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Our ref: 410358
Your ref: Regulation 19 Submission



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BY EMAIL ONLY

Dear Ashley

Dover District Local Plan to 2040 – Regulation 19 Submission – October 2022

Natural England Addendum

We appreciate your Authority's patience in allowing us to provide this additional advice on your Regulation 19 Local Plan after the statutory deadline. We understand that you will provide this additional response to the Planning Inspectorate and it will be their decision to accept it or not.

The letter below continues our advice on those matters unavoidably not included in our initial response of 9th December:

While we have raised some queries and recommended some further modifications to certain policies we do not find the Plan unsound on any grounds relating to our remit.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact me on 0208 0268024 or heather.twizell@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk

Yours sincerely

**Heather Twizell
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Strategic Policy 1 – Planning for Climate Change

Natural England welcomes the policy's recognition under points (e) and (h) of the importance that multi-functional green infrastructure can play in climate change mitigation and adaptation. We suggest that an additional point could be added to the 'Mitigation' list:

- Exploring nature-based solutions to climate challenges

Strategic Policy 3 – Housing Growth

We note your Authority's intention through this Plan to meet the latest objectively assessed housing need for the District of 10,998 new homes (611 dwellings per annum) over the plan period but not to go beyond this. This figure is comprised of an already committed supply total of 5,282 and Local Plan supply total of 6,642.

We further note the Plan's proposed distribution of housing growth in the District is primarily based on the settlement hierarchy and influenced by site availability, environmental constraints and factors of delivery. We acknowledge that several sites relatively high in the settlement hierarchy including Deal and Sandwich, which are sustainable locations across a large number of objectives, are nevertheless subject to significant environmental constraints due to the proximity of designated sites and landscapes.

Although we did not provide comments explicitly on this policy in our Regulation 18 response (SP2 at Reg 18) we did raise concern more generally around the number of large site allocations with the potential for significant impacts on the Kent Downs Area of Outstanding Natural Beauty (AONB). We welcome the revisions you have made following this advice including the removal of both the Farthingloe (DOV012) and North Aylesham (AYL004) allocations and appreciate how closely you have worked with the AONB Unit while doing this. We are not recommending any modifications to this policy in this Regulation 19 response.

Strategic Policy 6 – Economic Growth

Overall Natural England welcomes your Authority's intention to focus much of the District's economic growth over the next plan period at existing or previously allocated employment sites including Discovery Park, Sandwich; White Cliffs Business Park, Dover and the Aylesham Development Area.

To widen opportunities for economic growth across the District we note the inclusion of a number of new sites in this plan for either economic or mixed-use developments including Dover Waterfront; Fort Burgoyne; Western Heights, Dover; Snowdown Colliery, Aylesham and Statenborough Farm, Eastry and are pleased to see that most of these will see the redevelopment of brownfield land.

In our response to the Regulation 18 consultation on this plan we advised that for certain employment allocation sites appropriate policy wording should be included in order to protect relevant designated sites and protected landscapes. We have reviewed the relevant site allocation policies as set out below and are generally satisfied that the wording is sufficient to achieve this (although please note our additional recommendations for Fort Burgoyne and Snowdown Colliery and also refer to our wider advice elsewhere in this letter that certain policy requirements such as those requiring wintering bird surveys may be over-precautionary in some cases).

- White Cliffs Business Park, Phases 1,2,3 and 4, Whitfield (Policy SAP2)
- The Citadel, Western Heights, Dover (Policy SAP4)
- Fort Burgoyne, Dover (Policy SAP5) – given the acknowledgement in the supporting text of this policy that part of the site falls within the Kent Downs AONB (with the remainder in its setting) we would advise you to include reference to this in the policy wording itself, making clear that any future re-development of the site will need to maintain (and ideally enhance)

the special qualities of the AONB and should be supported by a full Landscape and Visual Impact Assessment (LVIA).

- Aylesham Development Area, Aylesham (Policy SAP25)
- Former Snowdown Colliery, Aylesham (Policy SAP26) – we have recently been made aware of evidence that this site may provide a good example of open mosaic habitat and could potentially have high biodiversity value, particularly as it is a relatively large site at ~40ha and has been disused for over 30 years. We note that the type and scale of employment development on this site has been left relatively open and would advise that the development capacity of the site should ideally be informed by the need to conserve and enhance biodiversity as well as heritage assets. We strongly support the policy requirement at point (g) for both species and habitats surveys.

