

**Dover District Council**

**Dover District Local Plan  
(Reg 19)  
Habitats Regulations  
Assessment**

**Final report**

Prepared by LUC

March 2023



**Dover District Council**

**Dover District Local Plan (Reg 19)  
Habitats Regulations Assessment**

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# Chapter 1

## Introduction

### Background

**1.1** LUC has been commissioned by Dover District Council to carry out a Habitats Regulations Assessment (HRA) of the Dover Local Plan.

**1.2** This iteration of the HRA assesses the impacts of the Regulation 19 version of the Dover District Local Plan and should be read in conjunction with this document.

### Context for the Dover District Local Plan

**1.3** Dover District Council formally adopted its Core Strategy on 24th February 2010. The Core Strategy allocates a number of strategic sites and contains the Core Policies and Development Management Policies to guide the future development of the District. The Core Strategy was followed by a Land Allocations Development Planning Document on 28th January 2015. The Land Allocations Local Plan identifies and allocates specific sites for employment, retail and housing development to deliver the aims of the Core Strategy.

**1.4** Several policy developments have occurred since the adoption of these development planning documents:

- The Regional Spatial Strategy used to determine the scope of the Core Strategy and the housing need of the Plan period has since been revoked and replaced by a National Planning Policy Framework (NPPF) and Guidance (NPPG) in 2012, and which was subsequently updated in 2019. The NPPF and NPPG require the preparation of clear, streamlined Local Plan documents as opposed to multiple development management documents.
- The Government has published a new standard approach for local authorities to follow when assessing housing need and preparing their 5-year housing supply requirements.
- The Government has published a white paper entitled 'Planning for the Future' (August 2020) consulting on various proposals to streamline and reform the planning system, including plan-making. The consultation ran until the end of October 2020. The government are now in the process of considering the consultation responses.

**1.5** Consequently, the Council is in the process of producing a new Local Plan for the District including updating its evidence base to support the Local Plan to 2040. The Local Plan document will include 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.

### The requirement to undertake Habitats Regulations Assessment of Development Plans

**1.6** The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in 2007<sup>1</sup>; the currently applicable version is the Habitats Regulations 2017, as amended<sup>2</sup>. When preparing the development plans, Dover District Council is therefore required by law to carry out an HRA. Dover District Council can commission consultants to undertake HRA work on its behalf and this (the work documented in this report) is then reported to and considered by Dover District Council as the 'competent authority'. Dover District Council will consider this work

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<sup>1</sup> The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 (2007) SI No. 2007/1843. TSO (The Stationery Office), London.

<sup>2</sup> The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579).

and would usually<sup>3</sup> only progress a Plan if it considers that the Plan will not adversely affect the integrity<sup>4</sup> of any 'European site', as defined below. The requirement for authorities to comply with the Habitats Regulations when preparing a Plan is also noted in the Government's online Planning Practice Guidance<sup>5</sup> (PPG).

**1.7** HRA refers to the assessment of the potential effects of a development plan on one or more sites afforded the highest level of protection in the UK: SPAs and SACs. These were classified under European Union (EU) legislation but, since 1 January 2021, are protected in the UK by the Habitats Regulations 2017<sup>2</sup> (as amended). Although the EU Directives from which the UK's Habitats Regulations originally derived are no longer binding, the Regulations still make reference to the lists of habitats and species that the sites were designated for, which are listed in annexes to the EU Directives:

- SACs are designated for particular habitat types (specified in Annex 1 of the EU Habitats Directive<sup>6</sup>) and species (Annex II).
- SPAs are classified for rare and vulnerable birds (Annex I of the EU Birds Directive<sup>7</sup>), and for regularly occurring migratory species not listed in Annex I.

**1.8** The term 'European sites' was previously commonly used in HRA to refer to 'Natura 2000' sites<sup>8</sup> and Ramsar sites (international designated under the Ramsar Convention). However, a Government Policy Paper<sup>9</sup> on changes to the Habitats Regulations 2017 post-Brexit states that:

- Any references to Natura 2000 in the 2017 Regulations and in guidance now refers to the new 'national site network'.
- The national site network includes existing SACs and SPAs; and new SACs and SPAs designated under these Regulations.
- Designated Wetlands of International Importance (known as Ramsar sites) do not form part of the national site network. Many Ramsar sites overlap with SACs and SPAs and may be designated for the same or different species and habitats.

**1.9** Although Ramsar sites do not form part of the new national site network, the Government Policy Paper<sup>10</sup> confirms that all Ramsar sites remain protected in the same way as SACs and SPAs. In LUC's view and unless the Government provides any guidance to the contrary, potential effects on Ramsar sites should continue to form part of the HRA of plans and projects since the requirement for HRA of plans and projects that might adversely affect Ramsar sites forms an essential part of the protection confirmed by the Government Policy Paper. Furthermore, the NPPF<sup>11</sup> and practice guidance<sup>12</sup> currently still state that competent authorities responsible for carrying out HRA should treat Ramsar sites in the same way as SACs and SPAs.

**1.10** The requirement for HRA does not apply to other nationally designated wildlife sites such as Sites of Special Scientific Interest or National Nature Reserves; therefore, for clarity, this report uses the term 'European sites' rather than 'national site network'.

**1.11** The overall purpose of the HRA is to conclude whether or not a proposal or policy, or whole development plan would adversely affect the integrity of the site in question. This is judged in terms of the implications of the plan for a site's 'qualifying features' (i.e. those Annex I habitats, Annex II species, and Annex I bird populations for which it has been designated). Significantly, HRA is based on the precautionary principle. Where uncertainty or doubt remains, an adverse effect should be assumed.

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<sup>3</sup> The exception to this would be where 'imperative reasons of overriding public interest' can be demonstrated; see paragraph 1.17.

<sup>4</sup> The integrity of a site is the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was designated. (Source: UK Government Planning Practice Guidance)

<sup>5</sup> <https://www.gov.uk/guidance/appropriate-assessment>

<sup>6</sup> Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive')

<sup>7</sup> Directive 2009/147/EC of 30 November 2009 on the conservation of wild birds (the 'Birds Directive')

<sup>8</sup> The network of protected areas identified by the EU: [https://ec.europa.eu/environment/nature/natura2000/index\\_en.htm](https://ec.europa.eu/environment/nature/natura2000/index_en.htm)

<sup>9</sup> <https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017>

<sup>10</sup> <https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017>

<sup>11</sup> NPPF para 176, available from <https://www.gov.uk/guidance/national-planning-policy-framework>

<sup>12</sup> The HRA Handbook, Section A3. David Tyldesley & Associates, a subscription based online guidance document: <https://www.dtapublications.co.uk/handbook/European>

## Stages of HRA

Table 1.1 summarises the stages involved in carrying out a HRA based on various guidance documents<sup>13, 14</sup>. This HRA presents the methodology and findings of Stage 1: Screening and Stage 2: Appropriate Assessment.

**Table 1.1: Stage of HRA**

Stage	Task	Outcome
Stage 1: Screening (the 'Significance Test')	<p>Description of the development plan and confirmation that it is not directly connected with or necessary to the management of European sites.</p> <p>Identification of potentially affected European sites and their conservation objectives<sup>15</sup>.</p> <p>Review of other plans and projects.</p> <p>Assessment of likely significant effects of the development plan alone or in combination with other plans and projects, prior to consideration of avoidance or reduction ('mitigation') measures<sup>16</sup>.</p>	<p>Where effects are unlikely, prepare a 'finding of no significant effect report'.</p> <p>Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.</p>
Stage 2: Appropriate Assessment (the 'Integrity Test')	<p>Information gathering (development plan and data on European sites<sup>17</sup>).</p> <p>Impact prediction.</p> <p>Evaluation of development plan impacts in view of conservation objectives of European sites.</p> <p>Where impacts are considered to directly or indirectly affect qualifying features of European sites, identify how these effects will be avoided or reduced ('mitigation').</p>	<p>Appropriate Assessment report describing the plan, European site baseline conditions, the adverse effects of the plan on the European site, how these effects will be avoided through, firstly, avoidance, and secondly, mitigation including the mechanisms and timescale for these mitigation measures.</p>
Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation	<p>Identify and demonstrate 'imperative reasons of overriding public interest' (IROPI).</p> <p>Demonstrate no alternatives exist.</p> <p>Identify potential compensatory measures.</p>	<p>This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous.</p>

**1.12** In assessing the effects of the Local Plan in accordance with Regulation 105 of the Habitats Regulations (as amended), there are potentially two tests to be applied by the competent authority: a 'Significance Test', followed, if necessary, by an Appropriate Assessment which will inform the 'Integrity Test'. The relevant sequence of questions is as follows:

<sup>13</sup> UK Government Planning Practice Guidance, available from <https://www.gov.uk/guidance/appropriate-assessment>

<sup>14</sup> The HRA Handbook. David Tyldesley & Associates, a subscription based online guidance document: <https://www.dtapublications.co.uk/handbook/>

<sup>15</sup> Conservation objectives are published by Natural England for SACs and SPAs:

<sup>16</sup> In line with the CJEU judgment in Case C-323/17 People Over Wind v Coillte Teoranta, mitigation must only be taken into consideration at this stage and not during Stage 1: HRA Screening.

<sup>17</sup> Conservation objectives are published by Natural England for SACs and SPAs.

- Step 1: Under Reg. 105(1)(b), consider whether the plan is directly connected with or necessary to the management of the sites. If not –
- Step 2: Under Reg. 105(1)(a) consider whether the plan is likely to have a significant effect on the site, either alone or in combination with other plans or projects (the ‘Significance Test’). [These two steps are undertaken as part of Stage 1: Screening shown in Table 1.1 above.] If Yes –
- Step 3: Under Reg. 105(1), make an Appropriate Assessment of the implications for the site in view of its current conservation objectives (the ‘Integrity Test’). In so doing, it is mandatory under Reg. 105(2) to consult Natural England, and optional under Reg. 105(3) to take the opinion of the general public. [This step is undertaken during Stage 2: Appropriate Assessment shown in Table 1.1.]
- Step 4: In accordance with Reg.105(4), but subject to Reg.107, give effect to the land use plan only after having ascertained that the plan will not adversely affect the integrity of the European site.

**1.13** It is normally anticipated that an emphasis on Stages 1 and 2 of this process will, through a series of iterations, help ensure that potential adverse effects are identified and eliminated through the avoidance of likely significant effects at Stage 1, and through Appropriate Assessment at Stage 2 by the inclusion of mitigation measures designed to avoid, reduce or abate effects. The need to consider alternatives could imply more onerous changes to a plan document. It is generally understood that so called ‘imperative reasons of overriding public interest’ (IROPI) are likely to be justified only very occasionally and would involve engagement with the Government.

**1.14** The HRA should be undertaken by the ‘competent authority’ - in this case Dover District Council, and LUC has been commissioned to do this on its behalf. The HRA also requires close working with Natural England as the statutory nature conservation body in order to obtain the necessary information and agree the process, outcomes and any mitigation proposals.

## Recent Case Law Changes

**1.15** This HRA has been prepared in accordance with recent case law findings, including most notably the recent ‘People over Wind’ and ‘Holohan’ rulings from the Court of Justice for the European Union (CJEU).

**1.16** The recent ‘People over Wind, Peter Sweetman v Coillte Teoranta’ judgment ruled that Article 6(3) of the Habitats Directive should be interpreted as meaning that mitigation measures should be assessed as part of an Appropriate Assessment and should not be taken into account at the screening stage. The precise wording of the ruling is as follows:

“Article 6(3) .....must be interpreted as meaning 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 measures intended to avoid or reduce the harmful effects of the plan or project on that site.”

**1.17** In light of the above, the HRA screening stage for the Local Plan as not relied upon avoidance or mitigation measures to draw conclusions as to whether the Local Plan would result in Likely Significant Effects on European sites, with any such measures being considered at the Appropriate Assessment stage as appropriate. This is discussed in more detail in **Section 3** below.

**1.18** This HRA also fully considers the recent ‘Holohan v An Bord Pleanala’ (9 Nov 2018) CJEU judgment which stated that:

“Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that an ‘Appropriate Assessment’ must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.

Article 6(3) of Directive 92/43 must be interpreted as meaning that the competent authority is permitted to grant to a plan or project consent which leaves the developer free to determine subsequently certain parameters relating to the construction phase, such as the location of the construction compound and haul routes, only if that authority is certain that

the development consent granted establishes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.

Article 6(3) of Directive 92/43 must be interpreted as meaning that, where the competent authority rejects the findings in a scientific expert opinion recommending that additional information be obtained, the 'Appropriate Assessment' must include an explicit and detailed statement of reasons capable of dispelling all reasonable scientific doubt concerning the effects of the work envisaged on the site concerned."

**1.19** In undertaking this HRA, LUC has fully considered the potential for effects on species and habitats, including those not listed as qualifying features, to result in secondary effects upon the qualifying features of European sites, including the potential for complex interactions and dependencies. In addition, the potential for offsite impacts, such as through impacts to functionally linked land, and or species and habitats located beyond the boundaries of European site, but which may be important in supporting the ecological processes of the qualifying features, has also been fully considered in this HRA.

**1.20** In addition to this, the HRA will take into consideration of the 'Wealden' judgment and the '*Dutch Nitrogen Case*' judgment from the Court of Justice for the European Union.

**1.21** 'Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority' (2017) ruled that it was not appropriate to scope out the need for a detailed assessment for an individual plan or project based on AADT figures detailed in the Design Manual for Roads and Bridges or the critical loads used by DEFRA or Environmental Agency without considering the in-combination impacts with other plans and projects.

**1.22** In light of this judgment, the HRA will therefore consider traffic growth based on the effects of development provided for by the Plan in combination with other drivers of growth such as development proposed in neighbouring districts and demographic change.

**1.23** The 2018 'Coöperatie Mobilisation for the Environment and Vereniging Leefmilieu (Dutch Nitrogen)' judgment stated that:

"May the positive effects of the autonomous decrease in the nitrogen deposition ... be taken into account in the Appropriate Assessment..., it is important that the autonomous decrease in the nitrogen deposition be monitored and, if it transpires that the decrease is less favourable than had been assumed in the Appropriate Assessment, that adjustments, if required, be made"

**1.24** The judgment states that according to previous case law:

"...it is only when it is sufficiently certain that a measure will make an effective contribution to avoiding harm to the integrity of the site concerned, by guaranteeing beyond all reasonable doubt that the plan or project at issue will not adversely affect the integrity of that site, that such a measure may be taken into consideration in the 'Appropriate Assessment' within the meaning of Article 6(3) of the Habitats Directive"

**1.25** The HRA therefore only considers the existence of conservation and/or preventative measures if the expected benefits of those measures are certain at the time of the assessment. The HRA also ensures that if a threshold approach is applied it considers the risk of significant effects being produced even if below the threshold values to ensure that there is no Adverse Effect on Integrity of the European sites.

## Structure of this report

**1.26** This chapter (**Chapter 1**) has described the background to the production of the Local Plan and the requirement to undertake HRA. The remainder of the report is structured into the following sections:

- **Chapter 2: The Local Plan** summarises the content of the Dover District Local Plan Regulation 19, which is the subject of this report.
- **Chapter 3: HRA Method** sets out the approach used, and the specific tasks undertaken during the screening and Appropriate Assessment of the HRA.



- **Chapter 4: HRA Screening Assessment** describes the findings of the screening stage of the HRA.
- **Chapter 5: Appropriate Assessment** sets out the findings of the Appropriate Assessment stage of the HRA.
- **Chapter 6: Conclusions** summarises the HRA conclusions for the Dover District Draft Local Plan Regulation 18 and describes the next steps to be undertaken.

# Chapter 2

## Dover District Local Plan

### Vision

**2.1** The overarching vision for Dover District in 2040 is:

“Dover District in 2040 will be a place of aspiration, providing outstanding opportunities for sustainable living. Initiatives to mitigate against, and adapt to, the climate change emergency will have been undertaken to build resilience across the built and natural environments of the District across the lifetime of the Plan. Through careful stewardship of its world class landscapes, thriving natural environments and wealth of historic sites, Dover District will be a destination of choice for people of all ages to make their home, for businesses to invest in and for visitors to explore and experience. Community spirit will be strong amongst the residents of the district, with an increased sense of health and wellbeing.”

**2.2** The overarching vision is supported by four other themed visions, used as a framework for 17 strategic objectives:

#### Spectacular and sustainable environment

“Above all, the District will be defined by its enviable countryside and coastal environments. The climate change emergency will have resulted in increased local food production, extensive tree planting, and the adoption of sustainable design and construction methods. From the iconic White Cliffs to the nationally valued chalk downlands of the Kent Downs AONB, international, national and locally protected landscapes, wildlife sites, habitats and species will have been protected and enhanced. Air quality and biodiversity will have been improved, and a net gain delivered in biodiversity, as the District achieves significant progress to becoming net zero carbon.”

#### Strategic Objectives

**2.3** Strategic objectives for this theme comprise:

- To respond to the challenges of the climate emergency, ensuring that all new development is designed to adapt to, and mitigate against, the effects of climate change, including by reducing carbon emissions, increasing energy efficiency, and through the integration of design and construction features that enable resilience to the harmful effects of climate change.
- To manage flood risk sustainably in a way that ensures the safety of residents and property, and take opportunities to reduce flood risk where possible.
- To conserve or enhance the designated and undesignated heritage assets of the District in a manner appropriate to their significance, recognising their intrinsic value as a finite resource as well as their contribution to the character of the District and the positive role they can play in the regeneration of the District.
- To conserve and enhance the District’s biodiversity and green infrastructure, including international, national and locally protected landscapes and coastlines, all designated wildlife sites, priority habitats and species and to enhance ecological connectivity between them, delivering a net gain in biodiversity.
- To conserve and enhance the District’s important natural landscapes and water environments, to ensure these assets can continue to be experienced and valued by residents and visitors and are protected from inappropriate development.

## Prosperous Economy

“The local economy will be prosperous and diverse, harnessing the world class potential of the Port of Dover and Discovery Park and building upon the key sectors of life sciences, pharmaceuticals, manufacturing and logistics, digital, creative and cultural development, tourism and the visitor economy, as well as local enterprise and entrepreneurial talent. The District will have attracted new businesses of all scales, with 21st century infrastructure, unrivalled transport connections with London and Europe, alongside home working facilities.

“Dover will be a District that domestic and international visitors want to spend time in, taking advantage of a diverse range of high-quality accommodation, attractions and unique experiences and building upon the world famous White Cliffs and iconic Dover Castle.”

### Strategic Objectives

2.4 Strategic objectives for this theme comprise:

- To grow and diversify the Dover District economy by making it an attractive and competitive place to start, grow and invest in a broad range of businesses, attracting more and better jobs and attracting and retaining working age people.
- To support opportunities to strengthen the role of Dover, Deal and Sandwich town centres through their diversification, enhancement and improvements to the public realm.
- To provide a range of high-quality tourism and visitor facilities, and accommodation and infrastructure, which facilitate the growth of the tourism and visitor economy sector and encourage more visits and longer stays.

## Vibrant Communities

“New developments will blend seamlessly with the existing townscapes to embody the best of local distinctiveness and will have created places that are well-designed and well-built. Built to local design codes, they will respect the spectacular natural environments and rich heritage of the District. New housing will enhance towns and villages, delivering a balanced and resilient housing market, a supply of new homes that meets people’s needs and where affordable and local housing is prioritised.

“Residents will have access to healthy lifestyle opportunities that the District’s high-quality countryside and maritime landscapes provide, including extensive and attractive public green spaces and an enhanced network of dedicated walking and cycling routes, as well as improved educational opportunities and leisure and community services.”

### Strategic Objectives

2.5 Strategic objectives for this theme comprise:

- To provide greater choice of high-quality housing to meet the needs of Dover District’s growing population and changing demographic, and address affordability issues.
- To focus new development at accessible and sustainable locations which can utilise existing infrastructure, facilities and services, and to ensure development contributes to the sustainability of local communities and services, supporting regeneration and wherever possible make the best use of brownfield land.
- To ensure that new buildings and spaces are of the highest design quality, to create attractive, inclusive, healthy places which promote local distinctiveness and a sense of place.
- To provide new and improved community infrastructure and assets, including open space and sports facilities to meet the needs of the District’s communities.

## Thriving Places

“The towns and villages of the District will enjoy improved infrastructure and services, including social and community facilities and accessible, attractive areas of public open space, enhancing the health and wellbeing of residents and improving the quality of life for those living and working here.

The urban expansion of Whitfield, identified as a strategic allocation in the Dover Core Strategy 2010 will continue during the lifetime of this Local Plan and will be delivered over the period to 2050, in accordance with the timescale set out in a revised SPD which will accompany this Plan.

Dover town will be thriving, with a strong core of local shops and services, a flourishing port, and regenerated areas of existing housing. Sensitive restoration of elements of its rich built heritage, will enhance the attractiveness of the town, while improved connections to its seafront will have been delivered by high quality design and investment in place making.

The distinctive historic environments of the towns of Deal and Sandwich will be protected and enhanced, their economies benefiting from a wide range of local businesses and services as well as investment in culture.

“The rural villages of the District will continue to enrich the landscapes here, with improved community facilities and housing opportunities, enabling more young people to stay and contribute to the communities where they grew up.”

## Strategic objectives

- To support improvements in the health and wellbeing of residents, improve quality of life for all and reduce health inequalities through high quality place making, including the provision of high quality green infrastructure and access to attractive areas of public open spaces in the built up areas of the District.
- To improve connectivity and movement through significantly enhancing the provision of walking and cycling routes and other sustainable modes of transport, as well as delivering improvements to the local and strategic road network.
- To ensure infrastructure is delivered, in a timely manner, to support the needs of new and existing communities in the District.
- To work with the Council's partners to ensure that the social, environmental and economic impacts of new developments are mitigated, and that the benefits of new development are captured, to protect the District's people and places.

## Content of the Dover Local Plan

**2.6** The Local Plan comprises of the following sections:

- Strategic Policies
- Strategic and Non-Strategic Housing and Employment Allocations
- Development Management Policies
  - Climate Change
  - Planning for Healthy and Inclusive Communities
  - New Homes
  - Employment and the Local Economy
  - Retail and Town Centres
  - Transport and Infrastructure
  - The Natural Environment
  - The Historic Environment

**2.7** However, for the purposes of the HRA the policies have been grouped into topics as shown below.

## Section 2: Climate Change

**2.8** This section comprises of nine policies, including one strategic policy and eight development management policies, which will respond to the challenges of climate change, ensuring new development is resilient to, and mitigates against the effects of climate change, including by reducing carbon emissions, and designing development that is resilient to the effects of climate change in line with the strategic objectives of the spectacular and sustainable environment theme.

## Section 3: Planning for Healthy and Inclusive Communities

**2.9** This section comprises of seven policies, including one strategic policy and six development management policies that aim to ensure high quality design and place making, which incorporate access to open space and community facilities to develop vibrant communities.

## Section 4: New Homes

**2.10** This section sets out policies for housing delivery in the Local Plan. This comprises of 10 policies, which make provision for new development and outlines guidance for housing type, design and layout. This includes:

- Strategic Policy 3: Housing Growth sets out the strategy to meet the need for 10,998 homes to 2040, including through the allocation of sites for in the region of 5,592 homes across the District.
- Strategic Policy 4: Residential Windfall Development (1,050 homes)
- Strategic Policy 5: Affordable Housing

**2.11** In addition, this section makes provision for the following Housing Policies:

- H1: Types and Mix of Housing
- H2: Rural Local Needs Housing
- H3: Meeting the needs of Gypsies and Travellers
- H4: Gypsy and Traveller Windfall Accommodation
- H5: Self-build and Custom Housebuilding
- H6: Residential Extensions and Annexes
- H7: Housing in Multiple Occupation

## Section 5: Employment and the Local Economy

**2.12** This section sets out strategic policies for the protection and provision of employment sites and outlines guidance for homeworking, tourism, conversion and re-build of rural buildings for employment in the Local Plan. This comprises of five policies, including one strategic policy and four development management policies, including:

- Strategic Policy 6: Economic Growth, which supports the delivery of economic growth in the District, through the following Economic Policies
  - E1: New Employment Development
  - E2 Loss or Redevelopment of Employment Sites and Premises
  - E3: Business Operating from a Residential Property
  - E4: Tourist Accommodation and Attractions

## Section 6: Retail and Town Centres

**2.13** This section comprises of eight policies, including four strategic policies and four development management policies, which set out the strategy for retail and town centres. These policies primarily focus in Dover, Deal and Sandwich town centres. In addition, it provides guidance on the quantity and location of development in these town centres. This includes Strategic Policy

7: Retail and Town Centres, Strategic Policy 8: Dover Town Centre, Strategic Policy 9: Deal Town Centre, and Strategic Policy 10: Sandwich Town Centre.

### Section 7: Transport and Infrastructure

**2.14** This section comprises of seven policies, including two strategic policies and five development management policies, which set out the Local Plan strategy on transport and infrastructure provision in the District. This includes Strategic Policy 11: Infrastructure and Developer Contributions, and Strategic Policy 12: Strategic Transport Infrastructure, which outline the requirement developer contributions to infrastructure networks such as the A2, rail and bus networks.

### Section 8: The Natural Environment

**2.15** This section sets out eight policies, including two strategic and five development management policies, to protect the natural environment, including:

- Strategic Policy 13: Protecting the Districts Hierarchy of Designated Environmental Sites and Biodiversity Assets,
- Strategic Policy 14: Enhancing Green Infrastructure and Biodiversity

**2.16** The remaining policies set out the delivery of biodiversity net gain, the Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy, protection of landscape features, air quality and water quality in the District.

### Section 9: The Historic Environment

**2.17** This section comprises of five policies, including one strategic policy and four development management policies, which set out protection for the historic environment.

### Section 10: Strategic and Non-Strategic Housing and Employment Site Allocation Policies

**2.18** This section sets out the site allocations across each of the following seven Settlements/groups of settlements:

1. Dover
2. Deal
3. Sandwich
4. Aylesham
5. Local Centres: Eastry, Wingham, Ash, Shepherdswell, St Margarets, Kingsdown, and Eythorne/Elvington
6. Larger Villages: Capel-le-Ferne, Lydden, Preston, Worth, Alkham, East Langdon
7. Smaller Villages and Hamlets: Ringwould, Chillenden, Nonnington, Woodnesborough, Staple, Betteshanger, Coldred

## Chapter 3 Method

**3.1** The HRA of the Local Plan comprises of two stages:

- Screening Assessment.
- Appropriate Assessment.

**3.2** The methods undertaken for each of these assessments is provided in more detail below.

### Screening Assessment

**3.3** HRA Screening of the plan has been undertaken in line with current available guidance and seeks to meet the requirements of the Habitats Regulations. The tasks that have been undertaken during the screening stage of the HRA and the conclusions reached are described in detail below. This section sets out policies and impact types for which Likely Significant Effects are predicted or cannot be ruled out prior to mitigation and avoidance measures.

**3.4** The purpose of the screening stage is to:

- Identify all aspects of the plan which would have no effect on a European site, so that that they can be eliminated from further consideration in respect of this and other plans.
- Identify all aspects of the plan which would not be likely to have a significant effect on a European site (i.e. would have some effect, because of links/connectivity, but which are not significant), either alone or in combination with other aspects of the same plan or other plans or projects, which therefore do not require 'Appropriate Assessment'.
- Identify those aspects of the plan where it is not possible to rule out the risk of significant effects on a European site, either alone or in combination with other plans or projects. This provides a clear scope for the parts of the plan that will require Appropriate Assessment.

### Identification of European sites which may be affected by the Plan

**3.5** In order to initiate the search of European sites that could potentially be affected by the Local Plan, it is established practice in HRAs to consider European sites within the local planning authority areas covered by a Plan, and also within a buffer distance from the boundary of the Plan area.

**3.6** A distance of 20km was used to identify European sites likely to be affected by impacts relating to development in Dover District. In addition to this, consideration was also given to European sites connected to the plan area beyond this distance, for example through hydrological pathways or recreational visits by residents of Dover District.

**3.7** European sites identified for inclusion in the HRA are listed below in **Table 3.1** and **Figure 1** in **Appendix A**. Detailed information about each site is provided in **Appendix B**

**Table 3.1: European sites within 20km of Dover District**

European Site	Closest Distance / Location from Dover District
<b>SACs</b> Sandwich Bay	Within the District

European Site	Closest Distance / Location from Dover District
Lydden and Temple Ewell Downs	Within the District
Dover to Kingsdown Cliffs	Within the District
Thanet Coast	0.08km / North
Stodmarsh	0.4km / North-west
Folkestone to Etchinghill Escarpment	0.9km / South-west
Parkgate Down	2.8km / West
Blean Complex	5.4km / North-west
Margate and Long Sands	6.8km / North
Wye and Crundale	11.5km West
Tankerton Slopes and Swalecliffe	11.5 / North-west
<b>SPAs</b>	
Thanet Coast and Sandwich Bay	Within the District
Stodmarsh	0.4km / North-west
Outer Thames Estuary	5km / North
The Swale	15km / North-west
Dungeness, Romney Marsh and Rye Bay	11.5km / South-west
<b>Ramsar sites</b>	
Thanet Coast and Sandwich Bay	Within the District
Stodmarsh	0.4km / North-west
The Swale	15km / North-west
Dungeness, Romney Marsh and Rye Bay	19km / South-west

**3.8** The designated features and conservation objectives of the European sites, together with current pressures on and potential threats, was established using Data Forms for SACs and SPAs<sup>18</sup> and Information Sheets for Ramsar Wetlands published on the JNCC website<sup>19</sup>, as well as Natural England's Site Improvement Plans<sup>20</sup>, Supplementary Advice Notes<sup>21</sup> and the most recent conservation objectives published on the Natural England website (most were published in 2014)<sup>22</sup>. This analysis enabled European site interest features to be identified, along with the features of each European site which determine site integrity and the specific sensitivities and threats facing the site. This information was then used to inform an assessment of how the potential impacts of the Local Plan may result in Likely Significant Effects on each of the European sites in question, either alone or in-combination.

### Assessment of 'Likely Significant Effect'

**3.9** As required under Regulation 105 of The Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'), an assessment has been undertaken of the 'Likely Significant Effects' of the Plan. The assessment has been prepared in order to identify which policies or site allocations would be likely to have a significant effect on European sites. The

<sup>18</sup> These were obtained from the Joint Nature Conservation Committee and Natural England websites ([www.jncc.gov.uk](http://www.jncc.gov.uk) and [www.naturalengland.org.uk](http://www.naturalengland.org.uk))

<sup>19</sup> [www.jncc.defra.gov.uk](http://www.jncc.defra.gov.uk)

<sup>20</sup> Natural England is in the process of compiling Site Improvement Plans for all Natura 2000 sites in England as part of the Improvement programme for England's Natura 2000 sites (IPENS).

<sup>21</sup> Supplementary Advice Notes, Natural England, <http://publications.naturalengland.org.uk/category/6490068894089216>

<sup>22</sup> <http://publications.naturalengland.org.uk/category/6490068894089216>



screening assessment has been conducted without taking pre-embedded mitigation into account, in accordance with the 'People over Wind' judgment.

**3.10** Consideration will be given to the potential for the development proposed to result in significant effects associated with:

- Physical loss of/damage to habitat.
- Non-physical disturbance (noise, vibration and light).
- Non-toxic contamination.
- Air pollution.
- Recreation pressure.
- Changes to hydrology including water quality and quantity.

**3.11** This approach also allows for consideration to be given to the cumulative effects of the site allocations rather than focussing exclusively on individual developments provided for by the Local Plan.

**3.12** A risk-based approach involving the application of the precautionary principle is adopted in the assessment, such that a conclusion of 'no significant effect' will only be reached where it is considered very unlikely, based on current knowledge and the information available, that a proposal in the Local Plan would have a significant effect on the integrity of a European site. The screening assessment identifies assumptions that have been applied to enable specific impacts on European sites to either be screened in or out.

### Interpretation of 'Likely Significant Effect'

**3.13** Relevant case law helps to interpret when effects should be considered as a Likely Significant Effect, when carrying out HRA of a land use plan.

**3.14** In the Waddenzee case<sup>23</sup>, the European Court of Justice ruled on the interpretation of Article 6(3) of the Habitats Directive (translated into Reg. 105 in the Habitats Regulations), including that:

An effect should be considered 'likely', "if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site" (para 44). An effect should be considered 'significant', "if it undermines the conservation objectives" (para 48). Where a plan or project has an effect on a site "but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned" (para 47).

**3.15** An opinion delivered to the Court of Justice of the European Union<sup>24</sup> commented that:

"The requirement that an effect in question be 'significant' exists in order to lay down a de minimis threshold. Plans or projects that have no appreciable effect on the site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill."

**3.16** This opinion (the 'Sweetman' case) therefore allows for the authorisation of plans and projects whose possible effects, alone or in combination, can be considered 'trivial' or de minimis; referring to such cases as those "*which have no appreciable effect on the site*". In practice such effects could be screened out as having no Likely Significant Effect; they would be 'insignificant'.

### Mitigation provided by the Local Plan

**3.17** Some of the potential effects of the Local Plan could be mitigated through the implementation of other policies in the plan itself, such as the provision of green infrastructure within new developments (which could help mitigate increased pressure from

<sup>23</sup> ECJ Case C-127/02 "Waddenzee" Jan 2004.

<sup>24</sup> Advocate General's Opinion to CJEU in Case C-258/11 Sweetman and others v An Bord Pleanala 22nd Nov 2012.

recreation activities at European sites). Nevertheless, in accordance with the recent 'People over Wind' judgment, avoidance and mitigation measures cannot be relied upon at the Screening Stage, and therefore, where such measures exist, they will be considered at the Appropriate Assessment stage for impacts and policies where Likely Significant Effects, either alone or in combination, cannot be ruled out.

## In-combination Effects

**3.18** Regulation 105 of the Amended Habitats Regulations 2017 requires an Appropriate Assessment where:

“a land use plan is likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and is not directly connected with or necessary to the management of the site”.

**3.19** Therefore, it will be necessary to consider whether any impacts identified from the Local Plan may combine with other plans or projects to give rise to significant effects in combination.

**3.20** This exercise will be carried out as part of the screening stage of the HRA. The potential for in-combination effects will only be considered for those Plan components identified as unlikely to have a significant effect alone, but which could act in combination with other plans and projects to produce a significant effect. This approach accords with recent guidance on HRA.

**3.21** The first stage in identifying 'in-combination' effects involves identifying which other plans and projects in addition to the Local Plan may affect the European sites that will be the focus of this assessment. This exercise will seek to identify those components of nearby plans that could have an impact on the European sites considered as part of this HRA, e.g. areas or towns where additional housing or employment development is proposed near to the same European sites (as there could be effects from the transport, water use, infrastructure and recreation pressures associated with the new developments).

**3.22** The potential for in-combination impacts has been focussed on these authorities and any authorities that overlap with European sites considered within this HRA. The findings of any associated HRA work for those plans will be reviewed where available. With help from the Council, any strategic projects in the area that could have in-combination effects with the Local Plan will also be identified and reviewed, if applicable.

**3.23** Should any other plans or projects be identified throughout the HRA process that could lead to in-combination effects on European sites with the Local Plan, they will be included in the review.

**3.24** The HRA Screening will identify and review other plans and projects for consideration of in-combination effects and will outline the components of each plan or project that could have an impact on nearby European sites and considering the findings of the accompanying HRA work (where available). This information will be updated as the HRA work for the Local Plan progresses. The local plans and associated HRAs of the following authorities will be included as a minimum:

- Canterbury District.
- Thanet District.
- Folkestone & Hythe District (Previously Shepway District).
- Ashford District.

**3.25** In addition, the following key plans and projects will be considered for inclusion as they are developed further:

- Stonestreet Green Solar.
- Lower Thames Crossing.
- Proposed Wheelabrator Kemsley (K3 Generating Station) and Wheelabrator Kemsley North (WKN) Waste to Energy Facility.
- Extension to Allington Energy from Waste Facility.
- Thanet Extension Offshore Wind Farm.
- Manston Airport.

- Cleve Hill Solar Park.
- Kemsley Mill K4 Combined Heat and Power Generating Station Development Consent Order.
- Richborough Connection Project.

**3.26** The Government's National Infrastructure Planning website<sup>25</sup> will also be reviewed for major projects that could have significant effects in combination with those of the Local Plan.

### Appropriate Assessment

**3.27** The Appropriate Assessment stage of HRA focuses on those policies and related impacts judged likely to have a significant effect at the Screening stage, and seeks to conclude whether, in light of mitigation and avoidance measures, they would result in an adverse effect on the integrity of the qualifying features of a European site(s), or where insufficient certainty regarding this remains. The integrity of a site depends on the site being able to sustain its 'qualifying features' across the whole of the site and ensure their continued viability.

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<sup>25</sup> <https://infrastructure.planninginspectorate.gov.uk/projects/south-east/>

# Chapter 4

## Screening Assessment

**4.1** As described in **Chapter 4**, a screening assessment was carried out in order to identify the Likely Significant Effects of the Local Plan on the European sites within 20km. The full screening matrix, which sets out the decision-making process used for this assessment can be found in **Appendix C** and the findings are summarised below.

