



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

Evidence Report

September 2022



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Photo credit: Cover Sandwich Bay, Sharon Bayne



Introduction

About this Report

The Thanet Coast and Sandwich Bay Special Protection Area Strategic Access Mitigation and Monitoring Strategy (SAMM) provides a strategic approach to mitigating the potential in-combination impacts of new housing development in the vicinity of the Thanet Coast and Sandwich Bay Special Protection Area (“the SPA”) arising from the Dover District Local Plan.

The SAMM is provided in a separate document. This report forms the evidence base for the SAMM and provides additional supporting information.

The SAMM draws on the existing evidence base for the SPA and has referenced other similar work across the UK. This evidence report sets out:

- Evidence relating to the SPA features and potential impacts on these arising from increased housing in Dover district;
- An evaluation of possible mitigation measures to address these impacts;
- The evidence for determining the geographical area within which new development will be required to pay a tariff contribution for mitigating the potential in-combination effects on the SPA (‘Zone of Influence’);
- Details of measures which will comprise the mitigation and monitoring package plus further access management measures which would support the SAMM but are outside the scope of the SAMM.

Legal and Policy Requirements

Part 6 of the Habitats Regulations¹ relates to the assessment of plans and projects for their effects upon ‘European’ sites,² their interest features and conservation objectives and provides

¹ 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).

² European sites refer to sites with designations originating from European law:

- Special Areas of Conservation (SACs) are designated under the Habitats Regulations as amended and target particular habitat types (specified in Annex 1 to the Habitats Directive) and species (specified in Annex II to the Habitats Directive). These annexes list habitat types and species (excluding birds) considered to be most in need of conservation at a European level. Designation of SACs also has regard to the threats of degradation or destruction to which the sites are exposed and, before EU exit day, to the coherence of the Natura 2000 network of European sites. After EU exit day, regard is had to the importance of such sites for the coherence of the national site network;
- Special Protection Areas (SPAs) are areas classified for rare and vulnerable birds or regularly occurring migratory species;

a process by which the consideration of potential effects and the decisions made with regard to whether plans and projects can proceed. Local planning authorities are 'competent authorities' to which the requirements of the Habitats Regulations apply.

Before undertaking a project, giving permission for a project, or giving effect to a plan (including Local Plans) a competent authority, including local planning authorities, must consider whether the plan or project is likely to have a significant effect upon a European site.³

The 'likely significant effect' is a judgement made in relation to the features for which the European site was designated and its conservation objectives. It needs to consider the nature of effect, its timing, duration and reversibility. Regulation 61(5) advises that a competent authority can only agree to the plan or project if it will not adversely affect the integrity of any European site, taking into account any conditions or restrictions that could be put in place. Any plan or project, if shown to adversely affect the integrity of a European site, must include measures to mitigate this affect.

The Requirement for a SAMM

The previous Thanet Coast SPA⁴ Mitigation Strategy 2012 sets out monitoring of potential impacts from recreation at Sandwich Bay, evidenced through a bird disturbance survey and visitor surveys. The strategy sets out that visitor surveys should be carried out in line with development with a trigger point of the building of each 3,000 bedrooms. The strategy reserves the right to draw on the funding to support wardening if the monitoring shows this to be required.

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- Ramsar sites support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance especially as Waterfowl Habitat (Ramsar Convention, 1971);
 - Potential SPAs (pSPAs), candidate SACs (cSACs) and Ramsar sites should also be treated as designated European sites.

³ 'A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which:

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

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

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

⁴ [sic] Document incorrectly names the designated site the Thanet Coast SPA rather than the Thanet Coast and Sandwich Bay SPA.

The Habitats Regulations Assessment for Dover District Council's Draft Local Plan⁵ sets out the need for the mitigation measures set out in the SAMM:

“4.70 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.

4.71 Based on visitor survey data collected between 2011 and 2020 to inform the Thanet Coast and Sandwich Bay SPA Mitigation Strategy, a ZOI of 9km was identified⁶ and has been applied in this assessment. [...]

4.72 A significant 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.”

Dover District Council's new Local Plan Policy 'NE3: Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy' seeks to protect the SPA due to its nature conservation importance for migratory birds⁷. It establishes a tariff for all new residential development to fund mitigation and monitoring measures required to prevent significant impact on the species for which this SPA is designated and which may arise from development coming forward as part of this Local Plan. This Policy also acknowledges that financial contributions from other forms development, such as holiday accommodation, may be sought.

Principles of Mitigation

Mitigation is required when the effects of development, when considered in combination with other plans and projects, cannot be ruled as insignificant under the Habitats Regulations 2017.