Finally, we would appreciate clarification as to why Discovery Park, Sandwich is the only employment site listed in Policy SP6 which does not have its own site allocation policy in this Plan. Is it because the site is already fully built out and there are no plans to expand it further in this plan period?

Strategic Policy 13 - Protecting the District's Hierarchy of Designated Environment Sites

We are pleased to see the progress that has been made in developing this policy since we provided our Regulation 18 advice. We particularly note the following changes based on this:

- Natural Capital is now referred to in the supporting text.
- The policy wording referring to National Sites has been strengthened in line with the National Planning Policy Framework (NPPF).
- Ancient Woodland is referenced as an Irreplaceable Habitat and policy wording has been strengthened in line with the NPPF.

However, we would still recommend the following additional changes:

- Supporting Text - Other International Sites - 3.259 – this paragraph relates to the potential for housing allocations in Dover District to have impacts on international sites located outside the district through the pathway of recreational pressure (i.e. more people from Dover District visiting these sites and potentially have negative impacts such as trampling of sensitive habitats or disturbing birds). The paragraph appears to require all site allocations in Dover District which fall within Zones of Influence (ZOIs) for these international sites to undergo project-level Habitats Regulations Assessment (HRA) with a view to identifying suitable open space provision to redirect this recreational pressure. This requirement does not appear to follow through clearly to the Policy wording on International Sites. We are also concerned that the three Zones of Influence (ZOIs) stated in this paragraph derive from the Local Plan HRA which has used best available evidence to make a judgement call on the likely distance most visitors will travel to particular sites BUT they are not based on detailed, site-specific visitor survey data. All large site allocations should be providing significant areas of high quality open space regardless, for the multiple benefits this can bring for both people and nature. We would like to work with your Authority to agree the best way to revise this requirement and the associated wording in the supporting text.
- Supporting Text - Local Sites - 3.269 – The local site of Princes Beachland is incorrectly listed here as a Site of Special Scientific Interest (SSSI).
- For policy requirements c (Thanet Coast & Sandwich Bay Special Protection Area (SPA) /Ramsar 500m) and d (wintering bird surveys) please see our HRA advice later in this letter.
- Policy section - Mitigation Hierarchy – our advice on this policy section at Regulation 18 was that the word 'compensation' had been used incorrectly. The Mitigation Hierarchy remains an incredibly important, step-wise process for development to address impacts on the

natural environment (as demonstrated by its inclusion in paragraph 180(a) of the NPPF). At present this section takes up a significant amount of policy text and in our view continues to lack clarity. Point J in particular appears to include wording drawn from both designated site and Biodiversity Net Gain requirements. While not wanting to re-write it for your Authority we would be happy to work with you to come up with revised wording that is more succinct and provides clear guidance for developers.

Strategic Policy 14 - Green Infrastructure and Biodiversity

Following our previous advice we are pleased to see that references to the future Kent Local Nature Recovery Strategy (LNRS) are included in both the policy wording and supporting text.

Supporting text – 3.289 – this paragraph recognises the importance of the District’s coastal environment and states that work to examine and address coastal squeeze will be progressed during the lifetime of the plan. We would appreciate further engagement with your Authority regarding the details and timescales for this. While perhaps not best included in this policy we would also encourage your Authority to consider including policy wording elsewhere in the Plan which requires new development close to the coast to consider the potential for impacts on natural habitats through the process of coastal squeeze or otherwise restricting the capacity of the coastline to adjust to sea-level rise and climate change.

We are not recommending any modifications to this policy in this Regulation 19 response.

SAP1 – Whitfield Urban Expansion

We are pleased to see that Policy SAP1 provides a considerably increased high-level policy steer on a number of matters relevant to our remit compared to policy CP11 in your Authority’s adopted Local Plan.

We strongly support policy provisions (d), (e), (f), (g), (h), (k), (l), (p) and (z). Given that this Plan makes provision for an uplift of around 600 homes through intensification of development on already allocated areas requirement (d) relating to a landscape led approach and LVIA will be particularly important in ensuring that the updated Masterplan does not have a significant impact on the setting of the Kent Downs AONB.