### HRA Screening of Policies

#### No 'Likely Significant Effect' Predicted

**4.2** The following policies are not expected to result in development and therefore will not result in significant effects on European sites:

- CC1: Reducing Carbon Emissions.
- CC2: Sustainable Design and Construction.
- CC3: Renewable and Low Carbon Energy Development.
- CC7: Coastal Change Management Areas.
- CC8: Tree Planting and Protection.
- Strategic Policy 2: Planning for Healthy and Inclusive Communities.
- PM1: Achieving High Quality Design, Placemaking and the provision of Design Codes.
- PM2: Quality of Residential Accommodation.
- Strategic Policy 4: Residential Windfall Development.
- Strategic Policy 5: Affordable Housing.
- H1: Type and Mix of Housing.
- H2: Rural Local Needs Housing.
- H5: Self-build and Custom Housebuilding.
- H7: Houses in Multiple Occupation.
- E2: Loss or Re-development of Employment Sites and Premises.
- E3: Businesses Operating from a Residential Property.
- R1: Primary Shopping Areas
- R2: Sequential Test and Impact Assessment.
- R3: Local Shops.
- R4: Shop fronts.
- Strategic Policy 11: Infrastructure and Developer Contributions.
- TI2: Transport Statements, Assessment and Travel Plans.

- TI3: Parking Provisions on New Development.
- TI4: Overnight Lorry Parking Facilities.
- TI5: Digital Technology.
- NE2: Landscape Character and the Kent Downs AONB.
- Strategic Policy 15: Protecting the Districts Historic Environment
- HE1: Designated and Non-Designated Heritage Assets
- HE2: Conservation Areas
- HE3: Archaeology
- HE4: Historic Parks and Gardens

**4.3** The following policies will not result in development and will contribute to ensuring the safeguarding of European sites:

- Strategic Policy 1: Planning for Climate Change.
- CC4: Water Efficiency.
- CC5: Flood Risk.
- CC6: Surface Water Management.
- PM3: Providing Open Space.
- PM5: Protection of Open Space, Sports Facilities and Local Green Space.
- TI1: Sustainable Transport and Travel.
- Strategic Policy 13: Protecting the Districts Hierarchy of Designated Environmental Sites and Biodiversity Assets.
- Strategic Policy 14: Green Infrastructure and Biodiversity.
- NE1: Biodiversity Net Gain.
- NE3: Thanet Coast and Sandwich bay SPA and Ramsar Mitigation and monitoring Strategy.
- NE4: Air Quality.
- NE5: Water Supply and Quality.
- NE6: The River Dour.

**Policies resulting in development or with potential pathways to European Sites where the scale and location of the impact is negligible, or the effect is insignificant.**

**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:

- PM4: Sports Provision
- PM6: Community Facilities and Services.
- H4: Gypsy and Traveller Windfall Accommodation.
- H5: Residential Extensions and Annexes.
- Strategic Policy 7: Retail and Town Centres
- Strategic Policy 8: Dover Town Centre.
- Strategic Policy 9: Deal Town Centres.

- Strategic Policy 10: Sandwich Town Centre.
- Strategic Policy 12: Strategic Transport Infrastructure.

### Likely Significant Effects predicted

**4.5** The following policies are highlighted as having potential impact pathways to European sites and Likely Significant Effects cannot be ruled out:

- Strategic Policy 3: Housing Growth.
- H3: Meeting the needs of Gypsies and Travellers
- Strategic Policy 6: Economic Growth
- E1: New Employment Development
- E4: Tourist Accommodation and Attractions.
- SAP 1 - Whitfield Urban Expansion
- SAP2 - White Cliffs Business Park
- SAP3 - Dover Waterfront
- SAP4 - Western Heights (Citadel)
- SAP5 - Fort Burgoyne
- SAP6- Dover Mid Town (DOV018)
- SAP7 - Bench Street Dover (DOV017)
- SAP8 - Land adjacent to the Gas Holder (DOV022B)
- SAP9 - Land at Barwick Road Industrial Estate (DOV022E)
- SAP10 - Buckland Paper Mil (DOV023)
- SAP11 - Westmount College (DOV026)
- SAP12 - Charlton Shopping Centre (DOV028)
- SAP13 - Dover Small Site Allocations
- SAP14 - Land off Cross Road (DEA008)
- SAP15 - Land at Rays Bottom (WAL002)
- SAP16 - Deal Small Site Allocations
- SAP17 -Land south of Stonar Lake and to north and east of Stonar Gardens (SAN004)
- SAP18 - Sandwich Highway Depot (SAN006)
- SAP19 - Land at Poplar Meadow (SAN007)
- SAP20 - Woods' Yard (SAN008)
- SAP21 - Land adjacent to Sandwich Technology School (SAN013)
- SAP22 - Land at Archers Low Farm (SAN023)
- SAP23 - Sydney Nursery, Dover Road
- SAP24 - Land to the South of Aylesham (AYL003)
- SAP25 - Aylesham Development Area
- SAP26 - Former Snowdown Colliery

- SAP27 - Land at Dorman Avenue
- SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
- SAP29 - Land on the south eastern side of Roman Way (EYT008)
- SAP30 - Chapel Hill, Eythorne
- SAP31 - Statenborough Farm
- SAP32 - Land at Buttsole Pond (EAS002)
- SAP33 - Eastry Small Sites
- SAP34 - Land at Woodhill Farm (KIN002)
- SAP35 - Land adjacent to Courtlands, Kingsdown
- SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House (SHE004/ TC4S082)
- SAP37 - Shepherdswell Small Sites
- SAP38 - Land adjacent to Reach Road bordering Reach Court Farm (STM003)
- SAP39 - Land to the west of Townsend Farm Road (STM007/ STM008)
- SAP40 - St Margaret's Small Sites
- SAP41 - Footpath Field (WIN0014)
- SAP42 - Wingham Small Sites
- SAP43 - Land at Short Lane, Alkham
- SAP44 - Land to the east of Great Cauldham Farm (CAP006)
- SAP45 - Capel Small Sites
- SAP46 - Land adjacent Langdon Court Bungalow (LAN003)
- SAP47 - Land adjacent to Lydden Court Farm (LYD003)
- SAP48 - Apple Tree Farm and north west of Apple Tree Farm (PRE003/PRE016/PRE017)
- SAP49 - Worth Small Sites
- SAP50 - Land adjacent to Short Street, Chillenden
- SAP51 - Land opposite the Conifers, Coldred
- SAP52 -Prima Windows (NON006)
- SAP53 - Land at Durlock Road, Staple
- SAP54 - Staple Small Sites
- SAP55 - Woodnesborough Small Sites

## HRA Screening of Impacts

**4.6** For some types of impacts, screening for Likely Significant Effects has been determined on a proximity basis, using GIS data to determine the proximity of potential development locations to the European sites that are the subject of the assessment. However, there are many uncertainties associated with using set distances as there are very few standards available as a guide to how far impacts will travel. Therefore, during the screening stage a number of assumptions have been applied in relation to assessing the Likely Significant Effects on European sites that may result from the plan, as described below.

### Physical Damage and Loss (onsite)

4.7 Any development resulting from the Local Plan would take place within the boundary of Dover; therefore, only European sites within the boundary could be affected by physical damage or loss of habitat within the site boundaries. European sites identified within the District and were considered in more detail, included: Sandwich Bay SAC, Dover to Kingsdown Cliffs SAC, Lydden and Temple Ewell Downs SAC and Thanet Coast and Sandwich Bay SPA and Ramsar.

4.8 No development proposed by the Local Plan lies within the boundaries of any European site and therefore **no Likely Significant Effect is predicted as a result of direct physical damage and loss either alone or in-combination with other plans and projects.**

### Physical Damage and Loss – Functionally Linked Land (offsite)

4.9 Habitat loss from development in areas outside of the European site boundaries may result in Likely Significant Effects where that habitat contributes towards maintaining the interest feature for which the European site is designated. This includes land which may provide offsite movement corridors or feeding and sheltering habitat for mobile species such as bats, birds and fish. European sites susceptible to the indirect effects of habitat loss are restricted to those sites with qualifying species that rely on offsite habitat, including:

- Thanet Coast and Sandwich Bay Ramsar.
- Stodmarsh SPA and Ramsar.
- Dungeness, Romney Marsh and Rye Bay SPA and Ramsar
- Outer Thames Estuary SPA.
- Swale SPA and Ramsar.

4.10 Natural England has advised that their recognised distance for the consideration of offsite functionally linked land for coastal wetland birds is generally 2km, but for certain species, including most notably, golden plover and lapwing, a greater distance of 5km may be appropriate<sup>26</sup>. Increased distances may also be appropriate where significant landscape scale features provide important functional linkages within European sites, for example, where river catchment flood plains and valleys extend considerable distances from a European site. No such landscape scale features have been identified for the Dover District Local Plan HRA and therefore the above buffers have been considered appropriate for each of the European sites designated for supporting qualifying bird species.

4.11 Dungeness, Romney Marsh and Rye Bay SPA and Ramsar sites are situated 11.5km and 19km respectively from the District. This European site supports wetland bird species, including golden plover and as such a 5km buffer was applied in this assessment. Whilst the Outer Thames Estuary SPA and Swale SPA and Ramsar were situated 5km and 15.5km from the District respectively. Both European sites supported wetland bird species (excluding lapwing and golden plover) and as such a 2km buffer was applied in this assessment. Given the distance of these European sites, **no Likely Significant Effect to the SPA is predicted as a result of physical damage and loss of functionally linked land either alone or in-combination with other plans and projects.**

### Thanet Coast and Sandwich Bay SPA and Ramsar

4.12 Thanet Coast and Sandwich Bay SPA is located along the coast in the east of the District and is designated for a range of qualifying bird species.

4.13 The SPA and Ramsar supports qualifying bird species, including Golden Plover, Turnstone and Little Tern, which rely on functional offsite habitat. Based on Natural England's recognised distances, a 5km buffer was applied to identify site allocations with potential to affect the SPA and Ramsar. Reference should be made to site allocations within 5km of the SPA and Ramsar in **Figure 2 and 3 in Appendix A.**

<sup>26</sup> Following consultation with Natural England on the HRA of the Regulation 19 Local Plan, it was advised that Natural England's Functionally Linked Land Impact Risk Zone (IRZ) for golden plover and lapwing is 5km for rural large-scale developments (>50 dwellings). This approach was considered proportionate and applied in this assessment.



**4.14** A review of proposed development within the Local Plan identified 22 sites, which fall within 5km of the SPA and Ramsar site and therefore, **there is potential for Likely Significant Effects to occur in relation to physical damage and loss offsite and therefore requires further consideration at Appropriate Assessment.**

#### Stodmarsh SPA and Ramsar

**4.15** Stodmarsh SPA and Ramsar lies outside of the District boundary at 0.4km and therefore no Likely Significant Effect is considered in relation to direct physical damage and loss.

**4.16** However, as this SPA and Ramsar supports qualifying bird species, including Gadwall, Great Bittern and Hen Harrier, which rely on functional offsite habitat. There is potential for proposed development within the Local Plan, which lie within 2km of the European site to result in a likely significant affect. A 5km buffer was not applied for this site as it did not support golden plover or lapwing. Reference should be made to site allocations within 2km of the SPA and Ramsar in **Figure 4 and 5 in Appendix A.**

**4.17** A review of site allocations proposed within the Local Plan identified PRE003, PRE016 and PRE017 within 2km of the SPA and Ramsar and therefore, **there is potential for Likely Significant Effects to occur in relation to physical damage and loss offsite and therefore requires further consideration at Appropriate Assessment.**

#### Non-Physical Disturbance

**4.18** Noise and vibration effects, e.g. during the construction of new housing or employment development, are most likely to disturb bird species and are thus a key consideration with respect to European sites where these species are the qualifying features. Artificial lighting at night (e.g. from streetlamps, flood lighting and security lights) has the potential to affect species where it occurs in close proximity to key habitat areas, such as key roosting sites of SPA birds.

**4.19** There is evidence of 300 metres being used as a distance up to which certain bird species can be disturbed by the effects of noise<sup>27</sup>; however, in line with a precautionary approach as required for HRA, it has been assumed that the effects of noise, vibration and light pollution are capable of causing an adverse effect if development takes place within 500 metres of a European site with qualifying features sensitive to these disturbances. European sites susceptible to non-physical disturbance from proposed development within the District are restricted to European sites, which lie in or within 500m of the District, including Thanet Coast and Sandwich Bay SPA and Ramsar and Stodmarsh SPA and Ramsar. This approach has been applied to HRA of Local Plans for numerous local authorities in the UK, including those in Kent, and it has been considered the application of this buffer is appropriate and in line with a precautionary principle.

**4.20** All other European sites are located over 500m from the District boundary at the closest point and/or do not support mobile species likely to be significantly affected as a result of non-physical disturbance.

#### Thanet Coast and Sandwich Bay SPA and Ramsar

**4.21** The SPA and Ramsar site support qualifying wetland bird species, which are susceptible to disturbance from noise, vibration and increased lighting. A review of site allocations identified residential and employment allocations within 500m. This included:

- SAN004 (160m).
- TC4S032 (200m).
- SAN023 (220m SAC only, 390m SPA and Ramsar).
- WOR006 (280m)\*.
- TC4S076 (400m)\*
- WOR009 (464m)\*.

\*This site allocation relates to impacts to the Ramsar site only.

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<sup>27</sup> British Wildlife Magazine. October 2007.

**4.22 There is potential for Likely Significant Effects to occur in relation to non-physical disturbance and therefore is considered further at Appropriate Assessment.**

**Stodmarsh SAC, SPA and Ramsar**

**4.23** The SPA and Ramsar site support qualifying wetland bird species, which are susceptible to disturbance from noise, vibration and increased lighting. A review of site allocations identified no proposed allocations with 500m of the SAC, SPA and Ramsar and therefore, **no Likely Significant Effect to the SAC, SPA and Ramsar are predicted as a result of non-physical disturbance either alone or in-combination with other plans and projects.**

**Air Pollution**

**4.24** Air pollution is most likely to affect European sites where plant, soil and water habitats are the qualifying features, but some qualifying animal species may also be affected, either directly or indirectly, by deterioration in habitat as a result of air pollution. Deposition of pollutants to the ground and vegetation can alter the characteristics of the soil, affecting the pH and nitrogen levels, which can then affect plant health, productivity and species composition.

**4.25** In terms of vehicle traffic, nitrogen oxides (NO<sub>x</sub>, i.e. NO and NO<sub>2</sub>) are considered to be the key pollutants. Deposition of nitrogen compounds may lead to both soil and freshwater acidification, and NO<sub>x</sub> can cause eutrophication of soils and water.

**4.26** Based on the Highways Agency Design Manual for Road and Bridges (DMRB) Manual Volume 11, Section 3, Part 114 (which was produced to provide advice regarding the design, assessment and operation of trunk roads including motorways), it is assumed that air pollution from roads is unlikely to be significant beyond 200m from the road itself. Where increases in traffic volumes are forecast, this 200m buffer needs to be applied to the relevant roads in order to make a judgement about the likely geographical extent of air pollution impacts.

**4.27** The DMRB Guidance for the assessment of local air quality in relation to highways developments provides criteria that should be applied at the Screening Stage of an assessment of a plan or project, to ascertain whether there are likely to be significant impacts associated with routes or corridors. Based on the DMRB guidance, affected roads which should be assessed are those where:

- Daily traffic flows will change by 1,000 AADT (Annual Average Daily Traffic) or more.
- Heavy duty vehicle (HDV) flows will change by 200 AADT or more.
- Daily average speed will change by 10 km/hr or more.
- Peak hour speed will change by 20 km/hr or more.
- Road alignment will change by 5 m or more.

**4.28** Where significant increases in traffic are possible on roads within 200m of European sites, traffic forecast data may be needed to determine if increases in vehicle traffic are likely to be significant. In line with the Wealden judgment<sup>28</sup>, the traffic growth considered by the HRA should be based on the effects of development provided for by the Plan in combination with other drivers of growth such as development proposed in neighbouring districts and demographic change.

**4.29** It has been assumed 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). As such, where a site is within 200m of only minor roads, no significant effect from traffic-related air pollution is considered to be the likely outcome.

**4.30** The key commuting corridor for new housing and employment development will likely include A2, A256, A258, A299, A20, A259 and A260, which are shown in **Figure 7 in Appendix A**. The following European sites were identified within 200m of a strategic road:

- Sandwich Bay SAC (A256).
- Thanet Coast and Sandwich Bay SPA and Ramsar (A256, A258).

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<sup>28</sup> Wealden v SSCLG [2017] EWHC 351 (Admin)

- Dover to Kingsdown Cliffs SAC (A2).
- Lydden and Temple Ewells Down SAC (A2).
- Folkestone to Etchinghill Escarpment SAC (A20, A259, A260).

**4.31** All other European sites were located further than 200m from the strategic road network for the District and therefore were screened out of the assessment.

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

**4.32** The SAC, SPA and Ramsar lie 60m to the east of the A256. In addition to this, the Ramsar site lies adjacent to the A258. A total proportion of 0.88% of the SAC, 0.55% of the SPA and 0.17% of Ramsar were situated within 200m of these strategic roads. Additionally, A roads were recorded within 200m of the SPA and Ramsar, including the A254, A299 and A28, however due to the location of these roads in relation to the District, impacts from increased traffic as a result of proposed development within the plan was considered negligible.

**4.33** Habitats present within 200m of the A256 and A258 included river, littoral sediment and grassland habitat. These habitats contribute to the value and viability of qualifying habitats and species of the SAC, SPA and Ramsar site and are susceptible to impacts from nitrogen deposition associated with traffic emissions, which can cause competitive plant species to dominate. These habitats have been identified from the corresponding SSSI units to be in favourable condition within 200m of the A256 and ranging from unfavourable – no change/recovering to favourable condition within 200m of the A258.

**4.34** The SAC supports a range of qualifying dune habitat types. These habitats are sensitive to changes in chemical status of the habitat's substrate, accelerating or damaging plant growth, altering vegetation structure and composition and causing the loss of sensitive typical species associated with it. A review of APIS data found current nitrogen deposition levels to be exceeding the lower critical load for all qualifying habitats with exception to humid dune slacks (calcareous), which has a critical load of 15-20kg N/ha/yr. Nitrogen deposition levels was recorded at 10.7kg N/ha/yr as the minimum load and 14.6kg N/ha/yr as the maximum load.

**4.35** In relation to the SPA and Ramsar, which supports a range of qualifying bird species. A review of APIS nitrogen deposition data identified current nitrogen deposition levels to be exceeding lower critical loads for habitats used by qualifying species, including coastal stable dune grassland, shifting coastal dunes and raised/blanket bogs whilst lower critical levels were not exceeded for habitats, such as pioneer, low-mid, mid-upper saltmarshes and low and medium altitude hay meadows. Nitrogen deposition levels was recorded at 10.4kg N/ha/yr as the minimum load and 14.6kg N/ha/yr as the maximum load<sup>29</sup>.

**4.36** As advised by Natural England "*for the purpose of assessing air quality impacts to designated sites the lower critical load limit of the APIS range should be applied.*" It can therefore be concluded that existing levels for habitat types that are present within 200m of the A256 and A258 exceed critical loads. In addition, the A256 and A258 are likely to be subject to increased levels of traffic as a result of proposed employment and residential development in this area of the District. **Therefore, there is potential for Likely Significant Effects to occur in relation to air pollution and therefore requires further consideration at Appropriate Assessment.**

#### Lydden and Temple Ewell Downs SAC

**4.37** The SAC lies 100m to the west of the A2 and supports calcareous grassland, which is vulnerable to impacts from nitrogen deposition associated with traffic emissions, which can cause competitive plant species to dominate. This comprised a total proportion of 2.67% of the SAC.

**4.38** Habitats present within 200m of the A2 comprised entirely of calcareous grassland for which the SAC is designated for. Corresponding SSSI units identified this habitat to be in favourable condition with exception to an area of habitat to the north, which was in unfavourable-recovering condition.

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<sup>29</sup> As there are not critical level loads specifically identified in relation to the Ramsar site, the data provided for the SPA was applied the Ramsar site.

**4.39** A review of APIS data identified nitrogen deposition levels to be exceeding the critical load of 15-25kg N/ha/yr for sub-Atlantic semi-dry calcareous grassland. Nitrogen deposition levels for the SAC was recorded at 16.5kg N/ha/yr as the minimum load and 18.3kg N/ha/yr as the maximum load.

**4.40** An increase in residential and employment sites in Dover District are likely to result in increased traffic levels along the A2 near the SAC and **therefore, there is potential for Likely Significant Effects to occur in relation to air pollution and therefore requires further consideration at Appropriate Assessment.**

#### Dover to Kingsdown Cliffs SAC

**4.41** The SAC lies 130m to the east of the A2 and supports calcareous grassland habitat, which is susceptible to nitrogen deposition associated with traffic emissions, which can act as a fertiliser encouraging non-target plant species to dominate and resulting in increased scrub succession. This can limit the extent and degrade the quality of the qualifying habitat. The total proportion of the SAC within 200m of the A2 was 0.47%.

**4.42** Habitats present within 200m of the A2 included supralittoral rock and calcareous grassland, which are the qualifying features of the SAC. Corresponding SSSI units identified these habitats to be in unfavourable – recovering/no change and favourable condition.

**4.43** A review of APIS data identified nitrogen deposition levels to be exceeding the critical load of 15-25kg N/ha/yr for semi-natural dry grasslands and scrubland facies on calcareous substrates. Nitrogen deposition levels for the SAC was recorded at 12.4kg N/ha/yr as the minimum load and 15.4kg N/ha/yr as the maximum load.

**4.44** The A2 is likely to be subject to increased levels of traffic as a result of proposed employment and residential development in this area of the District. **Therefore, there is potential for Likely Significant Effects to occur in relation to air pollution and therefore requires further consideration at Appropriate Assessment.**

#### Folkestone to Etchinghill Escarpment SAC

**4.45** The SAC lies adjacent to A20 and A260 and within 70m of the A259 and supports calcareous grassland habitat, which is susceptible to atmospheric deposition of nitrogen associated with vehicular emissions. This comprised a total proportion of 26.95% of the SAC. Although, this SAC lies outside of the District, these A-roads are likely to be used frequently by people travelling from Dover District to places, such as Folkestone and Ashford.

**4.46** Habitats present within 200m of these A-roads include calcareous grassland, which the SAC is designated for. Corresponding SSSI units identified this habitat to be in unfavourable-recovering and favourable condition.

**4.47** A review of APIS data identified nitrogen deposition levels to be exceeding the lower critical load of 15-25kg N/ha/yr for sub-Atlantic semi-dry calcareous grassland. Nitrogen deposition levels for the SAC was recorded at 14.4kg N/ha/yr as the minimum load and 17.4kg N/ha/yr as the maximum load.

**4.48** An increase in residential and employment sites in the south of the District is likely to result in increased traffic along these A-roads and **therefore, there is potential for Likely Significant Effects to occur in relation to air pollution and therefore requires further consideration at Appropriate Assessment.**

#### Recreation

**4.49** Recreational activities and human presence can result in significant effects on European sites as a result of erosion and trampling, associated impacts such as fire and vandalism or disturbance to sensitive features, such as birds through both terrestrial and water-based forms of recreation.

**4.50** European sites with qualifying bird species are likely to be particularly susceptible to recreational disturbances from walking, dog walking, angling, illegal use of off-road vehicles and motorbikes, wildfowling, and water sports. An increase in recreational pressure from development therefore has the potential to disturb bird populations of SPA and Ramsar sites as a result of both terrestrial and water-based recreation. In addition, recreation can physically damage habitat as a result of trampling and also through erosion associated with boat wash and terrestrial activities such as use of vehicles.

**4.51** The Local Plan will result in housing growth, and associated population increase within the District. Where increases in population are likely to result in significant increases in recreation at a European site, either alone or in-combination, the potential for Likely Significant Effects will require assessment.

**4.52** Each European site will typically have a 'Zone of Influence' (ZOI) within which increases in population would be expected to result in Likely Significant Effects. ZOIs are usually established following targeted visitor surveys and the findings are therefore typically specific to each European site (and often to specific areas within a European site). The findings are likely to be influenced by a number of complex and interacting factors and therefore it is not always appropriate to apply a generic or non-specific ZOI to a European Site. Particularly in relation to coastal European sites, which have the potential to draw large number of visitors from areas much further afield.

**4.53** At this stage, there is limited information available for the non-coastal European sites within 20km of Dover to determine a specific ZOI. Although, these sites are unique, they do not have the same draw as coastal sites and with recreational activities more easily managed and directed to alternative greenspace in the area. Based on the findings of the visitor survey undertaken at Lydden and Temple Ewells Down SAC in 2010 to inform the Whitfield Urban Extension, a non-specific ZOI of 4km has been applied to Folkestone to Etchinghill Escarpment SAC and Parkgate Down SAC, which support habitats that are directly comparable to Lydden and Temple Ewells Down SAC.

**4.54** For the remaining non-coastal European sites, including Stodmarsh SAC, SPA and Ramsar and Blean Complex SAC, which support woodland and wetland habitat, a non-specific ZOI of 7km was applied based on the typical findings from comparable studies in the south of England, including Epping Forest, Burnham Beeches and Thames Basin Heath. A more specific ZOI may be defined following targeted visitor surveys and discussions with land managers.

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

**4.55** The SAC is designated for supporting a range of dune habitat types and the SPA and Ramsar are designated for supporting qualifying wetland bird species. These habitats and species are particularly susceptible to terrestrial and water-based activities, which can result in physical damage and loss of habitat through trampling and erosion, increased nutrient enrichment can alter the soil chemistry and alter the prevalence of competitive plant species and disturbance of bird species affecting the foraging and roosting patterns of these species.

**4.56** Visitor studies undertaken in 2020 found that 91% of visitors originated from the District. Therefore, any increases in recreational pressure from proposed development in the Local Plan is likely to result in a significant impact on the European sites and will require appropriate avoidance and mitigation measures to be implemented.

**4.57** Based on visitor survey data collected between 2011 and 2020 to inform the Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy, a ZOI of 9km was identified and has been applied in this assessment. A review of residential site allocations identified 755 new housing units proposed within site allocations located in Sandwich, Eastry, Ringwould, Kingsdown, Deal, Worth, Great Mongeham and Woodnesborough.

**4.58** A number of housing units are proposed within the ZOI of the SAC, SPA and Ramsar, which will result in increased levels of recreation in the local area. This has potential to result in increased recreational pressure on the European sites as a result of proposed development within the Local Plan and will require appropriate avoidance and mitigation measures to ensure no adverse effect on the integrity of the European sites.

**4.59 There is potential for Likely Significant Effects to occur in relation to impacts from recreation and therefore requires further consideration at Appropriate Assessment.**

#### **Thanet Coast SAC**

**4.60** The SAC supports submerged or partially submerged sea caves and reefs habitats, which is considered one of the best examples of this habitat type. These habitats are susceptible to impacts from water-based recreational activities, including angling, sailing and SCUBA diving, which can result in physical damage and disturbance.

**4.61** Given the specialist nature of these activities, which is likely to attract visitors from greater distances, it is expected that increased development within the District itself is likely to be relatively minor. However, in line with a precautionary approach it is recommended that the potential impacts of recreational activities are considered in more detail and that avoidance and

mitigation measures are implemented to ensure that increased recreational pressure from the District in-combination with visitors from the wider area do not result in an adverse effect on the integrity of the SAC.

**4.62** There is no ZOI determined for this SAC, however based on studies undertaken in other areas of the UK<sup>30</sup>, it is likely that visitors will travel large distances to undertake water-based coastal activities such as those detailed above. In addition to this, based on data collected for the Thanet Coast and Sandwich Bay SPA along the Thanet District section of the coast as part of the SAMMs, it is understood that visitors to the site travel greater distances beyond the Thanet District and is therefore likely to be affected by visitors travelling from Dover District as well. In line with a precautionary approach the whole of the District has been included within the SAC's ZOI. **There is potential for Likely Significant Effects to occur in relation to impacts from recreation and therefore requires further consideration at Appropriate Assessment.**

#### Lydden and Temple Ewells Down SAC

**4.63** The SAC supports calcareous grassland habitat, which is susceptible to recreational activities, such as walking and dog walking, which can result in physical damage and loss through trampling, removal of orchid species, vandalism or fire and nutrient enrichment, which can alter the soil chemistry and alter the prevalence of competitive plant species.

**4.64** Visitor surveys were undertaken by Blackwood Bayne Ltd on behalf of Dover District Council in July and August 2021<sup>31</sup> to identify the zone of influence within which visitors originate from and to inform how increased development in the District will affect impacts from recreational pressure to this European site. This survey identified a ZOI of 2.53km within which 75% of visitors travelled to site with the average straight-line distance travelled to site 2.91km. Prior to this, a visitor survey was completed between March and August 2010<sup>32</sup> to inform the Whitfield Urban Extension. This visitor survey identified that 75% of visitors to the site travelled within 4km of the SAC with 50% of visitors travelling less than 2km to the site. In line with a precautionary approach, a ZOI of 4km was applied in this assessment.

**4.65** A review of site allocations within 4km of the SAC identified residential site allocations in Dover, Shepherdswell, Alkham, Lydden, Whitfield, Elvington and Eythorne. These have potential to contribute to increased recreational pressure in the SAC.

**4.66** A significant number of housing units are proposed within the ZOI of the SAC, which will result in increased levels of recreation in the local area. This has potential to result in increased recreational pressure on the SAC as a result of proposed development within the Local Plan and will require appropriate avoidance and mitigation measures to ensure no adverse effect on the integrity of the SAC.

**4.67** **There is potential for Likely Significant Effects to occur in relation to impacts from recreation and therefore requires further consideration at Appropriate Assessment.**

#### Dover to Kingsdown Cliffs SAC

**4.68** The SAC supports calcareous grassland habitat and vegetated sea cliffs along the coast, which are likely to be a unique attraction for visitors. The calcareous grassland habitat is likely to be particularly susceptible to impacts from recreational activities, such as walking and dog walking, which can result in physical disturbance through trampling and erosion and nutrient enrichment, which can alter the soil chemistry and alter the prevalence of competitive species. In comparison, impacts to the vegetated cliffs from recreational activities are likely to be limited as the steep cliff habitat cannot be accessed and disturbed from recreational activities.

**4.69** Visitor surveys were undertaken by Blackwood Bayne Ltd on behalf of Dover District Council in July and August 2021<sup>31</sup> to identify the zone of influence within which visitors originate from and to inform how increased development in the District will affect impacts from recreational pressure to this European site. This survey found that approximately half of all visitors travelled from home to visit the site (52%) whilst the remaining visitors comprised of people who were on holiday (48%). The distance travelled varied at each location surveyed at the SAC with the average distance travelled 32.14km. Given the distance that visitors will travel to visit this coastal European site, development proposed within the whole District has been taken into account in this assessment.

<sup>30</sup> Cruickshanks, K., Liley, D., Fearnley, H., Stillman, R., Harvell, P., Hoskin, R. & Underhill-Day, J. (2010). Desk Based Study on Recreational Disturbance to birds on the Humber Estuary. Footprint Ecology / Humber Management Scheme

<sup>31</sup> Blackwood Bayne Ltd (2021), Final Visitor Surveys: Lydden Temple Ewell SAC and Dover to Kingsdown Cliffs SAC July – August 2021

<sup>32</sup> Aspect Ecology (Aug 2010), Lydden and Temple Ewell Downs SAC and NNR Visitors Study

**4.70** There is a significant number of housing units proposed within District which will result in increased levels of recreation in the local area. This has potential to result in increased recreational pressure on the SAC as a result of proposed development within the Local Plan and will require appropriate avoidance and mitigation measures to ensure no adverse effect on the integrity of the SAC.

**4.71 There is potential for Likely Significant Effects to occur in relation to impacts from recreation and therefore requires further consideration at Appropriate Assessment.**

#### Folkestone to Etchinghill Escarpment SAC

**4.72** The SAC is designated for its calcareous grassland habitat with important assemblage of plants, including orchids. This habitat is susceptible to recreational activities, such as walking and dog walking, which can result in physical damage and loss through trampling, removal of orchids, vandalism or fire and nutrient enrichment.

**4.73** There is no specific survey data available, which can be drawn to inform a ZOI for this SAC. However, given the similarities of this European site in comparison to Lydden to Ewell Downs SAC, which are both designated for calcareous grassland, the HRA has drawn from the visitor survey information collected for this site. As detailed above, a precautionary ZOI of 4km has been defined and applied in this assessment for this SAC.

**4.74** A review of site allocations within 4km of the SAC identified three residential site allocations at Capel le Ferne, which comprise 93 new dwellings.

**4.75** Due to the proximity of the SAC from nearby settlements, such as Folkestone, the site is subject to existing high levels of recreation resulting the trampling and theft of rare orchids. It is understood that the management team for the SAC is considering the potential for additional protective measures to conserve the orchid populations.

**4.76** Given the proximity of proposed development within the Local Plan, there is potential for increased recreational pressure to result in a significant effect on the SAC in-combination with visitors travelling to the site from neighbouring districts and will require appropriate avoidance and mitigation measures to ensure no adverse impacts on the integrity of the SAC.

**4.77 There is potential for Likely Significant Effects to occur in relation to impacts from recreation and therefore requires further consideration at Appropriate Assessment.**

#### Stodmarsh SAC

**4.78** The SAC is designated for supporting the Desmoulins whorl snail, which relies on emergent vegetation habitat and which is inaccessible to the public. Due to a lack of access to habitats on which this species relies on, the SAC is therefore not considered susceptible to impacts from recreational activities. In this instance, a ZOI of 7km was not considered appropriate and was not applied in this assessment of the SAC.

**4.79 No Likely Significant Effect to the SAC is predicted as a result of impacts from recreation either alone or in-combination with other plans and projects.**

#### Stodmarsh SPA and Ramsar

**4.80** The SPA and Ramsar site support qualifying wetland bird species, which are susceptible to impacts from recreational disturbance from activities, such as walking and dog walking.

**4.81** A review of site allocations within 7km of the SPA and Ramsar identified residential site allocations in Preston, Wingham and Staple, which comprise 156 new housing units to have potential to contribute to increased recreational pressure in the European sites.

**4.82** Although, there is not a significant number of housing units proposed within the 7km ZOI of the SPA and Ramsar, there is potential for increased recreational pressure to result in a significant effect on the European sites in combination with visitors travelling to the site from neighbouring districts. To ensure no adverse effects on the integrity of the SPA and Ramsar, this will require appropriate avoidance and mitigation measures, which will be considered at the Appropriate Assessment.

**4.83 There is potential for Likely Significant Effects to occur in relation to impacts from recreation and therefore requires further consideration at Appropriate Assessment.**

### Parkgate Down SAC

**4.84** The SAC is designated for its calcareous grassland habitat and is considered to be important as an orchid rich site. The site is therefore susceptible to impacts from recreation as a result of physical disturbance from trampling, vandalism or fire and from changes in nutrient levels as a result of dog's being walked on the site, which may increase the prevalence of competitive species.

**4.85** The SAC is managed as a nature reserve by the Kent Wildlife Trust (KWT). There are no public rights of way entering the site and a warden is employed by KWT to manage and monitor the site and oversee implementation of access restrictions to protect sensitive ecological features including the orchid assemblage for which the site is designated as a SAC. The entire site is in favourable condition, which is evidence of the effectiveness of the current management of the SAC.

**4.86** No site allocations were identified within 4km of the SAC and therefore, **no Likely Significant Effect to the SAC are predicted as a result of impacts from recreation either alone or in-combination with other plans and projects.**

### Blean Complex SAC

**4.87** The SAC is designated for its oak-hornbeam woodland habitat, which is susceptible to recreational disturbance from recreational activities, which result in compaction of soil, particularly around ancient and veteran trees and damage to woodland habitat through antisocial activities, such as vandalism and fires. Most of the SAC lies over 7km from the District with exception to a parcel of land located immediate north-west of the District. Recreational impacts are therefore limited to a small area of the SAC, which lie within the 7km ZOI, which has been applied to this site.

**4.88** A review of site allocations within 7km of the SAC identified residential site allocations at Preston, which comprise 75 new housing units, to have potential to contribute to increased recreational pressure in the European sites in-combination with other plans and projects.

**4.89** The number of housing units proposed is relatively low and is therefore considered unlikely to have a significant effect on the SAC on its own. **However, there is potential for Likely Significant Effects in-combination with other plans and policies to impacts from recreation and therefore requires further consideration at Appropriate Assessment.**

### Margate and Long Sands SAC

**4.90** The SAC is designated for supporting sandbanks which are slightly covered by sea water all the time and mudflats and sandflats not covered by seawater at low tide. There is potential for these habitats to be affected by water-based recreational activities, such as sailing and fishing, which may erode and damage the sandbanks and mudflats.

**4.91** Although, recreational impacts are likely to be limited as a result of proposed development within the District, given the potential for people to travel great distances undertake these specialist activities and in line with a precautionary approach, it is recommended that impacts as a result of recreation are considered in more detail at the Appropriate Assessment.

