from KMBRC include one record of dark-bellied brent goose within 1km of this site in 2023. No records of curlew within 1km of the site were returned.	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.

Site Name			Characteristics	Golden Plover		Dark-bellied brent goose and curlew		Desmoulin's whorl snail	
	Area (ha.)	SLAA Ref.		FLL potential	Notes	FLL potential	Notes	FLL potential	Notes
W6 - Land at Golden Hill	4.52	SLAA321	A small area of arable land with partially vegetated field boundaries. Located directly adjacent to W5 Land South of Thanet Way and W9 Land lying to the west of Golden Hill.	Moderate	The site is located 2.8km to the southeast of the SPA. The intrinsic merits of the site are low based on proximity of developed areas including residential areas on the outskirts of Whitstable (with associated effects on sightlines etc), and the parcel is relatively small but adjacent to a larger area of suitable habitat (Land south of Thanet Way within the 2024 draft Local Plan) and so may have relatively greater contextual value than would otherwise be the case as adjacent land parcels may also be suitable. Limited wintering bird surveys completed in winter 2022 for a mixed-use development at the connected Land south of Thanet Way (CA/23/00379) did not record the presence of golden plover. Ornithological records within 1km of this site held by the Kent Ornithological Society were purchased from KMBRC but no records of golden plover were returned.	Very low	Intrinsic merits of the site are very low based on proximity of developed areas and preferences of these species; however the fields are close to a unit of the SPA (within 1.7km) and so may have relatively greater contextual value than would otherwise be the case, as adjacent land parcels may also be suitable. Limited wintering bird surveys completed in winter 2022 for a mixed use development at the connected Land south of Thanet Way (CA/23/00379) did not record the presence of dark-bellied brent geese or curlew. Kent Ornithological Society records purchased from KMBRC include one record of dark-bellied brent goose within 1km of this site in 2023. No records of curlew within 1km of the site were returned.	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.

Site Name			Characteristics	Golden Plover		Dark-bellied brent goose and curlew		Desmoulin's whorl snail	
	Area (ha.)	SLAA Ref.		FLL potential	Notes	FLL potential	Notes	FLL potential	Notes
W7 – Bodkin Farm	24.03	SLAA247	Large area of winter sown arable land with individual fields enclosed by hedgerows and woodland edge on the eastern boundary. There is an existing outline application for the site (CA/24/00224).	Moderate	The site is located 0.72km from the Thanet Coast and Sandwich Bay SPA and provides suitable habitat, though the hedgerows and woodland edge may reduce site lines; however, it may have relatively greater contextual value than would otherwise be the case as adjacent land provides additional suitable habitat, specifically a 32ha arable field without dividing hedgerows to the south. Wintering bird surveys undertaken for the existing application did not record golden plover on site but did record a flock of 238 birds approximately 250m from the site boundary. The HRA submitted in support of the planning application precautionarily assess this nearby field as FLL but concludes no impact on the integrity of the SPA as a result of development at W7.	Moderate	The site is located 3.4km from the Swale SPA and Ramsar site and comprises suitable habitat. Records purchased from KMBRC to support planning application CA/24/00224 returned one record of dark bellied brent goose approximately 0.14km from the site but no curlew. The wintering bird surveys undertaken for the application did not record either species.	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
W8 - Land to the south west of Joseph Wilson Business Park	1.93	SLAA322	A small area of arable field directly to the south of urban development (residential and industrial estates) at the south of Whitstable).	Low	The site is located 2.7km to the south of the SPA. The intrinsic merits of the site are low based on the proximity of developed areas and the parcel is small, although adjacent to a larger area of connected arable habitat and so may have greater contextual value than would otherwise be the case. Records held by the Kent Ornithological Society were purchased from KMBRC. This search returned a single record of golden plover within 1km of this site, with the nearest record being recorded at Chestfield (TR1365) in 1997.	Very low	Intrinsic merits of the site are very low based on proximity of developed areas and preferences of these species; however the fields are close to a unit of the SPA (approximately 2.1km away) and so may have relatively greater contextual value than would otherwise be the case, as adjacent land parcels may also be suitable. Records within 1km of this site held by the Kent Ornithological Society were purchased from Kent and Medway Biological Records Centre (KMBRC) but no records of dark-bellied brent goose or curlew were returned.	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.