Mitigation must address the issue or issues which are causing the significant effect. In terms of assessing development impact, the primary purpose of mitigation is to avoid potential impacts brought about by the development and not to ameliorate pre-existing impacts. However, a mitigation strategy may also have coincidental beneficial effects on pre-existing impacts.

⁵ Land Use Consultants. (January 2021). *Draft Dover District Local Plan (Reg 18) Habitat Regulations Assessment*.

⁶ See page 28 of this document.

⁷ The HRA of the Dover District Local Plan Regulation 19 concludes that “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 sites which overlap the SPA” (paragraph 5.101)

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

Some key principles underpin mitigation. Approaches should:

- Be **evidence based**: Measures should be based on evidence to justify need, appropriateness and effectiveness. Assumptions used must be based on robust evidence, however, evidence-gathering should be proportionate to the level of detail required;
- Be **necessary**: Measures should be required to enable planning permission to be granted;
- Be **effective**: A mitigation strategy must provide certainty that development can proceed without adverse effects on the European sites. Measures must avoid impacts or reduce them to levels which will not detrimentally affect the conservation interest of the site(s);
- Last in **perpetuity**: Any avoidance measures are required to be provided for in perpetuity;
- Be **adaptive**: Demographic changes, changes in the distribution of birds, changes in access and the implementation of the mitigation strategy itself can result in changes. A mitigation strategy needs to be able to respond to these changing circumstances. Monitoring is, therefore, a fundamental component of any package;
- Be **specific to the situation**: Although approaches used elsewhere can be useful comparators, a mitigation approach should be tailored to the specific situation;
- Be **proportionate**: Mitigation needs to work and be sufficient to protect the site and satisfy legal requirements. Developers should not be required to pay to rectify existing impacts for which they are not responsible, but their mitigation measures can include proposals to avoid or reduce existing impacts to ensure that the net effect of new plus existing impacts means there is no significant effect on a European site. They should not include measure to meet duties relating to the maintenance and restoration of European sites outside of new development.⁸ Approaches should also be fair in respect of, in this case, the sources of recreational activity;
- Be **compliant**: with planning law and policy.

⁸ As required by Article 6(2) of the Habitats Directive or Article 4(4) of the Birds Directive.

Strategic approaches to mitigation seek to address issues in a combined approach rather than dealing with effects on a case by case basis. Such approaches can incorporate or complement any case by case specific mitigation which may need to be implemented.

In addition to the principles applied to mitigation approaches previously outlined, strategic approaches must also: ⁹

- Have a degree of **flexibility**: A strategic approach may also be able to deal with atypical projects, however, a strategic approach for a plan will be based on assumptions about the projects likely to make up the plan, so if individual projects do not conform to these assumptions they will require separate assessment;
- Offer **certainty**: Needs to be underpinned by secure financial and legal mechanisms.

⁹ <http://guidanceanddata.defra.gov.uk/strategicapproacheshra/deciding-whether-to-develop-a-strategic-approach/>

The Area Covered by the SAMM

Sandwich and Pegwell Bay is a long, sweeping bay which stretches from north of Deal in Dover district to Cliffsend in Thanet District, with the estuary of the River Stour dividing Pegwell Bay from Sandwich Bay. The beach, which is largely shingle, with sandy flats revealed at low tide, is backed by sand dunes. There is a small settlement of around 60-70 properties at the Sandwich Bay Estate, but other than this, the Bay is undeveloped.