**4.92** **There is potential for Likely Significant Effects from increased recreation in-combination with other plans and policies to occur and therefore requires further consideration at Appropriate Assessment.**

### Outer Thames Estuary SPA

**4.93** The SPA is designated for supporting the qualifying red throated diver. There is potential for this species to be affected by disturbance from water-based recreational activities, such as sailing and fishing.

**4.94** Although, recreational impacts are likely to be limited as a result of proposed development within the District, given the potential for people to travel great distances undertake these specialist activities and in line with a precautionary approach, it is recommended that impacts as a result of recreation are considered in more detail at the Appropriate Assessment.

**4.95** **There is potential for Likely Significant Effects from increased recreation in-combination with other plans and policies to occur and therefore requires further consideration at Appropriate Assessment.**

### Dungeness, Romney Rye Bay and Marsh SPA and Ramsar

**4.96** This SPA and Ramsar supports qualifying wetland bird species, which are susceptible to impacts from terrestrial and water-based recreational activities.



**4.97** However, given the distance between the District and the European site, which via the road network is at least 20km at the closest point to the SPA and at least 30km at the closest points to the Ramsar to travel from the district boundary to these European sites and due to the presence of similar coastal sites within the District, it is considered unlikely for impacts from recreation as a result of proposed development in the Local Plan to significantly affect the SPA and Ramsar.

**4.98 No Likely Significant Effect to the SPA and Ramsar is predicted as a result of impacts from recreation either alone or in-combination with other plans and projects.**

### Water Quantity and Quality

**4.99** An increase in demand for water abstraction and treatment resulting from the growth proposed in the Plan could result in changes in hydrology at European sites. Depending on the qualifying features and particular vulnerabilities of the European sites, this could result in Likely Significant Effects; for example, due to changes in environmental or biotic conditions, water chemistry and the extent and distribution of preferred habitat conditions. Given the distance and lack of direct hydrological connectivity, no likely significant effect was considered in relation to the following European sites: Thanet Coast SAC, Margate and Long Sands SAC, Outer Thames Estuary, The Swale SPA and Ramsar and Dungeness, Romney Marsh and Rye Bay SPA and Ramsar

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

**4.100** The SAC supports sand dune habitats and the SPA and Ramsar supports qualifying bird species, which are reliant on coastal and estuarine habitat. These habitats are hydrologically connected to watercourses within the District and are therefore susceptible to changes in water quality and quantity as a result of increased demand in water abstraction and treatment from proposed growth within the District.

**4.101** The North East Kent Site Improvement Plan (SIP) has identified water quantity and quality to be a key threat to these European sites with increases in water quantity altering the plant communities associated with the sand dune habitats and changes in water quantity as a result of insufficient treatment of water at WwTW affecting habitats, which bird species rely to forage. An increase in development within the catchment areas, including North and South Streams and Stour Marshes, which are hydrologically connected to the SAC, SPA and Ramsar site will therefore have potential to result in a Likely Significant Effect on the SAC, SPA and Ramsar.

**4.102 There is potential for Likely Significant Effects from changes in water quantity and quality in-combination with other plans and policies to occur and therefore requires further consideration at Appropriate Assessment.**

### Stodmarsh SAC, SPA and Ramsar

**4.103** The SAC, SPA and Ramsar site support qualifying species, Desmoulin's whorl snail, invertebrates and wetland bird species, which are reliant on wetland habitat. Therefore, these European sites are susceptible to changes in water quality and quantity as a result of increased demand in water abstraction and treatment from proposed growth within the District.

**4.104** There is evidence showing that these European sites are currently subject to high levels of nitrogen and phosphorous input to its water environment, which are causing eutrophication of these designated sites. A key contributor to these high levels of nutrients is from wastewater from existing housing and agricultural sources. Therefore, any increase in demand for wastewater treatment is likely to result in a significant effect to the European sites.

**4.105** A small portion of Dover District partially lies within the Little Stour and Wingham catchment area, which has been identified by Natural England to be hydrologically connected to the Stodmarsh SAC, SPA and Ramsar site. The specific contributor from the district is Dambridge WwTW, which discharges its effluent via the Wingham River to the Little Stour and then at its confluence to the River Stour, which is 7km downstream from the Stodmarsh Lakes system and which is being pumped up to the level of the tidal reach by the Stourmouth Pumping Station. Any nutrient inputs from activities in the district would therefore need to be transported upstream by this distance and will only be discharged to the lower Little Stour when the pumps are in operation.

**4.106** A Water Quality Modelling Study<sup>33</sup> has been undertaken by APEM on behalf of Dover District Council to undertake an investigation into potential connectivity between Dambridge WwTW and the water bodies at Stodmarsh and as such have potential to affect nutrient levels into the Stodmarsh Lakes System. The model demonstrated that there is potential hydrological connectivity between Dambridge WwTW and the Stodmarsh Lakes System in extreme conditions but due to the high levels of dilution that there won't be any measurable contribution to the effluent discharge to nutrient loading in the lakes from the District itself. This approach has been discussed with Natural England from the outset and they have since confirmed on 25<sup>th</sup> August 2022 that they “agree that the figures provided demonstrate that any additional nutrients reaching Stodmarsh SAC/SPA/Ramsar as a result of new connections to Dambridge WwTW would be insignificant alone and in combination.”. It is understood that Natural England will be updating their advice on the Stour Catchment in light of the information provided in the report prepared by APEM<sup>34</sup>.

**4.107** In relation to water quantity, there are no abstraction points identified within the District, which are hydrologically connected the SAC, SPA and Ramsar. In addition, the WCS confirms that both Southern Water and Affinity Water WRMPs are robust and appropriately account for how they will accommodate for future growth in each respective catchment area whilst considering environmental conditions.

**4.108** No Likely Significant Effect to the SAC, SPA and Ramsar are predicted as a result changes in water quantity and quality either alone or in-combination with other plans and projects.

## Summary of Screening Assessment

**4.109** Table 4.1 below summarises the Screening conclusions reached in this HRA. Impact types for which a conclusion of No Likely Significant Effect (LSE) was reached are shown with no colour. Those potential impacts where LSEs cannot be ruled out are shown in orange and these are considered in more detail at the Appropriate Assessment stage in **Section 5**.

Table 4.1: Summary of Screening Assessment

European sites	Physical Damage and Loss	Non-physical Disturbance	Air Pollution	Recreation	Water Quantity and Quality
Sandwich Bay SAC	No LSE	No LSE	<u>Potential LSE</u>	<u>Potential LSE</u>	<u>Potential LSE</u>
Thanet Coast and Sandwich Bay SPA and Ramsar	<u>Potential LSE</u>	<u>Potential LSE</u>	<u>Potential LSE</u>	<u>Potential LSE</u>	<u>Potential LSE</u>
Dover to Kingsdown Cliffs SAC	No LSE	No LSE	<u>Potential LSE</u>	<u>Potential LSE</u>	No LSE
Lydden and Temple Ewell Downs SAC	No LSE	No LSE	<u>Potential LSE</u>	<u>Potential LSE</u>	No LSE
Folkestone to Etchinghill Escarpment SAC	No LSE	No LSE	<u>Potential LSE</u>	<u>Potential LSE</u>	No LSE
Stodmarsh SAC	No LSE	No LSE	No LSE	No LSE	No LSE

<sup>33</sup> APEM (2022), Stodmarsh Water Quality Modelling

<sup>34</sup> Natural England (2022), Letter in response to Impact on Stodmarsh Lakes from development served by Dambridge WwTW – updated hydrological study.

European sites	Physical Damage and Loss	Non-physical Disturbance	Air Pollution	Recreation	Water Quantity and Quality
Stodmarsh SPA and Ramsar	<u>Potential LSE</u>	No LSE	No LSE	<u>Potential LSE</u>	No LSE
Thanet Coast SAC	No LSE	No LSE	No LSE	<u>Potential LSE</u>	No LSE
Parkgate Down SAC	No LSE	No LSE	No LSE	No LSE	No LSE
Blean Complex SAC	No LSE	No LSE	No LSE	<u>Potential LSE</u>	No LSE
Margate and Long Sands SAC	No LSE	No LSE	No LSE	<u>Potential LSE</u>	No LSE
Wye and Crundale Downs SAC	No LSE	No LSE	No LSE	No LSE	No LSE
Tankerton Slopes and Swalecliffe SAC	No LSE	No LSE	No LSE	No LSE	No LSE
Outer Thames Estuary SPA	No LSE	No LSE	No LSE	<u>Potential LSE</u>	No LSE
Dungeness, Romney Marsh and Rye Bay SPA and Ramsar	No LSE	No LSE	No LSE	No LSE	No LSE
The Swale SPA and Ramsar	No LSE	No LSE	No LSE	No LSE	No LSE

## Chapter 5

### Appropriate Assessment

**5.1** Following the screening stage, the plan-making authority is required under Regulation 105 of the Habitats Regulations 2017 (as amended) to make an 'Appropriate Assessment' of the implications of the plan for European sites, in view of their conservation objectives.

**5.2** European Commission Guidance<sup>35</sup> states that the Appropriate Assessment should consider the impacts of the plan (either alone or in combination with other projects or plans) on the integrity of European sites with respect to their conservation objectives and to their structure and function.

**5.3** This stage seeks to determine whether implementation of the Local Plan will result in an adverse effect on the integrity of the whole European site in question (many European sites are made up of a number of fragments of habitat). It also considers the potential for in-combination effects from development proposed in neighbouring authorities' Local Plans. Consideration was given to mitigation measures that may be included in the Local Plan to reduce the likelihood and significance of effects on European sites.

**5.4** A European site's integrity depends on it being able to sustain its 'qualifying features' (i.e. those Annex 1 habitats, Annex II species, and Annex 1 bird populations for which it has been designated) and to ensure their continued viability. A high degree of integrity is considered to exist where the potential to meet a European site's conservation objectives is realised and where the European site is capable of self-repair and renewal with a minimum of external management support. Appropriate Assessment therefore needs to focus on those impacts judged likely to have an effect on the qualifying features of European sites, or where insufficient certainty regarding this remained at the screening stage.

**5.5** Likely Significant Effects arising from the Local Plan, either alone or in-combination, were identified for the following sites and impact types:

- **Physical damage and loss** – in relation to Thanet Coast and Sandwich Bay SPA and Ramsar, Stodmarsh SPA and Ramsar..
- **Non-physical Disturbance** – in relation to Thanet Coast and Sandwich Bay SPA and Ramsar.
- **Air Pollution** – in relation to Sandwich Bay SAC, Thanet Coast and Sandwich Bay SPA and Ramsar, Lydden and Temple Ewell Downs SAC, Dover to Kingsdown Cliffs SAC and Folkestone to Etchinghill Escarpment SAC.
- **Recreation** – in relation to Sandwich Bay SAC, Thanet Coast and Sandwich Bay SPA and Ramsar, Lydden and Temple Ewell Downs SAC, Dover to Kingsdown Cliffs SAC and Folkestone to Etchinghill Escarpment SAC, Stodmarsh SPA and Ramsar, Thanet Coast SAC, Blean Complex SAC, Margate and Long Sands and Outer Thames Estuary.
- **Water Quantity and Quality** – in relation to Sandwich Bay SAC and Thanet Coast and Sandwich Bay SPA and Ramsar.

**5.6** Appropriate Assessment has been undertaken for these European sites to determine whether the Local Plan will result in Adverse Effects on Integrity.

**5.7** The Appropriate Assessment focuses on those impacts that are judged likely to have a significant effect on the qualifying features of a European site, or where insufficient certainty regarding this remained at the screening stage. As described in **Chapter 1**, a conclusion needs to be reached as to whether or not a policy or site allocation in the Local Plan would adversely

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<sup>35</sup> Assessment of plans and projects significantly affecting European sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. European Commission Environment DG, November 2001.

affect the integrity of a European site. To reach a conclusion, consideration was given to whether the predicted impacts of the proposals (either alone or in combination) have the potential to:

- Delay the achievement of conservation objectives for the site.
- Interrupt progress towards the achievement of conservation objectives for the site.
- Disrupt factors that help to maintain the favourable conditions of the site.
- Interfere with the balance, distribution and density of key species that are the indicators of the favourable condition of the site.

**5.8** The conservation objectives for the above European sites are to ensure that the integrity of the site is maintained or restored as appropriate, and to ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

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

## Physical Damage and Loss – Functionally Linked Land (Offsite)

### Thanet Coast and Sandwich Bay SPA and Ramsar

**5.9** The Local Plan proposes development in areas where qualifying SPA and Ramsar bird species may make use of offsite habitat for foraging, roosting and loafing. Proposed allocations with potential to result in a Likely Significant Effect as a result of physical damage and loss were identified in the screening assessment and included the following site allocations: SAN004, SAN005, SAN008, SAN011, SAN013, SAN019, SAN023, EAS002, EAS009, WOO005, WOO006, WOR006, WOR009, DEA008, GTM003, WAL002, TC4S008, TC4S023, TC4S032, TC4S047 and TC4S076.

**5.10** A desk-based study was undertaken to identify potential impacts from proposed allocations on offsite habitat used by the qualifying bird species. The desk-based study has relied on a sequential approach, whereby if a site's suitability for qualifying bird species is considered negligible or low for a specific reason (e.g. distance or habitat type) no further investigations for that allocation were carried out. If, following the initial review of distance and habitat, a site's potential suitability for qualifying bird species could not be ruled out, a more detailed assessment including mapping of existing relevant bird records may be required. The initial desk study included the following components to inform the assessment:

- Identification of the bird species which are susceptible to the loss of the habitat types affected and ruling out those species unlikely to utilise the habitat types located within the site allocations (e.g. species restricted to marine habitats).
- A review of aerial imagery and Magic Map Application to identify main habitat types and land use within each site allocation and establish their potential value for qualifying birds.
- Recognition of factors likely to affect suitability of allocations for bird species, including openness, size, shape, proximity of negative factors such as tall boundary features and urban environs, and potential existing sources of disturbance.
- Consideration of the site's location within the landscape. For example, is there direct functional connectivity along flight lines between the allocation and the European sites? Are there landscape scale features which would reduce the suitability of the allocation, e.g. urban areas located along flight lines?
- A review of the site's location within flood risk zones, because many of the SPA bird species favour sites which do or do not flood.

## Bird Habitat Preferences

**5.11** Bird habitat preferences were cross referenced against the habitat types present within each allocation to determine the suitability of site allocations for qualifying species. Known habitat preferences are summarised in **Table 5.1** below, which were taken from Birds of the Western Palearctic, British Trust for Ornithology. **Table 5.1** also assesses whether each bird species is susceptible to the loss of habitats located within the site allocations

**Table 5.1: Typical Habitat Preferences for Qualifying Bird Species**

Bird Species	Season	Species Habitat Preferences (relative to season of designation)	Susceptible to loss of offsite habitat as a result of the Local Plan
European Golden Plover <i>Pluvialis apricaria</i>	Wintering	On migration and in winter, attracted to mown grass or close-grazed pastures, and to stubbles, fallows, harvest fields, and other farmlands of open character, including floodlands.  On coast, tends to neglect tidal flats of mud and sand and to prefer open ground above the foreshore thus sharing more commonly with Lapwings than with other waders.	<b>Yes – may utilise arable and pasture.</b>
Turnstone <i>Arenaria interpres</i>	Wintering	Outside breeding season almost entirely coastal, preferring shores which are stony, rocky, or covered with seaweed, and similar artefacts such as sea walls and breakwaters, harbours, and jetties.	No – habitat types affected are of low importance for this species.
Little Tern <i>Sterna albifrons</i>	Breeding	Frequently coast dwelling, more along mainland than on islands, but spreads freely up suitable reaches of major rivers and to some lakes where suitable conditions occur.  Strongly prefers linear strips of bare shingle, shell beach, or sand, only just above normal tide or flood limits, and often only a few metres from shallow clear water, saline or fresh, where fish of suitable size can be caught by plunging, without necessity for extended foraging flights.	No – habitat types affected are of low importance for this species.

**5.12** The review of habitat types located within the site allocations, in light of individual bird species preferences, identified the golden plover as being potentially susceptible to the loss of offsite habitat associated with site allocations proposed within the Local Plan.

**5.13** Following a review of the species habitat preferences and in line with previous discussions with Natural England with regards to recognised buffers zones within which this species is likely to rely on offsite habitats a distance of 5km was applied in relation to Thanet Coast and Sandwich Bay SPA. As Thanet Coast and Sandwich Bay Ramsar site was designated for turnstone, no further assessment was undertaken in relation to this European site.

## Assessment of Site Allocations

Following the establishment of typical habitat preferences for each species, each site allocation proposed in the Local Plan within 5km of the SPA and Ramsar was assessed for its suitability in supporting Golden Plover. The assessment was based on a number of parameters, as described in **Table 5.2** below. Typically, site allocations displayed varying combinations of the parameters outlined below and were therefore subject to professional judgement and interpretation.

**Table 5.2: Habitat suitability rating criteria**

Suitability for SPA and Ramsar Birds	Typical Description
High	Large sites; area of suitable habitat (e.g. wet grasslands, permanent pastures, arable) capable of supporting significant numbers of SPA birds; absence of any notable negative factors such as PRow and edge features; land parcel functionally linked with wider habitat and directly linked to SPA/Ramsar via green corridor; site may be prone to flooding (although note absence of flooding favoured by lapwing and golden plover); typically close to SPA/Ramsar and coast.
Moderate	Sites support large areas of functionally linked suitable habitat capable of attracting numbers of SPA birds which by themselves are unlikely to be significant, but which may contribute to supporting significant numbers of birds in-combination with other sites. Likely to be further from SPA/Ramsar and coast, and with presence of some limiting factors.
Low	Smaller or fragmented sites; habitats present may be suitable for supporting low numbers of SPA birds on occasion but limited by negative factors such as size, distance from SPA/Ramsar; absence of sight lines and reductions in 'openness' as a result of edge features such as trees, scrub, and buildings; edge features likely to be close to centre of site; suitability may be compromised by existing recreational use; may be isolated within urban areas.
Negligible	Habitats present are entirely unsuitable for SPA birds, for example existing developed land or small urban infill sites.

**Table 5.3: Suitability of Allocations for Qualifying Golden Plover Species**

Site allocation name	Review of site parameters	Assessment of Suitability for SPA Qualifying birds
SAN004 Land south of Stonar Lake and to north and east of Stonar Gardens, Stonar Road, Sandwich	c. 0.19km from the SPA Area: Species considered: European Golden Plover Industrial and urban landscape, small areas of grassland and scattered trees.	Negligible
SAN006 Sandwich Highway Depot/Chippies Way Ash Road, Sandwich	1.3km from the SPA Area: 2.09Ha Species considered: European Golden Plover Car park, urban landscape and surrounding area of grassland and scrub with hedgerows and trees lining the site.	Low
SAN007 Land known as Poplar Meadow, Adjacent to 10 Dover Road, Sandwich	0.96km from the SPA Area: 1.58Ha Species considered: European Golden Plover Grassland area next to arable field, the railway and residential housing. Site lined with small hedgerow.	Low
SAN008 Woods' Yard, rear of 17 Woodnesborough Road, Sandwich	1.2km from the SPA Area: 0.70Ha Species considered: European Golden Plover A few houses on the edge of a static caravan park, developed and urban land with some scrub.	Negligible

Site allocation name	Review of site parameters	Assessment of Suitability for SPA Qualifying birds
SAN011 Discovery Park Enterprise Zone, Sandwich	Adjacent to the SPA Area: 77.04Ha Species considered: European Golden Plover Industrial and urban landscape, small areas of grassland and scattered trees.	Negligible
SAN013 Land adjacent to Sandwich Technology School, Deal Road, Sandwich.	1.35, m from the SPA Area: 3.42 Species considered: European Golden Plover Two arable fields bound by two roads and residential development.	Low
SAN019 Sydney Nursey, Dover Road, Sandwich	2km from the SPA Area: 0.38Ha Species considered: European Golden Plover Small field on the edge of the road adjoining other grassland fields.	Low
SAN023 Land at Archers Low Farm, St George's Road, Sandwich	0.45km from the SPA Area: 2.19Ha Species considered: European Golden Plover Arable field on the edge of housing, site lined with trees.	Moderate
EAS002 Land at Buttsole Pond, Lower Street, Eastry	1.5km from the SPA Area: 3.93Ha Species considered: European Golden Plover Small arable field on the edge of a larger arable area.	Moderate
EAS009 Eastry Court Farm, Eastry	4.2km from the SPA Area: 0.84Ha Species considered: European Golden Plover Industrial building/warehouse, surrounded by hardstanding, a few smaller outbuildings with some scrub around the boundary of the site and a few scattered trees.	Negligible
WOO005 Beacon Lane Nursery, Beacon Lane, Woodnesborough	4km to the SPA Area: 0.73Ha Species considered: European Golden Plover Industrial area, warehouses, car parks and small amounts of scrub on border of site to the NW.	Negligible
WOO006 Land south of Sandwich Road, Woodnesborough	2.7km from the SPA Area: 1.27Ha Species considered: European Golden Plover	Moderate



Site allocation name	Review of site parameters	Assessment of Suitability for SPA Qualifying birds
	Arable fields along edge of The Street, backing on to other arable fields.	
WOR006 Land to the east of Jubilee Road	1.4 km from the SPA Area: 0.56Ha Species considered: European Golden Plover Edge of an arable field adjacent to Jubilee Road.	Low
WOR009 Land to east of former Bisley Nursery, The Street, Worth	1.5km from the SPA Area: 0.83Ha Species considered: European Golden Plover Small area at the edge of a housing estate, possibly a worksite with some scrub overgrowing the bare ground, lined by hedgerows on two sides.	Negligible
DEA008 Land off Cross Road, Deal	3.2km to the SPA Area: 8.73Ha Species considered: European Golden Plover Large area of arable land, with an area of thicker scrub and scattered tree in the NW corner and along the W boundary.	High
GTM003 Land to the east of Northbourne Road, Great Mongeham	3.3km from the SPA Area: 0.77Ha Species considered: European Golden Plover Small area of grassland with a short hedgerow on the SW boundary and small areas of scrub along the boundary with Northbourne Road.	Low
WAL002 Lan at Rays Bottom between Liverpool Road and Hawksdown	4.3km from the SPA Area: 4.45Ha Species considered: European Golden Plover N end of an arable field adjacent to Liverpool Road and a small area of woodland.	Moderate
TC4S008 Bridleway Riding School, Station Road, Deal	3.7km from the SPA Area: 1.09ha Species considered: European Golden Plover A small field of grassland bound by hedgerows. Small areas of building and hardstanding.	Low
TC4S023 Land adjacent to Cross Farm, Eastry, Near Sandwich	4.5km from the SPA Area: 0.44ha Species considered: European Golden Plover	Low

Site allocation name	Review of site parameters	Assessment of Suitability for SPA Qualifying birds
	Two small pasture fields, a hedgerow along the N boundary, residential housing to the N and S.	
TC4S032 Ethelbert Road Garages, Deal	0.24km from the SPA Area: 0.09Ha Species considered: European Golden Plover Buildings and hardstanding	Negligible
TC4S047 104 Northwall Road, Deal	0.6km from the SPA Area: 0.28ha Species considered: European Golden Plover Buildings and hardstanding with grassland and hedgerow boundary in the N.	Negligible
TC4S076 Statenborough Farm, Felderland Land, Worth, Deal	3.5km from the SPA and 0.4km from the Ramsar site Area: 0.8ha Species considered: European Golden Plover Building and hardstanding with grassland in the S.	Negligible

**5.14** The desk-based review of site allocations identified that the majority of site allocations are considered to have low or negligible potential to support significant numbers of SPA/Ramsar qualifying bird species, either alone or cumulatively with other allocations, and were therefore discounted from further consideration in terms of offsite functional land.

**5.15** However, the desk-based review also identified four site allocations with moderate potential and one site with high potential to support Golden Plover. These sites provide suitable habitat for golden plover in the form of arable fields and short grazed pasture, which are common and widespread in the District. These sites was not considered to support habitats or features notable value, rarity or which populations are likely to be dependent on. In isolation the importance of such sites for Golden Plover are likely to be low with the extensive areas of habitat of greater suitability both within the District and the wider land areas surrounding these European sites. As a result, the potential for the loss of offsite habitat to adversely affect these species relates primarily to the cumulative effect of reducing the extent of feeding areas. Given the dependency of these species on offsite arable fields and grasslands, inclusion and implementation of appropriate safeguards and mitigation will be required in Local Plan to provide certainty that there will be no adverse effect on the integrity of the SPA.

### Stodmarsh SPA and Ramsar

**5.16** The Local Plan proposes development in areas where qualifying SPA and Ramsar bird species may make use of offsite habitat for foraging, roosting and loafing. Proposed allocations with potential to result in a Likely Significant Effect as a result of physical damage and loss were identified in the screening assessment and included PRE003, PRE016 and PRE017.

**5.17** A desk-based study was undertaken to identify potential impacts from proposed allocations on offsite habitat used by the qualifying bird species. This was completed in line with the method detailed above be **para 5.11, 5.12 and 5.15**.

### Bird Preferences

Bird habitat preferences were cross referenced against the habitat types present within each allocation to determine the suitability of site allocations for qualifying species. Known habitat preferences are summarised in **Table 5.4** below, which were taken from Birds of the Western Palearctic, British Trust for Ornithology. **Table 5.4** also assesses whether each bird species is susceptible to the loss of habitats located within the site allocations.

Table 5.4: Typical Habitat Preferences for Qualifying Bird Species

Bird Species	Season	Species Habitat Preferences (relative to season of designation)	Susceptible to loss of offsite habitat as a result of the Local Plan
Gadwell <i>Anas strepera</i>	(Breeding/Non-Breeding)	In winter, tends towards local concentration in suitable shallow sheltered parts of large wetlands, lakes, deltas, estuaries, or lagoons.	No – habitat types affected are of low importance for this species.
Great Bittern <i>Botaurus stellaris</i>	Wintering and Breeding	Closely restricted to lowland swamps and densely vegetated wetlands with extensive shallow standing water, not unduly fluctuating in level. Favours tracts or fringes overgrown with tall emergent vegetation, especially reed, giving dense cover close to sheltered open waters.	No – habitat types affected are of low importance for this species.
Hen Harrier <i>Circus cyaneus</i>	Wintering	In winter, often on arable farmland or rough pastures, or on heathland, coastal sand-dunes, and marshy areas. Habitat selection largely governed by availability of preferred prey species which can be seized in the open; otherwise, not discriminating but choosing spacious, relatively undisturbed landscapes rather than areas in intensive human use.	<b>Yes – may utilise arable and pasture in areas away from existing human settlements.</b>
Northern Shoveler <i>Anas clypeata</i>	Breeding and Wintering	They use shallow wetlands with submerged vegetation during the breeding season, nesting along the margins and in the neighbouring grassy fields. Outside of the breeding season they forage in saltmarshes, estuaries, lakes, flooded fields, wetlands, agricultural ponds, and wastewater ponds	<b>Yes – may utilise arable and pasture.</b>
Ruff <i>Philomachus pugnax</i>	Passage	Outside breeding season, the need for proximity between feeding, resting, and roosting places is reduced, with local movements of up to c.20km from one another sometimes being undertaken. Although dry grasslands, harvested cornfields, airfields, and dried beds of seasonal water bodies may still be used, preference is much stronger for muddy margins of lakes, pools, ponds, rivers and other watercourses, irrigated levels, floodlands, and marshes; less frequently seashores and tidal mudflats.	<b>Yes – may utilise arable and pasture.</b>
<b>Waterbird Assemblage</b>			
Water Rail <i>Rallus aquaticus</i>  28 individuals representing an average of 6.2% of the GB population (5yr peak mean 1998/9-2002/3)	Wintering and Resident	Reed beds and other marshy sites with tall, dense vegetation, building its nest a little above the water level from whatever plants are available nearby	No – habitat types affected are of low importance for this species.

**5.18** The review of habitat types located within the site allocations, in light of individual bird species preferences, identified the hen harrier, northern shoveler and ruff as being potentially susceptible to the loss of offsite habitat associated with site allocations proposed within the Local Plan.

**5.19** Following a review of the species habitat preferences and in line with previous discussions with Natural England with regards to recognised buffers zones within which this species is likely to rely on offsite habitats a distance of 2km was applied.

#### Assessment of Site Allocations

**5.20** Following the establishment of typical habitat preferences for each species, each site allocation proposed in the Local Plan within 2km of the SPA and Ramsar was assessed for its suitability in supporting hen harrier, northern shoveler and ruff as detailed in **Table 5.5**.

**Table 5.5: Suitability of Site Allocations for Qualifying Bird Species**

Site allocation name	Review of site parameters	Assessment of Suitability for SPA Qualifying birds
PRE017 Site north-west of Appletree Farm, Stourmouth Road	1.1km from SPA and Ramsar Area: 2.53Ha Species considered: Hen Harrier, Northern Shoveler and Ruff Medium sized arable field with a hedgerow on the NW boundary.	High
PRE016 Site north of discovery Drive, Preston	1.8km from SPA and Ramsar Area: 1.10Ha Species considered: Hen Harrier, Northern Shoveler and Ruff Car park and areas of bare ground and hard standing, with a hedgerow on the NE boundary.	Negligible
PRE003 Apple Tree Farm, Stourmouth Road	1.7km from SPA and Ramsar Area: 0.76Ha Species considered: Hen Harrier, Northern Shoveler and Ruff Caravan/camping site with amenity grassland, scattered trees, and hard standing throughout. Also, a number of small buildings in the S of the site.	Low

**5.21** The desk-based review of site allocations identified two of the three site allocations were considered to have low or negligible potential to support significant numbers of SPA/Ramsar qualifying bird species, either alone or cumulatively with other allocations, and were therefore discounted from further consideration in terms of offsite functional land.

**5.22** The third site allocation was identified with high potential to support these qualifying bird species. The site identified above provides suitable offsite foraging habitat for qualifying bird species in the form of arable fields, which are common and widespread in the District. This site was not considered to support habitats or features notable value, rarity or which populations are likely to be dependent on in isolation the importance of this site for these species is likely to be low when compared with the extensive areas of habitat of greater suitability both within the District and the wider land areas surrounding these European sites. As a result, the potential for the loss of offsite habitat to adversely affect these species relates primarily to the cumulative effect of reducing the extent of feeding areas. Given this is the only site allocation with potential to affect these qualifying bird species, the impacts of proposed development is considered unlikely to adversely affect the integrity of the European site.

**5.23** Following consultation with Natural England on the HRA of the Regulation 19 Local Plan, it was advised that impacts from the proposed development in the Local Plan to hen harrier are considered unlikely to be significant alone or in-combination with other plans and projects due to the extent of suitable habitat present within the District and given the low

densities of this species in the local area. In addition to this, Natural England advised that the key concern for ruffs from development relates to disturbance of roost sites, however it was considered that that development would need to be significantly closer to the SPA and Ramsar site than the site allocation identified for impacts to arise.

**5.24** Given the dependency of these species on offsite arable fields and grasslands, inclusion and implementation of appropriate safeguards and mitigation will be required in Local Plan to provide certainty that there will be no adverse effect on the integrity of the SPA and Ramsar site.

### Mitigation

**5.25** To provide certainty that the loss of offsite functional habitat will not adversely affect the integrity of the Thanet Coast and Sandwich Bay SPA and Ramsar, Stodmarsh SPA and Ramsar and Dungeness, Romney Marsh and Rye Bay SPA, it is recommended that the following safeguard measures are implemented at the project level:

- Wintering bird surveys are required for sites with high and moderate suitability to support these qualifying bird species to determine their individual and cumulative importance for these species and inform mitigation proposals. This specifically relates to sites identified in relation to Thanet Coast and Sandwich Bay SPA.
- A commitment to mitigation is required within the Local Plan dependent on the findings of bird surveys. This will need to take into account the cumulative numbers of SPA birds affected by the allocations as they come forward for development. In the unlikely but possible event that cumulative numbers of SPA birds affected are likely to exceed thresholds of significance (i.e. >1% of the associated European Site), appropriate mitigation in the form of habitat creation and management in perpetuity, either on-site or through provision of strategic sites for these species elsewhere within Dover District, will be required. If required, mitigation will need to create and manage suitably located habitat which maximises feeding productivity for these SPA species, and such mitigatory habitat would need to be provided and be fully functional prior to development which would affect significant numbers of SPA birds. Due to the common and widespread nature of the habitats present it is considered with certainty that mitigation can be easily achieved through the creation of alternative habitat of equal or greater value should a significant number of qualifying birds be found to utilise the site. This approach has been approved at recent Examination in Public for other coastal Local Authorities, including North Essex Authorities.

**5.26** Specific wording is provided in Strategic Policy 13: Protecting the Districts Hierarchy of Designated Environmental Sites and Biodiversity Assets, which outlines the requirement for site allocations identified in this HRA to implement the above safeguard measures.

**5.27** In addition to this, policies within the Local Plan will provide safeguards and mitigation measures from physical damage and loss of habitats. This includes: Strategic Policy 13: Protecting the Districts Hierarchy of Designated Environmental Sites and Biodiversity Assets, Strategic Policy 14: Enhancing Green Infrastructure and Biodiversity, NE3: Thanet Coast and Sandwich bay SPA Mitigation and Monitoring Strategy, PM3: Providing Open Space and PM5: Protection of Open Space, Sports Facilities and Local Green Space

### Conclusion

**5.28 Providing the above mitigation measures incorporated into the Local Plan are implemented successfully, adverse effects on the integrity of the Thanet Coast and Sandwich Bay SPA and Ramsar and Stodmarsh SPA and Ramsar , as a result of damage and loss of habitat will be avoided.**

## Non-physical Disturbance

### Thanet Coast and Sandwich Bay SPA and Ramsar

**5.29** Proposed allocations in the Local Plan identified within 500m of the SPA and Ramsar have potential to result in a Likely Significant Effect on qualifying bird species as a result of disturbance from noise and vibrations and from increased light spill. Site allocations identified in the Screening Assessment included: SAN004, TC4S032, SAN023, WOR006, TC4S076 and WOR009. .

## Mitigation

**5.30** To provide certainty that non-physical disturbance will not adversely affect the integrity of the Thanet Coast and Sandwich Bay SPA and Ramsar, it is recommended that any development site within 500m is required to demonstrate the provision of suitable best practice construction measures, including detailed site-specific working methods and sensitive timings of work, as part of a Construction Environmental Management Plan. Detailed mitigation and avoidance measures would need to be informed by a site-specific assessment undertaken at the project level.

**5.31** The Local Plan includes wording in Strategic Policy 14: Enhancing Green infrastructure and Biodiversity, which stipulates the requirement for any proposals to protect habitats and species for European designated sites. This policy states:

"proposals must safeguard features of nature conservation interest, and retain, conserve and enhance habitats, including internationally, nationally and locally designated sites"

**5.32** In addition, the Local Plan includes in-built safeguard and mitigation measures in Strategic Policy 13: Protecting the Districts Hierarchy of Designated Environmental Sites and Biodiversity Assets, which specifies that:

"Development within 500m of the Thanet Coast and Sandwich Bay SPA, SAC and Ramsar sites will only be permitted where a project level assessment has demonstrated, in accordance with the Habitat Regulations, that any proposal will not adversely affect the integrity of these sites, with specific regard to non-physical disturbance."

## Conclusion

**5.33** Providing the above mitigation measures are incorporated into the Local Plan and are implemented successfully, adverse effects on the integrity of the Sandwich bay SAC, Thanet Coast and Sandwich Bay SPA and Ramsar, Dover to Kingsdown Cliffs SAC and Lydden to Temple Ewell Downs SAC, as a result of damage and loss of habitat will be avoided.

## Air Pollution

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

**5.34** The SAC, SPA and Ramsar is situated along the eastern coastline of the District and is comprised of a wide range of coastal habitat, including sand dunes, sandy coastal grassland mudflats, saltmarsh, chalk cliffs, freshwater grazing marsh, scrub and woodland. The sand dunes, which the SAC is designated for and the sandy coastal grassland, mudflats, saltmarsh and freshwater grazing marsh, which the qualifying bird species of the SPA and Ramsar rely on, are susceptible to atmospheric deposition of nitrogen associated with vehicular emissions.

**5.35** The northern section SAC, SPA and Ramsar adjacent to Ramsgate Road and Pegwell Bay Country Park and the river Stour section of these sites were located within 200m of the A256. In addition to this, an inland section of the Ramsar site at Hacklinge was recorded adjacent to the A258 on either side. The total proportion of these European sites within 200m of a strategic road comprised of 0.88% of the SAC, 0.55% of the SPA and 0.17% of Ramsar site.

**5.36** Corresponding SSSI units, which overlap the SAC, identified the following within 200m of the strategic roads:

- Unit 6 – the A259 (Richborough Way) lies 130m to the west of the SAC, SPA and Ramsar.
- Unit 7 – the A259 (Ramsgate Road) lies 80m to the west of the SAC, SPA and Ramsar.
- Unit 8 – the A259 (Ramsgate Road) 60m to the east of the SAC, SPA and Ramsar.
- Unit 44 – the A258 lies adjacent the Ramsar site in the west.
- Unit 45 – the A258 lies adjacent the Ramsar site in the west.
- Unit 55 – the A258 lies 40m to the east of the Ramsar site.
- Unit 56 – the A258 lies adjacent to the Ramsar site in the east.