Site Name			Characteristics	Golden Plover		Dark-bellied brent goose and curlew		Desmoulin's whorl snail	
	Area (ha.)	SLAA Ref.		FLL potential	Notes	FLL potential	Notes	FLL potential	Notes
W9 - Land lying to the west of Golden Hill	0.04	SLAA353	A very small area of arable / pasture field, located directly adjacent to W6 Land at Golden Hill.	Moderate	The site is located 2.8km to the south east of the SPA. The intrinsic merits of the site are low based on proximity of developed areas including residential areas on the outskirts of Whitstable (with associated effects on sightlines etc), and the parcel is relatively small but adjacent to a larger area of suitable habitat (Land south of Thanet Way) and so may have relatively greater contextual value than would otherwise be the case as adjacent land parcels may also be suitable. Limited wintering bird surveys completed in winter 2022 for a mixed use development at the connected Land south of Thanet Way (CA/23/00379) did not record the presence of golden plover. Ornithological records within 1km of this site held by the Kent Ornithological Society were purchased from KMBRC for the adjacent allocated site (W6 Land at Golden Hill) but no records of golden plover were returned.	Very low	Intrinsic merits of the site are very low based on proximity of developed areas and preferences of these species; however the fields are close (approximately 1.9km) to a unit of the SPA and so may have relatively greater contextual value than would otherwise be the case, as adjacent land parcels may also be suitable. Limited wintering bird surveys completed in winter 2022 for a mixed use development at the connected Land south of Thanet Way (CA/23/00379) did not record the presence of dark-bellied brent geese or curlew. Kent Ornithological Society records purchased from KMBRC for the adjacent allocation W6 Land at Golden Hill include one record of dark-bellied brent goose within 1km of this site in 2023. No records of curlew within 1km of the site were returned.	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
W10 - Land at Beresford Road	0.20	SLAA330	A small urban industrial estate within Whitstable.	None	Not suitable based on existing land-use and characteristics, despite proximity to the SPA (approximately 2.4km away).	None	Very unlikely to comprise FLL based on the habitats, species' preferences, despite the close proximity to the SPA (approximately 0.5km away).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
W11 – St Vincent's Centre	0.29	SLAA223	A small urban site consisting of existing hardstanding and buildings.	None	Not suitable based on existing land-use and characteristics, despite proximity to the SPA (approximately 1.76km away).	None	Very unlikely to comprise FLL based on the habitats, species' preferences, despite the close proximity to the SPA (approximately 0.81km away).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
HB4 - Land at Beacon Road	1.15	SLAA374	Disused tennis / sports courts	None	Not suitable based on existing land-use and characteristics, despite close proximity to the SPA (approximately 260m away).	None	Very unlikely to comprise FLL based on the habitats, species' preferences, and distance from SPA (over 7.5km away).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.

Site Name	Area (ha.)	SLAA Ref.	Characteristics	Golden Plover		Dark-bellied brent goose and curlew		Desmoulin's whorl snail	
				FLL potential	Notes	FLL potential	Notes	FLL potential	Notes
HB5 – Land to the West of Thorndean Wood Road	16.25	SLAA240	A medium sized site comprising three arable fields with hedgerows.	Low	The intrinsic merits of the site are low based on field size and proximity of developed areas (with associated effects on sightlines etc); however the fields are close to a unit of the SPA (0.78km) and within the 'green gap' between Whitstable and Herne Bay and so may have relatively greater contextual value than would otherwise be the case. Note, surveys for this species were not undertaken in connection with Molehill Solar Farm or the nearby Owl's Hatch Solar Farm, or requested by NE at that time (2014/15).	Very Low	Very unlikely to comprise FLL based on the habitats, in particular poor sight lines and low suitability of adjacent habitats, species' preferences and distance from the SPA (4.16km).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
HB6 – Land comprising Nursery Industrial Units and former Kent Ambulance Station	0.50	SLAA067	A small urban site consisting of existing hardstanding and buildings.	None	Not suitable based on existing land-use and characteristics, despite proximity to the SPA (approximately 0.85km away).	None	Very unlikely to comprise FLL based on the habitats, species' preferences, and distance from SPA (5.63km away).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
HB7 - Former Herne Bay Driving Range	0.35	SLAA333	Previous golfing driving range structures, adjacent to residential units under construction.	None	Not suitable based on existing land-use and characteristics, despite proximity to the SPA (approximately 1.5km away).	None	Very unlikely to comprise FLL based on the habitats, species' preferences, and distance from SPA (over 6km away).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
HB8 - Land to the east of Bullockstone Road	1.30	SLAA356	Horse pasture fields and agricultural yard units.	Very Low	The Site is located approximately 1.8km from the SPA. The intrinsic merits of the site are low based on the proximity of developed areas including residential areas to the north, east and west, and poor sightlines associated with the vegetated site boundaries. Records held by the Kent Ornithological Society were purchased from KMBRC. This search returned 28 records of golden plover within 1km of this site, with the nearest record being recorded at Plenty Brook (TR1766) in 1998, and the most recent wintering record recorded in 2002.	None	Very unlikely to comprise FLL based on the habitats, species' preferences, and distance from SPA (over 6km away). Records within 1km of this site held by the Kent Ornithological Society were purchased from Kent and Medway Biological Records Centre (KMBRC) but no records of dark-bellied brent goose or curlew were returned.	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.