For requirement (i) regarding wintering bird surveys please see our HRA comments later in this letter.

We note that work is underway to update the Supplementary Planning Document (SPD) that guides delivery of the site and would be happy to work with you and the developers on this on a cost-recovery basis if required (having most recently provided non-statutory advice specifically on SANGs to the developer in July 2022).

CC4 - Water Efficiency

We note that this policy still refers to the 110 litres per person per day set by Regulation 36(3) of the Building Regulations. We maintain the advice given at Regulation 18 that in light of Dover District containing areas of Serious Water Stress this policy should go beyond the Building Regulations and set a more stringent water efficiency target. While we appreciate the second sentence in the policy stating that “The Council will strongly support proposals that seek to reduce daily water consumption even further, through the use of additional measures such as rainwater harvesting” we are not sure how effective this will be in driving the levels of change needed in the current climate emergency.

NE3 - Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy

We strongly support the inclusion of this policy to help provide certainty and security around your Authority’s strategic mitigation to protect the Thanet Coast and Sandwich Bay SPA and Ramsar site from the adverse impacts of increased recreational pressure from new development.

While the policy makes clear that development types other than housing that could increase recreational pressure will be assessed on a case by case basis and may be required to contribute to the SAMM in full or in part we would encourage you to also consider including clarity in the policy for:

- Large developments outside the 9km ZOI
- Permanent gypsy and traveller pitches – which under a number of other such strategic approaches around the country are generally considered to equate to new dwellings.

Local Plan Habitats Regulations Assessment (HRA)

HRA Screening of Policies

Natural England agrees with the policies listed under 4.2, 4.3 and 4.5.

For 4.4 (The following policies could result in some development, but the development arising would be either located away from sensitive European sites within the urban area or would be small in scale so would not be expected to contribute significantly to increased vehicle traffic, recreation pressure or changes to water quantity and quality) we would query whether or not the following policies would sit better under list 4.5:

- **H3: Meeting the needs of Gypsies and Travellers** – this policy identifies 3 sites suitable for intensification – 2 at Eastry and 1 at Alkham. The Eastry sites would fall within the 9km Zone of Influence agreed for the Thanet Coast and Sandwich Bay SAMM and similar strategic solutions to address recreational pressure on other SPAs have considered a new, permanent pitch to equate to a dwelling and therefore to have an impact in-combination that requires mitigation (linked to our advice earlier in this letter on policy NE3).
- **E4: Tourist Accommodation and Attractions.** This includes the following policy criterion – (x) Developments which are located within the 9km Zone of Influence of the Thanet Coast and Sandwich Bay SPA will be assessed on a case by case basis under the Habitats Regulations and may be required to make full or partial contributions towards the SAMM if applicable in line with the requirements of Policy NE3. Given the inclusion of this policy criterion the implication is that development could come forward under this policy which has the potential for a likely significant effect on the Thanet Coast and Sandwich Bay SPA in the absence of mitigation.

Physical Damage and Loss – Functionally Linked Land (Offsite)

We agree that the following sites can be screened out as not likely to be significantly affected through this impact pathway on the basis of the bird species they support and the distance from Dover District:

- Dungeness, Romney Marsh and Rye Bay Ramsar site (19km)
- Outer Thames Estuary SPA (5km)
- The Swale SPA / Ramsar (15.5km).

We note that for designated sites supporting golden plover and lapwing a maximum buffer of 15km has been applied to identify allocation sites which could result in the loss of functionally-linked land (FLL). The HRA states this has been defined through discussions with Natural England on HRA work relating to Essex, including North Essex Authorities and was found to be robust through the Examination in Public but it is not clear if discussions were held specifically in relation to this Plan and the designated sites falling within or close to Dover District as circumstances and influencing factors around the country can vary. We can only apologise for not raising this sooner but having now discussed with one of our national, ornithology specialists we are confident in advising that 15km could be seen as a highly precautionary distance.