- Unit 57 – the A258 lies 40m to the east of the Ramsar site.

**5.37** A review of the SSSI site condition assessments was undertaken to confirm the current condition of the component SSSI units of the SAC in areas susceptible to the effects of air quality. This approach confirmed that in terms of current condition, Unit 6, 7 and 8 to be in favourable condition. The SSSI Units 55, which overlaps the Ramsar site, was found to be in favourable condition. Whilst Units 44, 45 and 57 were in 'unfavourable – recovering', due to poor ditch conditions, which are currently being managed but are not yet considered to meet the appropriate conditions and presence of algae in Unit 57. Unit 56 was identified as being in 'unfavourable – no change' condition, due to inappropriate ditch management and presence of high levels of algae from high levels of phosphate. This is thought to be due to water quality issues relating to the South Stream, which runs along the northern and eastern boundary of these SSSI units rather than from air quality issues.

**5.38** It is recognised that Common Standards Monitoring, which is used to monitor the condition of the component SSSIs, was not designed to recognise adverse effects associated with deposition of pollutants, and often habitats are slow to display visible signs of the effects of changes in air quality. Therefore, the absence of apparent adverse factors does not necessarily indicate an absence of effects associated with nutrient enrichment and airborne pollutants in particular in relation to A256.

**5.39** An Air Quality Assessment<sup>36</sup> was undertaken to assess the impacts of development in the Local Plan. Impacts were considered in relation to nitrogen oxide, nitrogen deposition and acid deposition at ecological receptor points, which were located within European sites at the closest point to the road to demonstrate the maximum impact. The assessment stipulated that it is likely that deposition rates will be at a lower level across the rest of the European site. The assessment was completed based on two scenarios, including Do Minimum and Do Something scenarios. The findings of the assessment are presented below.

#### Nitrogen Oxide (NOx)

**5.40** The assessment identified four ecological receptor locations, including ER30 and ER33, which lie within the Ramsar site only and ER45 and ER45, which lies within the SAC, SPA and Ramsar site, to exceed NOx thresholds in relation to respective Air Quality Standards (AQS) for both scenarios. Whilst the background rate at each receptor location was found to exceed the minimum critical load, the process contribution of the Local Plan was calculated to be below 1µg m-3 at all receptor locations. Therefore, it was concluded that NOx levels resulting from development in the Local Plan will not be significant.

#### Nitrogen Deposition

**5.41** The assessment identified one ecological receptor location, ER24, which lies within the Ramsar site only, to result in a negative process contribution. This represents a reduction in contribution towards nitrogen deposition from modelled roads in the Do Something Scenario.

**5.42** Overall, whilst the background rate at each receptor location was found to exceed the minimum critical load, the process contribution of nitrogen deposition of the Local Plan was calculated to be less than 1% of the minimum critical load. Therefore, it was concluded that nitrogen deposition levels resulting from development in the Local Plan will not be significant.

#### Acid Deposition

**5.43** The assessment identified one ecological receptor location, ER24, present in an area of the Ramsar site only, to result in a negative process contribution. This represents a reduction in contribution towards acid deposition.

**5.44** Overall, whilst the background rate at each receptor location was found to exceed the minimum critical load, the process contribution of acid deposition of the Local Plan was calculated to be less than 1% of the minimum critical load. Therefore, it was concluded that acid deposition levels resulting from development in the Local Plan will not be significant.

**5.45** Based on the findings of the Air Quality Assessment it can be concluded that no Adverse Effect on Integrity will occur in relation to air pollution as a result of proposed development either alone or in-combination. This will be supported by mitigation measures that are detailed below and will be implemented as part of the Local Plan.

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<sup>36</sup>Bureau Veritas, (2020), Local Plan Air Quality Inputs - Dispersion Modelling Assessment.

### Lydden and Temple Ewell Downs SAC

**5.46** The Lydden and Temple Ewell Downs SAC is located in the south of the District. The SAC supports some of the richest calcareous grassland in Kent, which is situated on steep south-west facing slopes on thin soils. On the shallower slopes, areas of scrub and woodland have established at the top of the slopes and areas of woodland at the base of the slopes. The SAC is comprised of 61.7ha, which support calcareous grassland. This qualifying habitat is susceptible to atmospheric deposition of nitrogen associated with vehicular emissions.

**5.47** The Site Improvement Plan outlines that current levels of nitrogen deposition exceed the critical load for calcareous grassland and recognises that air pollution as a result of nitrogen deposition is an existing pressure at the site. This is supported by data provided by APIS, which shows that existing nitrogen deposition levels exceed the lower critical level loads of 15-25kg N/ha/yr. Nitrogen deposition levels were 16.5kg N/ha/yr at the minimum and 18.3kg N/ha/yr at the maximum.

**5.48** Sections of the SAC lies within 200m of the A2 between Dover and Canterbury. This comprises a total proportion of 2.67% of the SAC. Given the proportion of the SAC with potential to be affected by air pollution from vehicle emission, it is likely that impacts will be minimal and unlikely to adversely affect the integrity of the SAC. However, as this A-Road is likely to be a key commuting corridor between Dover and Canterbury and the wider area for people within the District, air pollution impacts from an increase of development within the District cannot be ruled out at this stage.

**5.49** Corresponding SSSI units, which overlap the SAC, identified the following within 200m of the strategic roads:

- Unit 1 – the A2 lies within 170m to the north of the SAC.
- Unit 2 – the A2 lies 190m to the east of the SAC.
- Unit 5 – the A2 lies 100m to the north-east of the SAC.

**5.50** A review of the SSSI site condition assessments was undertaken to confirm the current condition of the component SSSI units of the SAC in areas susceptible to the effects of air quality. This approach confirmed that in terms of current condition, Unit 2 and 5 are in favourable condition. The most recent condition assessment of Unit 1 confirmed that the unit is in 'unfavourable recovering' condition due to overgrazing by livestock and rabbits. This issue has been addressed in part by reducing the levels of grazing by livestock, however rabbit grazing continues to remain high. It is recognised that Common Standards Monitoring, which is used to monitor the condition of the component SSSIs, was not designed to recognise adverse effects associated with deposition of pollutants, and often habitats are slow to display visible signs of the effects of changes in air quality. Therefore, the absence of apparent adverse factors does not necessarily indicate an absence of effects associated with nutrient enrichment and airborne pollutants.

**5.51** To determine the impacts of air pollution in relation to proposed development within the Local Plan in relation to the SAC, SPA and Ramsar, an Air Quality Assessment was undertaken. The findings of the assessment are presented below.

- Nitrogen Oxide (NO<sub>x</sub>)
  - No ecological receptor locations were found to exceed NO<sub>x</sub> thresholds in relation to respective AQS for both scenarios. Therefore, it was concluded that NO<sub>x</sub> levels resulting from development in the Local Plan will not be significant.
- Nitrogen Deposition
  - The assessment identified two ecological receptor locations, ER13 and ER14, which lie within the SAC, to result in a negative process contribution. This represents a reduction in contribution towards nitrogen deposition from modelled roads in the Do Something Scenario.
  - Overall, whilst the background rate at each receptor location was found to exceed the minimum critical load, the process contribution of nitrogen deposition from the Local Plan is calculated to be less than 1% of the minimum critical load. Therefore, it was concluded that nitrogen deposition levels resulting from development in the Local Plan will not be significant.
- Acid Deposition



- The assessment identified two ecological receptor locations, ER13 and ER14, which lie within the SAC, to result in a negative process contribution. This represents a reduction in contribution towards acid deposition from modelled roads in the Do Something Scenario.
- Overall, whilst the background rate at each receptor location was found to exceed the minimum critical load, the process contribution of acid deposition from the Local Plan was calculated to be less than 1% of the minimum critical load. Therefore, it was concluded that acid deposition levels resulting from development in the Local Plan will not be significant.

**5.52** Based on the findings of the Air Quality Assessment it can be concluded that no Adverse Effect on Integrity will occur in relation to air pollution as a result of proposed development either alone or in-combination. This will be supported by mitigation measures that are detailed below and will be implemented as part of the Local Plan.

### Dover to Kingsdown Cliffs SAC

**5.53** Dover to Kingsdown Cliffs SAC is situated along the coastline in the south of the District. The SAC is comprised of 183.35ha vegetated cliffs, which support calcareous grassland interspersed with areas of scrub. The calcareous grassland for which the site is designated for is susceptible to atmospheric deposition of nitrogen associated with vehicular emissions.

**5.54** A section of the SAC in the west lies within 200m of the A2, which runs into Dover. The total proportion of the SAC within 200m of the A2 is 0.47%. Given the proportion of the SAC with potential to be affected by air pollution from vehicle emission, it is likely that impacts will be minimal and unlikely to adversely affect the integrity of the SAC. However, as this A-Road is likely to be a key road for people travelling to and from Dover, air pollution impacts from an increase of development within the District cannot be ruled out at this stage. This is particularly likely to be the case, given that a large proportion of the site allocations are proposed in the Dover area.

**5.55** Corresponding SSSI units, which overlap the SAC, identified the following within 200m of the strategic roads:

- Unit 10 – the A2 lies 150m to the west of the SAC.
- Unit 12 – the A2 lies 150m to the west of the SAC.
- Unit 13 – the A2 lies 130m to the west of the SAC.
- Unit 14 – the A2 lies 140m to the west of the SAC.
- Unit 15 - the A2 lies 150m to the west of the SAC.

**5.56** A review of the SSSI site condition assessments was undertaken to confirm the current condition of the component SSSI units of the SAC in areas susceptible to the effects of air quality. This approach confirmed that in terms of current condition, Unit 10, 12, and 13 are in favourable condition whilst Unit 14 was in 'unfavourable - recovering' condition due to encroachment of scrub, which is being managed and Unit 15 was in 'unfavourable – no change', which remains unmanaged and failing to meet the condition assessment as a result of scrub cover, sward height, species composition and grass to herb ratio. The change in species composition and encroachment of scrub cover could be in part caused by changes in soil chemistry as a result of increased levels of nitrogen deposition.

**5.57** To determine the impacts of air pollution in relation to proposed development within the Local Plan in relation to the SAC, SPA and Ramsar, an Air Quality Assessment was undertaken by Bureau Veritas UK Ltd. The findings of the assessment are presented below.

- Nitrogen Oxide (NOx)
  - No ecological receptor locations were found to exceed NOx thresholds in relation to respective AQS for both scenarios. Therefore, it was concluded that NOx levels resulting from development in the Local Plan will not be significant.
- Nitrogen Deposition
  - Overall, the background rate at each receptor location in the SAC was found to exceed the minimum critical load with the process contribution of nitrogen deposition from the Local Plan to be calculated as less than 1% of the minimum

critical load. Therefore, it was concluded that nitrogen deposition levels resulting from development in the Local Plan will not be significant.

■ Acid Deposition

- Overall, the background rate at each receptor location was found to exceed the minimum critical load with the process contribution of acid deposition from to the Local Plan to be calculated as less than 1% of the minimum critical load. Therefore, it was concluded that acid deposition levels resulting from development in the Local Plan will not be significant.

**5.58** Based on the findings of the Air Quality Assessment it can be concluded that no Adverse Effect on Integrity will occur in relation to air pollution as a result of proposed development alone and in-combination with other plans and projects. This will be supported by mitigation measures that are detailed below and will be implemented as part of the Local Plan.

### Folkestone to Etchinghill Escarpment SAC

**5.59** The Folkestone to Etchinghill Escarpment SAC is located in the north-east of Folkestone & Hythe District, which lies adjacent to Dover District, and is situated along a natural chalk escarpment at the northern edge of Folkestone. The SAC is composed of a total area of 263.25 ha, supporting broadleaved woodland and calcareous grasslands. The grassland habitats for which this SAC has been designated are susceptible to atmospheric deposition of nitrogen associated with vehicular emissions.

**5.60** The Site Improvement Plan specifies that current levels of nitrogen deposition exceed the critical load for calcareous grassland habitat at the site and recognises that air pollution as a result of nitrogen deposition is an existing pressure at the site. This is supported by data provided by APIS, which shows that existing nitrogen deposition levels exceed the lower critical level loads of 15-25kg N/ha/yr. Nitrogen deposition levels were 14.4kg N/ha/yr at the minimum and 17.4kg N/ha/yr at the maximum.

**5.61** The majority of the SAC is located beyond 200m from strategic road with a total proportion of 26.95% within 200m of a strategic road, including the A20, A260 and A259. These roads represent key commuting corridors between Dover District to places, such as Folkestone and Ashford in the surrounding area. It is therefore likely that an increase in development within Dover District to have the potential to result in a Likely Significant Effect on the SAC.

**5.62** Corresponding SSSI units, which overlap the SAC, identified the following within 200m of the strategic roads:

- Unit 7 - the A260 (Canterbury Road) is adjacent to Sugar Loaf Hill within the SAC; the A20 is adjacent to Castle Hill and Round Hill within the SAC, and the A259 which is 65m to the south of the Sugar Loaf Hill section of the SAC.
- Unit 8 - the A260 (Canterbury Road) is adjacent to Wingate Hill within the SAC, and the B2011 is adjacent to Creteway Down at the south easternmost section of the SAC.

**5.63** A review of the SSSI site condition assessments was undertaken to confirm the current condition of the component SSSI units of the SAC in areas susceptible to the effects of air quality. This approach confirmed that in terms of current condition, Unit 7 of the component Folkestone to Etchinghill Downs Escarpment SSSI is currently in favourable condition. This Unit meets all of the condition objectives including in terms of species diversity, scrub control, an absence of negative factors and the presence of target orchid species. The most recent condition assessment of Unit 8 confirmed that the unit is in 'unfavourable recovering' condition due to undergrazing resulting in scrub encroachment. It is recognised that Common Standards Monitoring, which is used to monitor the condition of the component SSSIs, was not designed to recognise adverse effects associated with deposition of pollutants, and often habitats are slow to display visible signs of the effects of changes in air quality. Therefore, the absence of apparent adverse factors does not necessarily indicate an absence of effects associated with nutrient enrichment and airborne pollutants.

**5.64** Natural England as part of the Site Improvement Plan recommended trying to control, reduce and ameliorate atmospheric nitrogen impacts with a Site Nitrogen Action Plan (SNAP), a government improvement programme which aims to identify, tackle and reduce sources of atmospheric nitrogen and trying to restore and maintain habitats to mitigate the impact of the atmospheric nitrogen. Previous discussions in relation to the Folkestone and Hythe PPLP with White Cliffs Partnership<sup>37</sup>, who oversee management at the site, confirmed that no such plan has yet been produced or implemented. It is recommended that

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<sup>37</sup> Pers comm (21,09,2016), Kirk Alexander – Project Manager, White Cliffs Countryside Partnership

discussions within White Cliffs Partnership in relation to the Dover District Local Plan are undertaken to identify any changes in management since then.

**5.65** This SAC was not included as part of the Air Quality Assessment for Dover; however an air quality assessment was completed as part of the Folkestone and Hythe Core Strategy Review Local Plan, which took into account impacts to air quality from proposed growth in the plan in-combination with future predicted traffic levels and air quality trends within the southeast and growth in neighbouring authorities.

**5.66** The air quality assessment identified that the baseline NO<sub>x</sub> concentrations where the SAC lies adjacent to the A20 are high. By 2031, total flows on the A20 are forecast to increase to 'in combination', and the bulk of this increase is attributable to the Draft Core Strategy Review Local Plan. Whilst NO<sub>x</sub> concentrations throughout the modelled transect are forecast to experience a net reduction on all links.

**5.67** The assessment considered a 'Do Something' scenario with the 2017 Base and showed the forecast 'in-combination' change in NO<sub>x</sub> concentrations to 2031, including the Shepway Draft Core Strategy Review Local Plan, PPLP and strategic growth proposed in neighbouring authorities. It states that:

"for the A20, it can be seen that the Shepway Draft Core Strategy Partial Review Local Plan will retard the forecast improvement in NO<sub>x</sub> by a worst-case 3 µgm<sup>-3</sup> (10% of the critical level) at the closest point to the A20 and even at 30-40m from the roadside will retard improvement by c. 1 µgm<sup>-3</sup>. This still leaves a substantial net forecast improvement of c. 26 µgm<sup>-3</sup> but is certainly a large retardation. The primary role of NO<sub>x</sub> for vegetation is as a source of nitrogen. The retardation of forecast improvement attributable to the Shepway Draft Core Strategy Partial Review Local Plan is clearly high enough to mean the resulting nitrogen deposition must be modelled directly to determine what botanical effect would result".

**5.68** In assessing the effect of NO<sub>x</sub> on nitrogen deposition, the air quality assessment goes on to explain that:

"since NO<sub>x</sub> is the main source of nitrogen from vehicle exhaust emissions, the results from the NO<sub>x</sub> analysis carry over to the nitrogen deposition calculations. However, since most of the emitted NO<sub>x</sub> is not deposited at the roadside, the change in nitrogen deposition rates due to the Shepway Draft Core Strategy Partial Review Local Plan is forecast to be lower than the change in NO<sub>x</sub> concentrations".

**5.69** The air quality assessment takes into account forecast improvements in NO<sub>x</sub> reductions over the plan period. Crucially, the air quality assessment found that, if the forecast improvement is realised in practice, it will bring the deposition rates below the critical load at all links, even adjacent to the A20.

**5.70** The air quality assessment concluded that:

"Given that the 'in combination' deposition rate is a) forecast to be below the critical load of 15 kgN/ha/yr and well below the rate of 25 kgN/ha/yr at which Caporn et al report a decline in diversity in calcareous grassland, b) forecast to fall further to 2031 and c) only retarded by the Shepway Draft Core Strategy Partial Review Local Plan to a small extent along even the most affected road, no Likely Significant Effect is expected alone or in combination despite the elevated NO<sub>x</sub> concentrations".

**5.71** The air quality assessment for the Shepway Draft Core Strategy Review Local Plan takes into account impacts of the plan in-combination with growth proposed in neighbouring authorities, such as Dover District. Therefore, this air quality assessment can be relied on when considering the impacts of proposed development in Dover District. Based on the information provided as part of this assessment, it can be concluded that there will be no Adverse Effect on Integrity as a result of proposed development in the District. This will be supported by mitigation measures that are detailed below and will be implemented as part of the Local Plan.

## Mitigation

**5.72** The Air Quality Assessment outlines that any development proposed should provide mitigation in line with Kent and Medway Air Quality Planning Guidance. The assessment also provides detail of broad range of mitigation measures specific to

residential and commercial/industrial development. It is recommended that these measures are considered and implemented as appropriate for development proposals, which might lead to a significant deterioration in air quality. The Local Plan provides reference to this study in Policy NE4: Air Quality.

**5.73** Policies detailed within the Local Plan will provide, to some degree, a level of mitigation, particularly through NE4: Air Quality, which specifies that:

"Major development proposals will be required to demonstrate a shift to the use of sustainable low emission transport, in accordance with Policy TI 1, in order to minimise the impact of vehicle emissions on air quality and how such a modal shift will be achieved.

Development proposals that might lead to a significant deterioration in air quality or national air quality objectives being exceeded, either by itself, or in combination with other committed development, will be required to submit an Air Quality Assessment, carried out in accordance with the relevant guidance, to be agreed with the Local Planning Authority."

**5.74** In addition, Strategic Policy 1: Planning for Climate Change and TI1: Sustainable Transport and Travel, which encourage the reduction and use of sustainable transport to minimise impacts from vehicle emissions, and Strategic Policy 14: Enhancing Green Infrastructure and Biodiversity, which protects sites of conservation interest, will safeguards and mitigation measures.

## Conclusion

**5.75 In light of the above and providing the mitigation measures incorporated into the plan are implemented successfully, adverse effects on the integrity of Sandwich bay SAC, Thanet Coast and Sandwich Bay SPA and Ramsar, Dover to Kingsdown Cliffs SAC, Lydden to Temple Ewell Downs SAC and Folkestone to Etchinghill Escarpment, as a result of air pollution will be avoided.**

## Recreation

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

**5.76** The SAC, SPA and Ramsar is located along the coastline in the east of the District. Key threats from recreation to these European sites primarily relate to direct physical damage and loss of habitat from trampling and erosion and disturbance of wetland birds from recreational activities, such as walking, dog walking, exercise and wildlife watching.

**5.77** Recent visitor studies undertaken in 2020 found that 91% of visitors originated from the District. Therefore, an increase in development within the District has potential to result in an adverse effect on these European sites.

**5.78** Based on visitor survey data collected between 2011 and 2020 to inform the Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy, a ZOI of 9km was identified, which has been applied in this assessment. A review of residential site allocations identified 775 new housing units proposed within site allocations located in Sandwich, Eastry, Ringwould, Kingsdown, Deal, Worth, Great Mongeham and Woodnesborough.

**5.79** The 2020 visitor studies has informed the preparation of the draft Thanet Coast and Sandwich Bay SPA Strategic Access Monitoring and Mitigation Strategy<sup>38</sup>. This strategy outlines the requirement for specific mitigation measures and is designed provides a strategy to mitigate the potential in-combination impacts of new housing development in the vicinity of the Thanet Coast and Sandwich Bay Special Protection Area (SPA) arising from the Dover District Local Plan. The mitigation measures required for the SPA will also ensure that there are no adverse effects on the integrity of both the SAC and Ramsar site, which overlap the SPA. Similar mitigation strategies have been successfully implemented across the UK, such as Birdwise and Bird Aware Solent and therefore there is a confidence that this strategy will also be successful in mitigating for impacts from recreation.

**5.80** In light of the above and providing mitigation measures detailed in the Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy are incorporated in the Local Plan and delivered successfully, there is a high level of confidence that the mitigation strategy being prepared will provide the appropriate mechanisms required to ensure no Adverse Effect on Integrity

<sup>38</sup> Blackwood Bayne Ltd (2021), Thanet Coast and Sandwich Bay SPA: Strategic Access Monitoring and Mitigation Strategy (SAMM)

in relation to the SAC, SPA and Ramsar. However, to satisfy the requirements of HRA it is recommended that there is sufficient detail in place in the mitigation strategy and that these measures are agreed with Natural England prior to the adoption of the Local Plan.

### Thanet Coast SAC

**5.81** The SAC is located along the coastline adjacent to Thanet District. Key threats from recreation to this SAC primarily relate to water-based activities, including angling, sailing and SCUBA diving, which have potential to result in physical damage and loss of submerged or partially submerged sea caves and reef habitat.

**5.82** Given the specialist nature of these activities, which is likely to attract visitors from greater distances, it is expected that increased development within the District itself is likely to be relatively minor. In addition, there are a range of coastal codes, which have been developed and are regularly updated as part of the Thanet Coast North East Kent<sup>39</sup> to safeguard the areas coastline and wildlife, including the qualifying features of the SAC. These codes cover recreational activities, including powercraft activities, such as motorboats, watercraft and water-skiing, and marine wildlife watching, which provide appropriate safeguard measures to ensure no adverse effect on the integrity of the SAC.

**5.83** In light of the above, it can therefore be concluded that adverse effect on the integrity of the SAC will be avoided.

### Lydden and Temple Ewell Downs SAC

**5.84** The SAC is located in the centre of the District in the south. Key threats from recreation to this SAC primarily relate to walking and dog walking from people living in the local area, which have the potential to result in physical disturbance through trampling and erosion and nutrient enrichment.

**5.85** Based on visitor survey data that was collected in 2010<sup>40</sup> to inform the Whitfield Urban Extension, it was identified that 75% of visitors to the site travelled within 4km of the SAC.

**5.86** Key findings of the visitor study also found:

- The majority of visitors to the SAC are of local origin (50% living within 2km of the SAC) and make very regular visits, daily or at least several times per week.
- Most (75%) make the journey to the SAC by walking rather than driving, although car parking is very limited in close proximity to most of the formal access points.
- Dog walking is the primary reason for visiting the SAC, with almost as many dogs as people encountered during the course of the three surveys.
- The majority of dogs are allowed off their leads during all or part of their visit.
- During the summer months there is an increase in the number of people visiting because of the wildlife interest of the area, but dog walking remains the reason that most people visit the SAC.
- The majority of visitors walk between 1 – 3km within the SAC, with less than 10% of visits involving a walk of more than 3km. Visitor access is predominantly within the two easternmost parcels of the SAC.
- Routes followed within the SAC are not random, with visitors following identifiable paths or 'desire lines' for much of their routes.
- Proximity to the visitors' homes and the lack of alternative sites within walking distance were cited by approximately two thirds of visitors questioned as being the reasons for visiting this particular location rather than another.

**5.87** One of the key findings of the Lydden and Temple Ewell Downs Visitor Survey (2010) was that people tend to follow desire lines and utilise regular routes. Whilst this can lead to a concentration of negative effects to specific locations, it may also imply that direct pressures to the wider site can be restricted and efforts to manage and restrict recreational activities can be more efficiently focused. This is likely to be particularly so for the SAC, which is actively managed by Kent Wildlife Trust, including the provision of gates and fences and specific paths to follow. The calcareous grassland for which the site is designated for is

<sup>39</sup> <http://www.thanetcoast.org.uk/factfile/thanet-coastal-codes/>

<sup>40</sup> Aspect Ecology (Aug 2010), Lydden and Temple Ewell Downs SAC and NNR Visitors Study

typically only susceptible to direct effects associated with recreation, for example, localised nutrient enrichment from dogs, and trampling and erosion associated with walking. Furthermore, much of the SAC is located on steep slopes which are not conducive to recreational activities and therefore likely to be resilient to associated adverse effects.

**5.88** In addition to this, the visitor study concluded that the provision of appropriately designed green infrastructure within the Whitfield Urban Extension area would provide effective mitigation for potential impacts on the SAC. This is in line with similar visitor studies in southern England, such as the Thames Basin Heaths Delivery Framework, which one of the primary mitigation measures included the requirement for suitable alternative natural greenspace for new residential development to be provided within 5km. This example demonstrates the importance and effectiveness of providing new open space alongside new residential developments in mitigating recreational pressures on sensitive sites.

**5.89** Given the time that has elapsed since the original survey, an updated visitor survey<sup>31</sup> was undertaken in 2021 to identify the zone of influence within which visitors originate from and to inform how increased development in the District will affect impacts from recreational pressure to this European site. This survey identified a ZOI of 2.53km within which 75% of visitors travelled to site with the average straight-line distance travelled to site 2.91km. However, in line with a precautionary approach a ZOI of 4km has been applied in this assessment.

**5.90** A review of site allocations within 4km of the SAC identified residential site allocations in Dover, Shepherdswell, Alkham, Lydden, Whitfield, Elvington and Eythorne, which comprise 3,562 new housing units. These have potential to contribute to increased recreational pressure in the SAC.

**5.91** The findings confirmed that the visitor profile remains largely unchanged from previous survey results in 2010 and as such mitigation through the delivery of suitable alternative natural green spaces (SANGs) within the Whitfield development continues to be appropriate approach to take.

**5.92** In light of the above information, it is recommended that mitigation measures as detailed below and which are designed address the cumulative impacts of increased recreation on the SAC as a result of the Local Plan are implemented to ensure that a sufficient level of certainty in concluding that the Local Plan will not result in adverse effects on the integrity of the SAC.

### Dover to Kingsdown Cliffs SAC

**5.93** The SAC is located along the southern coastline of the District. Key threats from recreation to this SAC relate to walking and dog walking from people living in the local area, which have the potential to result in physical disturbance through trampling and erosion and nutrient enrichment.

**5.94** Visitor surveys were undertaken in 2021<sup>31</sup>, to identify the zone of influence within which visitors originate from and to inform how increased development in the District will affect impacts from recreational pressure to this European site. This survey found that approximately half of all visitors travelled from home to visit the site (52%) whilst the remaining visitors comprised of people who were on holiday (48%). The distance travelled varied at each location surveyed at the SAC with the average distance travelled 32.14km. Given the distance that visitors will travel to visit this coastal European site, development proposed within the whole District has been taken into account in this assessment. Albeit it should be noted that over two fifths of visitors were visitors for the first time or visiting for the first time in 12 months, which suggests that this is not a frequently visited site by local residents based in Dover.

**5.95** The majority site is owned and managed by the National Trust and is subject to active management to protect, enhance and create calcareous grassland. This is being undertaken in consultation with Natural England. Key components of the current management include grazing of grassland by Exmoor ponies, mechanical cutting and collection in areas that are close to the cliff edge and removal of scrub. This management also encourages visitors who want to walk through the site, particularly those with dogs to follow specific measures to minimise impact on the environment. The calcareous grassland for which the site is designated for is typically only susceptible to direct effects associated with recreation, for example, localised nutrient enrichment from dogs, and trampling and erosion associated with walking. As part of the SAC lies on the cliff edge, it is likely that visitors to the site will be concentrated at certain locations along the coast path due to a lack of public rights of way linking to the route, which may allow direct pressures to the wider site can be restricted and efforts to manage and restrict recreational activities can be more efficiently focused.

**5.96** In light of the above information, it is recommended that mitigation measures as detailed below and which are designed to address the cumulative impacts of increased recreation on the SAC as a result of the Local Plan are implemented to ensure that a sufficient level of certainty in concluding that the Local Plan will not result in adverse effects on the integrity of the SAC.

### Folkestone to Etchinghill Escarpment SAC

**5.97** The SAC is located to the 0.9km to the west of the District in Folkestone and Hythe District. Key threats from recreation to this SAC relate to walking and dog walking from people living in the local area, which have the potential to result in physical disturbance through trampling and erosion, nutrient enrichment and taking of rare plants.

**5.98** The SAC is currently managed by the White Cliffs Countryside Project (WCCP) in partnership with Natural England, to maintain and restore the extent, distribution, structure, function and supporting processes of the calcareous grassland and important orchid populations for which the SAC is designated. The SAC Conservation Management plan is implemented by the WCCP, which seeks to secure chalk downland habitat restoration and creation around Dover and Folkestone through re-introducing grazing management, the provision of new infrastructure and encouraging a partnership between landowners, managers and communities. Key components of the current management of the SAC include cattle-grazing, provision of fencing and gates, invasive species control and mechanical scrub management.

**5.99** As outlined in the Screening Assessment, there is no specific survey data available, which can be drawn to inform a ZOI for this SAC. However, given the similarities of this European site in comparison to Lydden to Ewell Downs SAC, which are both designated for calcareous grassland, the HRA has drawn from the visitor survey information collected for this site. As detailed above, 75% of visitors to the site travelled within 4km of the Lydden to Ewell Downs SAC and therefore a ZOI of 4km has been applied in this assessment for this SAC. A review of site allocations proposed as part of the Local Plan identified 83 housing units proposed at Capel-le-Ferne.

**5.100** A key finding of the Lydden and Temple Ewell Downs Visitor Survey is that people tend to follow desire lines and utilise regular routes. Whilst this can lead to a concentration of negative effects to specific locations, it may also imply that direct pressures to the wider site can be restricted and efforts to manage and restrict recreational activities can be more efficiently focused. This is likely to be particularly so for Folkestone to Etchinghill Escarpment SAC because the site is actively managed, including provision of gates and fencing, and the presence of on-site wardening. In addition, the qualifying features of grassland and orchids are typically only susceptible to direct effects associated with recreation, for example, plant collecting, localised nutrient enrichment from dogs, and trampling and erosion associated with walking and illegal use of motorbikes. Furthermore, much of the SAC is located on steep escarpments which are not conducive to recreational activities and therefore likely to be resilient to associated adverse effects.

**5.101** In light of the above information, it is recommended that mitigation measures as detailed below and which are designed address the cumulative impacts of increased recreation on the SAC as a result of the Local Plan are implemented to ensure that a sufficient level of certainty in concluding that the Local Plan will not result in adverse effects on the integrity of the SAC.

### Stodmarsh SPA and Ramsar

**5.102** The SPA and Ramsar is located 0.4km to the north-west of the District. Key threats from recreation to these European sites primarily relate to physical disturbance to qualifying bird species, as a result of walking, dog walking and wildlife watching.

**5.103** As outlined in the Screening Assessment, there is no specific survey data available, which can be drawn to inform a ZOI for this SAC. Therefore, a precautionary non-specific ZOI of 7km has been applied based on the findings of similar projects in southern England. A review of site allocations within 7km of the SPA and Ramsar identified residential site allocations in Preston, Wingham and Staple, which comprise 156 new housing units to have potential to contribute to increased recreational pressure in the European sites.

**5.104** The SPA and Ramsar is owned by Natural England and is actively managed for wildlife and visitors. This includes the provision of waymarked trails and provision of interpretation boards to direct visitors across the site without disturbing areas supporting birds that are sensitive to disturbance and educating visitors to the site. It is recommended that discussions with Natural England are undertaken to understand the potential risk of recreation to the site in more detail and to confirm the mitigation measures that are currently in place.

**5.105** In light of the above information, it is recommended that mitigation measures as detailed below and which are designed address the cumulative impacts of increased recreation on the SPA and Ramsar as a result of the Local Plan are implemented to ensure that there is a sufficient level of certainty in concluding that the Local Plan will not result in adverse effects on the integrity of the SPA and Ramsar.

### Blean Complex SAC

**5.106** The SAC is located 5km to the north-west of the District. Key threats from recreation to these European sites primarily relate to compaction of soil, particularly around ancient and veteran trees and damage to woodland habitat through antisocial activities, such as vandalism and fires.

**5.107** As outlined in the Screening Assessment, there is no specific survey data available, which can be drawn to inform a ZOI for this SAC. Therefore, a precautionary non-specific ZOI of 7km has been applied based on the findings of similar projects in southern England. Most of the SAC lies over 7km from the District with exception to a parcel of land located immediate north-west of the District. Recreational impacts have therefore only been considered in relation to areas of the SAC, which lie within the 7km ZOI, which has been applied to this site.

**5.108** A review of site allocations within 7km of the SAC identified residential site allocations at Preston, which comprise 75 new housing units, to have potential to contribute to increased recreational pressure in the European sites in-combination with other plans and projects.

**5.109** Given the number housing units proposed and distance by car at which visitors from these site allocations would travel (<7km) it is likely that any impact from increased recreational pressure in the District would be minor. Natural England's Supplementary Advice note indicates that existing recreational levels are not considered to be a concern due to the existing management and educational programmes and therefore a minor increase in pressure is considered unlikely to result in an adverse effect on the integrity of the SAC. However, in line with a precautionary approach it is recommended that the mitigation measures detailed below and which are designed to address the cumulative impacts of increased recreation on the SAC as a result of the Local Plan in-combination with other plans and projects are implemented to ensure that there is a sufficient level of certainty in concluding that the Local Plan will not result in adverse effects on the integrity of the SAC.

### Margate and Long Sands SAC / Outer Thames SPA

**5.110** The SAC and SPA are located along the north coastline of Kent and is separated from the District by Canterbury District and Thanet District. Key threats from recreation to this SAC primarily relate to water-based activities, including sailing and fishing, which have potential to result in physical damage and loss of qualifying habitats and physical disturbance of the qualifying red-throated diver.

**5.111** Given the specialist nature of these activities, which is likely to attract visitors from greater distances, it is expected that increased development within the District itself it likely to be relatively minor. In addition, the extent of the SAC and SPA span across an area of open sea covering nearly 65,000 ha and 380,000 ha and extending 30km and 40km from the coastline, respectively. The nearest point of the European sites to the District is located in close proximity to Thanet District and is notably excludes the area of coastal water adjacent to Dover District.

**5.112** The qualifying species of the SPA primarily use the SPA for foraging at sea and will cover vast distances to do so whereas recreational boats would be expected to remain relatively close to the coast. Given the mobility of these species and the visibility afforded to them while feeding and loafing at sea they are unlikely to be disturbed by watercraft, which would result in an Adverse Effect on Integrity. Furthermore, the increase in usage of watercraft is unlikely to result in any discernible increase in the numbers, distribution or frequency of watercraft navigating these waters.

**5.113** In addition, there are a range of coastal codes, which have been developed and are regularly updated as part of the Thanet Coast North East Kent to safeguard the areas coastline and wildlife, including the qualifying features of the SAC and SPA. These codes cover recreational activities, including powercraft activities, such as motorboats, watercraft and water-skiing, and marine wildlife watching, which provide appropriate safeguard measures to ensure no adverse effect on the integrity of the SAC and SPA.

**5.114** In light of the above, it can therefore be concluded that adverse effect on the integrity of the SAC and SPA will be avoided as a result of proposed development in the District.

### Mitigation

**5.115** It is recommended that the following mitigation measures are implemented to ensure that there is a sufficient level of certainty that proposed development in the Local Plan will not result in an adverse effect in the integrity of these European sites. These measures have been designed to ensure that the cumulative effect of increased recreational pressure is addressed for



each site allocation, which has potential to contribute to the increased recreational pressure on each European site through the provision of specific mitigation measures. It is recommended that these measures are considered alongside mitigation requirements outlined as part of more detailed studies, such as Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy and alongside discussions with land managers and Natural England.