Site Name			Characteristics	Golden Plover		Dark-bellied brent goose and curlew		Desmoulin's whorl snail	
	Area (ha.)	SLAA Ref.		FLL potential	Notes	FLL potential	Notes	FLL potential	Notes
HB9 - Land at Home Farm Strode Park	9.66	SLAA335	A relatively large parcel of arable fields with hedgerow margins.	Moderate	The site is within 2.4km of the SPA and features arable fields of a sufficiently large size to be attractive, with reasonable sight lines towards the coast in the north. Records held by the Kent Ornithological Society were purchased from KMBRC. This search returned 24 records of golden plover within 1km of this site, with the nearest record being recorded at Plenty Brook (TR1766) in 1998, and the most recent wintering record recorded in 2002.	None	Intrinsic merits of the site are very low based on the preferences of this species and the distance from the SPA (over 6km). Records within 1km of this site held by the Kent Ornithological Society were purchased from Kent and Medway Biological Records Centre (KMBRC) but no records of dark-bellied brent goose or curlew were returned.	None	While ditches are present along the road in the north of the site, aerial imagery suggests that these do not support the typical reed-grass and sedge vegetation favoured by species, and there is a lack of apparent hydrological connectivity to Stodmarsh SAC.
HB10 - Land to the west of Bullockstone Road	1.67	SLAA350	Small caravan park with amenity areas.	Low	The site is located 2.2km to the south of the SPA. The intrinsic merits of the site are low based on the use of the site and the size of the parcel, although adjacent to a larger area of connected arable habitat and so may have greater contextual value than would otherwise be the case. Records held by the Kent Ornithological Society were purchased from KMBRC. This search returned 25 records of golden plover within 1km of this site, with the nearest record being recorded at Plenty Brook (TR1766) in 1998, and the most recent wintering record recorded in 2002.	None	Intrinsic merits of the site are very low based on use of the site, distance from SPA (over 6km) and preferences of this species. Records within 1km of this site held by the Kent Ornithological Society were purchased from Kent and Medway Biological Records Centre (KMBRC) but no records of dark-bellied brent goose or curlew were returned.	None	While ditches are present along the road in the north of the site, aerial imagery suggests that these do not support the typical reed-grass and sedge vegetation favoured by species, and there is a lack of apparent hydrological connectivity to Stodmarsh SAC.
HB11 – Altira	1.57	SLAA226	Small field and existing housing bordered by woodland.	None	Not suitable based on existing land-use and characteristics, despite proximity to the SPA (approximately 1.12km away).	None	Very unlikely to comprise FLL based on the habitats, species' preferences, and distance from SPA (over 8km away).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
HB12 - Moyne	0.32	SLAA026	Residential property and associated garden area on the edge of a trading estate.	None	Not suitable based on existing land-use and characteristics, despite proximity to the SPA (approximately 1.1km away).	None	Very unlikely to comprise FLL based on the habitats, species' preferences, and distance from SPA (over 8km away).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.