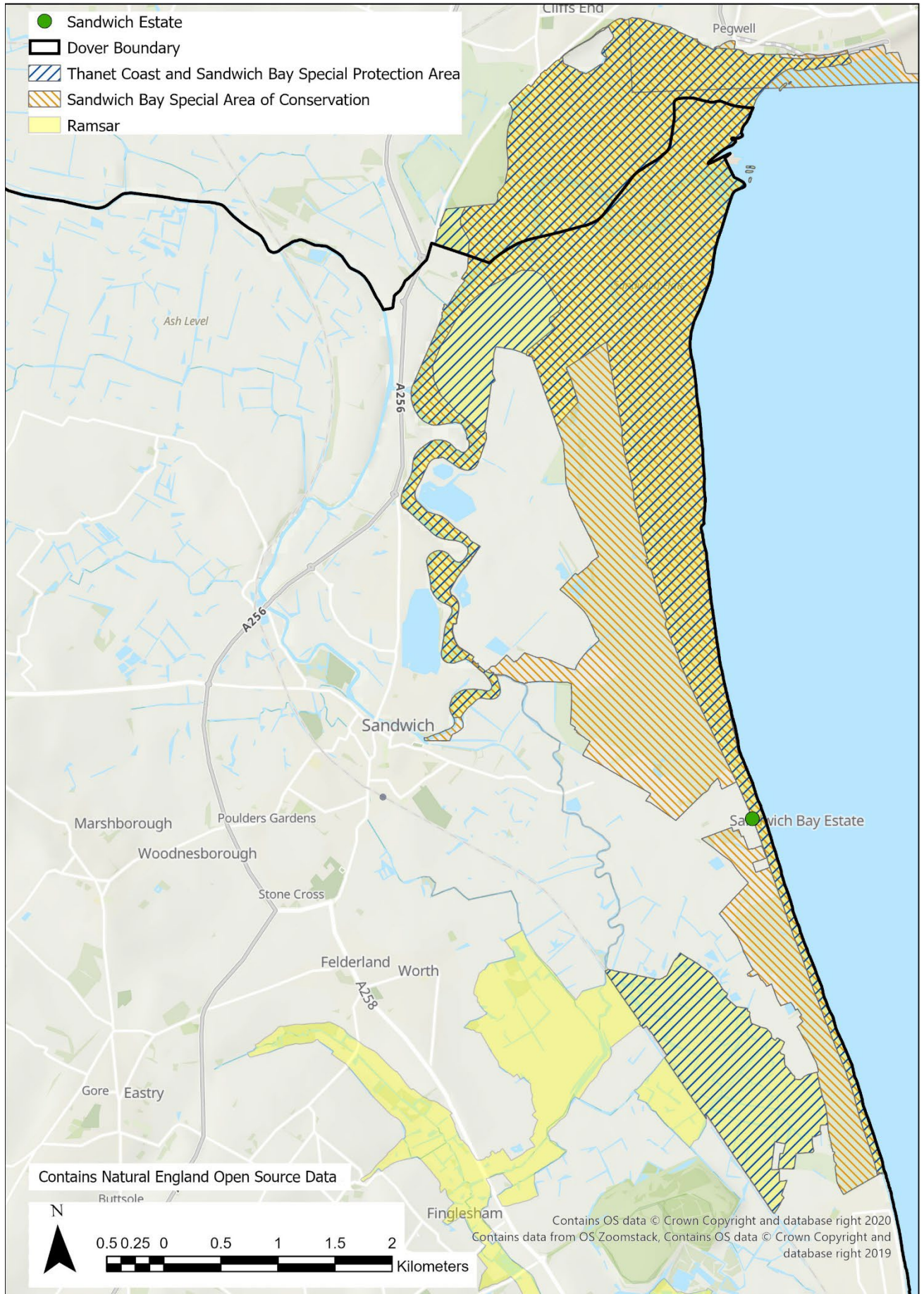
The SAMM covers that part of the SPA which is within Dover District, comprising all of Sandwich Bay. This stretches from north of the town of Deal to south of the River Stour, with Shellness Point at the most northern point. The Dover District Council boundary crosses the northern part of Shellness Point. Although the most northerly part of Shellness Point is within Thanet District, the Point is treated as one entity within the SAMM as visitors to this area must pass through Dover district to reach it.

There are several protected areas in Sandwich Bay. These are the Sandwich Bay Special Area of Conservation (SAC) and Thanet Coast and Sandwich Bay Ramsar Wetland, as well as other national and local designations – Sandwich and Pegwell Bay National Nature Reserve (NNR), Sandwich Bay to Hacking Marshes Site of Special Scientific Interest (SSSI) and Princes Beachlands Local Nature Reserve (LNR). Many of these designations overlap, creating a complex layering of designations¹⁰. The SPA and other protected areas are shown in Plans 1 and 2 for information and context (the features of these designated areas are not included in the SAMM).