#### Thanet Coast and Sandwich Bay SPA Strategic Access Monitoring and Mitigation Strategy (SAMM)

**5.116** As detailed above, a SAMM has been prepared, which seeks to provide mitigation through a range of management and engagement methods, which actively encourages coastal visitors to visit the European site in a responsible manner instead of restricting access and activities.

**5.117** This strategy proposes the following measure to avoid and mitigate for impacts arising from increased recreational pressure in the district. This includes:

- Access management and zoning.
- Engagement and education with visitors to alter attitudes and behaviours.
- Developing and delivery a new partnership of landowners in the bay.
- Enforcement of the existing Public Space Protection Order.
- Improvement of onsite signage.
- Online and information campaigns.
- On-going visitor and bird monitoring surveys.

**5.118** The delivery of the SAMM will be the responsibility of Dover District Council with support from SAMM Steering Group and new partnership working across the bay. The scheme will be overseen and delivered by a specific SAMM officer who will engage with visitors, landowners and the wider community.

#### Provision of Visitor Surveys and Bird Monitoring

**5.119** To ensure that the SAMM continues to be based upon up-to-date information, updated visitor and bird monitoring surveys will be undertaken. These will be programmed every five years and completed in the same year as each other.

#### Financial Contribution

**5.120** The SAMM will be funded by financial contributions from proposed residential development that lie with the ZOI of 9km from the Thanet SPA. This is supported by Policy NE3: Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy, which outlines the requirements for all new residential development to make a financial contribution to the scheme.

#### Provision of Updated Monitoring Surveys

**5.121** Visitor surveys have been undertaken at Lydden and Temple Ewell Downs SAC and Dover to Kingsdown Cliffs SAC have been undertaken in 2021 to ensure that mitigation measures are based upon up-to-date information. It is recommended that visitor survey information is updated at least once every five years following the adoption of the plan to ensure that measures continue to be effective.

#### Provision of Open Spaces

**5.122** The provision of alternative natural green space and green infrastructure (GI) represents an important aspect of mitigation for non-coastal European sites. Therefore, the strategic approach to incorporating protective measures specified in the Local Plan is considered likely to provide an effective contribution in mitigating significant effects associated with recreation. In particular, there is specific detail in SAP1 Whitfield Urban Expansion that mitigation through the delivery of suitable alternative natural green spaces (SANGs) within the Whitfield development continues to be required during this plan period to mitigate for impacts from increased recreational pressure in relation to Lydden and Temple Ewell Downs SAC.

**5.123** To maximise the effectiveness of its role in mitigation recreational impacts on European sites, the design and management of open space and green infrastructure will need to be focused towards attracting those groups of visitors who regularly visit the European sites. This primarily includes walkers and dog walkers.

**5.124** Given the unique nature and attraction of coastal European sites, provision of alternative open space is less applicable as a mitigation measure for the Sandwich Bay SAC, Thanet Coast and Sandwich Bay SPA and Ramsar and Dover to Kingsdown Cliffs SAC and therefore the focus of the Mitigation Strategy should be primarily on access management and monitoring.

#### Project Level HRA

**5.125** Site specific planning applications, especially larger ones in proximity to the above European sites, will need to consider the requirement to undertake project level HRA, and where appropriate would be expected to incorporate necessary safeguards in line with the policy safeguards included within the Local Plan.

#### Access Management and Monitoring of Dover to Kingsdown Cliffs SAC

**5.126** As detailed above, access management and monitoring is considered the most effective form of mitigation of recreational impacts at Dover to Kingsdown Cliffs SAC. The SAC is predominantly managed by the National Trust who have committed to an extensive programme of on-site visitor management and mitigation measures. The Council have provided commitment in the Local Plan through Policy SP13: Protecting the Districts Hierarchy of Designated Environmental Sites and Biodiversity Assets to work closely with the National Trust to deliver onsite visitor management and mitigation measures over the plan period.

#### Policy Wording

**5.127** Policies within the Local Plan will provide safeguards and mitigation from recreational impacts. This includes: Policy PM3: Providing Open Space and Policy PM5: Protection of Open Space, Sports Facilities and Local Green Space, which provide new alternative open spaces that meet quantity and access standards either onsite or through offsite financial contributions and protect existing open spaces for people to undertake recreational activities; Policy SP13 Protecting the Districts Hierarchy of Designated Environmental Sites and Biodiversity Assets and Policy SP14: Green Infrastructure and Biodiversity, which protects sites of conservation interest; and Policy NE3: Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy, which provides specific mitigation measures for recreational impacts to the Thanet Coast and Sandwich Bay SPA.

#### Conclusion

**5.128** In light of the above, providing mitigation measures detailed in the Thanet Coast and Sandwich Bay SPA SAMM are incorporated in the Local Plan and delivered successfully, there is a high level of confidence that the mitigation strategy being prepared will provide the appropriate mechanisms required to ensure no Adverse Effect on Integrity in relation to the Sandwich Bay SAC and Thanet Coast and Sandwich Bay SPA and Ramsar. However, to satisfy the requirements of HRA and ensure that the efficacy of the measures is sufficient, it is recommended that these measures are agreed with Natural England prior to the adoption of the Local Plan.

**5.129** In addition, providing the above mitigation measures are incorporated into the Local Plan, and implemented successfully, adverse effects on the integrity of the Lydden and Temple Ewell Downs, SAC, Dover to Kingsdowns Cliffs SAC, Folkestone to Etching Hill Escarpment SAC, Stodmarsh SPA and Ramsar, Blean Complex SAC, Thanet Coast SAC, Margate and Long Sands SAC and Outer Thames Estuary SPA will be avoided.

#### Water Quantity

**5.130** Dover District forms part of Kent, which is known to be one of the driest regions in England and Wales. The ground water resources from the underlying chalk aquifer in the District is under significant pressure from abstraction. The Environment Agency's Stour Catchment Abstraction Management Strategy has identified the groundwater resources to be over-abstracted.

**5.131** The District falls within the Dour and Thanet Water Resource Zones (WRZ), which are managed by Affinity Water and Southern Water respectively and will experience a shortfall in demand up to 2031. Water companies have a statutory duty to establish how planned development in their area can be serviced. These plans are set out in their Water Resources Management Plan (WRMP). Investments to deliver the plans are based on five-year planning cycles known as Asset Management Periods (AMP) so the water company programme for water infrastructure upgrades may constrain the rate at which residential growth can be supported.

**5.132** In 2019, Affinity Water published its latest WRMP for the plan period of 2020-2080 and Southern Water published its latest WRMP for the plan period of 2020 to 2070. The water resources supplied to these WRZ is mostly from groundwater.

**5.133** The Affinity Water WRMP for the Dour WRZ proposes to continue to collaborate with neighbouring water companies, including Southern Water and South East Water who currently export water resources to the WRZ and improvement of water efficiency through measures, such as leakage control, fitting water saving devices and working with initiatives and local governments.

**5.134** The Southern Water WRMP for the Thanet Water WRZ proposes the implementation of a range of measures to manage factors, such as an increase in demand, changes in abstraction licences and expected reductions in water availability due to licence changes and to protect and enhance the environment. For this WRZ, this comprises a strategic development of a shared resource with South East Water and the improvement of water efficiency in the area.

### Catchment Abstraction Licencing Strategy (ALS)

**5.135** The Environment Agency is responsible for managing water resources in England. The Environment Agency controls how much water is abstracted with a permitting system, regulating existing licences and granting new ones. It uses the CALS process and abstraction licensing strategies to do this. The CALS process aims to aid the meeting of the environmental objectives of the Water Framework Directive by:

- Providing a water resource assessment of rivers, lakes, reservoirs, estuaries and groundwater referred to as water bodies under the Water Framework Directive (WFD).
- Identifying water bodies that fail flow conditions expected to support good ecological status.
- Preventing deterioration of water body status due to new abstractions.
- Providing results which inform River Basin Management Plans (RBMPs).

**5.136** Dover District lies entirely within the Stour Catchment Abstraction areas for which the most recent CALs was published in 2013<sup>41</sup>. The CALS identify that the main water resources pressures are extensive water supply abstraction.

**5.137** The CALS process has developed a classification system in order to inform the abstraction process. This classification provides an indication of:

- The relative balance between the environmental requirements for water and how much is licensed for abstraction.
- Whether water is available for further abstraction.
- Areas where abstraction may need to be reduced.

**5.138** In terms of surface water, water is restricted during high flows (Q30) and is not available during medium to low flows (Q50, 70 and 95).

**5.139** At Q30 the District supports areas with water available in the Little Stour and Wingham and no water available for licencing outside this catchment. Whilst at Q50 and 70, there is restrict water for licencing and at Q95, there is no water available for licencing at Little Stour and Wingham catchment.

**5.140** For the majority of the District there is a water resource available less than 30% of the time with exception to the Little Stour and Wingham catchment, which has water resource available at least 50% of the time.

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

**5.141** The SAC, SPA and Ramsar site support coastal habitats and species, which lie along the eastern coastline of Dover District and are reliant on water resources that are hydrologically connected to the District.

**5.142** The North East Kent (Thanet) SIP has identified hydrological changes in relation to qualifying habitats of the SAC was identified as a key threat as a result of changes to plant community composition. This is also likely to have an adverse impact on the foraging habitat used wetland bird species of the SPA and Ramsar site.

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<sup>41</sup> Environment Agency, (2013), Stour Abstraction licensing strategy

**5.143** A review of water catchment areas<sup>42</sup> within the District identified the North and South Streams, which discharges directly into River Stour, which forms part of the European site and connects to the Stour Marshes and coastal habitat, which the SAC is qualified for and which the SPA and Ramsar species rely on. The CALS outlined that the:

"North and South Streams have been significantly affected by human activity, with some reaches losing water to others. The upper reaches have been known to suffer from very low flows, but further downstream the surface watercourses receive more support from groundwater in flow. Downstream of Hacklinge, water is pumped via the Roaring Gutter Dyke into the slow-moving network of drainage ditches and channels of the Lydden Valley".

**5.144** As this river is connected to the River Stour, which forms part of the SAC, SPA and Ramsar, increased demand in abstraction in this area is likely to result in adverse effect on these European sites.

**5.145** The CALs identifies presence of two abstraction points within the District, one at Dover from the River Dour and one at Hacklinge North and South Streams. An increase in demand for water abstraction at Hacklinge North and South Streams, which lies in an area with no additional water available for licencing at the highest flows, therefore, has the potential to adversely affect the SAC, SPA and Ramsar. A Water Cycle Study<sup>43</sup> (WCS) completed in 2023 to support the new Local Plan outlines "*that the presence of Abstraction Points contributes to the degradation of watercourses in the district*". However, the WCS confirms that both Southern Water and Affinity Water WRMPs are robust and appropriately account for how they will accommodate for future growth in each respective catchment area whilst considering environmental conditions.

### Mitigation

**5.146** Policies detailed within the Local Plan will provide, to some degree, safeguards and a level of mitigation to European sites. This includes Policy SP1: Planning for Climate Change, Policy CC4: Water Efficiency, Policy CC5: Flood Risk, Policy SP13: Protecting the Districts Hierarchy of Designated Environmental Sites and Biodiversity Assets, Policy SP14: Green Infrastructure and Biodiversity and Policy NE5: Water Supply and Quality. Policies in the plan have been informed by the Dover District Water Cycle Study.

**5.147** Specifically, Policy CC4: Water Efficiency outlines the requirement for all new development to meet the higher water efficiency standard under Regulation 36(3) of the Building Regulations, to achieve a maximum use of 110 litres per person per day.

**5.148** In addition to this, Policy NE5: Water Supply and Quality states:

"Major proposals for new development must be able to demonstrate that there are, or will be, adequate water supply and wastewater treatment facilities via a main sewer in place to serve the whole development, or where development is being carried out in phases, the whole of the phase for which approval is being sought. Improvements in these facilities, the timing of their provision and funding sources will be key to the delivery of development"

and

"The Council will support, in principle, infrastructure proposals designed to increase water supply and wastewater treatment capacity subject to there being no significant adverse environmental impacts and the minimisation of those that may remain."

**5.149** These measures will ensure that water efficiency is improved to reduce demand for water and that there is sufficient supply in place provided that there are no adverse effects on designated sites.

<sup>42</sup> <https://environment.data.gov.uk/catchment-planning/WaterBody/GB107040019621>

<sup>43</sup> Dover District Council, (2023), Water Cycle Study

## Conclusion

**5.150 Providing the above mitigation measures detailed in the Southern Water and Affinity Water's respective WRMP are implemented successfully, adverse effects on the integrity of Sandwich Bay SAC, Thanet Coast and Sandwich Bay SPA and Ramsar and Stodmarsh SAC, SPA and Ramsar will be avoided.**

## Water Quality

**5.151** Dover District is comprised of three main river catchments. The River Dour has bad water quality in its upper reaches and a moderate classification for its lower stretches. The River Stour, which includes the North and South Streams and has moderate water quality. The Little Stour and its tributary the Wingham River are classified as having poor water quality.

**5.152** New development proposed as part of the Local Plan has the potential to result in the following:

- Increased volumes of treated wastewater discharges, resulting in nutrient enrichment of water and potential lowering of dissolved oxygen.
- Overloading of the combined sewer network during storm events with the potential for flooding and contamination of hydrologically connected European sites.
- Increase in the area of urban surfaces and roads could increase the potential for contaminated surface runoff and the contamination of hydrologically connected European sites.

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

**5.153** The SACs and SPA support coastal habitats and species, which are reliant on water resources that are hydrologically connected to the District. Increased demand for treatment of water as a result of the Local Plan has the potential to lead to adverse effects in the European sites.

**5.154** The North East Kent (Thanet) SIP has identified water pollution to be a key threat in relation to these European sites. In particular, the SIP outlined changes in water quality to watercourses that connect to the European sites has been as a result of insufficient discharge permits and therefore treatment of water at WwTW. It is understood that efforts have been made to improve water quality through phosphate stripping, however, it is likely that further improvements, such as this and upgrades to infrastructure will be required to ensure that there is sufficient capacity to deal with increased demand for water treatment as a result of development in the District.

**5.155** As detailed above under water quantity, the District supports the North and South Streams, which flow directly in the River Stour and into Pegwell Bay. Therefore, demand for water treatment as a result of development proposed in these catchment areas or which discharge into WwTW in these catchments has the potential to adversely affect these European sites. This is likely to be exacerbated by water pollution from rivers in the adjoining districts, including Monkton and Minster Marshes in Thanet District.

**5.156** The WCS confirmed that WwTW that treats water in the District have sufficient capacity to accept the additional wastewater flow from proposed development in the Local Plan. Providing avoidance and mitigation measures, which are detailed below and within the Local Plan are successfully implemented, it can be concluded that there will be no Adverse Effect on Integrity in relation to increased demand for wastewater treatment in the District as a result of proposed development in the Local Plan.

## Mitigation

**5.157** Policies detailed within the Local Plan will provide, to some degree, safeguards and a level of mitigation to European sites. This includes Policy SP1: Planning for Climate Change, Policy CC4: Water Efficiency, Policy CC5: Flood Risk, Policy CC6: Surface Water Management, Policy SP13: Protecting the Districts Hierarchy of Designated Environmental Sites and Biodiversity Assets, Policy SP14: Green Infrastructure and Biodiversity and Policy NE5: Water Supply and Quality. Policies in the plan have been informed by the Dover District Water Cycle Study<sup>Error! Bookmark not defined.</sup>.

**5.158** Specifically, Policy CC4: Water Efficiency outlines the requirement for:

"all new development to meet the higher water efficiency standard under Regulation 36(3) of the Building Regulations, to achieve a maximum use of 110 litres per person per day."

**5.159** In addition to this, Policy NE5: Water Supply and Quality states:

"Major proposals for new development must be able to demonstrate that there are, or will be, adequate water supply and wastewater treatment facilities via a main sewer in place to serve the whole development, or where development is being carried out in phases, the whole of the phase for which approval is being sought. Improvements in these facilities, the timing of their provision and funding sources will be key to the delivery of development.

and

"The Council will support, in principle, infrastructure proposals designed to increase water supply and wastewater treatment capacity subject to there being no significant adverse environmental impacts and the minimisation of those that may remain."

**5.160** Alongside this, Policy CC5: Flood Risk is in place to ensure that flood risk is managed responsibly and sustainably and Policy CC6: Surface Water Management outlines requirements to minimise the risk of flooding from surface water run-off through the provision of measures, such as Sustainable Urban Drainage Systems. Thus, ensuring that there is in-built mitigation in the plan to protect European sites from impacts arising from water quality.

## Conclusion

**5.161** Providing the above mitigation measures detailed in the Local Plan are implemented successfully, adverse effects on the integrity of Sandwich Bay SAC, Thanet Coast and Sandwich Bay SPA and Ramsar and Thanet Coast SAC will be avoided.

## Summary of Appropriate Assessment

**5.162** The conclusions of the Appropriate Assessment are summarised in **Table 5.8**:

- The European sites that are shown as screened out with no colour indicate sites that were considered to have no Likely Significant Effect at the screening stage.
- The European sites highlighted as having no Adverse Effect on Integrity (AEoI) in grey were found to have no Adverse Effect on Integrity providing the mitigation measures detailed in Chapter 5 are implemented.

**Table 5.6: Summary of Appropriate Assessment**

European sites	Physical Damage and Loss	Non-physical Disturbance	Air Pollution	Recreation	Water Quantity and Quality
Sandwich Bay SAC	Screened out	Screened out	<u>No AEoI</u>	<u>No AEoI</u>	<u>No AEoI</u>
Thanet Coast and Sandwich Bay SPA and Ramsar	<u>No AEoI</u>	<u>No AEoI</u>	<u>No AEoI</u>	<u>No AEoI</u>	<u>No AEoI</u>
Dover to Kingsdown Cliffs SAC	Screened out	Screened out	<u>No AEoI</u>	<u>No AEoI</u>	Screened out

European sites	Physical Damage and Loss	Non-physical Disturbance	Air Pollution	Recreation	Water Quantity and Quality
Lydden and Temple Ewell Downs SAC	Screened out	Screened out	<u>No AEoI</u>	<u>No AEoI</u>	Screened out
Folkestone to Etchinghill Escarpment SAC	Screened out	Screened out	<u>No AEoI</u>	<u>No AEoI</u>	Screened out
Stodmarsh SAC	Screened out	Screened out	Screened out	Screened out	<u>Screened out</u>
Stodmarsh SPA and Ramsar	<u>No AEoI</u>	Screened out	Screened out	<u>No AEoI</u>	<u>Screened out</u>
Thanet Coast SAC	Screened out	Screened out	Screened out	<u>No AEoI</u>	Screened out
Parkgate Down SAC	Screened out	Screened out	Screened out	No LSE	Screened out
Blean Complex SAC	Screened out	Screened out	Screened out	<u>No AEoI</u>	Screened out
Margate and Long Sands SAC	Screened out	Screened out	Screened out	<u>No AEoI</u>	Screened out
Wye and Crundale Downs SAC	Screened out	Screened out	Screened out	No LSE	Screened out
Tankerton Slopes and Swalecliffe SAC	Screened out	Screened out	Screened out	No LSE	Screened out
Outer Thames Estuary SPA	Screened out	Screened out	Screened out	<u>No AEoI</u>	Screened out
Dungeness, Romney Marsh and Rye Bay SPA and Ramsar	<u>No AEoI</u>	Screened out	Screened out	Screened out	Screened out
The Swale SPA and Ramsar	Screened out	Screened out	Screened out	Screened out	Screened out

# Chapter 6

## Conclusions and Next Steps

### Conclusions

**6.1** At the Screening stage, Likely Significant Effects on European sites, either alone or in combination with other policies and proposals, were identified for Local Plan policies:

- Strategic Policy 3: Housing Growth.
- Strategic Policy 6: Economic Growth
- H3: Meeting the needs of Gypsies and Travellers
- E1: New Employment Development
- E4: Tourist Accommodation and Attractions
- SAP 1 - Whitfield Urban Expansion
- SAP2 - White Cliffs Business Park
- SAP3 - Dover Waterfront
- SAP4 - Western Heights (Citadel)
- SAP5 - Fort Burgoyne
- SAP6- Dover Mid Town (DOV018)
- SAP7 - Bench Street Dover (DOV017)
- SAP8 - Land adjacent to the Gas Holder (DOV022B)
- SAP9 - Land at Barwick Road Industrial Estate (DOV022E)
- SAP10 - Buckland Paper Mill (DOV023)
- SAP11 - Westmount College (DOV026)
- SAP12 - Charlton Shopping Centre (DOV028)
- SAP13 - Dover Small Site Allocations
- SAP14 - Land off Cross Road (DEA008)
- SAP15 - Land at Rays Bottom (WAL002)
- SAP16 - Deal Small Site Allocations
- SAP17 -Land south of Stonar Lake and to north and east of Stonar Gardens (SAN004)
- SAP18 - Sandwich Highway Depot (SAN006)
- SAP19 - Land at Poplar Meadow (SAN007)
- SAP20 - Woods' Yard (SAN008)
- SAP21 - Land adjacent to Sandwich Technology School (SAN013)



- SAP22 - Land at Archers Low Farm (SAN023)
- SAP23 - Sydney Nursery, Dover Road
- SAP24 - Land to the South of Aylesham (AYL003)
- SAP25 - Aylesham Development Area
- SAP26 - Former Snowdown Colliery
- SAP27 - Land at Dorman Avenue
- SAP28 - Land between Eythorne and Elvington (EYT003/EYT009/EYT012)
- SAP29 - Land on the south eastern side of Roman Way (EYT008)
- SAP30 - Chapel Hill, Eythorne
- SAP31 - Statenborough Farm
- SAP32 - Land at Buttsole Pond (EAS002)
- SAP33 - Eastry Small Sites
- SAP34 - Land at Woodhill Farm (KIN002)
- SAP 35 - Land adjacent to Courtlands, Kingsdown
- SAP36 - Land to the north and east of St Andrews Gardens and adjacent to Mill House (SHE004/ TC4S082)
- SAP37 - Shepherdsweil Small Sites
- SAP38 - Land adjacent to Reach Road bordering Reach Court Farm (STM003)
- SAP39 - Land to the west of Townsend Farm Road (STM007/ STM008)
- SAP40 - St Margaret's Small Sites
- SAP41 - Footpath Field (WIN0014)
- SAP42 - Wingham Small Sites
- SAP43 - Land at Short Lane, Alkham
- SAP44 - Land to the east of Great Cauldham Farm (CAP006)
- SAP45 - Capel Small Sites
- SAP46 - Land adjacent Langdon Court Bungalow (LAN003)
- SAP47 - Land adjacent to Lydden Court Farm (LYD003)
- SAP48 - Apple Tree Farm and north west of Apple Tree Farm (PRE003/PRE016/PRE017)
- SAP49 - Worth Small Sites
- SAP50 - Land adjacent to Short Street, Chillenden
- SAP51 - Land opposite the Conifers, Coldred
- SAP52 -Prima Windows (NON006)
- SAP53 - Land at Durlock Road, Staple
- SAP54 - Staple Small Sites
- SAP55 - Woodnesborough Small Sites

**6.2** The findings of the HRA screening determined that impacts from physical damage and loss, non-physical disturbance, air pollution, recreation and water quantity and quality could result in a Likely Significant Effect in relation to:

- **Physical damage and loss** – in relation to Thanet Coast and Sandwich Bay SPA and Ramsar and Stodmarsh SPA and Ramsar..
- **Non-physical Disturbance** – in relation to Thanet Coast and Sandwich Bay SPA and Ramsar.
- **Air Pollution** – in relation to Sandwich Bay SAC, Thanet Coast and Sandwich Bay SPA and Ramsar, Lydden and Temple Ewell Downs SAC, Dover to Kingsdown Cliffs SAC and Folkestone to Etchinghill Escarpment SAC.
- **Recreation** – in relation to Sandwich Bay SAC, Thanet Coast and Sandwich Bay SPA and Ramsar, Lydden and Temple Ewell Downs SAC, Dover to Kingsdown Cliffs SAC and Folkestone to Etchinghill Escarpment SAC, Stodmarsh SPA and Ramsar, Thanet Coast SAC, Blean Complex SAC, Margate and Long Sands and Outer Thames Estuary.
- **Water Quantity and Quality** – in relation to Sandwich Bay SAC and Thanet Coast and Sandwich Bay SPA and Ramsar.

**6.3** The Appropriate Assessment stage identified whether the above Likely Significant Effect will, in light of mitigation and avoidance measures, result in Adverse Effects on Integrity (AEoI) of the European sites either alone or in-combination with other plans or projects. The findings of the Appropriate Assessment are detailed below.

**6.4** It can be concluded that no Adverse Effect on Integrity will occur for the following European sites subject to the provision of safeguarding and mitigation measures as detailed in Chapter 5.

- **Physical Damage and Loss** – the Appropriate Assessment concluded no Adverse Effect on Integrity as a result of physical damage and loss in relation to Thanet Coast and Sandwich Bay SPA and Ramsar and Stodmarsh SPA and Ramsar providing the following safeguards and mitigation measures were implemented successfully:
  - The Local Plan outlines the requirement for the completion of wintering bird surveys for site allocations identified with high or moderate suitability for qualifying bird species and where bird surveys identify the potential for a site allocation to exceed the threshold of >1% for birds that there is a commitment in the Local Plan for specific mitigation, such provision of suitable habitat for birds to be implemented.
- **Non-physical Disturbance** – the Appropriate Assessment concluded no Adverse Effect on Integrity as a result of non-physical disturbance in relation to Thanet Coast and Sandwich Bay SPA and Ramsar providing developments within 500m can demonstrate appropriate best practice construction measures through a Construction Environmental Management Plan, including site-specific working methods and sensitive timings of works, and providing the wording provided in Strategic Policy 13: Protecting the Districts Hierarchy of Designated Environmental Sites and Biodiversity Assets and Strategic Policy 14: Green Infrastructure and Biodiversity, which includes specific detail on the requirement to protect European sites from Adverse Effect on Integrity is implemented successfully
- **Air Pollution** – the Appropriate Assessment concluded no Adverse Effect on Integrity as a result of air pollution in relation to Sandwich Bay SAC, Thanet Coast and Sandwich Bay SPA and Ramsar, Lydden and Temple Ewell Downs SAC, Dover to Kingsdown Cliffs SAC and Folkestone to Etchinghill Escarpment SAC. This will be supported by broad mitigation measures that are detailed within the Air Quality Assessment and will be implemented as part of the plan.
- **Recreation** – the Appropriate Assessment concluded no Adverse Effect on Integrity as a result of increased recreational pressure in relation to all European sites providing the following safeguards and mitigation measures are implemented successfully. This included:
  - The delivery of the Thanet Coast and Sandwich Bay SPA Strategic Access Monitoring and Mitigation Strategy (SAMM). The Local Plan commits to the successful delivery of this scheme and will be funded through develop contributions for those residential developments that come forward within the ZOI of 9km.
  - Provision of updated monitoring surveys to ensure that mitigation is based on the most up-to-date information.
  - Provision of open space as requirement within the Local Plan.
  - The Local Plan outlines support for the access management and monitoring of Dover to Kingsdown Cliffs SAC.
- **Water Quantity and Quality** – the Appropriate Assessment concluded no Adverse Effects on Integrity as a result of water quantity and quality providing the safeguards and mitigation measures detailed within the Plan are implemented successfully. This included requirements for all new development to meet water efficiency standards and to demonstrate

that there is adequate water supply and wastewater treatment facilities to serve the whole development without adverse effects on European sites.

## Next Steps

**6.5** HRA is an iterative process and as such is expected to be updated in light of newly available evidence and comments from key consultees. It is recommended that this report is subject to consultation with Natural England and the Environment Agency to confirm that the conclusion of the assessment is considered appropriate.

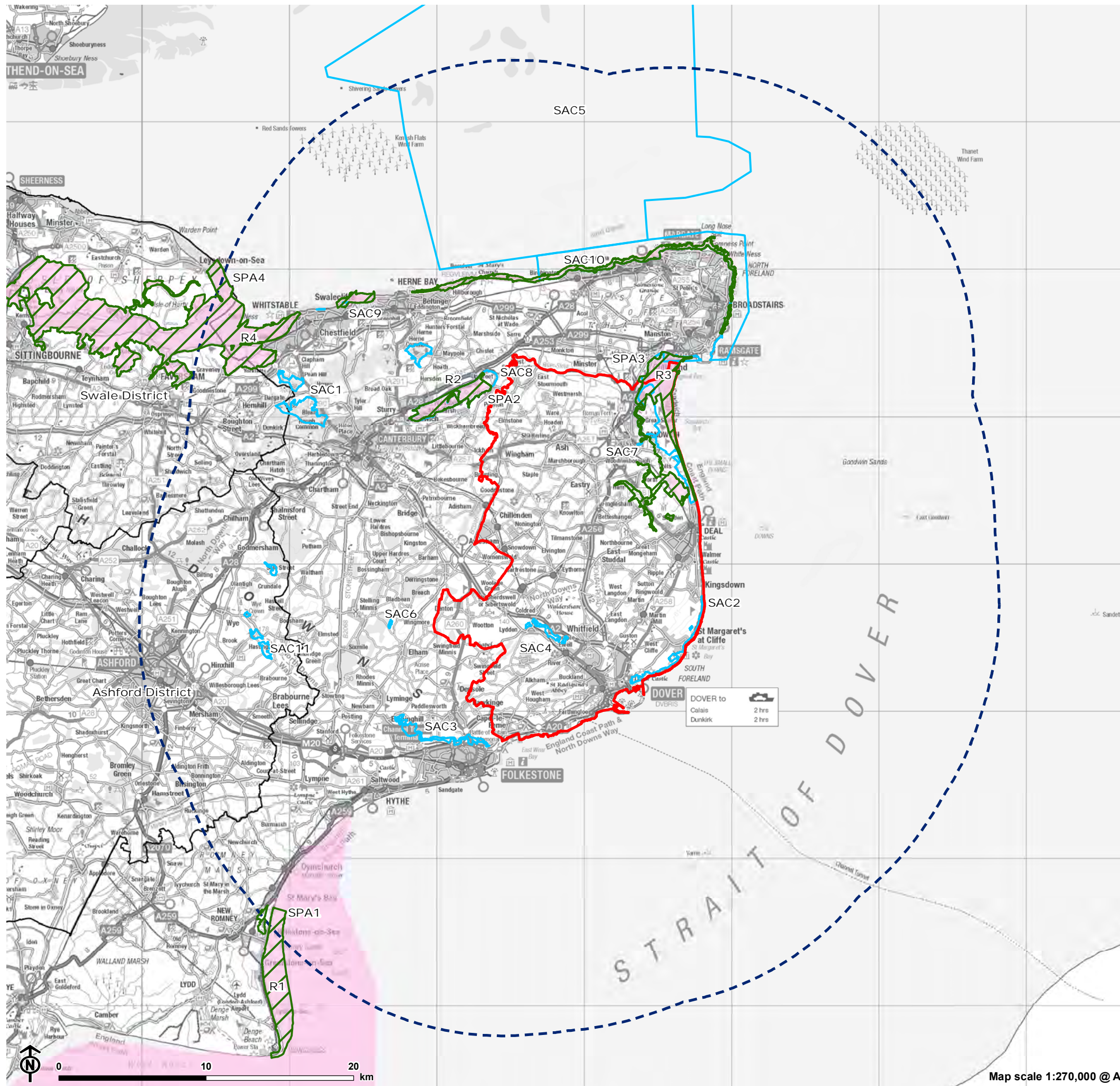
# Appendix A

## Figures

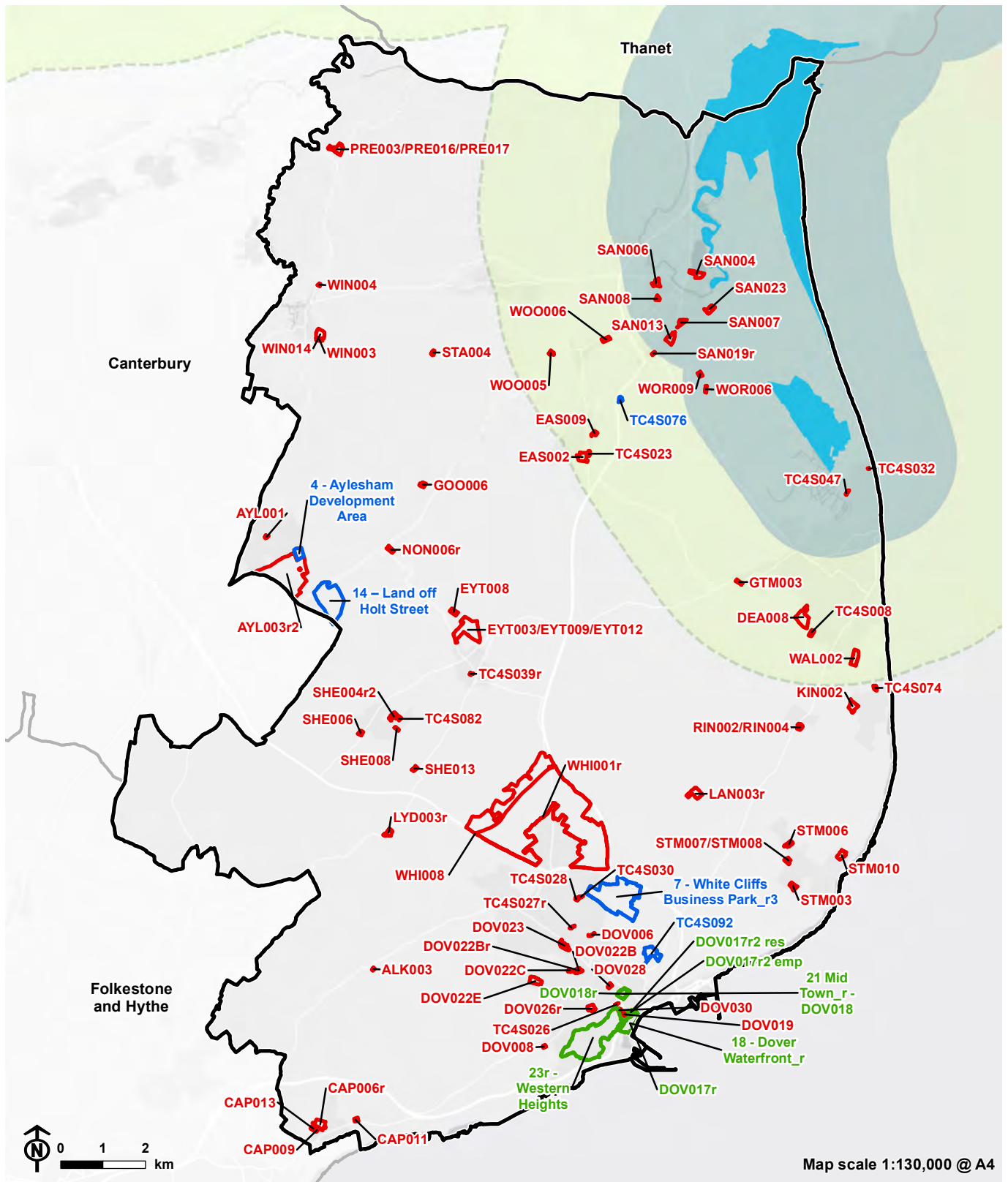
# Appendix A

## Figures

Figure 1: European Sites within 20km of Dover District



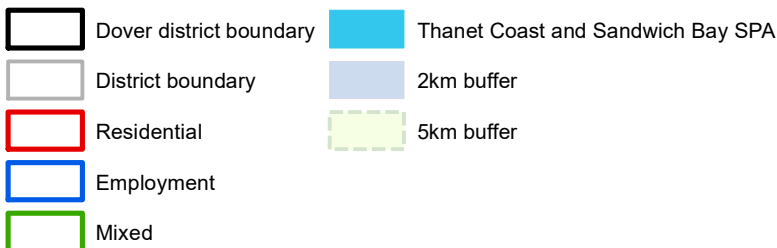
- SPA
  - Dover district boundary
  - Surrounding district boundaries
  - 20km buffer
  - Ramsar
- R1: Dungeness, Romney Marsh and Rye Bay  
R2: Stodmarsh  
R3: Thanet Coast & Sandwich Bay  
R4: The Swale
- Special Protection Area**
- SPA1: Dungeness, Romney Marsh and Rye Bay  
SPA2: Stodmarsh  
SPA3: Thanet Coast & Sandwich Bay  
SPA4: The Swale
- Special Area of Conservation**
- SAC1: Blean Complex  
SAC2: Dover to Kingsdown Cliffs  
SAC3: Folkestone to Etchinghill Escarpment  
SAC4: Lydden & Temple Ewell Downs  
SAC5: Margate and Long Sands  
SAC6: Parkgate Down  
SAC7: Sandwich Bay  
SAC8: Stodmarsh  
SAC9: Tankerton Slopes and Swalecliffe  
SAC10: Thanet Coast  
SAC11: Wye & Crundale Downs