Site Name			Characteristics	Golden Plover		Dark-bellied brent goose and curlew		Desmoulin's whorl snail	
	Area (ha.)	SLAA Ref.		FLL potential	Notes	FLL potential	Notes	FLL potential	Notes
HB13 – Hawthorn Corner	2.77	SLAA042	Small field with grassland and areas of scrub, bordered by trees and hedges. Adjacent land includes developed areas, woodland and a wastewater treatment plant.	None	Not suitable based on existing land-use and characteristics, despite proximity to the SPA (approximately 1.28km away). Land parcels adjacent to the site are not suitable as FLL either (woodland / developed areas).	None	Very unlikely to comprise FLL based on the habitats, species' preferences, and distance from SPA (over 10km away).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
HB14 – Eddington Business Park	6.33	-	An urban site consisting of existing hardstanding and buildings.	None	Not suitable based on existing land-use and characteristics, despite proximity to the SPA (approximately 1.39km away).	None	Very unlikely to comprise FLL based on the habitats, species' preferences, and distance from SPA (6.29km away).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
R2 – Great Pett Farmyard	0.86	SLAA218	Small farmyard area surrounded by trees. Adjacent land is cropped.	None	Not suitable (existing land-use and characteristics).	None	Not suitable (existing land-use and characteristics).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
R3 - Chartham Paper Mill	11.42	SLAA355	A mixed site split into two parcels, comprising the industrial / warehouse structures of the paper mill, with woodland and a small area of pasture to the west of Station Road; and further industrial and wooded areas to the east of Station Road.	Very Low	The site is located over 10km away from the SPA and is large, although only a small proportion of this, comprising the pasture land, is considered to be potentially suitable for golden plover. The intrinsic merits of the site are also very low based on proximity of developed areas including the paper mill within the site itself and adjacent residential settlements, and (with associated effects on sightlines etc). Records held by the Kent Ornithological Society were purchased from KMBRC. This search returned three records of golden plover within 1km of this site, with the nearest record being recorded at Chartham (TR1055) in 2022.	None	Very unlikely to comprise FLL based on the habitats, species' preferences and distance to The Swale SPA (over 8km). Kent Ornithological Society records purchased from KMBRC include one record of dark-bellied brent goose within 1km of this site in 2020 at Chartham (TR1155). No records of curlew within 1km of the site were returned.	Low	The River Stour is present directly within and adjacent to the site, and small tributaries / ditches may also be present within the site boundary, although the site is within a developed area over 8km from the Stodmarsh SAC which may reduce the likelihood of significant populations being present.
R4 – Land at Ashford Road (west)	0.73	SLAA311	Site comprises a small grassland field adjacent to the A28, bordered by mature trees. Fields / habitats immediately adjacent are used for tree growing.	None	Very unlikely to be attractive to this species (land-use; field size / shape; poor sight-lines and distance from designated site at over 11km away).	None	Although the site appears to support grassland habitat, it is considered very unlikely to comprise FLL based on small size and surrounding habitat and distance to The Swale SPA (over 8km).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.