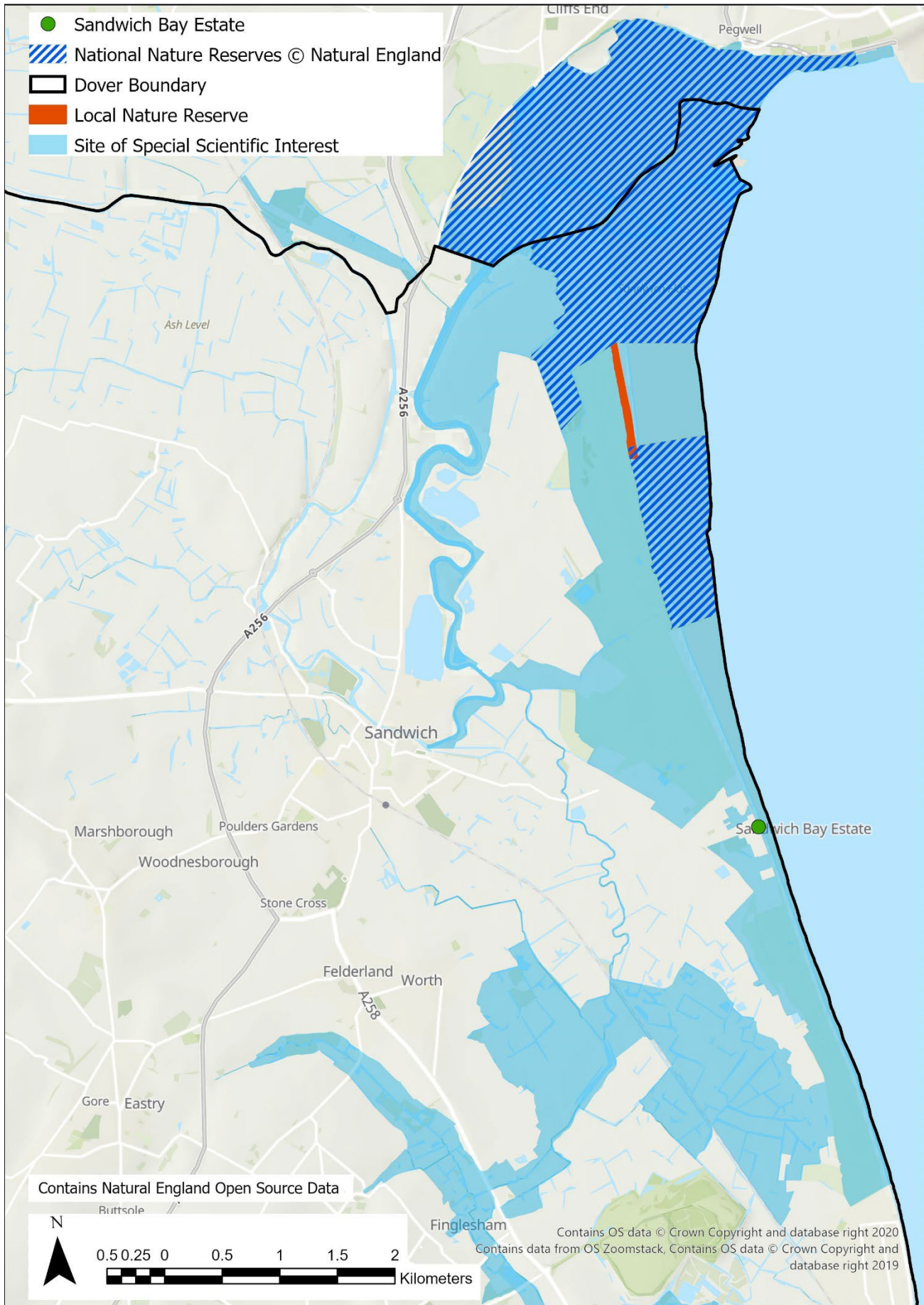
The Bay is under multiple ownership. Areas of the northern part of the Bay are owned by conservation charities – the National Trust, the Royal Society for the Protection of Birds and the Kent Wildlife Trust. The Sandwich and Pegwell Bay NNR Steering Group brings together the land managers of the National Nature Reserve. Around the middle section of the Bay is the Sandwich Bay Estate, a small estate of residential properties. Sandwich Bay (Residents) Ltd owns the roads and the foreshore to the high water mark. There are three golf courses situated on the dunes of the Bay. To the north of the Sandwich Bay Estate properties are Princes Golf Course and The Royals St George's Golf Club. The Royal Cinque Ports Golf Club is located at the southern end of the Bay nearer to Deal. The Sandwich Bay Bird Observatory is located towards the northern part of the Bay and also owns some areas of land.

¹⁰ The HRA of the Dover District Local Plan Regulation 19 concludes that “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 sites which overlap the SPA” (paragraph 5.101)

Plan 1: SPA, SAC and Ramsar Designations



Plan 2: NNR, SSSI and LNR Designations



Thanet Coast and Sandwich Bay SPA

Summary of the SPA

Table 1 summarises the qualifying features and key vulnerabilities of the SPA.