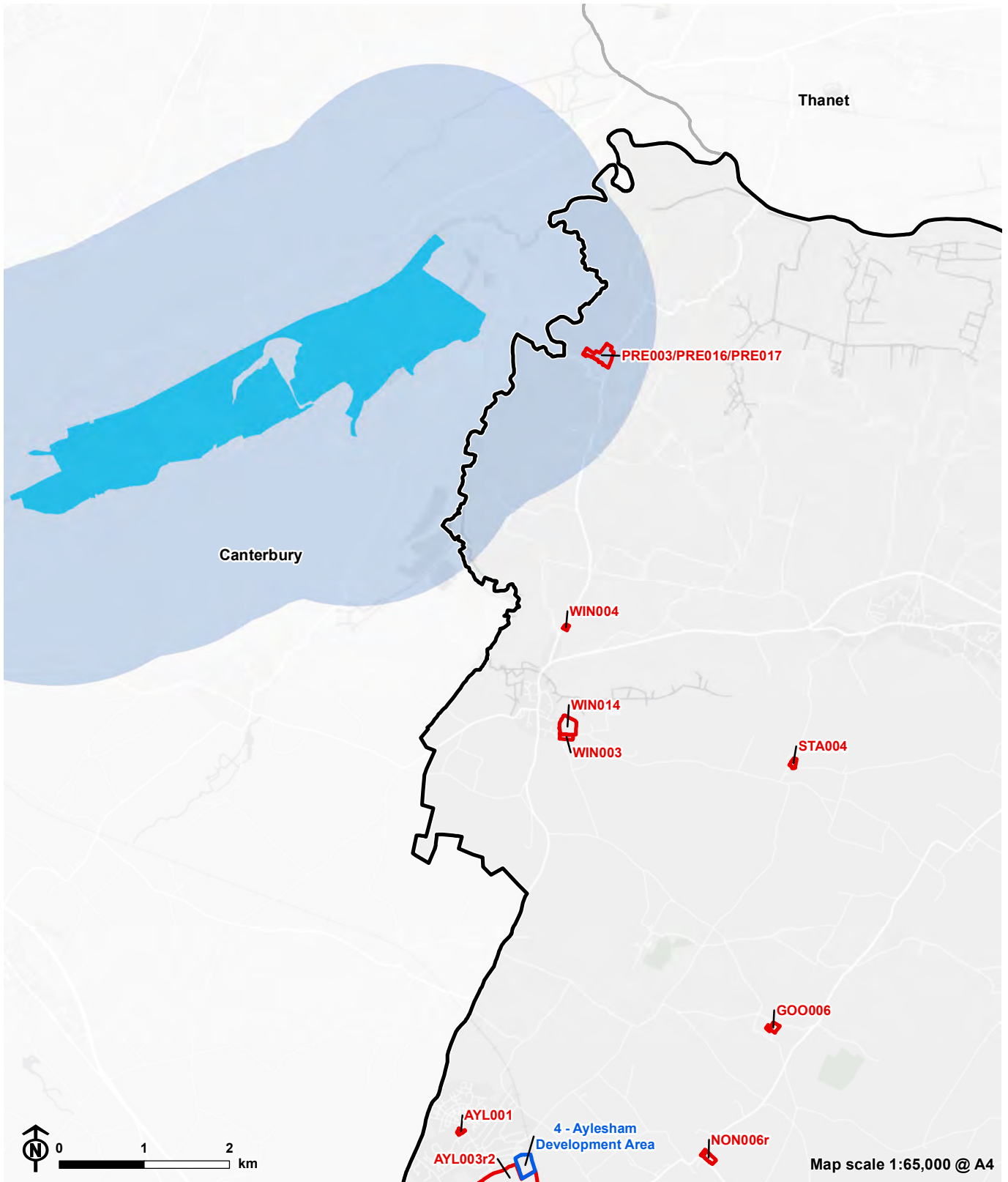


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CB:CB EB:Tembo\_L LUC Fig2\_10043\_r1\_ThanetCoast\_SPA\_A4P\_20/03/2023  
 Source: DDC, OS, NE

**Figure 2: Offsite Functional Habitat Buffers: Thanet Coast and Sandwich Bay SPA**

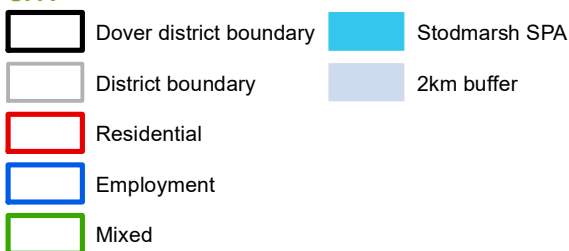




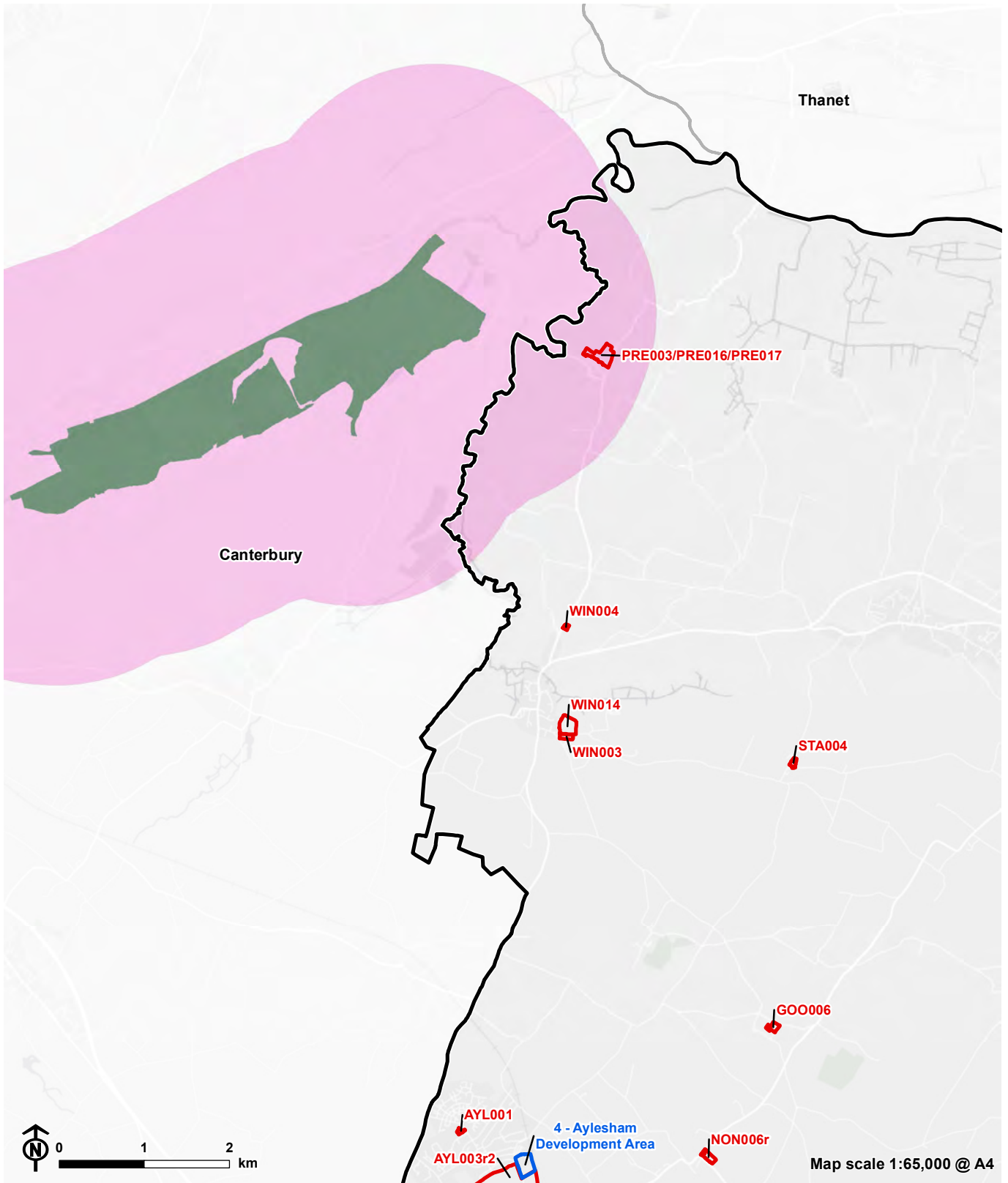
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CB:CB EB:Green\_C LUC Fig4\_10043\_r0\_Stodmarsh SPA\_A4P 19/09/2022  
 Source: DDC, OS, NE

**Figure 3: Offsite Functional Habitat Buffers: Stodmarsh SPA**














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CB:CB EB:Green\_C LUC Fig5\_10043\_r0\_Stodmarsh\_Ramsar\_A4P 19/09/2022  
 Source: DDC, OS, NE

**Figure 4: Offsite Functional Habitat Buffers: Stodmarsh Ramsar**

- |                                                                                     |                         |                                                                                     |                  |
|-------------------------------------------------------------------------------------|-------------------------|-------------------------------------------------------------------------------------|------------------|
|  | Dover district boundary |  | Stodmarsh Ramsar |
|  | District boundary       |  | 2km buffer       |
|  | Residential             |                                                                                     |                  |
|  | Employment              |                                                                                     |                  |
|  | Mixed                   |                                                                                     |                  |

## Appendix B

# European Site Information

# Appendix B

## European Site Information

This appendix contains information about the European sites scoped into the HRA. Information about each site's area, the site descriptions, qualifying features and pressures and threats are drawn from Natural England's Site Improvement Plans (SIPs) and the Standard Data Forms or Ramsar Information Sheets available from the JNCC website. Site conservation objectives are drawn from Natural England's website and are only available for SACs and SPAs.

Site Name	Area (ha)	Qualifying Features	Key Vulnerabilities	Conservation Objectives	Non-qualifying habitats and species upon which the qualifying Habitats and/or species depend
Dungeness, Romney Marsh and Rye Bay are located on the south coast of England, on the border of East Sussex and Kent between Hastings and New Romney. This is a large area with a diverse coastal landscape comprising a number of habitats including extensive shingle beaches, sand dunes, saline lagoons, natural freshwater pits, basin fens, intertidal mud flats and sand flats. Rivers to the north associated with the Weald comprise areas of sheltered saltmarsh, reedbeds, grazing marsh and mudflats.					
Dungeness, Romney Marsh and Rye Bay SPA	4217.53	<p>Article 4.1 of the Directive (2009/147/EC) as it is used regularly by 1% or more of the Great Britain populations of the following species listed in Annex 1:</p> <ul style="list-style-type: none"> <li>■ Aquatic Warbler <i>Acrocephalus paludicola</i></li> <li>■ Northern Shoveler <i>Anas clypeata</i></li> <li>■ Bittern <i>Botaurus stellaris</i></li> <li>■ Western Marsh Harrier <i>Circus aeruginosus</i></li> <li>■ Hen Harrier <i>Circus cyaneus</i></li> <li>■ Bewick's Swan <i>Cygnus columbianus bewickii</i></li> <li>■ Mediterranean Gull: <i>Larus melanocephalus</i></li> <li>■ Ruff <i>Philomachus pugnax</i></li> <li>■ European Golden Plover <i>Pluvialis apricaria</i></li> <li>■ Pied Avocet <i>Recurvirostra avosetta</i></li> <li>■ Little Tern <i>Sterna albifrons</i></li> </ul>	<p><b>Vehicles:</b></p> <p>Illicit – disturbance to bird species (wintering).</p> <p><b>Invasive species:</b></p> <p>Garden escapees, Crassula and Red Valerian can outcompete and smother native species. Could reduce suitable nesting and foraging habitat</p> <p><b>Inappropriate scrub control:</b></p> <p>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.</p> <p><b>Public Access/Disturbance:</b></p> <p>Disturbance during the bird breeding season from the public accessing the territories</p>	<p>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;</p> <ul style="list-style-type: none"> <li>■ The extent and distribution of the habitats of the qualifying features;</li> <li>■ The structure and function of the habitats of the qualifying features;</li> <li>■ The supporting processes on which the habitats of the qualifying features rely;</li> <li>■ The population of each of the qualifying features; and,</li> </ul>	<p>In general, the qualifying bird species of the SPA rely on:</p> <ul style="list-style-type: none"> <li>■ The sites ecosystem as a whole (see list of habitats below).</li> <li>■ Maintenance of populations of species that they feed on (see list of diets below).</li> </ul> <p>Aquatic Warbler: <i>Acrocephalus paludicola</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: coastal reedbeds and low vegetation.</li> <li>■ Diet: insects, grubs, caterpillars and spiders.</li> </ul> <p>Northern shoveler: <i>Anas clypeata</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: shallow lakes, marsh, reedbed and wet meadow.</li> <li>■ Diet: omnivorous, esp. small insects, crustaceans, molluscs, seeds; filters particles with sideways sweeping of bill.</li> </ul> <p>Great bittern: <i>Botaurus stellaris</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: reedbed and marshes.</li> </ul>

Site Name	Area (ha)	Qualifying Features	Key Vulnerabilities	Conservation Objectives	Non-qualifying habitats and species upon which the qualifying Habitats and/or species depend
		<ul style="list-style-type: none"> <li>■ Common Tern <i>Sterna hirundo</i></li> <li>■ Sandwich Tern <i>Sterna sandvicensis</i></li> </ul>	<p>of sensitive breeding bird species could impact breeding success. Recreational activities such as dog walking (particular off leash) could disturb the SPA . Recreational waterborne activities like kite boarding and windsurfing across intertidal areas on the dune and saltmarsh habitats may disturb SPA.</p> <p><b>Inappropriate water levels:</b></p> <p>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.</p>	<ul style="list-style-type: none"> <li>■ The distribution of the qualifying features within the site.</li> </ul>	<ul style="list-style-type: none"> <li>■ Diet: mostly fish, amphibians, insects but wide variety, mostly in shallow water in or near cover.</li> </ul> <p>Western Marsh Harrier: <i>Circus aeruginosus</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: moor, marsh, steppe and fields.</li> <li>■ Diet: mostly small birds, nestlings and small rodents.</li> </ul> <p>Bewick's Swan: <i>Cygnus columbianus bewickii</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: shallow tidal waters, coastal lagoons, inland freshwater lakes and marshes and flooded pastures.</li> <li>■ Diet: seeds, roots, and stems of aquatic plants, occasional small invertebrate, including mollusks and arthropods, and polychaete worms, and also some grass growing on dry land.</li> </ul> <p>Mediterranean Gull: <i>Larus melanocephalus</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: marshes, lagoons or coastal islands are ideal breeding habitats. May also nest in fields close to inland water. During winter, they are coastal, often roosting on grasslands near to beaches.</li> <li>■ Diet: opportunistic omnivore, eating fish, worms, scraps, insects, offal and carrion.</li> </ul> <p>Ruff: <i>Philomachus pugnax</i></p>

Appendix B  
European Site Information

Dover District Local Plan (Reg 19)  
March 2023

Site Name	Area (ha)	Qualifying Features	Key Vulnerabilities	Conservation Objectives	Non-qualifying habitats and species upon which the qualifying Habitats and/or species depend
					<ul style="list-style-type: none"> <li>■ Habitat preference: shallow water around lakes and wetland areas near the coast.</li> <li>■ Diet: insects, larvae, frogs, small fish, seeds.</li> </ul> <p>European Golden Plover: <i>Pluvialis apricaria</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: farmland and coastal flats during the winter.</li> <li>■ Diet: worms, beetles and insects.</li> </ul> <p>Pied Avocet: <i>Recurvirostra avosetta</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: grassland, marine and intertidal straits and wetlands.</li> <li>■ Diet: Aquatic insects and their larvae, crustaceans and worms.</li> </ul> <p>Little Tern: <i>Sterna albifrons</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: nest exclusively on the coast in well-camouflaged shallow scrapes on sand and shingle beaches, spits or inshore islets.</li> <li>■ Diet: fish, crustacean and invertebrates.</li> </ul> <p>Common Tern: <i>Sterna hirundo</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: shallow water, along coasts, at freshwater inland lakes and in estuaries.</li> <li>■ Diet: mainly eat fish, but also consume shrimps and other crustaceans, small squid, marine worms, and leeches.</li> </ul>

Site Name	Area (ha)	Qualifying Features	Key Vulnerabilities	Conservation Objectives	Non-qualifying habitats and species upon which the qualifying Habitats and/or species depend
					<p>Sandwich Tern: <i>Sterna sandvicensis</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: coastal areas, nesting in colonies on sand and shingle beaches.</li> <li>■ Diet: fish such as sandeels, sprats and whiting.</li> </ul>
Dungeness, Romney Marsh and Rye Bay RAMSAR site	6377.63	<p><b>Criterion 2:</b></p> <p>Consists of a complex network of wetland habitats including saltmarsh, natural freshwater pits, fens, ponds, gravel pits and grazing marsh and ditches. These in turn support a rich and diverse assemblage of bryophytes, vascular plants and invertebrates.</p> <p>This site supports rare plant species such as:</p> <ul style="list-style-type: none"> <li>■ Sea Barley: <i>Hordeum marinum</i></li> <li>■ Borrer's Saltmarsh-Grass: <i>Puccinellia fasciculata</i></li> <li>■ Slender Hare's-Ear: <i>Bupleurum tenuissimum</i></li> <li>■ Sea Heath: <i>Frankenia laevis</i></li> <li>■ Sharp-Leaved Pondweed: <i>Potamogeton acutifolius</i></li> <li>■ Divided Sedge: <i>Carex divisa</i></li> <li>■ Rootless Duckweed: <i>Wolffia arrhizal</i></li> </ul> <p>This site also supports a rich water beetle assemblage including species from reed</p>	No threats specified. See threats associated with Dungeness, Romney Marsh and Rye Bay SPA for threats likely to affect the RAMSAR site.	No specific conservation objectives outlined. See conservation objectives associated with Dungeness, Romney Marsh and Rye Bay SPA.	<p><b>Plants:</b></p> <p>Plant communities are reliant on the coastal habitats within the Ramsar site. These habitats are dependent on a range of coastal factors and processes, including salinity, sedimentation, sea level, turbidity and elevation.</p> <p><b>Invertebrates:</b></p> <p>These species are reliant on the saltmarsh habitat and characteristic flora and fauna present within the European site. Key sources of food range from flowering plants, organic matter and other invertebrate species.</p> <p>Water Vole: <i>Arvicola amphibious</i></p> <ul style="list-style-type: none"> <li>■ Habitat: rivers, streams and ditches, around ponds and lakes, and in marshes, reedbeds and areas of wet moorland.</li> <li>■ Diet: grasses and waterside vegetation.</li> </ul> <p>Aquatic Warbler: <i>Acrocephalus paludicola</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: coastal reedbeds and low vegetation.</li> </ul>

Site Name	Area (ha)	Qualifying Features	Key Vulnerabilities	Conservation Objectives	Non-qualifying habitats and species upon which the qualifying Habitats and/or species depend
		<p>beetle <i>Donacia</i>, snail-killing flies <i>Sciomyzidae</i> and soldier-flies <i>Stratiomyidae</i>.</p> <p>In addition to the threatened ecological communities, the site supports internationally important species comprising:</p> <ul style="list-style-type: none"> <li>■ Greater Water-Parsnip: <i>Sium latifolium</i></li> <li>■ Wame's Thread-Moss: <i>Bryum warneum</i></li> <li>■ Water Vole: <i>Arvicola amphibious</i></li> <li>■ Aquatic Warbler: <i>Acrocephalus paludicola</i></li> <li>■ Great Crested Newt: <i>Triturus cristatus</i></li> <li>■ Medicinal Leech: <i>Hirudo medicinalis</i></li> <li>■ Ground Beetle: <i>Omophron limbatum</i></li> <li>■ Marsh Mallow Moth: <i>Hydraecia osseola hucherardi</i></li> <li>■ De Folin's Lagoon Snail: <i>Caecum amoricum</i></li> </ul> <p><b>Criterion 5:</b></p> <p>The site qualifies under Criterion 5 as it regularly supports 20,00 or more waterbirds: in the non-breeding system the site regularly supports 34,957 individuals (5 year peak mean 2002/2 – 2006/7).</p> <p><b>Criterion 6:</b></p> <p>The site qualifies under Criterion 6 as it regularly supports 1% of the individuals in the</p>			<ul style="list-style-type: none"> <li>■ Diet: insects, grubs, caterpillars and spiders.</li> </ul> <p>Great Crested Newt: <i>Triturus cristatus</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: breeding in ponds during the spring and spending most of the rest of the year in woodland, hedgerows, marshes and tussocky grassland. They hibernate underground, among tree roots and in old walls.</li> <li>■ Diet: primarily of invertebrates including insects, worms, water snails, larvae and sometimes tadpoles.</li> </ul> <p>Medicinal Leech: <i>Hirudo medicinalis</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: favour shallow ponds and ditches with fluctuating water levels that dry down during the summer months.</li> <li>■ Diet: frog or mammalian blood, also known to eat fish and amphibian eggs.</li> </ul> <p>Ground Beetle: <i>Omophron limbatum</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: fine substrates on the margins of lakes, ponds and streams and also around coastal seepages and outpourings.</li> </ul> <p>Marsh Mallow Moth: <i>Hydraecia osseola hucherardi</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: marshes, fens, riverbanks and ditches.</li> <li>■ Diet: larvae feed on Marsh Mallow.</li> </ul>



Site Name	Area (ha)	Qualifying Features	Key Vulnerabilities	Conservation Objectives	Non-qualifying habitats and species upon which the qualifying Habitats and/or species depend
		<p>populations of the following species or subspecies of waterbird in any season:</p> <ul style="list-style-type: none"> <li>■ Mute Swan <i>Cygnus olor</i> (348 individuals observed wintering was a 5 year peak mean between 2002/3 – 2006/7, which represents 1.1% of the British population).</li> <li>■ Shoveler <i>Anas clypeata</i> (485 individuals observed wintering was a 5 year peak mean between 2002/3 – 2006/7, which represents 1.2% of the north-western and central European population (non-breeding)).</li> </ul>			<p>De Folin's Lagoon Snail: <i>Caecum amoricum</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: marine habitats.</li> <li>■ Diet: vegetable detritus. Bacterial and diatom film.</li> </ul> <p>Mute Swan: <i>Cygnus olor</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: It's possible to see them anywhere there is a shallow lake, or a slow-flowing rivers, even in urban areas and parks.</li> <li>■ Diet: eat aquatic vegetation, molluscs which cling to the vegetation, small fish, frogs and worms. They will also graze on grassy fields.</li> </ul> <p>Shoveler: <i>Anas clypeata</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: shallow lakes, marsh, reedbed &amp; wet meadow.</li> <li>■ Diet: omnivorous, esp. small insects, crustaceans, molluscs, seeds; filters particles with sideways sweeping of bill.</li> </ul>
<p>Stodmarsh SPA is a wetland comprised of open water bodies, reedbeds, grazing marshes and alder-carr. It is known to provide suitable wintering and breeding opportunities for wetland bird species, particularly wildfowl and waders. Stodmarsh SAC supports the UK BAP species Desmoulin's whorl snail <i>Vertigo moulinsiana</i> which occurs within the site on emergent vegetation in fen areas and along ditches in the grazing marsh.</p>					
Stodmarsh SPA	481.33	<ul style="list-style-type: none"> <li>■ Gadwall: <i>Anas strepera</i> (breeding/non-breeding)</li> <li>■ Great Bittern: <i>Botaurus stellaris</i> (non-breeding)</li> </ul>	<p><b>Water pollution:</b></p> <p>Poor water quality can lead to a reduction in fish stocks and macrophytes, which can</p>	<p>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</p>	<p>In general, the qualifying bird species of the SPA rely on:</p> <ul style="list-style-type: none"> <li>■ The sites ecosystem as a whole (see list of habitats below).</li> </ul>

Site Name	Area (ha)	Qualifying Features	Key Vulnerabilities	Conservation Objectives	Non-qualifying habitats and species upon which the qualifying Habitats and/or species depend
		<ul style="list-style-type: none"> <li>■ Hen Harrier: <i>Circus cyaneus</i> (non-breeding)</li> </ul>	<p>reduce food availability for SPA birds (including bittern).</p> <p><b>Invasive species:</b></p> <p><i>Crassula</i> has been reported across the SPA which due to its nature of forming a blanket of vegetation, can reduce food availability and hinder birds from finding food.</p> <p><b>Inappropriate scrub control:</b></p> <p>Dense scrub cover can reduce the habitat suitability for SPA birds.</p>	<p>Birds Directive, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>■ The extent and distribution of the habitats of the qualifying features;</li> <li>■ The structure and function of the habitats of the qualifying features;</li> <li>■ The supporting processes on which the habitats of the qualifying features rely;</li> <li>■ The population of each of the qualifying features; and,</li> <li>■ The distribution of the qualifying features within the site.</li> </ul>	<ul style="list-style-type: none"> <li>■ Maintenance of populations of species that they feed on (see list of diets below).</li> </ul> <p>Great bittern: <i>Botaurus stellaris</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: reedbed and marshes.</li> <li>■ Diet: mostly fish, amphibians, insects but wide variety, mostly in shallow water in or near cover.</li> </ul> <p>Gadwall: <i>Botaurus stellaris</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: marshes, lakes, on migration also rivers, estuaries.</li> <li>■ Diet: leaves, shoots, mostly while swimming with head under water.</li> </ul> <p>Northern shoveler: <i>Anas clypeata</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: shallow lakes, marsh, reedbed &amp; wet meadow.</li> <li>■ Diet : pmnivororous, esp. small insects, crustaceans, molluscs, seeds; filters particles with sideways sweeping of bill.</li> </ul> <p>Hen harrier: <i>Circus cyaneus</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: moor, marsh, steppe and fields.</li> <li>■ Diet: mostly, small birds, nestlings and small rodents.</li> </ul>
Stodmarsh SAC	564.64	<ul style="list-style-type: none"> <li>■ Desmoulin's Whorl Snail: <i>Vertigo moulinsiana</i></li> </ul>	<b>Water pollution:</b>	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure	In general, the qualifying species of the SAC rely on:

Site Name	Area (ha)	Qualifying Features	Key Vulnerabilities	Conservation Objectives	Non-qualifying habitats and species upon which the qualifying Habitats and/or species depend
			<p>It is currently unknown what impact this may have on this species. To be included as a precautionary measure.</p>	<p>that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:</p> <ul style="list-style-type: none"> <li>■ The extent and distribution of the habitats of qualifying species;</li> <li>■ The structure and function of the habitats of qualifying species;</li> <li>■ The supporting processes on which the habitats of qualifying species rely;</li> <li>■ The populations of the qualifying species; and,</li> <li>■ The distribution of the qualifying species within the site.</li> </ul>	<ul style="list-style-type: none"> <li>■ The sites ecosystem as a whole (see list of habitats below).</li> <li>■ Maintenance of populations of species that they feed on (see list of diets below).</li> </ul> <p>Desmoulins's Whorl Snail: <i>Vertigo moulinsiana</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: permanently wet, usually calcareous, swamps, fens and marshes, bordering rivers, lakes and ponds, or in river floodplains.</li> <li>■ Diet: fungi, micro-algae and bacteria.</li> </ul>
Stodmarsh RAMSAR	481.33	<p><b>Criterion 2:</b></p> <p>The site supports eight British Data Book wetland invertebrates, two nationally rare plants, and five nationally scarce species. A diverse assemblage of rare wetland birds.</p> <p>Flora of the site includes the following:</p> <ul style="list-style-type: none"> <li>■ Rare Sharp-Leaved Pondweed: <i>Potamogeton acutifolius</i> (considered</li> </ul>	<p>No threats specified. See threats associated with Dungeness, Stodmarsh SPA for threats likely to affect the RAMSAR site.</p>	<p>No specific conservation objectives outlined. See conservation objectives associated with Stodmarsh SPA.</p>	<p>Similar to Stodmarsh SPA above.</p> <p><b>Plants:</b></p> <p>Plant communities are reliant on the coastal habitats within the Ramsar site. These habitats are dependent on a range of coastal factors and processes, including salinity, sedimentation, sea level, turbidity and elevation.</p>

Site Name	Area (ha)	Qualifying Features	Key Vulnerabilities	Conservation Objectives	Non-qualifying habitats and species upon which the qualifying Habitats and/or species depend
		<p>critically endangered by the GB Red Book)</p> <ul style="list-style-type: none"> <li>■ Whorled Water-Milfoil: <i>Myriophyllum verticillatum</i></li> <li>■ Rootless Duckweed: <i>Wolffia arrhizal</i></li> <li>■ Divided Sedge: <i>Carex divisa</i></li> <li>■ Water-Meadow Dandelion: <i>Taraxacum hygrophilum</i></li> <li>■ Tall Whitetop: <i>Lepidium latifolium</i></li> <li>■ Marsh Sowthistle: <i>Sonchus palustris</i></li> </ul> <p>Otter <i>Lutra</i> has also been recorded within the Site.</p> <p>NOTE: The remainder of species considered vulnerable, endangered or critically endangered will be specified within the next update (Ramsar Information Sheet Version 3.0, 05/2005).</p> <p>Wetland bird assemblages supported include the following:</p> <ul style="list-style-type: none"> <li>– Ruff: <i>Philomachus pugnax</i>, 19 individuals representing an average of 2.7% of the GB population (5yr peak mean 1998/9-2002/3) (wintering).</li> <li>– Water Rail: <i>Rallus aquaticus</i>, 28 individuals representing an average of 6.2% of the GB population (5yr</li> </ul>			<p><b>Invertebrates:</b></p> <p>These species are reliant on the saltmarsh habitat and characteristic flora and fauna present within the European site. Key sources of food range from flowering plants, organic matter and other invertebrate species.</p> <p><b>Birds – see above for other species:</b></p> <p>Water Rail <i>Rallus aquaticus</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: thick reedbeds and marshes, and numerous kinds of wet habitats with aquatic vegetation and slow-moving water. It often forages in muddy soils and it is frequently hidden in small or narrow wet areas within other type of habitat.</li> <li>■ Diet: omnivorous, although they mainly feed on animals. These include leeches, worms, gastropods, small crustaceans, spiders, and a wide range of both terrestrial and aquatic insects and their larvae. Small vertebrates such as amphibians, fish, birds and mammals may be killed or eaten as carrion.</li> </ul>

Site Name	Area (ha)	Qualifying Features	Key Vulnerabilities	Conservation Objectives	Non-qualifying habitats and species upon which the qualifying Habitats and/or species depend
		<p>peak mean 1998/9-2002/3) (wintering).</p> <ul style="list-style-type: none"> <li>– Gadwall <i>Anas strepera</i>, 6 pairs, representing an average 1% of the GB population (1988-92) (breeding). Also supports a peak count of 267 individuals in spring/autumn, representing approximately 1.5% of the GB population (5yr peak mean 1998/9-2002/3).</li> <li>– Great Bittern <i>Botaurus stellaris</i>, 2 individuals representing an average of 2% of the GB population (5yr peak mean 1998/9-2002/3) (wintering).</li> <li>– Hen Harrier: <i>Circus cyaneus</i>, 9 individuals, representing an average of 1.2% of the GB population (5 winter period peak count 1987/8-1991/2) (wintering).</li> <li>– Northern Shoveler: <i>Anas clypeata</i>, 2 individuals, representing an average of 2% of the GB population (5yr peak mean 1998/9-2002/3) (wintering).</li> </ul>			
<p>Thanet Coast is a continuous stretch of coastal chalk in Britain (23km). The coastline is comprised of a variety of habitats which are uncommon in Europe, such as the chalk cliff face, and the cave and tunnel habitats. The intertidal reef combined with mudflats and sandflats provide optimal foraging and roosting habitat for wading bird species. Sandwich Bay is comprised of a variety of fixed and shifting sand dunes supporting vegetation that is iconic of these habitat types i.e. Marram Grass <i>Ammophila arenaria</i>.</p>					
Thanet Coast and Sandwich Bay SPA	1880.85	<ul style="list-style-type: none"> <li>■ European Golden Plover: <i>Pluvialis apricaria</i> (Non-breeding)</li> </ul>	<p><b>Changes in species distributions:</b></p> <p>A decline in overwintering turnstone and breeding little</p>	<p>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</p>	<p>In general, the qualifying bird species of the SPA rely on:</p>

Site Name	Area (ha)	Qualifying Features	Key Vulnerabilities	Conservation Objectives	Non-qualifying habitats and species upon which the qualifying Habitats and/or species depend
		<ul style="list-style-type: none"> <li>■ Ruddy Turnstone: <i>Arenaria interpres</i> (Non-breeding)</li> <li>■ Little Tern: <i>Sterna albifrons</i> (Breeding)</li> </ul>	<p>terns are thought to be due to human disturbance. The lack of breeding Little Terns within the site is also thought to be influenced by predation or nest inundation. Management measures such as fencing of nesting areas and signage have been implemented however has led to no known success.</p> <p><b>Invasive species:</b> A number of invasive species are thought to pose a threat to the SPA through the competitive interactions they have with mussel beds which support the wading species for which the SPA is designated for. The invasive species include pacific oysters, wireweed, Chinese mitten crab, carpet sea squirt, wakame and <i>Caulacanthus ustulatus</i> (a red algae).</p> <p><b>Public access/disturbance:</b> Recreational pressures linked with description for 'changes in species distributions'.</p> <p><b>Water pollution:</b></p>	<p>Birds Directive, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>■ The extent and distribution of the habitats of the qualifying features;</li> <li>■ The structure and function of the habitats of the qualifying features;</li> <li>■ The supporting processes on which the habitats of the qualifying features rely;</li> <li>■ The population of each of the qualifying features; and,</li> <li>■ The distribution of the qualifying features within the site.</li> </ul>	<ul style="list-style-type: none"> <li>■ The sites ecosystem as a whole (see list of habitats below).</li> <li>■ Maintenance of populations of species that they feed on (see list of diets below).</li> </ul> <p>The individual qualifying species of the SPA also rely on the following habitats and species:</p> <p>European Golden Plover: <i>Pluvialis apricaria</i> (Non-breeding)</p> <ul style="list-style-type: none"> <li>■ Habitat preference: farmland and coastal flats during the winter.</li> <li>■ Diet: worms, beetles and insects.</li> </ul> <p>Ruddy Turnstone: <i>Arenaria interpres</i> (Non-breeding)</p> <ul style="list-style-type: none"> <li>■ Habitat preference: rocky, muddy and sandy shorelines.</li> <li>■ Diet: insects, crustaceans and molluscs.</li> </ul> <p>Little Tern: <i>Sterna albifrons</i> (Breeding)</p> <ul style="list-style-type: none"> <li>■ Habitat preference: nest exclusively on the coast in well-camouflaged shallow scrapes on sand and shingle beaches, spits or inshore islets.</li> <li>■ Diet: fish, crustacean and invertebrates.</li> </ul>

Site Name	Area (ha)	Qualifying Features	Key Vulnerabilities	Conservation Objectives	Non-qualifying habitats and species upon which the qualifying Habitats and/or species depend
			Potentially could reduce food availability for SPA birds.		
Sandwich Bay SAC	1137.87	<ul style="list-style-type: none"> <li>■ H2110. Embryonic shifting dunes</li> <li>■ H2120. Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes")</li> <li>■ H2130. Fixed dunes with herbaceous vegetation ("grey dunes"); Dune grassland</li> <li>■ H2170. Dunes with <i>Salix repens ssp. argentea</i> (<i>Salicion arenariae</i>); Dunes with creeping willow</li> <li>■ H2190. Humid dune slacks</li> </ul>	<p><b>Public Access/Disturbance:</b></p> <p>Linked with recreational pressures i.e. compaction, trampling, erosion, and enrichment of sand dunes, particularly where vehicles have access to the sea front.</p> <p><b>Air Pollution:</b></p> <p>Nitrogen deposition currently exceeds site relevant critical loads. Possibility that this contributes towards an increase in MG grassland at the expense of sand dune vegetation, although stated that this could be due to over-stabilisation of the dune system.</p>	<p>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;</p> <ul style="list-style-type: none"> <li>■ The extent and distribution of qualifying natural habitats</li> <li>■ The structure and function (including typical species) of qualifying natural habitats; and,</li> <li>■ The supporting processes on which qualifying natural habitats rely.</li> </ul>	<p>H2110. Embryonic shifting dunes</p> <ul style="list-style-type: none"> <li>■ site displays a good sequence of embryonic shifting dune communities and there is a clear zonation within the dune habitat, with strandline species on the seaward edge and sand-binding grasses inland.</li> </ul> <p>H2120. Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes")</p> <ul style="list-style-type: none"> <li>■ shifting dune vegetation contains a good range of characteristic foredune species including sea bindweed <i>Calystegia soldanella</i>, sea spurge <i>Euphorbia paralias</i> and sea-holly <i>Eryngium maritimum</i>.</li> </ul> <p>H2130. Fixed dunes with herbaceous vegetation ("grey dunes"); Dune grassland</p> <ul style="list-style-type: none"> <li>■ The vegetation is extremely species-rich and the site has been selected because it includes a number of rare and scarce species, such as fragrant evening-primrose <i>Oenothera stricta</i>, bedstraw broomrape <i>Orobanche caryophyllacea</i> and sand catchfly <i>Silene conica</i>, as well as the UK's largest population of lizard orchid <i>Himantoglossum hircinum</i>.</li> </ul>