Site Name	Area (ha.)	SLAA Ref.	Characteristics	Golden Plover		Dark-bellied brent goose and curlew		Desmoulin's whorl snail	
				FLL potential	Notes	FLL potential	Notes	FLL potential	Notes
R5 – Land at Ashford Road (east)	0.37	SLAA115	A small grassland / scrub field adjacent to the A28, bordered by mature trees. Fields / habitats immediately adjacent are used for tree growing.	None	Very unlikely to be attractive to this species (land-use; field size / shape; poor sight-lines and distance from designated site at over 11km away).	None	Although the site appears to support grassland habitat, it is considered very unlikely to comprise FLL based on small size and surrounding habitat and distance to The Swale SPA (over 8km).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
R6 – Bread and Cheese Field	7.51	SLAA163	Arable field on village edge, bordered by housing, woodland / trees, and rough grassland. Adjacent land parcels are small areas of rough grassland, woodland and housing.	None	Very unlikely to be attractive to this species (land-use; field size / shape; poor sight-lines and distance from designated site at 6.8km away).	None	Although the site appears to support grassland habitat, it is considered very unlikely to comprise FLL based on small size and surrounding habitat and distance to The Swale SPA (over 10km).	None	Despite being very close to the SAC (165m), there is no apparent suitable habitat within the site.
R7 – Land at Hersden	1.24	SLAA146	Small area of rough grassland and woodland on village edge, bordered by mature treelines and hedges; adjacent land parcels are arable or housing / amenity / developed land. Nearby arable fields relatively large.	None	Very unlikely to be attractive to this species (land-use; field size / shape; poor sight-lines and distance from designated site at over 7km away).	None	Although the site appears to support grassland habitat, it is considered very unlikely to comprise FLL based on small size and surrounding habitat and distance to The Swale SPA (over 11km).	None	Despite being very close to the SAC (505m), there is no apparent suitable habitat within the site.
R8 - Land at Former Spires Academy	1.33	SLAA342	Land previously in use as recreational sports field, currently unmanaged grassland.	None	Very unlikely to be attractive to this species (land-use; field size / shape; poor sight-lines and distance from designated site at over 6km away).	None	Although the site appears to support grassland habitat, it is considered very unlikely to comprise FLL based on lack of regular mowing / management, and based on distance to The Swale SPA (approximately 10km).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
R9 – The Hill, Littlebourne	15.99	SLAA098	Arable fields on edge of village; fields bordered by mature treelines and hedges. Adjacent land parcels mixed farmland or housing.	Very low	Whilst arable fields could support golden plover, this site is unlikely to be attractive to this species due to its relatively small size and the presence of tree lines and hedgerows interfering with sight lines. Adjacent habitats also have low suitability. Distance from SPA (over 10km) makes use as FLL very unlikely, although note that KoS has a record of 30 golden plover from a location near Bekesbourne.	None	Very unlikely to comprise FLL based on the habitats, species' preferences, and distance from SPA (over 11km away).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.

Site Name			Characteristics	Golden Plover		Dark-bellied brent goose and curlew		Desmoulin's whorl snail	
	Area (ha.)	SLAA Ref.		FLL potential	Notes	FLL potential	Notes	FLL potential	Notes
R10 – Land north of Court Hill	1.98	SLAA145	Small grassland field and agricultural buildings on edge of village. Nearby arable fields relatively large.	Very low	The intrinsic merits of the site are low based on the use of the site and the size of the parcel, although adjacent to a larger area of connected arable habitat and so may have greater contextual value than would otherwise be the case. Distance from the SPA (over 10km) makes its use as FLL very unlikely.	None	Very unlikely to comprise FLL based on the habitats, species' preferences, and distance from SPA (over 12km away).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
R11 – Land North of Popes Lane	9.31	SLAA011	Arable field on the edge of an urban area; bordered by woodland blocks and developed areas. Subject to an existing outline planning application (CA/23/01743)	Very low	The arable land on site could provide suitable habitat for golden plover though the site is over 6km from the SPA. Wooded boundaries reduce sight lines and adjacent habitats have low suitability. Wintering bird surveys in 2022-23 did not record golden plover on site and the HRA for CA/23/01743 concluded the site is not FLL.	None	Very unlikely to comprise FLL based on the habitats, species' preferences, and distance from SPA (over 8km away). Wintering bird surveys in 2022-23 did not record either species.	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
R12 – Land at The Paddocks, Shalloak Road	2.44	SLAA066	Small grassland field bordered by woodland. Adjacent land parcels are woodland and housing.	None	Very unlikely to be attractive to this species (land-use; field size / shape; poor sight-lines and distance from designated site at over 7km away).	None	Although the site appears to support grassland habitat, it is considered very unlikely to comprise FLL based on size and surrounding habitat and distance to The Swale SPA (over 8km).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
R14 – Land west of Coofing Lane and South of Station Road	2.64	SLAA185	Small area of rough grassland on village edge, bordered by mature treelines. Adjacent land parcels are arable or housing / amenity / developed land. Nearby arable fields are relatively large.	Very low	The intrinsic merits of the site are low based on the habitats present and the size of the parcel, although adjacent to a larger area of connected arable habitat and so may have greater contextual value than would otherwise be the case. Distance from the SPA (over 11km) makes its use as FLL very unlikely.	None	Although the site appears to support grassland habitat, it is considered very unlikely to comprise FLL based on size and surrounding habitat and distance to The Swale SPA (over 16km).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
R15 – Land adjacent to Valley Road	2.78	SLAA062	Small pasture with trees in village. Adjacent land parcels are developed land with mature trees.	None	Very unlikely to be attractive to this species (land-use; field size / shape; poor sight-lines and distance from designated site at over 15km away).	None	Although the site appears to support grassland habitat, it is considered very unlikely to comprise FLL based on size and surrounding habitat and distance to The Swale SPA (over 18km).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.