We acknowledge that golden plover may forage up to 15km from a roost within a designated site. However, our advice is that beyond 10km use of individual sites is likely to be extremely sporadic, designated site population sensitivity to any impacts on sites beyond this distance much reduced and wintering bird surveys unlikely to be effective in picking up birds from a designated site population. It is worth also referring to Natural England's Impact Risk Zones (IRZs) which we both use internally and encourage local planning authorities to use to decide when to consult us on developments likely to affect protected sites. For large, rural residential developments (>50 houses) our FLL IRZ for wintering golden plover and lapwing only extends 5km from relevant designated site boundaries.

Dover District Council is the competent authority under the Habitats Regulations so it remains your decision as to whether you reduce the current 15km buffer.

Thanet Coast and Sandwich Bay SPA and Ramsar site

The SPA and Ramsar site designations here overlap, but not exactly. The Thanet Coast Ramsar site is only notified for turnstone (which are not considered to make use of functionally-linked arable land) and a wetland invertebrate assemblage. The SPA is notified for golden plover, turnstone and little tern. Therefore we would advise that when deciding which allocation sites fall within an impact buffer for functionally-linked land it is distance from the SPA which should be considered.

Based on the current 15km buffer there are 12 site allocations with moderate potential as FLL and 6 sites with high potential (including all three strategic housing allocations). If a maximum buffer of 10km was applied this would reduce to only 6 site allocations with moderate potential and 4 sites with high potential and if a buffer of 5km was applied this would come down to 4 sites with moderate potential and only one with high.

We have raised concerns previously around plan deliverability given the reliance on project-level survey and HRA. If we agreed with the use of the 15km buffer then I believe these concerns would be genuine given that all three of the Plan's strategic housing sites fall within this. However, as we are now advising that this distance is extremely precautionary and given the distance of the three sites in question from the SPA (AYL003 – 11.7km, EYT003/009/12 – 8.9km and Whitfield – 9.9km) we do not find the plan unsound on these grounds.

Stodmarsh SPA and Ramsar site

One site is currently considered to have high potential for impact on FLL (PRE017 – 1.1km distant – relatively small site – 2.53ha). Birds such as hen harrier can forage for tens of kilometres and make significant use of undesignated farmland but the extent of this habitat coupled with low densities of birds reduces the likelihood of a significant impact even in-combination. Concern is more around disturbance to roost sites for which development would need to be considerably closer. Ruff are a passage species only so likely to be more difficult to pick up through surveys. Given the distance, size of site and the behaviour of the species in question we would argue that a policy requirement for wintering bird surveys (specifically to quantify potential impacts on the Stodmarsh SPA and Ramsar site through the loss of FLL) is excessive. However, this does not mean that species surveys for other reasons may not be appropriate if the site is ultimately taken forward for development.

Dungeness, Romney Marsh and Rye Bay SPA

Only one site is flagged with moderate potential (CAP006) which could be removed if even the slightly less precautionary buffer distance of 10km was used for golden plover and lapwing.

Non-physical Disturbance

The concern here is around the bird disturbance impacts of noise, vibration and lighting. The only site which has been screened in (as having site allocations within 500m) is the Thanet Coast and Sandwich Bay SPA and Ramsar site.

The policy approach currently proposed is for all site allocations within 500m of the SPA and Ramsar site to be subject to project-level HRA to demonstrate no adverse impacts through the pathway of non-physical disturbance. Natural England queried this approach in our non-statutory advice letter dated 22nd October 2021 (DAS/ A002312) and advised that it needed to be clearly supported by evidence. It is not clear how this advice has been acted upon.

Addressing such non-physical disturbance impacts is likely to require a more case by case approach. Cumulative impacts are not so much of an issue here as the concern is primarily around temporary construction impacts – none of the allocation sites named explicitly in the HRA are close enough to have a significant lighting disturbance impact once built. Of the sites explicitly listed in the HRA we have the following comments to make:

- SAN001 or SAN011 (0m) – neither of these site allocation references from the HRA appear to be included in the Plan itself.
- SAN004 (160m) – SAP17 – 40 houses (no specific policy wording) – this is the closet and largest allocation, although on the site of an existing industrial estate – there may be some justification for requiring project-level HRA for this allocation.
- TC4S032 (200m) – SAP16 – 5 houses (no specific policy wording) – this is a small site in an existing urban area. Noise and vibration will require control anyway to avoid posing a nuisance to local residents and lighting won't reach the designated site (other existing properties are much closer). This site does not require project-level HRA for this impact pathway.
- TC4S076 – SAP 31 – employment – within 500m of Ramsar site (wetland invertebrate assemblage) but SPA much further away. This site does not require project-level HRA for this impact pathway.
- SAN023 (220m SAC only, 390m SPA and Ramsar) – SAP22 – 35 houses – explicit wording in policy. Given the modest scale of development and the distance from the SPA and Ramsar site we would suggest removal of the current policy requirement.
- WOR006 (10 houses - 280m) and WOR009 (15 houses - 464m) – SAP49 – (no specific policy wording). These sites do not require project-level HRA for this impact pathway.

Air Pollution

Natural England has reviewed both the Air Pollution section of the Local Plan HRA and the supporting assessment produced by Bureau Veritas in January 2021 (Local Plan Air Quality Inputs - Dispersion Modelling Assessment).

HRA paragraph 4.32

This states the assumption that only those roads forming part of the primary road network (motorways and 'A' roads) are likely to experience any significant increases in vehicle traffic as a result of development (i.e. greater than 1,000 AADT). On this basis designated sites within 200m of only minor roads have been discounted as unlikely to suffer significant effects from traffic-related air pollution. We agree that this will often be the case, particularly for sites outside of Dover District, but it would be helpful to have confirmation that none of the Plan's larger site allocations are located such that they could lead to significantly increased use of minor roads.

We agree that it is appropriate for all of the following sites to be screened in and taken to the Appropriate Assessment stage as all lie within 200m of a strategic road:

- Sandwich Bay SAC (A256).
- Thanet Coast and Sandwich Bay SPA and Ramsar (A256, A258).
- Dover to Kingsdown Cliffs SAC (A2).
- Lydden and Temple Ewells Down SAC (A2).
- Folkestone to Etchinghill Escarpment SAC (A20, A259, A260)

For NO_x, nitrogen deposition and acid deposition the Appropriate Assessment goes on to conclude

no Adverse Effect on Integrity (either alone or in combination) without the need for plan-specific mitigation for all five of the sites listed above.

The thresholds used to draw this conclusion are correct and the HRA clearly states that impacts have been considered in-combination however we would appreciate the opportunity to explore further with your consultants to confirm that this has been carried out correctly as neither the HRA nor the Blackwood Bayne report provide clear differentiation between figures alone and in-combination.

Despite the conclusion of the conclusion of the Appropriate Assessment paragraph 5.78 goes on to outline mitigation measures which new development should provide and we are supportive of these as general good practice.

Ammonia

In previous non-statutory advice dated 19th Jan 2022 (Our ref: 379423) Natural England flagged the need for your Authority's Local Plan HRA to consider the potential air quality impacts from increased ammonia. This advice was issued after the production of the Blackwood Bayne report but the HRA itself has been updated more recently and yet still contains no reference to this pollutant. This was not raised as part of our statutory Regulation 18 response as it had not emerged as an area of concern at this time.

We understand from recent, informal correspondence with your Authority that this matter has been considered by both your air quality and HRA consultants but due to the lack of clear guidance on it the decision was taken not to make any changes to the HRA. We recognise that this is an emerging issue but there is a growing understanding of the significance of ammonia from road traffic, as catalytic converters, whilst aiding in reducing NOx emissions, can result in increased ammonia emissions (see, for instance [Air Quality Consultants - News - Ammonia Emissions from Roads for Assessing Impacts on Nitrogen-Sensitive Habitats \(aqconsultants.co.uk\)](https://www.aqconsultants.co.uk/news/ammonia-emissions-from-roads-for-assessing-impacts-on-nitrogen-sensitive-habitats))

We would be happy to discuss this further with your Authority to agree a pragmatic way forward.

Recreation

Primary concerns are trampling, erosion of habitats and bird disturbance.