Site Name	Area (ha)	Qualifying Features	Key Vulnerabilities	Conservation Objectives	Non-qualifying habitats and species upon which the qualifying Habitats and/or species depend
Thanet Coast SAC	2815.95	<ul style="list-style-type: none"> <li>■ H1170. Reefs</li> <li>■ H8330. Submerged or partially submerged sea caves</li> </ul>	<p><b>Invasive species:</b></p> <p>The species listed above are considered to pose a threat to the condition of the SAC. The intertidal chalk reef biotopes (a SAC subfeature) are considered to be affected by the presence of these species.</p>	<p>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;</p> <ul style="list-style-type: none"> <li>■ The extent and distribution of qualifying natural habitats;</li> <li>■ The structure and function (including typical species) of qualifying natural habitats; and,</li> <li>■ The supporting processes on which qualifying natural habitats rely.</li> </ul>	<p>H1170. Reefs</p> <ul style="list-style-type: none"> <li>■ Reefs on soft chalk along the shore. Thanet has sublittoral chalk platforms that extend into the littoral and form chalk cliffs. They are an unusual feature because of the scarcity of hard substrates in the area.</li> <li>■ The subtidal chalk platforms extend offshore in a series of steps dissected by gullies.</li> <li>■ Species present include an unusually rich littoral algal flora, essentially of chalk-boring algae. Thanet remains the sole known location for some algal species.</li> </ul> <p>H8330. Submerged or partially submerged sea caves</p> <ul style="list-style-type: none"> <li>■ They support very specialised algal and lichen communities containing species such as <i>Pseudodoctonium submarinum</i> and <i>Lyngbya</i> spp</li> </ul>
Thanet Coast and Sandwich Bay RAMSAR	2169.23	<p><b>Ramsar criterion 2:</b></p> <p>The site supports 15 British Red Data Book wetland invertebrates.</p> <p><b>Ramsar criterion 6:</b></p> <p>The site supports species/populations occurring at levels of international importance.</p> <p>Species with peak counts in winter:</p>	<p>No threats specified. See threats associated with Thanet Coast and Sandwich Bay SPA for threats likely to affect the RAMSAR site.</p>	<p>No specific conservation objectives outlined. See conservation objectives associated with Thanet Coast and Sandwich Bay SPA.</p>	<p>Ruddy turnstone: <i>Arenaria interpres</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: rocky, muddy and sandy shorelines.</li> <li>■ Diet: insects, crustaceans and molluscs.</li> </ul>



Site Name	Area (ha)	Qualifying Features	Key Vulnerabilities	Conservation Objectives	Non-qualifying habitats and species upon which the qualifying Habitats and/or species depend
		Ruddy turnstone =, <i>Arenaria interpres</i>			
<p>The Swale is situated on the southern aspect of the outer Thames Estuary in south-eastern England. The Swale is an estuarine and is comprised of brackish and freshwater habitats, floodplain grazing marshes, intertidal saltmarshes and mudflats. The SPA contains the largest extent of grazing marsh in Kent. The wide diversity of coastal habitats support important wetland bird assemblages throughout the year.</p>					
The Swale SPA	6514.71	<ul style="list-style-type: none"> <li>■ Avocet: <i>Recurvirostra avosetta</i></li> <li>■ Marsh Harrier: <i>Circus aeruginosus</i></li> <li>■ Mediterranean Gull: <i>Larus melanocephalus</i></li> <li>■ Bar-tailed Godwit: <i>Limosa lapponica</i></li> <li>■ Golden Plover: <i>Pluvialis apricaria</i></li> <li>■ Hen Harrier: <i>Circus cyaneus</i></li> <li>■ Ringed Plover: <i>Charadrius hiaticula</i></li> <li>■ Grey Plover: <i>Pluvialis squatarola</i></li> <li>■ Knot: <i>Calidris canutus</i></li> <li>■ Pintail: <i>Anas acuta</i></li> <li>■ Redshank: <i>Tringa totanus</i></li> <li>■ Shoveler: <i>Anas clypeata</i></li> </ul>	<p><b>Public Access/Disturbance:</b> Breeding and overwintering waterfowl are susceptible to disturbance from humans through recreational activities.</p> <p><b>Invasive species:</b> Freshwater non-native invasive species such as pennywort, crassula, parrots feather etc. can reduce suitable habitat availability for diving waterfowl species.</p> <p><b>Vehicles:</b> The illicit use of motor vehicles can cause disturbance to SPA birds utilising the site.</p>	<p>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;</p> <ul style="list-style-type: none"> <li>■ The extent and distribution of the habitats of the qualifying features;</li> <li>■ The structure and function of the habitats of the qualifying features;</li> <li>■ The supporting processes on which the habitats of the qualifying features rely;</li> <li>■ The population of each of the qualifying features; and,</li> <li>■ The distribution of the qualifying features within the site.</li> </ul>	<p>In general, the qualifying bird species of the SPA rely on:</p> <ul style="list-style-type: none"> <li>■ The sites ecosystem as a whole (see list of habitats below).</li> <li>■ Maintenance of populations of species that they feed on (see list of diets below).</li> <li>■ Off-site habitat, which provide foraging habitat for these species.</li> <li>■ Open landscape with unobstructed line of sight within nesting, foraging or roosting habitat.</li> </ul> <p>The individual qualifying species of the SPA also rely on the following habitats and species:</p> <p>Grey plover: <i>Pluvialis squatarola</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: tundra, and on migration pasture and estuaries.</li> <li>■ Diet: in summer, invertebrates and in winter primarily marine worms, crustaceans and molluscs.</li> </ul> <p>Dark-bellied brent goose: <i>Branta bernicla</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: tundra, and on migration marshes and estuaries.</li> </ul>

Site Name	Area (ha)	Qualifying Features	Key Vulnerabilities	Conservation Objectives	Non-qualifying habitats and species upon which the qualifying Habitats and/or species depend
					<ul style="list-style-type: none"> <li>■ Diet: vegetation, especially eelgrass.</li> </ul> <p>Ringed plover: <i>Charadrius hiaticula</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: sandy areas with low vegetation, and on migration estuaries.</li> <li>■ Diet: in summer, invertebrates and in winter primarily marine worms, crustaceans and molluscs.</li> </ul> <p>Common redshank: <i>Tringa totanus</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: rivers, wet grassland, moors and estuaries.</li> <li>■ Diet: invertebrates, especially earthworms, crane fly larvae (inland) crustaceans, molluscs, marine worms (estuaries).</li> </ul> <p>Dunlin: <i>Calidris alpina</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: tundra, moor, heath, and on migration estuaries and coastal habitat.</li> <li>■ Diet: insects, snails and worms.</li> </ul> <p><b>Breeding Bird Assemblage:</b></p> <p>The grazing marshes support a typical assemblage of breeding species.</p> <p><b>Waterbird Assemblage:</b></p> <p>The mudflats also support smaller numbers of wintering migratory waterfowl.</p>

Site Name	Area (ha)	Qualifying Features	Key Vulnerabilities	Conservation Objectives	Non-qualifying habitats and species upon which the qualifying Habitats and/or species depend
					The grazing marshes support internationally and nationally important numbers of several waterbirds.
The Swale RAMSAR site	6514.71	<p><b>Ramsar criterion 2:</b> The site supports nationally scarce plants and at least seven British Red data book invertebrates.</p> <p><b>Ramsar criterion 5:</b> The site supports assemblages of international importance, with peak counts in winter of 77501 waterfowl (5 year peak mean 1998/99 – 2002/03).</p> <p><b>Ramsar criterion 6:</b> This site supports species/populations occurring at levels of international importance. Species with peak counts in spring/autumn:  <ul style="list-style-type: none"> <li>– Common Redshank: <i>Tringa totanus</i></li> </ul> Species with peak counts in winter:  <ul style="list-style-type: none"> <li>– Dark-Bellied Brent Goose: <i>Branta bernicla</i></li> <li>– Grey Plover: <i>Pluvialis squatarola</i></li> </ul> Species/populations identified subsequent to designation for possible future consideration under criterion 6.  Species with peak counts in spring/autumn:  <ul style="list-style-type: none"> <li>– Ringed Plover: <i>Charadrius hiaticula</i></li> </ul> </p>	No threats specified. Please refer to the threats identified in association with The Swale SPA site for threats likely to affect the RAMSAR site.	No specific conservation objectives outlined. See conservation objectives associated with The Swale SPA.	<p><b>Plants:</b></p> <ul style="list-style-type: none"> <li>■ Plant communities are reliant on the coastal habitats within the Ramsar site. These habitats are dependent on a range of coastal factors and processes, including salinity, sedimentation, sea level, turbidity and elevation.</li> </ul> <p><b>Invertebrates:</b></p> <ul style="list-style-type: none"> <li>■ These species are reliant on the coastal habitat and characteristic flora and fauna present within the European site. Key sources of food range from flowering plants, organic matter and other invertebrate species.</li> </ul> <p><b>Birds:</b> Refer to The Swale SPA above.</p>

Site Name	Area (ha)	Qualifying Features	Key Vulnerabilities	Conservation Objectives	Non-qualifying habitats and species upon which the qualifying Habitats and/or species depend
		<p>Species with peak counts in winter:</p> <ul style="list-style-type: none"> <li>– Eurasian Wigeon: <i>Anas Penelope</i></li> <li>– Northern Pintail: <i>Anas acuta</i></li> <li>– Northern Shoveler: <i>Anas clypeata</i></li> <li>– Black-Tailed Godwit: <i>Limosa islandica</i></li> </ul>			
<p>The Swale is situated on the southern aspect of the outer Thames Estuary in south-eastern England. The Swale is an estuarine and is comprised of brackish and freshwater habitats, floodplain grazing marshes, intertidal saltmarshes and mud-flats. The SPA contains the largest extent of grazing marsh in Kent. The wide diversity of coastal habitats support important wetland bird assemblages throughout the year.</p>					
Blean Complex SAC	522.89	<ul style="list-style-type: none"> <li>■ H9160. Sub-Atlantic and medio-European oak or oak-hornbeam forests of the Carpinion betuli</li> </ul>	<p><b>Air Pollution:</b></p> <p>Nitrogen deposition exceeds the site-relevant critical load for ecosystem protection and hence there is a risk of harmful effects, but there is a risk of impacting sensitive features within the Site. Currently the woodlands are considered to be in favourable condition, although further investigation is required to determine if exceeded nitrogen levels will impact sensitive features present within the Site.</p>	<p>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;</p> <ul style="list-style-type: none"> <li>■ The extent and distribution of qualifying natural habitats;</li> <li>■ The structure and function (including typical species) of qualifying natural habitats; and,</li> <li>■ The supporting processes on which</li> </ul>	<p>H9160. Sub-Atlantic and medio-European oak or oak-hornbeam forests of the Carpinion betuli</p> <ul style="list-style-type: none"> <li>■ Light grazing and browsing from herbivores, such as deer to promote diverse woodland structure and continuous seedling establishment.</li> </ul>

Site Name	Area (ha)	Qualifying Features	Key Vulnerabilities	Conservation Objectives	Non-qualifying habitats and species upon which the qualifying Habitats and/or species depend
				qualifying natural habitats rely.	
Dover to Kingsdown Cliffs SAC	184.54	<ul style="list-style-type: none"> <li>■ H1230. Vegetated sea cliffs of the Atlantic and Baltic coasts</li> <li>■ H6210# Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>)</li> </ul>	<p><b>Inappropriate scrub control:</b> Small areas of the site in private ownership are insufficiently managed. Scrub management needs to be undertaken to retain chalk grassland habitat.</p> <p><b>Undergrazing:</b> Small areas of the site in private ownership are insufficiently grazed. Grazing needs to be undertaken to retain chalk grassland habitat.</p> <p><b>Air Pollution; impact of atmospheric nitrogen deposition:</b> Nitrogen deposition exceeds site relevant critical loads. There is a risk of increases in tall grasses, a decline in species diversity, increased mineralization, N leaching; surface acidification.</p>	<p>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;</p> <ul style="list-style-type: none"> <li>■ The extent and distribution of qualifying natural habitats;</li> <li>■ The structure and function (including typical species) of qualifying natural habitats; and,</li> <li>■ The supporting processes on which qualifying natural habitats rely.</li> </ul>	<p>In general, qualifying habitats of the SAC rely on:</p> <ul style="list-style-type: none"> <li>■ Key species to maintain the structure, function and quality of habitat.</li> <li>■ Natural vegetation transitions to create diversity and support a range of species.</li> <li>■ Habitat connectivity to the wider landscape to allow for migration, dispersal and genetic exchange of species typical of this habitat.</li> </ul> <p>Active and ongoing conservation management to protect, maintain or restore these habitats.</p> <p>H1230. Vegetated sea cliffs of the Atlantic and Baltic coasts</p> <ul style="list-style-type: none"> <li>■ The cliffs support a full zonation of maritime cliff communities found on chalk substrates, reflecting different levels of exposure to wind and salt spray.</li> </ul> <p>Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (*important orchid sites)</p> <ul style="list-style-type: none"> <li>■ Thin, well-drained, lime-rich soils. Most of these agriculturally unimproved calcareous grasslands are maintained by grazing.</li> </ul>

Site Name	Area (ha)	Qualifying Features	Key Vulnerabilities	Conservation Objectives	Non-qualifying habitats and species upon which the qualifying Habitats and/or species depend
Folkestone to Etchinghill Escarpment SAC	187.02	<ul style="list-style-type: none"> <li>■ H6210# Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) (important orchid sites)</li> </ul> <p>This site consists of extensive CG4 <i>Brachypodium pinnatum</i> and CG5 <i>Bromus erectus</i> – <i>Brachypodium pinnatum</i> calcareous grasslands, together with smaller areas of short-turf CG2 <i>Festuca ovina</i> – <i>Avenula pratensis</i> grassland. The site contains an important assemblage of rare and scarce species, including early spider-orchid <i>Ophrys sphegodes</i>, late spider-orchid <i>O. fuciflora</i> and burnt orchid <i>Orchis ustulata</i>.</p>	<p><b>Undergrazing:</b></p> <p>Scrub/woodland encroachment and a dominance of Tor grass are occurring at Dolls House Hill and Hunger Down due to insufficient grazing at Dolls House Hill, and lack of any management at Hunger Down. This is reducing the extent and quality of the grassland feature.</p> <p><b>Inappropriate scrub control:</b></p> <p>Extensive scrub development on Creteway Down is reducing the extent of the grassland feature. Existing incentives (Higher Level Stewardship funding) are currently insufficient to fund work to restore scrub areas to grassland.</p> <p><b>Air Pollution; impact of atmospheric nitrogen deposition:</b></p> <p>Nitrogen deposition exceeds site relevant critical loads.</p>	<p>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;</p> <ul style="list-style-type: none"> <li>■ The extent and distribution of qualifying natural habitats;</li> <li>■ The structure and function (including typical species) of qualifying natural habitats; and,</li> <li>■ The supporting processes on which qualifying natural habitats rely.</li> </ul>	<p>In general, qualifying habitats of the SAC rely on:</p> <ul style="list-style-type: none"> <li>■ Key species to maintain the structure, function and quality of habitat.</li> <li>■ Natural vegetation transitions to create diversity and support a range of species.</li> <li>■ Habitat connectivity to the wider landscape to allow for migration, dispersal and genetic exchange of species typical of this habitat.</li> </ul> <p>Active and ongoing conservation management to protect, maintain or restore these habitats.</p> <p>Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (*important orchid sites)</p> <ul style="list-style-type: none"> <li>■ Thin, well-drained, lime-rich soils. Most of these agriculturally unimproved calcareous grasslands are maintained by grazing.</li> </ul>

Site Name	Area (ha)	Qualifying Features	Key Vulnerabilities	Conservation Objectives	Non-qualifying habitats and species upon which the qualifying Habitats and/or species depend
Lydden & Temple Ewell Downs SAC	62.77	<ul style="list-style-type: none"> <li>■ H6210# Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) (important orchid sites)</li> </ul> <p>This site hosts the priority habitat type "orchid rich sites". This site consists largely of CG4 <i>Brachypodium pinnatum</i> and CG5 <i>Bromus erectus</i> – <i>Brachypodium</i>.</p>	<p><b>Overgrazing:</b></p> <p>The southern and central parts of the site have suffered from heavy rabbit grazing in recent years which has resulted in a reduction in the number of flowering orchids.</p> <p>Climate change could exacerbate this situation with increased spring/early summer drought adversely affecting the grassland, much of which occurs on the steep scarp slopes with shallow soils.</p> <p><b>Public Access/Disturbance:</b></p> <p>Public use of the site, primarily dog walking, has increased in the last 10 - 15 years causing trampling to the grassland and potential nutrient increases in the soil, leading to changes in the species composition.</p> <p><b>Air Pollution; impact of atmospheric nitrogen deposition:</b></p> <p>Nitrogen deposition exceeds site relevant critical loads.</p>	<p>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;</p> <ul style="list-style-type: none"> <li>■ The extent and distribution of qualifying natural habitats;</li> <li>■ The structure and function (including typical species) of qualifying natural habitats; and,</li> <li>■ The supporting processes on which qualifying natural habitats rely.</li> </ul>	<p>In general, qualifying habitats of the SAC rely on:</p> <ul style="list-style-type: none"> <li>■ Key species to maintain the structure, function and quality of habitat.</li> <li>■ Natural vegetation transitions to create diversity and support a range of species.</li> <li>■ Habitat connectivity to the wider landscape to allow for migration, dispersal and genetic exchange of species typical of this habitat.</li> </ul> <p>Active and ongoing conservation management to protect, maintain or restore these habitats.</p> <p>Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (*important orchid sites)</p> <ul style="list-style-type: none"> <li>■ Thin, well-drained, lime-rich soils. Most of these agriculturally unimproved calcareous grasslands are maintained by grazing.</li> </ul>

Site Name	Area (ha)	Qualifying Features	Key Vulnerabilities	Conservation Objectives	Non-qualifying habitats and species upon which the qualifying Habitats and/or species depend
Margate and Long Sands SAC	64876.85	<ul style="list-style-type: none"> <li>H1110. Sandbanks which are slightly covered by sea water all the time</li> <li>H1140. Mudflats and sandflats not covered by seawater at low tide</li> </ul>	<p><b>Fisheries; commercial marine and estuarine:</b></p> <p>Commercial fishing activities categorised as 'amber or green' under Defra's revised approach to commercial fisheries in European Marine Sites (EMS) require assessment and (where appropriate) management. This assessment will be undertaken by Kent &amp; Essex IFCA and the Marine Management Organisation (MMO). For activities categorised as 'green', these assessments should take account of any in-combination effects of amber activities, and/or appropriate plans or projects, in the site. Fishing activities within the site include set and drift-net tramelling netting, potting, and trawling.</p>	<p>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;</p> <ul style="list-style-type: none"> <li>The extent and distribution of qualifying natural habitats;</li> <li>The structure and function (including typical species) of qualifying natural habitats; and,</li> <li>The supporting processes on which qualifying natural habitats rely.</li> </ul>	<p>H1110 Sandbanks which are slightly covered by sea water all the time:</p> <ul style="list-style-type: none"> <li>sandbanks are composed of well-sorted sandy sediments, with muddier and more gravelly sediments in the troughs between banks, and the upper crests of some of the larger banks dry out at low tide. The banks are tidally-influenced estuary mouth sandbanks.</li> <li>fauna of the bank crests is characteristic of species-poor, mobile sand environments, and is dominated by polychaete worms and amphipods. Within the troughs and on the bank slopes a higher diversity of polychaetes, crustacea, molluscs and echinoderms are found. Mobile epifauna includes crabs and brown shrimp, along with squid and commercially important fish species such as sole and herring.</li> </ul>
Parkgate Down SAC	6.92	<ul style="list-style-type: none"> <li>H6210# Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) (important orchid sites)</li> </ul> <p>This site hosts the priority habitat type "orchid rich sites". Parkgate Down is situated on the</p>	<p><b>Habitat fragmentation:</b></p> <p>The small size and relative isolation of the site raises concern for the long-term genetic viability of some of the orchid populations.</p>	<p>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</p>	<p>In general, qualifying habitats of the SAC rely on:</p> <ul style="list-style-type: none"> <li>Key species to maintain the structure, function and quality of habitat.</li> </ul>



Site Name	Area (ha)	Qualifying Features	Key Vulnerabilities	Conservation Objectives	Non-qualifying habitats and species upon which the qualifying Habitats and/or species depend
		<p>chalk of the North Downs and consists largely of NVC type CG4 <i>Brachypodium pinnatum</i> grassland. The site contains an outstanding assemblage of orchids including the nationally rare monkey orchid <i>Orchis simia</i> and late spider orchid <i>Ophrys fuciflora</i> together with the nationally scarce musk orchid <i>Herminium monorchis</i> and lady orchid <i>Orchis purpurea</i>.</p>	<p><b>Air Pollution; risk of atmospheric nitrogen deposition:</b></p> <p>Nitrogen deposition exceeds the site-relevant critical load for ecosystem protection and hence there is a risk of harmful effects, but the sensitive features are currently considered to be in favourable condition on the site. This requires further investigation.</p>	<p>Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>■ The extent and distribution of qualifying natural habitats;</li> <li>■ The structure and function (including typical species) of qualifying natural habitats; and,</li> <li>■ The supporting processes on which qualifying natural habitats rely.</li> </ul>	<ul style="list-style-type: none"> <li>■ Natural vegetation transitions to create diversity and support a range of species.</li> <li>■ Habitat connectivity to the wider landscape to allow for migration, dispersal and genetic exchange of species typical of this habitat.</li> </ul> <p>Active and ongoing conservation management to protect, maintain or restore these habitats.</p> <p>Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (*important orchid sites)</p> <ul style="list-style-type: none"> <li>■ Thin, well-drained, lime-rich soils. Most of these agriculturally unimproved calcareous grasslands are maintained by grazing.</li> </ul>
Tankerton Slopes and Swalecliffe SAC	13.01	<ul style="list-style-type: none"> <li>■ S4035. Fisher's estuarine moth: <i>Gortyna borelii lunata</i></li> </ul>	<p><b>Public Access/Disturbance:</b></p> <p>Public use of the site causing erosion.</p> <p>Climate change could exacerbate this situation with rising sea levels causing coastal flooding.</p>	<p>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;</p> <ul style="list-style-type: none"> <li>■ The extent and distribution of qualifying natural habitats;</li> <li>■ The structure and function (including</li> </ul>	<p>Fisher's estuarine moth: <i>Gortyna borelii lunata</i></p> <ul style="list-style-type: none"> <li>■ Habitat preference: rough grassland where Hog's Fennel (<i>Peucedanum officinale</i>), its sole larval foodplant, grows. Long coarse grasses, such as 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.</li> </ul>

Site Name	Area (ha)	Qualifying Features	Key Vulnerabilities	Conservation Objectives	Non-qualifying habitats and species upon which the qualifying Habitats and/or species depend
				<p>typical species) of qualifying natural habitats; and,</p> <ul style="list-style-type: none"> <li>■ The supporting processes on which qualifying natural habitats rely.</li> </ul>	
<p>Wye &amp; Crundale Downs SAC</p>	<p>111.32</p>	<ul style="list-style-type: none"> <li>■ H6210# Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) (important orchid sites)</li> </ul> <p>This site hosts the priority habitat type "orchid rich sites". Wye and Crundale Downs consists mostly of NVC types CG4 <i>Brachypodium pinnatum</i> and CG5 <i>Bromus erectus</i>–<i>Brachypodium pinnatum</i> grasslands, although small areas of CG2 <i>Festuca ovina</i>–<i>Avenula pratensis</i> grassland also occur. It has an important assemblage of rare, scarce and uncommon orchids, including early spider-orchid <i>Ophrys sphegodes</i>, late spider-orchid <i>O. fuciflora</i>, burnt orchid <i>Orchis ustulata</i> and lady orchid <i>Orchis purpurea</i>. The site contains the largest UK colony of <i>O. fuciflora</i>, representing about 50% of the national population.</p>	<p><b>Overgrazing:</b></p> <p>Grazing pressure from livestock and rabbits is only partially controlled and parts of the site are overgrazed resulting in too short a sward height and inhibiting flowering plants. A programme of rabbit control is underway but effectiveness needs to be monitored.</p> <p><b>Inappropriate scrub control:</b></p> <p>Scrub encroachment on the steep slopes of the Devil's Kneading Trough and other areas of the NNR is only partially controlled by grazing, which is leading to a reduction in the extent of grassland feature.</p>	<p>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;</p> <ul style="list-style-type: none"> <li>■ The extent and distribution of qualifying natural habitats;</li> <li>■ The structure and function (including typical species) of qualifying natural habitats; and,</li> <li>■ The supporting processes on which qualifying natural habitats rely.</li> </ul>	<p>In general, qualifying habitats of the SAC rely on:</p> <ul style="list-style-type: none"> <li>■ Key species to maintain the structure, function and quality of habitat.</li> <li>■ Natural vegetation transitions to create diversity and support a range of species.</li> <li>■ Habitat connectivity to the wider landscape to allow for migration, dispersal and genetic exchange of species typical of this habitat.</li> <li>■ Active and ongoing conservation management to protect, maintain or restore these habitats.</li> </ul> <p>More specific information has been provided for each qualifying habitat as follows:</p> <p>Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) (important orchid sites)</p> <ul style="list-style-type: none"> <li>■ This habitat is maintained by grazing and is reliant on key pollinator species.</li> </ul>

Appendix B  
European Site Information

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Site Name	Area (ha)	Qualifying Features	Key Vulnerabilities	Conservation Objectives	Non-qualifying habitats and species upon which the qualifying Habitats and/or species depend
			<p><b>Air Pollution; risk of atmospheric nitrogen deposition:</b></p> <p>Nitrogen deposition exceeds the site-relevant critical load for ecosystem protection and hence there is a risk of harmful effects, but the sensitive features are currently considered to be in favourable condition on the site. This requires further investigation.</p>		

## Appendix C

# Screening Matrix

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Table 6.1: Screening Matrix. The following colour coding has been used to identify sites where Likely Significant Effects are uncertain (**Orange**) and where policies provide safeguards and mitigation (**Green**).

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Screening Matrix

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Plan Policy	Likely activities (operations) to result as a consequence of the proposal	Likely effect if proposal is implemented	European site/s potentially affected	Could the proposal have Likely Significant Effects
Climate Change				
Strategic Policy 1: Planning for Climate Change	None – this policy sets out the requirement for new development to mitigate and adapt to climate change.	N/A	N/A	No
CC1: Reducing Carbon Emissions	None – this policy sets out the requirement for new development to incorporate design features that deliver a reduction in carbon emissions.	N/A	N/A	No
CC2: Sustainable Design and Construction	None – this policy sets out the requirement for development to be designed and constructed in a sustainable manner.	N/A	N/A	No
CC3: Renewable and Low Carbon Energy Development	None – this policy encourages the provision of renewable and low carbon energy developments and sets out criteria with which this development type must meet.	N/A	N/A	No
CC4: Water Efficiency	None – this policy sets out the requirement for new development to meet water efficiency standards.	N/A	N/A	No
CC5: Flood Risk	None – this policy sets out the requirement for new developments in areas of flood risk to meet NPPF and	N/A	N/A	No

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	associated guidance requirements.			
CC6: Surface Water Management	None – This policy sets out the requirement for new development to manage surface water run-off appropriately.	N/A	N/A	No
CC7: Coastal Change Management Areas	None – this policy relates to coastal change and the requirements that new development needs to meet.	N/A	N/A	No
CC8: Tree Planting and Protection	None – this policy sets out the requirement for tree planting and protection.	N/A	N/A	No
<b>Planning for Healthy and Inclusive Communities</b>				
Strategic Policy 2: Planning for Healthy and Inclusive Communities	None – this policy sets out the principles for new development to create healthy, inclusive and safe communities.	N/A	N/A	No
PM1: Achieving High Quality Design, Placemaking and the provision of Design Codes	None – this policy sets out the requirement for new development to achieve high quality design.	N/A	N/A	No
PM2: Quality of Residential Accommodation	None – this policy sets out the requirement for quality residential accommodation.	N/A	N/A	No
PM3: Providing Open Space	None – this policy sets out the requirement for new development to make provision for open spaces.	N/A	N/A	No



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	developments of 10 or more dwellings.			result in Likely Significant Effect on European sites.
PM5: Protection of Open Space, Sports Facilities and Local Green Space	None – this policy sets out the requirement to protect existing open spaces.	N/A	N/A	No
PM6: Community Facilities and Services.	Yes – this policy encourages the retention, enhancement and maintenance of existing community facilities and incorporation of new facilities.	N/A	N/A	No - this policy will result in small scale development that will not result in Likely Significant Effect on European sites.
New Homes				
Strategic Policy 3: Housing Growth	Yes – this policy sets out the requirement for 10,998 additional homes in the District between 2020 and 2040. This has potential to result in the following impacts:  Loss and Damage of habitats  Increase in vehicle use  Increase in recreational activities  Increase in demand for water abstraction and treatment	Loss and/or damage of habitats.  Increased air pollution  Disturbance from recreation.  Change in water quantity and increased water pollution.	Sandwich Bay SAC  Thanet Coast and Sandwich Bay SPA and Ramsar  Thanet Coast SAC  Dover to Kingsdown Cliffs SAC  Lydden and Temple Ewell Downs SAC  Stodmarsh SPA and Ramsar  Folkestone to Etchinghill Escarpment SAC  Blean Complex SAC  Margate and Long Sands  Outer Thames Estuary	Uncertain

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Strategic Policy 4: Residential Windfall Development	No – this policy supports the delivery of residential windfall development in the district but will not itself directly result in development.	N/A	N/A	No
Strategic Policy 5: Affordable Housing	None – this policy sets out the requirement for affordable housing within the plan.	N/A	N/A	No
H1: Type and Mix of Housing	None – this policy sets out the requirements in relation to types and mix of housing.	N/A	N/A	No
H2: Rural Local Needs Housing	None – this policy sets out the requirement for local needs housing.	N/A	N/A	No
H3: Meeting the needs of Gypsies and Travellers	<p>Yes – this policy sets out the proposals for 4 additional sites providing a total of 7 pitches for gypsy and traveller sites.</p> <p>This has potential to result in the following impacts:</p> <ul style="list-style-type: none"> <li>■ Loss and Damage of habitats.</li> <li>■ Increased in vehicle use</li> <li>■ Increase in recreational activities</li> <li>■ Increase in demand for water abstraction and treatment</li> </ul>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation.</p> <p>Change in water quantity and increased water pollution.</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p>	Uncertain

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		Outer Thames Estuary		
H4: Gypsy and Traveller Windfall Accommodation	Yes – this policy sets out the requirements for gypsy and traveller accommodation on windfall sites.	N/A	N/A	No - this policy will result in small scale development that will not result in Likely Significant Effect on European sites.
H5: Self-build and Custom Housebuilding	None – this policy encourages the provision of self-build and custom house building.	N/A	N/A	No
H6: Residential Extensions and Annexes	Yes – this policy sets out the requirements for residential extensions and annexes.	N/A	N/A	No- this policy will result in small scale development that will not result in Likely Significant Effect on European sites.
H7: Housing in Multiple Occupation	None – this policy sets out requirements for houses in multiple occupation.	N/A	N/A	No
Employment and the Local Economy				
Strategic Policy 6: Economic Growth	Yes – this policy sets out the requirement to deliver a minimum of 128,000 sqm of new employment floorspace (34ha of land) between 2020 and 2040 and to regenerate existing sites for mixed uses.	Loss and/or damage of habitats. Increased air pollution Change in water quantity and increased water pollution.	Sandwich Bay SAC Thanet Coast and Sandwich Bay SPA and Ramsar Dover to Kingsdown Cliffs SAC Lydden and Temple Ewell Downs SAC Stodmarsh SPA and Ramsar Folkestone to Etchinghill Escarpment SAC	Uncertain

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E1: New Employment Development	Yes – this policy sets out the provision of new employment premises and alteration of existing employment sites.	Loss and/or damage of habitats.  Increased air pollution  Change in water quantity and increased water pollution.	Sandwich Bay SAC  Thanet Coast and Sandwich Bay SPA and Ramsar  Dover to Kingsdown Cliffs SAC  Lydden and Temple Ewell Downs SAC  Stodmarsh SPA and Ramsar  Folkestone to Etchinghill Escarpment SAC	Uncertain
E2: Loss or Re-development of Employment Sites and Premises	None – this policy sets out the requirement for loss of existing employment sites.	N/A	N/A	No
E3: Businesses Operating from a Residential Property	None – this policy supports proposals for business to operate from a residential property.	N/A	N/A	No
E4: Tourist Accommodation and Attractions	Yes – this policy supports additional high quality, sustainable tourist facilities.	Loss and/or damage of habitats.  Increased air pollution  Disturbance from recreation.  Change in water quantity and increased water pollution.	Sandwich Bay SAC  Thanet Coast and Sandwich Bay SPA and Ramsar  Thanet Coast SAC  Dover to Kingsdown Cliffs SAC  Lydden and Temple Ewell Downs SAC  Stodmarsh SPA and Ramsar  Folkestone to Etchinghill Escarpment SAC	Uncertain

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			Blean Complex SAC Margate and Long Sands Outer Thames Estuary	
<b>Retail and Town Centres</b>				
Strategic Policy 7: Retail and Town Centres	Yes – this policy will result in the development of retail in main towns.	N/A	N/A	No - this policy will result in small scale development that will not result in Likely Significant Effect on European sites.
Strategic Policy 8: Dover Town Centre	Yes – this policy sets out the provision of retail in Dover town centre.	N/A	N/A	No - this policy will result in small scale development that will not result in Likely Significant Effect on European sites.
Strategic Policy 9: Deal Town Centres	Yes – this policy sets out the provision of retail in Deal town centre.	N/A	N/A	No - this policy will result in small scale development that will not result in Likely Significant Effect on European sites.
Strategy 10: Sandwich Town Centre	Yes – this policy sets out the provision of retail in Sandwich town centre.	N/A	N/A	No - this policy will result in small scale development that will not result in Likely Significant Effect on European sites.
R1: Primary Shopping Areas	None – this policy sets out requirements for primary shopping areas.	N/A	N/A	No
R2: Sequential Test and Impact Assessment	None – this policy sets out the requirements for retail development	N/A	N/A	No

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	proposed outside of the primary shopping area.			
R3: Local Centres	None – this policy sets out protection measures for proposals to change the use of existing retail sites.	N/A	N/A	No
R4: Shop fronts	None – this policy sets out requirements for new employment and retail fronts.	N/A	N/A	No
Transport and Infrastructure				
Strategic Policy 11: Infrastructure and Developer Contributions	None – this policy sets out the requirement for the Council to work with service providers delivering infrastructure.	N/A	N/A	No
Strategic Policy 12: Strategic Transport Infrastructure	Yes – this policy facilitates major, long-term improvements of the A2, alongside rail and bus network improvements.	N/A	N/A	No - this policy will result in small scale development that will not result in Likely Significant Effect on European sites.
T11 - Sustainable Transport and Travel	None – this policy sets out the requirement for new development to include sustainable transport measures.	N/A	N/A	No
T12 - Transport Statements, Assessments and Travel Plans	None – this policy sets out the requirement for new development in relation to highway network and safety.	N/A	N/A	No

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TI3: Parking Provision on New Development	None – this policy sets out requirement for parking provision for new development.	N/A	N/A	No
TI4: Overnight Lorry Parking Facilities	None – this policy sets out the provision for suitable overnight lorry parking, which does not create a detrimental impact on the amenity of local residents.	N/A	N/A	No
TI5: Digital Technology	None – this policy sets out the requirement for new development to provide appropriate digital infrastructure.	N/A	N/A	No
<b>The Natural Environment</b>				
Strategic Policy 13: Protecting the Districts Hierarchy of Designated Environmental Sites and Biodiversity Assets	None – this policy sets out protection for designated environment sites from proposed development.	N/A	N/A	N/A
Strategic Policy 14: Green Infrastructure and Biodiversity	None – this policy sets out the requirement to protect and enhance biodiversity and green infrastructure.	N/A	N/A	No
NE1: Biodiversity Net Gain	None – this policy sets out the requirement for new development to achieve biodiversity net gain.	N/A	N/A	No
NE2: Landscape Character and the Kent Downs AONB	None – this policy sets out the requirement to protect the	N/A	N/A	No

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	landscape character in the District and the AONB.			
NE3: Thanet Coast and Sandwich bay SPA Mitigation and Monitoring Strategy	None – this policy sets out the requirement for new development with the ZOI of the SPA and Ramsar to comply with the mitigation measures.	N/A	N/A	No
NE4: Air Quality	None – this policy sets out the requirement for new development to allow for sustainable travel and minimise impacts of vehicle emissions on air quality.	N/A	N/A	No
NE5: Water Supply and Quality	None – this policy sets out the requirement for new development to achieve water efficiency and to demonstrate that there is adequate supply and sewage system capacity.	N/A	N/A	No
NE6: The River Dour	None – this policy sets out protection for the River Dour from proposed development.	N/A	N/A	No
The Historic Environment				
Strategic Policy 15: Protecting the Districts Historic Environment	None – this policy sets out the requirement to protect heritage assets.	N/A	N/A	No



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HE1: Designated and Non-Designated Heritage Assets	None – this policy sets out the requirement to protect heritage assets.	N/A	N/A	No
HE2: Conservation Areas	None – this policy sets out the requirements for development in Conservation Areas.	N/A	N/A	No
HE3: Archaeology	None – this policy sets out the requirement to protect heritage assets.	N/A	N/A	No
HE4: Historic Parks and Gardens	None – this policy sets out the requirement to protect and enhance historic parks and gardens.	N/A	N/A	No
<b>Strategic and Non-Strategic Housing and Employment Allocations</b>				
<b>Settlement: Dover</b>				
Site Allocation Policy (SAP) 1: Whitfield Urban Expansion	<p>Yes – this policy sets out the provision of approximately 6,350 new homes, employment land and open space to the west, north and east of Whitfield.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p>	Uncertain

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	Increase in demand for water abstraction and treatment		Blean Complex SAC Margate and Long Sands Outer Thames Estuary	
SAP2: White Cliffs Business Park	<p>Yes – this policy sets out the proposals for mixed use employment land.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	Uncertain
SAP3: Dover Waterfront (DOV017)	<p>Yes – this policy proposes a mixed-use development of residential and employment across a total area of 11ha.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p>	Uncertain

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	<p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>		<p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	
<p>SAP4: Western Heights (Citadel) (DOV012)</p>	<p>Yes – this policy sets out the provision for residential development on land of 11ha.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	<p>Uncertain.</p>
<p>SAP5: Fort Burgoyne</p>	<p>Yes – this policy sets out the provision for residential and mixed use development on land of 10ha.</p> <p>This has potential to result in the following impacts:</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p>	<p>Uncertain.</p>

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	<p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Change in water quantity and increased water pollution</p>	<p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	
SAP6: Dover Mid Town	<p>Yes – This policy proposes a large area of mixed-use development for 100 new homes.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	Uncertain.
SAP7: Bench Street	<p>Yes – This policy proposes mixed-use development.</p>	<p>Loss and/or damage of habitats.</p>	<p>Sandwich Bay SAC</p>	Uncertain.