Table 1: Summary of Thanet Coast and Sandwich Bay SPA¹¹

Site	Thanet Coast and Sandwich Bay SPA
Area	1880.85 hectares
Qualifying Features	<ul style="list-style-type: none"> • European Golden Plover: <i>Pluvialis apricaria</i> (non-breeding) • Ruddy Turnstone: <i>Arenaria interpres</i> (non-breeding) • Little Tern: <i>Sterna albifrons</i> (breeding)
Key Vulnerabilities	<p>Changes in species distributions:</p> <p>A decline in overwintering turnstone and breeding Little Tern are thought to be due to human disturbance. The lack of breeding Little Tern 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>Invasive species:</p> <p>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>Public access/disturbance:</p> <p>Recreational pressures linked with description for ‘changes in species distributions.’</p> <p>Water pollution:</p> <p>Potentially could reduce food availability for SPA birds.</p>
Conservation Objectives	<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"> • The extent and distribution of the habitats of the qualifying features; • The structure and function of the habitats of the qualifying features; • The supporting processes on which the habitats of the qualifying features rely; • The population of each of the qualifying features; and, • The distribution of the qualifying features within the site.
Non-qualifying habitats and species upon which the qualifying habitats and/or species depend	<p>In general, the qualifying bird species of the SPA rely on:</p> <ul style="list-style-type: none"> • The sites ecosystem as a whole (see list of habitats below). • Maintenance of populations of species that they feed on (see list of diets below).

¹¹ From a summary provided in Dover HRA. Landuse Consultants for Dover District Council. (Draft December 2020). *Draft Dover District Local Plan (Reg. 18) Habitats Regulations Assessment*.

Site	Thanet Coast and Sandwich Bay SPA
	<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"> • Habitat preference: farmland and coastal flats during the winter. • Diet: worms, beetles and insects. <p>Ruddy Turnstone: <i>Arenaria interpres</i> (non-breeding)</p> <ul style="list-style-type: none"> • Habitat preference: rocky, muddy and sandy shorelines. • Diet: insects, crustaceans and molluscs. <p>Little Tern: <i>Sterna albifrons</i> (breeding)</p> <ul style="list-style-type: none"> • Habitat preference: nest exclusively on the coast in well-camouflaged shallow scrapes on sand and shingle beaches, spits or inshore islets. • Diet: fish, crustacean and invertebrates.

Natural England's Site Improvement Plan¹² reports that there has been a decline in overwintering Turnstone, noting that anthropogenic disturbance is a probable cause for some of the decline in numbers. It notes the features of the SPA affected by public access/disturbance as the three bird species – Golden Plover, Turnstone and Little Tern.

SPA Species

Turnstone

The overwintering population of Turnstone arrive in the UK in the early autumn (although first arrivals may occur in July¹³). Most leave again in spring, with the majority having left by April/May; although some individuals may remain through the summer. Alongside the core population of over-wintering residents are visitors and some passage birds and in later spring the SPA can be a staging post for migrating birds.

Turnstones have been reported as being less mobile than other shorebirds, with over-wintering populations of generally stable numbers and a relatively high level of roost fidelity. However, while studies have shown that individuals do return year on year to previous roost sites, the birds will move distances of a few kilometres during the winter period and sometimes far greater distances. This is also supported from evidence from the Thanet Turnstone survey of 2010,¹⁴ when 927 (75%) of the total 1247 birds were recorded in Pegwell Bay. This evidence of movement around the SPA further supports an integrated approach to mitigation across the Thanet Coast and Sandwich Bay SPA.

¹² Natural England. (2014). *Site Improvement Plan: North East Kent (Thanet)*.

¹³ <https://app.bto.org/birdfacts/results/bob5610.htm>

¹⁴ Hodgson, I. (2010). *Thanet Coast Turnstone (*Arenaria interpres*) Monitoring*. Sandwich Bay Bird Observatory Trust.

A high degree of roost fidelity, i.e. the birds do not readily move, may mean that disturbance is potentially more serious and that such species are more greatly affected by habitat loss, whether from absolute loss of habitat or loss of habitat capacity due to a reduced ability to feed.

A 2002 study into Turnstone disturbance on the SPA¹⁵ recorded that dogs in the inter-tidal zone elicited the greatest disturbance response. Other activities which disturbed the birds were (in order of severity), shellfish harvesting, walking in the intertidal zone (no dog) and dog walking above the intertidal zone. The activities which scored the highest level of disturbance of complete movement of the flock were cart-boarding and dogs actively chasing birds. The report also highlighted that the distribution of the birds varies during the winter, with the birds congregating in larger roosts in December and into the early new year, with the roosts more dispersed in the autumn.

The UK is of major importance for Turnstones, supporting over 50% of the Greenland/Canada birds in winter. WeBS Core Counts show that the UK's winter population has decreased by 39% over the long term measure of 25 years. The Thanet Coast and Sandwich Bay SPA records a significantly higher level of decline, at 82% over 25 years, see Table 2. This would infer that there are site-specific conditions which are resulting in this decline. The alert for the Thanet Coast and Sandwich Bay SPA is therefore 'High.'