We agree with the HRA's conclusions regarding the following sites (either screened out as no likely significant effect or concluding no Adverse Effect on Integrity (AEOI) without the need for plan-specific mitigation measures):

- **Parkgate Down SAC**
- **Dungeness, Romney Marsh and Rye Bay SPA / Ramsar**
- **Thanet Coast SAC**
- **Margate and Long Sands SAC**
- **Outer Thames Estuary SPA**
- **Stodmarsh SAC**

Sandwich Bay SAC / Thanet Coast and Sandwich Bay SPA / Ramsar

We agree that the additional housing growth proposed in the Plan could have an adverse effect on the integrity on the Thanet Coast and Sandwich Bay SPA and Ramsar site through the pathway of increased recreational pressure / disturbance in the absence of mitigation. We further agree with the mitigation proposed to address this, namely the Thanet Coast and Sandwich Bay SPA Strategic Access Monitoring and Mitigation Strategy (SAMM) – which will result in the provision of targeted access management and educational measures funded by developer contributions. We explicitly agreed the 9km ZOI within which new housing development will be required to contribute to the SAMM in a previous non-statutory response. We fully support the need to secure the SAMM approach through Local Plan Policy NE3.

We would like to correct one point in paragraph 5.85 which currently states that the SAMM was developed to “address the cumulative effects of increased recreational pressure resulting from proposed development in the Local Plan within the defined ZOI of the SPA *in-combination* with existing levels of recreational pressure” This is incorrect as within the terminology of the Habitats Regulations current / baseline levels of impact cannot be considered *in-combination* with likely future impacts.

Lydden and Temple Ewell Downs SAC

This SAC lies close to the Whitfield UE strategic site allocation where Suitable Alternative Natural Greenspaces (SANGs) have been an agreed mitigation measure for new housing since the previous Local Plan was adopted.

We support the HRA’s continued precautionary use of a 4km ZOI even through a more recent survey in 2021 gave a reduced distance of 2.53km (for 75% of visits). At this time the country was still recovering from the aftermath of the covid-19 pandemic and this could still have been affecting visitor behaviour.

We agree that the additional housing growth proposed in the Plan (3,562 new housing units within 4km) could have an adverse effect on the integrity of the SAC through the pathway of increased recreational pressure in the absence of mitigation. We further agree that SANGs within the Whitfield development continue to be an acceptable mitigation approach (the SANG approach having already been agreed as scale-able in relation to other sites). We fully support the need to secure this mitigation approach through explicit policy wording in SAP1.

Dover to Kingsdown Cliffs SAC

Natural England recognises the difficulties in managing recreational pressure on this SAC given that it forms part of the iconic and uniquely attractive White Cliffs of Dover. We note that the visitor surveys undertaken in 2021 by Blackwood Bayne found an average travel distance of 31.14 km with many visitors being drawn from outside Dover District (either visiting directly from home or while on holiday). We further note the extensive visitor management work that is undertaken by the National Trust (who own and manage most of the SAC) and your Authority’s commitment to working with them and other partners on this going forwards.

While monitoring is not mitigation we support the HRA’s recommendation that comprehensive visitor survey information for this site should be updated at least every five years following adoption of the plan. This is on the basis that though not part of this Local Plan your Authority is currently pursuing a tourism growth strategy for the period 2020 to 2030 ‘Destination White Cliffs Country’ so visitor trends relating to this site could see continued change. We would like to be clear where this recommendation is committed to.

Folkestone to Etchinghill Escarpment SAC Stodmarsh SPA and Ramsar site Blean Complex SAC

For these three sites please see our comments regarding the potential for recreational pressure impacts under Policy SP13. We would like to work with your Authority to ensure a balanced approach to the protection of these sites.

Water Quantity and Quality

We agree with the HRA’s conclusions regarding the following sites i.e. that they can be screened out due to distance / lack of hydrological connectivity:

- **Thanet Coast SAC**
- **Margate and Long Sands SAC**

- **Outer Thames Estuary SPA**
- **The Swale SPA and Ramsar site**
- **Dungeness, Romney Marsh and Rye Bay SPA and Ramsar site**

We also previously agreed in September 2022 that based on the further work commissioned by your Authority there will be no significant water quality impacts on the Stodmarsh suite of designated sites via the Dambridge Wastewater Treatment Works.

Sandwich Bay SAC, Thanet Coast and Sandwich Bay SPA/Ramsar

Natural England supports the HRA's conclusions in relation to water quantity and quality for these sites.