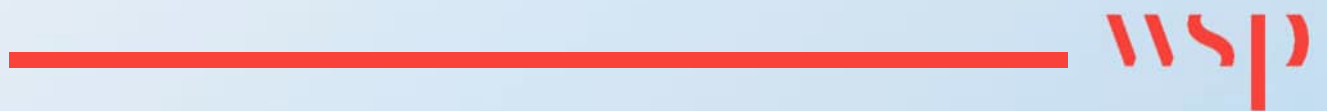
Site Name	Area (ha.)	SLAA Ref.	Characteristics	Golden Plover		Dark-bellied brent goose and curlew		Desmoulin's whorl snail	
				FLL potential	Notes	FLL potential	Notes	FLL potential	Notes
R16 – Land at Goose Farm, Shalloak Road	2.11	SLAA235	Brownfield site dominated by hardstanding. Currently being developed with industrial units.	None	Not suitable (existing land-use and characteristics).	None	Not suitable (existing land-use and characteristics).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
R17 – Land at Shalloak Road	0.42	SLAA313	Small site with existing buildings and trees.	None	Not suitable (existing land-use and characteristics).	None	Not suitable (existing land-use and characteristics).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
R18 – Land fronting Mayton Lane	0.50	SLAA045	Small field on the edge of a village. Adjacent land parcels are developed land or agricultural with polytunnels, bordered by trees and hedges.	None	Very unlikely to be attractive to this species (land-use; field size / shape; poor sight-lines and distance from designated site at over 6km away). Adjacent habitats have little to no suitability.	None	Although the site appears to support grassland habitat, it is considered very unlikely to comprise FLL based on size and surrounding habitat and distance to The Swale SPA (over 7km).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
R19 – Land at Church Farm	1.16	SLAA202	Small arable field and existing agricultural building on the edge of a village. Adjacent land parcels are developed land or relatively small arable fields bordered by trees and hedges.	None	Very unlikely to be attractive to this species (land-use; field size / shape; poor sight-lines and distance from designated site at 4.4km away). Adjacent habitats have little to no suitability.	None	Although the site appears to support grassland habitat, it is considered very unlikely to comprise FLL based on size and surrounding habitat and distance to The Swale SPA (over 9km).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
R21 – Land at Canterbury Business Park	22.43	SLAA155	Site comprises a number of small agricultural fields (all< 3ha) with woodland / trees and amenity grassland. Surrounding fields are generally small also.	Very low	Very unlikely to be attractive to this species despite the overall allocation size as the fields are in and of themselves small and woodland and trees reduce sight lines. This is the case for the surrounding land also. The distance from the SPA also makes this site unlikely to be used as FLL (over 14km).	None	Although the site appears to support grassland habitat, it is considered very unlikely to comprise FLL based on size of the fields and surrounding habitat and distance to The Swale SPA (over 14km).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.
R22 - Barham Layby	0.89	SLAA375	Roadside layby with scrub habitats	None	Not suitable based on existing land-use and characteristics and distance from the designated sites (over 14km away)	None	Very unlikely to comprise FLL based on the habitats, species' preferences and distance to the SPA (over 20km away).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.



Site Name	Area (ha.)	SLAA Ref.	Characteristics	Golden Plover		Dark-bellied brent goose and curlew		Desmoulin's whorl snail	
				FLL potential	Notes	FLL potential	Notes	FLL potential	Notes
R24 – Broad Oak Reservoir and Country Park	443.63	SLAA233	Proposed reservoir site, predominantly arable fields and woodland.	Low	Although the allocation is large the vast majority of the land parcels affected are small (<10ha) and most will have a very low intrinsic suitability for this species based on field size and habitat preferences. Note that SE Water have been completing surveys for the site and engaging with NE, so are likely to have already addressed this issue.	None	Very unlikely to comprise FLL based on the habitats, species' preferences, despite the close proximity to the SPA (over 5km away).	None	No apparent suitable habitat within site, and lack of apparent hydrological connectivity to Stodmarsh SAC.

Appendix F

AIR QUALITY ASSESSMENT







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