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	<p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	
<p>SAP8: Land adjacent to the Gas Holder, Coombe Valley Road (DOV022B)</p>	<p>Yes – this policy sets out the provision for residential development of 80 dwellings.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p>	<p>Uncertain.</p>

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			Outer Thames Estuary	
SAP9: Land at Barwick Road Industrial Estate, Coombe Valley (DOV022E)	<p>Yes – this policy sets out the provision for residential development of 220 dwellings.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	Uncertain.
SAP10: Buckland Paper Mill, Crabble Hill (DOV023)	<p>Yes – this policy sets out the provision for residential development.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p>	Uncertain

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			Blean Complex SAC Margate and Long Sands Outer Thames Estuary	
SAP11: Westmount College, Folkestone Road (DOV026)	<p>Yes – this policy sets out the provision for residential development.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	Uncertain
SAP12: Charlton Shopping Centre, High Street (DOV028)	<p>Yes – this policy sets out the provision for residential development.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p>	Uncertain.

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	Increase in demand for water abstraction and treatment		Stodmarsh SPA and Ramsar Folkestone to Etchinghill Escarpment SAC Blean Complex SAC Margate and Long Sands Outer Thames Estuary	
SAP13: Dover Small Sites	<p>Yes – this policy sets out the provision for residential developments across 9 small sites (DOV006, DOV008, DOV019, DOV022C, DOV030, TC4S026, TC4S027, TC4S028, TC4S030).</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	Uncertain
<b>Settlement: Deal</b>				
SAP14: Land of Cross Road, Deal (DEA008)	<p>Yes – this policy sets out the provision for a residential development of approx. 100 dwellings.</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p>	Uncertain



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	<p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	
<p>SAP 15: Land at Rays Bottom between Liverpool Road and Hawksdown (WAL002)</p>	<p>Yes – this policy sets out the provision for a residential development of approx. 50 dwellings.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	<p>Uncertain</p>

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<p>SAP16: Deal Small Sites</p>	<p>Yes – this policy sets out the provision for residential developments across 4 small sites (GTM003, TC4S008, TC4S032, TC4S047).</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activity</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	<p>Uncertain</p>
<p>Settlement: Sandwich</p>				
<p>SAP17: Land south of Stonar Lake and to north and east of Stonar Gardens (SAN004)</p>	<p>Yes – this policy sets out the provision for a residential development.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p>	<p>Uncertain</p>

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			<p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	
<p>SAP18: Sandwich Highway Depot/Chippie's Way, Ash Road (SAN006)</p>	<p>Yes – this policy sets out the provision for a residential development of 32 dwellings.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	<p>Uncertain</p>
<p>SAP19: Land at Poplar Meadow, Adjacent to Delfbridge House (SAN007)</p>	<p>Yes – this policy sets out the provision for a residential development of 35 dwellings.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p>	<p>Uncertain</p>

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	<p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>		<p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	
<p>SAP20: Woods' Yard, rear of 17 Woodnesborough Road (SAN008)</p>	<p>Yes – this policy sets out the provision for a residential development of 35 dwellings.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	<p>Uncertain</p>
<p>SAP21: Land adjacent to Sandwich Technology School Deal Road (SAN013)</p>	<p>Yes – this policy sets out the provision for a residential development allocated for an indicative capacity of 40 dwellings</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p>	<p>Uncertain</p>

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	<p>and land for the expansion of the Sandwich Sports and Leisure Centre.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary Sandwich Bay SAC</p>	
<p>SAP22: Land at Archers Low Farm, St Georges Road (SAN023)</p>	<p>Yes – this policy sets out the provision for a residential development allocated for an indicative capacity of 40 dwellings and land for the expansion of the Sandwich Sports and Leisure Centre.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	<p>Uncertain</p>

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<p>SAP23: Sydney Nursery, Dover Road</p>	<p>Yes – this policy sets out the provision for residential developments across 1 small site; SAN019.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activity</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	<p>Uncertain</p>
<p>Settlement: Aylesham</p>				
<p>SAP24: South Aylesham (AYL003)</p>	<p>Yes – this policy sets out the provision for a mixed use development including 640 new homes, community facilities and employment in south Aylesham.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p>	<p>Uncertain</p>

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	Increase in demand for water abstraction and treatment		Folkestone to Etchinghill Escarpment SAC Blean Complex SAC Margate and Long Sands Outer Thames Estuary	
SAP25: Aylesham Development Area (ELR4)	<p>Yes – this policy sets out the proposals for mixed use employment land.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	Uncertain
SAP26: Former Snowdown Colliery (AYL005)	<p>Yes – this policy sets out the proposals for employment land.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p>	Uncertain

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	Increase in demand for water abstraction and treatment		Lydden and Temple Ewell Downs SAC Stodmarsh SPA and Ramsar Folkestone to Etchinghill Escarpment SAC Blean Complex SAC Margate and Long Sands Outer Thames Estuary	
SAP27: Land at Dorman Avenue (AYL001)	<p>Yes – this policy sets out the provision for a residential development.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	Uncertain

Local Centres: Eastry, Wingham, Ash, Shepherdswell, St Margarets, Kingsdown, Eythorne and Elvington



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<p>SAP28: Eythorne and Elvington (EYT003/EYT009/EYT012)</p>	<p>Yes – this policy sets out the proposals for a new mixed use<sup>3</sup> development including residential development of 350 new homes, employment and community facilities.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	<p>Uncertain</p>
<p>SAP29: Land on the south eastern side of Roman Way, Elvington (EYT008)</p>	<p>Yes – this policy sets out the provision for a residential development of 50 dwellings.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p>	<p>Uncertain</p>

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			Margate and Long Sands Outer Thames Estuary	
SAP31: Statenborough Farm (TC4S076)	<p>Yes – this policy sets out the proposals for employment land.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	Uncertain
SAP32: Land at Buttsole Pond, Lower Street, Eastry (EAS002)	<p>Yes – this policy sets out the provision for a residential development of 80 dwellings.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p>	Uncertain

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	Increase in demand for water abstraction and treatment		Folkestone to Etchinghill Escarpment SAC Blean Complex SAC Margate and Long Sands Outer Thames Estuary	
SAP33: Eastry Small Sites (EAS009)	<p>Yes – this policy sets out the provision for a residential development of 5 dwellings.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	Uncertain
SAP34: Land at Woodhill Farm, Ringwould Road, Kingsdown (KIN002)	<p>Yes – this policy sets out the provision for a residential development of 50 dwellings.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p>	Uncertain

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	<p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>		<p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	
<p>SAP35: Land adjacent to Courtlands, Kingsdown (TC4S074)</p>	<p>Yes – this policy sets out the provision for a residential development of 10 dwellings.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	<p>Uncertain</p>
<p>SAP36: Land to the north and east of St Andrews Gardens and adjacent to Mill House</p>	<p>Yes – this policy sets out the provision for a residential development of 57 dwellings.</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p>	<p>Uncertain</p>

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<p>Shepherdswell (SHE004 &amp; TC4S082)</p>	<p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	
<p>SAP37: Shepherdswell Small Sites (SHE008)</p>	<p>Yes – this policy sets out the provision for residential developments for 10 dwellings.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activity</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	<p>Uncertain</p>

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<p>SAP38: Land adjacent to Reach Road bordering Reach Court Farm and rear of properties on Roman Way (STM003)</p>	<p>Yes – this policy sets out the provision for a residential development of 40 dwellings.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	<p>Uncertain</p>
<p>SAP39: Land to the west of Townsend Farm Road St. Margarets at Cliffe (STM007 &amp; STM008)</p>	<p>Yes – this policy sets out the provision for a residential development of 36 dwellings.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p>	<p>Uncertain</p>

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			Margate and Long Sands Outer Thames Estuary	
SAP40: St Margarets at Cliffe Small Sites (STM006, STM010)	<p>Yes – this policy sets out the provision for residential developments of 20 dwellings.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activity</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	Uncertain
SAP41: Footpath Field, Staple Road, Wingham (WIN014)	<p>Yes – this policy sets out the provision for a residential development of 75 dwellings.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p>	Uncertain

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	Increase in demand for water abstraction and treatment		Folkestone to Etchinghill Escarpment SAC Blean Complex SAC Margate and Long Sands Outer Thames Estuary	
SAP41: Wingham Small Sites (WIN003, WIN004)	<p>Yes – this policy sets out the provision for residential developments for 28 new dwellings.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activity</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	Uncertain
Larger Villages: Capel-le-Ferne, Lydden, Preston, Worth, Alkham, East Langdon				
SAP43: Land at Short Lane, Alkham (ALK003)	<p>Yes – this policy sets out the proposals for residential development at 1 small sites.</p> <p>This has potential to result in the following impacts:</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p>	Uncertain



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	<p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Change in water quantity and increased water pollution</p>	<p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	
<p>SAP44: Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006)</p>	<p>Yes – this policy sets out the provision for a residential development of 50 dwellings.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	<p>Uncertain.</p>

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<p>SAP45: Capel Small Sites (CAP009, CAP011 and CAP013)</p>	<p>Yes – this policy sets out the proposals for residential development at 3 small sites.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	<p>Uncertain</p>
<p>SAP46: Land adjacent Langdon Court Bungalow (LAN003)</p>	<p>Yes – this policy sets out the provision for a residential development of 40 dwellings.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p>	<p>Uncertain.</p>

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			Margate and Long Sands Outer Thames Estuary	
SAP47: Land adjacent to Lydden Court Farm, Church Lane, Lydden (LYD003)	<p>Yes – this policy sets out the provision for a residential development of 30 dwellings.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	Uncertain.
SAP48: Apple Tree Farm and north west of Apple Tree Farm, Stourmouth Road, Preston (PRE003, PRE016 and PRE017)	<p>Yes – this policy sets out the provision for a residential development of 65 dwellings.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p>	Uncertain

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	Increase in demand for water abstraction and treatment		Folkestone to Etchinghill Escarpment SAC Blean Complex SAC Margate and Long Sands Outer Thames Estuary	
SAP49: Worth Small Sites (WOR006 and WOR009)	<p>Yes – this policy sets out the proposals for residential development at 2 small sites.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats.</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	Uncertain
<b>Smaller Villages and Hamlets</b>				
SAP50: Land adjacent to Short Street, Chillenden	<p>Yes – this policy sets out the provision for residential developments across one small site.</p>	<p>Loss and/or damage of habitats</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p>	Uncertain

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	<p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Change in water quantity and increased water pollution</p>	<p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	
<p>SAP51: Land opposite the Conifers, Coldred</p>	<p>Yes – this policy sets out the provision for residential developments across one small site.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	<p>Uncertain</p>

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<p>SAP52: Prima Windows, Easole Street/ Sandwich Road, Nonington (NON006)</p>	<p>Yes – this policy sets out the proposal for residential development of 35 dwellings.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	<p>Uncertain.</p>
<p>SAP53: Ringwould Small Sites (RIN002, RIN004)</p>	<p>Yes – this policy sets out the provision for residential developments across 1 small sites.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p>	<p>Uncertain</p>

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			Margate and Long Sands Outer Thames Estuary	
SAP54: Land at Durlock Road, Staple (STA004)	<p>Yes – this policy sets out the provision for residential developments across 1 small site.</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p> <p>Increase in demand for water abstraction and treatment</p>	<p>Loss and/or damage of habitats</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p> <p>Folkestone to Etchinghill Escarpment SAC</p> <p>Blean Complex SAC</p> <p>Margate and Long Sands</p> <p>Outer Thames Estuary</p>	Uncertain
SAP54: Woodnesborough Small Sites (WOO005, WOO006)	<p>Yes – this policy sets out the provision for residential developments across 2 small sites</p> <p>This has potential to result in the following impacts:</p> <p>Loss and Damage of habitats.</p> <p>Increase in vehicle use</p> <p>Increase in recreational activities</p>	<p>Loss and/or damage of habitats</p> <p>Increased air pollution</p> <p>Disturbance from recreation</p> <p>Change in water quantity and increased water pollution</p>	<p>Sandwich Bay SAC</p> <p>Thanet Coast and Sandwich Bay SPA and Ramsar</p> <p>Thanet Coast SAC</p> <p>Dover to Kingsdown Cliffs SAC</p> <p>Lydden and Temple Ewell Downs SAC</p> <p>Stodmarsh SPA and Ramsar</p>	Uncertain

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	Increase in demand for water abstraction and treatment		Folkestone to Etchinghill Escarpment SAC Blean Complex SAC Margate and Long Sands Outer Thames Estuary	
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## Appendix D

### **Review of other plans and projects for in combination effects**

## **Appendix D**

### **Review of other plans and projects for in-combination effects**

**District level Local Plans (strategic issues / 'core strategies) providing for development**

<b>Thanet Local Plan<sup>44</sup></b>	
Plan Owner/Competent Authority:	Thanet District Council
Related Work HRA/AA:	Thanet Local Plan Habitats Regulations Assessment: Information to support an assessment under Regulation 105 of the Conservation of Habitats and Species Regulations 2017 <sup>45</sup>
Notes on Plan Documents:	<p>A new Local Plan that will guide development and regeneration decisions and investment over the period 2018 to 2031.</p> <p>Overall target is to deliver a minimum of 5,000 jobs across the District during the Plan period to 2031 concentrating on the transformational initiatives coupled with improved transport and communications infrastructure.</p> <p>Housing provision is made for 17,140 additional homes over the 20-year period to 2031.</p>
<p><b>Conclusions on potential effects of relevance to European sites within scope of HRA of Dover Local Plan</b></p> <ul style="list-style-type: none"> <li>- Blean Complex SAC</li> <li>- Dover to Kingsdown Cliffs SAC</li> <li>- Sandwich Bay SAC</li> <li>- Stodmarsh SAC / Stodmarsh SPA / Stodmarsh Ramsar</li> <li>- Thanet Coast SAC</li> <li>- Margate and Long Sands SAC</li> <li>- Tankerton Slopes and Swalecliffe SAC</li> <li>- Thanet Coast and Sandwich Bay SPA / Thanet Coast and Sandwich Bay Ramsar</li> <li>- The Swale SPA / The Swale Ramsar</li> </ul> <p>In summary, the screening of the proposed policies demonstrated that the vast majority will have no effect on any European sites. However, 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 excluded due to:</p>	

<sup>44</sup> <https://www.thanet.gov.uk/wp-content/uploads/2018/03/Thanet-Local-Plan-July-2020-1-1.pdf>

<sup>45</sup> <https://www.thanet.gov.uk/wp-content/uploads/2018/03/CD7.5-HRA-report-July-2018.pdf>

Thanet Local Plan <sup>44</sup>	
■	The potential for turnstone using the Thanet Coast and Sandwich Bay SPA and Thanet Coast and Sandwich Bay Ramsar to be affected by increased disturbance due to recreational pressure; and,
■	The potential for golden plover to be affected when using non-designated functional habitats outside the SPA boundary.

Folkestone & Hythe District Places and Policies Local Plan <sup>46</sup>	
Plan Owner/Competent Authority:	Folkestone and Hythe District Council
Related Work HRA/AA:	Shepway Places and Policies Plan 2016 Habitats Regulations Assessment <sup>47</sup>
Notes on Plan Documents:	<p>Part One of the Local Plan allocates 55 sites for development for new homes, mixed-use development, business, retail, leisure, hotel and other uses.</p> <p>For residential development it identifies a core objective to deliver a minimum of 350 dwellings a year on average until 2030/31. For the first 20 years of the plan period (2006/07-2025/26) a target of 8,000 dwellings is set, with a minimum requirement of 7,000 dwellings; For business uses a target of 20ha is set to 2025/26; and for retail development a target of 35,000sqm is set to 2025/26.</p> <p>Part Two of the Local Plan sets out general Development Management Policies across nine themes, which provide a basis for considering planning applications within the district.</p>

<p><b>Conclusions on potential effects of relevance to European sites within scope of HRA of Dover Local Plan</b></p> <ul style="list-style-type: none"> <li>- Dungeness, Romney Marsh and Rye Bay Ramsar and SPA</li> <li>- Dungeness SAC</li> <li>- Folkestone to Etchinghill Escarpment SAC</li> </ul> <p>Potential for recreation to adversely affect the Dungeness complex (SAC/SPA/Ramsar) through bird disturbance and degradation of habitat, and the potential for loss of offsite habitat to adversely affect bird species populations of the Dungeness SPA and Ramsar which may rely on such habitats for foraging and loafing. These issues were taken forward to the Appropriate Assessment stage to determine whether the effects predicted would result in adverse effects on the integrity of the European sites in question. The Appropriate Assessment found that the</p>	
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<sup>46</sup> [https://www.folkestone-hythe.gov.uk/media/2969/Places-and-Policies-Local-Plan-2020/pdf/Places\\_and\\_Policies\\_Local\\_Plan\\_2020.pdf?m=637370773065900000](https://www.folkestone-hythe.gov.uk/media/2969/Places-and-Policies-Local-Plan-2020/pdf/Places_and_Policies_Local_Plan_2020.pdf?m=637370773065900000)

<sup>47</sup> [https://www.folkestone-hythe.gov.uk/media/305/Habitat-Regulations-Assessment-Reg-19-Submission-Version-2018-Addendum/pdf/Shepway\\_Local\\_Plan\\_Reg\\_19\\_HRA\(1.10\)\\_Update\\_2018.pdf?m=637001651859230000](https://www.folkestone-hythe.gov.uk/media/305/Habitat-Regulations-Assessment-Reg-19-Submission-Version-2018-Addendum/pdf/Shepway_Local_Plan_Reg_19_HRA(1.10)_Update_2018.pdf?m=637001651859230000)

**Folkestone & Hythe District Places and Policies Local Plan<sup>46</sup>**

strategic approach adopted by the Council in managing and avoiding recreational pressure, both via the SAS and through mitigatory policies specified within the PPLP provides a mechanism for ensuring that adverse effects can be avoided by adopting an iterative approach to future management of Dungeness.

Additionally, loss of off-site functionally linked habitat was taken forward to the Appropriate Assessment. The Appropriate Assessment found that habitat types which will be lost as a result of the site allocations are considered to be of low importance for SPA birds due to species habitat preferences and/or the abundance of similar habitat types in the wider landscape. However, under the precautionary principle, site specific project level assessments were required of three policies.

With regards to Folkestone and Etchinghill Escarpment SAC, potential Likely Significant Effects could not be ruled out for air pollution and recreational impacts. The Appropriate Assessment concluded that road side monitoring of NO<sub>x</sub> at the A20 and local management measures would avoid significant impacts. Additionally, in relation to recreational impacts, the Appropriate Assessment found that avoidance and mitigation safeguards included completion of a visitor study, monitoring, project level HRA assessment as appropriate, and identifying and promoting opportunities for strategic provision of alternative greenspace as part of the Green Infrastructure Plan would avoid significant impacts.

In conclusion, the Appropriate Assessment concluded that, subject to implementation of certain safeguards, the Shepway Places and Policies Local Plan will not result in adverse effects on the Folkestone and Etchinghill Escarpment SAC, Dungeness SAC, SPA, or Ramsar either alone or in-combination with other plans and projects.

**Rother District Local Plan Core Strategy<sup>48</sup>**

Plan Owner/Competent Authority:	Rother District Council
Related Work HRA/AA:	Core Strategy Appropriate Assessment Screening Report Habitats Regulation Assessment Initial Screening Report for Rother District Council 'Development and Site Allocations Plan' and Neighbourhood Plans forming part of the Development Plan for Rother <sup>49</sup>
Notes on Plan Documents:	Adopted September 2014. Development provided for include 5700 dwellings and 100,000 sqm of business floor space between 2011 and 2028.

**Conclusions on potential effects of relevance to European sites within scope of HRA of Dover Local Plan**

The Appropriate Assessment Screening Report identified offsite impacts, water quality and quantity, recreational pressure and air pollution to have Likely Significant Effects on:

<sup>48</sup> <http://www.rother.gov.uk/CHttpHandler.ashx?id=22426&p=0>

<sup>49</sup> <http://www.rother.gov.uk/article/8829/Habitat-Regulations-Assessment-HRA>

**Rother District Local Plan Core Strategy<sup>48</sup>**

- Dungeness SAC,
- Dungeness, Romney Marsh and Rye Bay SPA, and Ramsar

Further assessment of Dungeness European and international designations resulted in the incorporation of appropriate changes to the Plan. These changes to policy and supporting text were deemed sufficient to safeguarding Dungeness European and international sites. The screening report for the development and site allocations plan and neighbourhood plans was not considered to have a Likely Significant Effect on the above European sites. However, further assessment would be required if policies emerge that deviate significantly from the Core Strategy.

**Canterbury District Draft Local Plan**

Plan Owner/Competent Authority:	Canterbury District Council
Related Work HRA/AA:	Habitats Regulations Assessment of the main modifications to the Submission Draft Local Plan policies <sup>50</sup>
Notes on Plan Documents:	Development provided for includes 15,600 new houses and 118,000 sqm for employment between 2011 and 2031.

**Conclusions on potential effects of relevance to European sites within scope of HRA of Dover Local Plan**

- The Thames, Medway and Swale Estuary and Marshes SPA and Ramsar;
- Thanet Coast and Sandwich Bay SPA and Ramsar;
- The Blean Complex SAC;
- Stodmarsh SAC, SPA and Ramsar;
- Tankerton Slopes and Swalecliffe SAC

The screening has identified that the Local Plan policies as proposed for adoption (incorporating the main modifications) along with the avoidance, monitoring and mitigation measures to be put in place will ensure that the development proposals outlined in the Local Plan will not have a Likely Significant Effect on a European site or Ramsar site.

<sup>50</sup> [https://drive.google.com/drive/folders/13X41iIU1j6D4fawtLM-pFmo8j\\_7cFs2H](https://drive.google.com/drive/folders/13X41iIU1j6D4fawtLM-pFmo8j_7cFs2H)

Ashford Local Plan <sup>51</sup>	
Plan Owner/Competent Authority:	Ashford Borough Council
Related Work HRA/AA:	Habitat Regulations Assessment of the Local Plan <sup>52</sup>
Notes on Plan Documents:	The Ashford Local Plan 2030 was adopted in February 2019 and now forms the main statutory development plan for the Borough. The plan makes provision for 16,872 new houses between 2011 and 2030 and 63ha of employment land between 2014 and 2030.
<p><b>Conclusions on potential effects of relevance to European sites within scope of HRA of Dover Local Plan</b></p> <p>The HRA considered the impacts of the Local Plan for a number of European sites including Wye and Crundale SAC and The Swale SPA and Ramsar. Due to the distance The Swale SPA and Ramsar from the Borough at 15km, this European site was scoped out of the assessment before screening stage.</p> <p>Impacts to Wye and Crundale SAC was considered in relation to habitat loss, disturbance, recreational activities, air pollution, water quantity and quality. The HRA concluded no Likely Significant Effects in relation to these impacts on the SAC.</p>	

Pre-submission Draft Swale Local Plan <sup>53</sup>	
Plan Owner/Competent Authority:	The Swale Borough Council
Related Work HRA/AA:	Habitats Regulations Assessment Swale Borough Council Local Plan <sup>54</sup>
Notes on Plan Documents:	The draft Local Plan for the period 2022 to 2038 is currently under review. The draft plan sets out the requirement for 1,038 dwellings per annum representing an increase of 33.8% compared with the current local plan, Bearing Fruits <sup>55</sup> , that has an objectively assessed need of 776 dwellings per annum for 2014 – 2031.

<sup>51</sup> <https://www.ashford.gov.uk/media/7542/adopted-ashford-local-plan-2030-2.pdf>

<sup>52</sup> <https://www.ashford.gov.uk/media/5412/hra-december-2017.pdf>

<sup>53</sup> [https://services.swale.gov.uk/assets/Planning%20Policy%202019/FINAL%20Reg%2019%20\(RGB\)%20119MB.pdf](https://services.swale.gov.uk/assets/Planning%20Policy%202019/FINAL%20Reg%2019%20(RGB)%20119MB.pdf)

<sup>54</sup> [https://services.swale.gov.uk/assets/Planning%20Policy%202019/Swale%20LPR%20HRA%202021%20FINAL%20\(V2\)%20issue.pdf](https://services.swale.gov.uk/assets/Planning%20Policy%202019/Swale%20LPR%20HRA%202021%20FINAL%20(V2)%20issue.pdf)

<sup>55</sup> <http://services.swale.gov.uk/media/files/localplan/adoptedlocalplanfinalwebversion.pdf>



**Pre-submission Draft Swale Local Plan<sup>53</sup>**

The adopted Local Plan set out the requirement for 14,966 dwellings in the period 2014-2031 and the draft Local Plan sets out the requirement to allocate an additional 6,290 dwellings in the period 2022-2038.

**Conclusions on potential effects of relevance to European sites within scope of HRA of Dover Local Plan**

The HRA of the draft Local Plan considered the following European sites:

- The Swale SPA and Ramsar – recreation, loss of supporting habitat, visual and noise disturbance, air quality and water quality
- Blean Complex SAC – air quality
- Outer Thames Estuary SPA – visual and noise disturbance

The Screening Assessment concluded no LSE upon The Swale SPA and Ramsar in relation to air quality and water quality. Additionally, it concluded no LSE upon Blean Complex SAC in relation to air quality and no LSE in relation to visual and noise disturbance upon the Outer Thames Estuary SPA.

The Appropriate Assessment for the draft local plan concluded no adverse affect on integrity of Swale SPA and Ramsar with regard to the requirement to comply with the Bird Wise North Kent Mitigation Strategy and the requirement for site specific project HRAs for particular land allocations. Additionally, the Appropriate Assessment concluded no adverse effect on integrity resulting from nitrogen deposition upon the Swale SPA and Ramsar as a result of the plan alone.

Therefore, the HRA concluded no adverse affect on integrity of any of the European Sites.

**Major infrastructure projects**

<b>Stonestreet Green Solar</b>	
Plan Owner/Competent Authority:	Evolution Power Limited
Related Work HRA/AA:	Not yet carried out.
Notes on Plan Documents:	Solar photovoltaic array plus energy storage with associated infrastructure and grid connection, with a generating capacity greater than 50MW. Land at Aldington, southeast of Ashford in Kent.
<b>Conclusions on potential effects of relevance to European sites within scope of HRA of Dover Local Plan</b>	
Not available.	

<b>Lower Thames Crossing</b>	
Plan Owner/Competent Authority:	Highways England
Related Work HRA/AA:	Not yet carried out.
Notes on Plan Documents:	Proposals to construct a new connecting road system within the counties of Kent and Essex. The new road system includes a new crossing of the River Thames to the east of London and the existing Dartford Crossing and Queen Elizabeth II Bridge. The Proposed Development will connect the A2 east of Gravesend to the M25 in Essex.
<b>Conclusions on potential effects of relevance to European sites within scope of HRA of Dover Local Plan</b>	
Not available.	

Proposed Wheelabrator Kemsley (K3 Generating Station) and Wheelabrator Kemsley North (WKN) Waste to Energy Facility	
Plan Owner/Competent Authority:	WTI/EFW Holdings Ltd
Related Work HRA/AA:	Regulation 63 of the Conservation of Habitats and Species Regulations 2017 <sup>56</sup>
Notes on Plan Documents:	A Nationally Significant Infrastructure Project comprising a power upgrade and increase in tonnage throughput to the existing Kemsley Generating Station (K3); and a new Wheelabrator Kemsley North (WKN) waste to energy facility.  Adjacent to and immediately NE of the Kemsley Paper Mill, in Kemsley, Sittingbourne, Kent.
<p><b>Conclusions on potential effects of relevance to European sites within scope of HRA of Dover Local Plan</b></p> <p>The Applicant's screening assessment contained in the updated 2019 HRA concluded that the operation and decommissioning of the <b>K3</b> Proposed Development would have <b>no Likely Significant Effect</b>, either alone or in-combination with other projects or plans, on the qualifying features of any of the eight European sites.</p> <p>The Applicant's screening assessment contained in the updated 2019 HRAR concluded that the <b>WKN</b> development was <b>likely to give rise to significant effects</b>, alone, on air and water quality through recreational, lighting, noise and visual disturbance, on the qualifying features of the three European sites listed below:</p> <ul style="list-style-type: none"> <li>– Swale Special SPA and Ramsar</li> </ul> <p>The Applicant's Appropriate Assessment contained within the 2021 HRAR concluded that, with adopted mitigation against dust, noise, visual disturbance and water pollution during construction, operation and decommissioning, the <b>WKN</b> development would have <b>no adverse effect on integrity</b> of Swale SPA and Ramsar as a result of the project alone or in-combination.</p>	

Extension to Allington Energy from Waste Facility <sup>57</sup>	
Plan Owner/Competent Authority:	FCC Environment (UK) Limited
Related Work HRA/AA:	Not yet carried out.
Notes on Plan Documents:	Extension of an existing energy generating station to process residual non-hazardous waste.  Land off Laverstoke Road, Allington, Kent, ME16 0LE.

<sup>56</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010083/EN010083-001006-EN010083-HRA-Report.pdf>

<sup>57</sup> <https://infrastructure.planninginspectorate.gov.uk/projects/south-east/extension-to-allington-energy-from-waste-facility/?ipcsection=overview>

### Extension to Allington Energy from Waste Facility<sup>57</sup>

#### Conclusions on potential effects of relevance to European sites within scope of HRA of Dover Local Plan

Not available.

### Manstone Airport

Plan Owner/Competent Authority:	RiverOak Strategic Partners Ltd
Related Work HRA/AA:	Habitats Regulations Assessment for an application under the planning act 2008: the Manston Airport development consent order <sup>58</sup>
Notes on Plan Documents:	Plans to reopen and develop Manston Airport into a dedicated air freight facility able to handle at least 10,000 air cargo movements per year whilst also offering passenger, executive travel, and aircraft engineering services.  5km west of Ramsgate, Kent.

#### Conclusions on potential effects of relevance to European sites within scope of HRA of Dover Local Plan

As the competent authority for Transport NSIPs as defined under the PA2008, the Secretary of State for Transport has undertaken an Appropriate Assessment under Regulation 63 of the Habitats Regulations in relation to the following European sites:

- Sandwich Bay SAC
- The Swale SPA;
- The Swale Ramsar site;
- Thanet Coast and Sandwich Bay SPA; and
- Thanet Coast and Sandwich Bay Ramsar site.

The Secretary of State is satisfied that, given the relative scale and magnitude of the identified effects on the qualifying features of these European sites and where relevant, the measures in place to avoid and reduce the potential harmful effects, there would not be any implications for the achievement of the conservation objectives for those European sites.

<sup>58</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005350-200709%20Manston%20Airport-%20HRA%20Appropriate%20Assessment%20FINAL.pdf>

Cleve Hill Solar Park	
Plan Owner/Competent Authority:	Cleve Hill Solar Park Ltd
Related Work HRA/AA:	Record of the Habitats Regulations Assessment undertaken under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 <sup>59</sup>
Notes on Plan Documents:	Solar photovoltaic array, and electrical storage and connection infrastructure on land approximately 2 km northeast of Faversham and 5 km west of Whitstable on the North Kent Coast.
<p><b>Conclusions on potential effects of relevance to European sites within scope of HRA of Dover Local Plan</b></p> <p>The Project Site includes land close to a number of internationally, nationally, and locally designated sites of biodiversity value, the northern, eastern, and western extents of the Project site include areas that are part of:</p> <ul style="list-style-type: none"> <li>- The Swale SPA; and</li> <li>- Swale Ramsar site.</li> </ul> <p>The Secretary of State concludes that, subject to the mitigation secured in the DCO, the effects of the Project, either alone or in-combination with other plans and projects, on the features of the Swale SPA and Ramsar, would not lead to an adverse effect on the integrity of these sites.</p>	

Kemsley Mill K4 Combined Heat and Power Generating Station Development Consent Order	
Plan Owner/Competent Authority:	DS Smith Paper Ltd
Related Work HRA/AA:	Regulation 63 of the Conservation of Habitats and Species Regulations 2017, and Regulation 28 of the Conservation of Offshore Marine Habitats and Species Regulations 2017 <sup>60</sup>
Notes on Plan Documents:	A Combined Heat and Power Plant comprising a gas turbine, Waste Heat Recovery Boilers and Steam Turbine. Land within the south-eastern part of the Kemsley Paper Mill, Kemsley, Sittingbourne.

<sup>59</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010085/EN010085-001954-200528%20EN010085%20CHSP%20Habitats%20Regulations%20Assessment.pdf>

<sup>60</sup> [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010090/EN010090-000794-KEM4\\_Habitats\\_Regulations\\_Assessment.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010090/EN010090-000794-KEM4_Habitats_Regulations_Assessment.pdf)

### Kemsley Mill K4 Combined Heat and Power Generating Station Development Consent Order

#### Conclusions on potential effects of relevance to European sites within scope of HRA of Dover Local Plan

The use of a 10km radius follows air emission guidance published by the Department for Environment, Food & Rural Affairs (“DEFRA”) and the Environment Agency (“EA”). All sites identified within this radius are listed below.

- The Swale Special Protection Area (SPA);
- The Swale Ramsar site;
- Outer Thames Estuary SPA

The Secretary of State has considered carefully all the information presented within the Project application and the representations made by all stakeholders. On the basis of his AA findings he has concluded that the Project, alone and in-combination with other plans or projects, will not have an adverse effect on any European site. This conclusion is consistent with the advice provided by Natural England during the Examination of the Project.

### Richborough Connection Project

Plan Owner/Competent Authority:	National Grid
Related Work HRA/AA:	Habitat Regulations Assessment Screening <sup>61</sup>
Notes on Plan Documents:	Proposed electricity transmission connection between Richborough and Canterbury in Kent to connect the proposed new UK to Belgium interconnector (known as the Nemo Link).

#### Conclusions on potential effects of relevance to European sites within scope of HRA of Dover Local Plan

Following European sites within an associated potential zone of influence of the Richborough Connection:

- Thanet Coast & Sandwich Bay SPA (Golden plover – Non-breeding)
- Stodmarsh SPA (Gadwall and Hen harrier – Non-breeding)
- Stodmarsh SAC/Ramsar (Desmoulin’s whorl snail/ rare invertebrates)

<sup>61</sup> [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020017/EN020017-000298-5.5%20\(Part%201%20of%202\)%20No%20Significant%20Effects%20Report%20\(Habitat%20Regulations%20Assessment%20Screening\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020017/EN020017-000298-5.5%20(Part%201%20of%202)%20No%20Significant%20Effects%20Report%20(Habitat%20Regulations%20Assessment%20Screening).pdf)

**Richborough Connection Project**

In relation to each European site considered as part of the screening exercise, it has been concluded from baseline information and consultation responses received that there are no Likely Significant Effects on the European site(s), either alone or in combination with other plans or projects and therefore no further assessment is required.