Table 2: WeBS Alerts: Turnstone¹⁶

Site	Short-term % change (5 years)	Medium-term % change (10 years)	Long-term % change (up to 25 years)	Baseline winter	% change since baseline
Great Britain	-2	-20	-39	-	-
SPA suite for UK within GB	-7	-24	-41	-	-
Thanet Coast and Sandwich Bay SPA	-59	-83	-82	1988/89	-85

The Current Conservation Status for Turnstone is amber.¹⁷

¹⁵ Webb, K. (2002). *The effects of human activity on Turnstones and other wading birds within the Thanet and Sandwich Bay Special Protection Area (SPA)*. Published in Proceedings of the North East Kent Coastal Research Workshop, English Nature Reports ENRR570.

¹⁶ Woodward, I.D., Frost, T.M., Hammond, M.J., and Austin, G.E. (2019). *Wetland Bird Survey Alerts 2016/2017: Changes in numbers of wintering waterbirds in the Constituent Countries of the United Kingdom, Special Protection Areas (SPAs), Sites of Special Scientific Interest (SSSIs) and Areas of Special Scientific interest (ASSIs)*. BTO Research Report 721. BTO, Thetford. www.bto.org/webs-reporting-alerts RED shading = high alert, ORANGE shading = medium alert.

¹⁷ Due to Recent Breeding Population Decline (1981-2007), Recent Winter Population Decline (1981-2007), Recent Breeding Range Decline (1981-2010), Recent Winter Range Decline (1981-2010), Important Non-breeding Population <https://app.bto.org/birdfacts/results/bob5610.htm>

Turnstone monitoring is carried out for most of the Thanet Coast and Sandwich Bay SPA every year. This monitoring does not include Sandwich Bay and therefore detailed data specifically for Sandwich Bay are not available.

Golden Plover

Golden Plover (*Pluvialis apricaria*) also overwinters within and around the SPA, utilising inland grassland and intertidal areas.

A report on Golden Plover was published in 2003.¹⁸ This study reported that the birds use various inland and intertidal sites near to the Thanet and Dover coast. A further study in 2016 surveyed areas around the SPA.¹⁹ Inland areas around Sandwich Bay were found to have Golden Plover present with some areas holding some of the largest numbers of wintering birds. Significant areas for the winter population were the flood relief pools next to the River Stour at Sandwich Marshes (between Bloody Point and Back Sand Point), where up to 610 roosting birds were recorded. There was also a regular presence in the Worth Marshes (east) area (to the west and south of Sandwich Bay Estate), with a maximum of 242 birds and around 6% of all birds counted being in this area. Public rights of way pass close to some of these areas. Surveyors noted that the disturbance was most frequent in areas close to residential development or vehicle parking. However, whilst the report notes that anecdotally there appeared to be increases in recreational use this could not be quantified.

Table 3: WeBS Alerts: Golden Plover²⁰

Site	Short-term % change (5 years)	Medium-term % change (10 years)	Long-term % change (up to 25 years)	Baseline winter	% change since baseline
Great Britain	33	-32	-45	-	-
SPA suite for UK within GB	6	-40	20	-	-
Thanet Coast and Sandwich Bay SPA	-83	-92	187	1988/89	82

¹⁸ Natural England. (2003). Numbers and distribution of the wintering golden plover population in and around the Thanet Coast & Sandwich Bay SPA 2002/2003 (ENRR569).

¹⁹ Henderson, A. & Sutherland, M. (2017). *Numbers and Distribution of Golden Plovers in the Thanet Coast and Sandwich Bay SPA during the winter of 2016/2017*. Report to Natural England.

²⁰ Woodward, I.D., Frost, T.M., Hammond, M.J., and Austin, G.E. (2019). Wetland Bird Survey Alerts 2016/2017: Changes in numbers of wintering waterbirds in the Constituent Countries of the United Kingdom, Special Protection Areas (SPAs), Sites of Special Scientific Interest (SSSIs) and Areas of Special Scientific interest (ASSIs). BTO Research Report 721. BTO, Thetford. www.bto.org/webs-reporting-alerts RED shading = high alert, ORANGE shading = medium alert.

The alert for the Thanet Coast and Sandwich Bay SPA for Golden Plover is 'High' over the short- and medium-term.

The Current Conservation Status for Golden Plover is green.

Little Tern

Little Tern (*Stena albifrons*) return to sites in Europe in the summer to breed after spending the winter in the coastal areas of west Africa. The North East Kent European Marine Sites Management Scheme original management scheme²¹ reports that Little Tern used to breed at Shellness in small, single-species colonies on areas of shingle and sand, many of which were occasionally overtopped by the sea.

In the five year period 1986-90, an average of 30 pairs of Little Tern bred within the Thanet Coast and Sandwich Bay SPA, representing 1% of the British breeding population. The maximum number of pairs that attempted to breed during this period was 67 in 1986. At the time of the first North East Kent European marine sites Management Scheme (2002) it was noted that numbers of Little Tern had been decreasing dramatically in recent years. This was thought to be largely because of increased disturbance. The Sandwich Bay Bird Observatory and the Kent Trust for Nature Conservation²² wardened these colonies for several years. Little Tern has not bred at Shellness Point since 1997.

Natural England's Site Improvement Plan²³ states:

Breeding Little Tern are a species listed under the SPA designation, however, the species has not bred within the site for over ten years [report dated 2014]. This is thought to be due to a number of reasons including; human disturbance, predation, nest inundation. Management has been attempted previously, in the form of fencing of nest site areas, signage and managing access to these areas, to encourage breeding Little Tern back to the site however, to date, this has not been successful.

²¹ North East Kent European Marine Sites Management Scheme. (2002). The North East Kent European marine sites Management Scheme. *Section 2: Reasons for Designation as European Marine Sites*. p16.

²² Now the Kent Wildlife Trust.

²³ Natural England. (2014). *Site Improvement Plan: North East Kent (Thanet)*.

The features of importance within the marine sites for Little Tern are:

- Shingle shores - Sparsely vegetated shingle areas are an important nesting area for Little Tern within the SPA. The Little Tern breeding sites are located on areas of sandy shingle at Shellness which are occasionally overtopped by seawater. Successful breeding is largely dependent on relatively little disturbance and limited predation.
- Shallow coastal waters - Little Tern feed in shallow coastal waters mainly on small fish (e.g. sandeel, pipefish, and gobies) and also crustaceans (shrimps, prawns and crabs). When the tide is in, feeding activity occurs in Sandwich Bay and in the lower reaches of the River Stour.

The Current Conservation Status for Little Tern is amber.²⁴

SSSI Condition

Some units of the Sandwich Bay to Hacklinge Marshes SSSI are in unfavourable recovering or unfavourable no change condition, but the reasons for this are not related to access or bird disturbance.

²⁴ Due to Recent Breeding Population Decline (1981-2007), Recent Winter Population Decline (1981-2007), Recent Breeding Range Decline (1981-2010), Recent Winter Range Decline (1981-2010)
<https://app.bto.org/birdfacts/results/bob6240.htm>

Access at Sandwich Bay

The access network in and around Sandwich Bay is shown in Plan 3.

Vehicle Access into Sandwich Bay

Vehicle access to Sandwich Bay is from Guilford Road/Golf Road, which links Sandwich and Deal. Access to the sea front by vehicles is through the Sandwich Bay Estate. The Sandwich Bay Estate owns the road through the Estate and there is a toll charge.

Princes Drive follows the sea front to the north from the Sandwich Bay Estate. It leads to the north to the entrance to Prince's Golf Club. Princes Drive extends for a short distance to the south but it is not publicly accessible and is reserved for residents of the Sandwich Bay Estate.

Vehicles park along the dunes adjacent to Princes Drive. The main parking areas are at the northern end of Princes Drive, at the entrance to Prince's Golf Club, and approximately mid-way along Princes Drive, where there are toilet blocks maintained by the Sandwich Bay Estate.

Public Access

Sandwich Bay is also accessible from a network of public rights of way. Public footpaths links Sandwich town across Royal St George's and Prince's Golf Courses to the sea front. A public byway also runs parallel to Guilford Road and a public bridleway links Worth to Guilford Road.

Access rights to through the England Coastal Path came into force in July 2016 and this section of the England Coastal Path is now fully open. The path follows the Stour estuary, cutting across Shellness Point (but not reaching the most northerly part of the Point), and then following a route along the seafront.

Several promoted routes also cross Sandwich Bay:

- The Saxon Shore Way is a 163 mile long distance walk around the ancient coastline of Kent and into Sussex (shown on Ordnance Survey mapping);
- The Stour Valley Walk, is a 58 mile walk promoted by Kent County Council. It is shown on Ordnance Survey mapping as extending to Shellness Point, using a permissive path. The guidebook for this walk is out of print (shown on Ordnance Survey mapping);
- The White Cliffs Country Trail was produced by the White Cliffs Countryside Project but is out of print (shown on Ordnance Survey mapping);
- The Sandwich to Rye walking route and;
- Explore Kent promotes a circular route from Sandwich
- National Cycle Route 1 follows Guilford Road, with this section promoted as the Sandwich to Rye Cycle Route.



Visitor Surveys

Several visitor surveys have been carried out at Sandwich Bay to increase the understanding regarding visitors to the Bay and to support decisions on access management and mitigation. These were required through the Thanet Coast Mitigation Strategy 2012 but have also been carried out by other organisations. Specific findings of relevance to formulating the SAMM are included throughout this report, with key points detailed next.

Sandwich Bay Visitor Survey 2020

Visitor surveys were carried out between 4th January 2020 and 8th March 2020, both on weekdays and at weekends. Key findings were:

- 126 visitor groups were surveyed;
- 91% of visitors visiting Sandwich Bay from home originated from within Dover District area;
- A high proportion of visitors are frequent visitors. 47.2% of visitor groups visited once a week or more frequently;
- Dog walking was the most popular main activity at Sandwich Bay, with 73.8% of visitor groups indicating this was their main reason for visiting;
- 86.4% of regular visitors (visiting once a week or more) had a dog with them;
- 88% of dogs were off the lead;
- The average length of route taken was 4.42 km;
- The most popular route was from the end of Princes Drive heading north and then returning either along the beach or the dunes. Walking along the beach was more popular at low tide;
- There was low awareness of the PSPO (see page 21) - 48.4% were aware that a PSPO was in place and 49.2% were not aware;
- There was low awareness of the restrictions which the PSPO puts in place. 57.9% of visitor groups did not know or could not give an answer. 27.8% thought it placed restrictions on dogs;
- There was low awareness around the reasons for the PSPO. One third (33.3%) of respondents did not know why the PSPO had been put in place. A further third (33.3%) thought it was to protect 'wildlife and nature' without being able to be more specific;
- There was generally low awareness of most of the features for which Sandwich Bay is important. 29.2% of visitor groups thought Sandwich Bay was important for birds in general, but could not name a type of bird or a species;
- Many visitors had not seen any information around why Sandwich Bay is important for wildlife. 45.2% of respondents had not seen any information, either onsite or online – the

highest response. 42.8% of respondents had seen the notice boards on site. Few visitors had visited websites to find out information;

- There was low awareness of how visitors might have an impact on the wildlife interest of Sandwich Bay. 45.2% of visitor groups were not aware of any potential impact of visitors on nature conservation interest. 27% of groups thought that visitors may affect birds in general but could not be more specific;
- Over half of visitor groups (51.4%) did not know or could not give a suggestion around how recreation management could be improved for wildlife. 17.5% thought that current management was appropriate.

Pegwell and Sandwich Bay Visitor Surveys, 2018, 2012 and 2011

These surveys interviewed visitors at Pegwell Bay and Sandwich Bay during the winters of 2011, 2012 and 2018.

In 2011, 105 interviews were carried out at Sandwich Bay. This survey demonstrated that visitors to sites each side of the River Stour tended to originate from that side of the river - Ramsgate being the main origin of visitors to Pegwell Bay (north of the river) and Sandwich and Deal being the main origin for visitors to Sandwich Bay (south of the river). Most visitors (56%) were accompanied by a dog, with 93% of dog walkers coming specifically to let their dog off the lead. The survey indicated a high level of regular visitation, with 66% of visitors to Sandwich Bay visiting once a week or more.

In 2012, 132 interviews were carried out at Sandwich Bay. 58% of visitors to Sandwich Bay originated from Deal and Sandwich, whereas 54% of visitors to Pegwell Bay originated from Cliffs End, Ramsgate and Broadstairs. Most visitors (58%) were accompanied by a dog. In 2018, 126 interviews were carried out at Sandwich Bay. 75% of visitors had a dog with them, with 70% indicating that dog walking was a reason for visiting Sandwich Bay. 68% of visitors visited Sandwich Bay once a week or more.

In 2018, 126 interviews were carried out at Sandwich Bay. 55% of visitors came from Sandwich or Deal with a further 12% from areas near Sandwich and Deal. 75% of visitors had a dog with them, and 78% said this was their regular dog walking area. 92% of dog walkers said they let their dog off the lead. 69% of visitors visited Sandwich Bay once a week or more.

Visitor Pattern

The 2020 visitor survey provided insight into the routes visitors use at Sandwich Bay. Visitors were shown a map of the Sandwich Bay area and asked to indicate where they had started their visit and the route they had taken or planned to take. All the routes were plotted and the distance walked was calculated.

Visits usually began from the car park at the end of Princes Drive. However, visits could start from anywhere along the coast between the Sandwich Bay Estate and The Lodge at Prince's (within Prince's Golf Course just north of public car park) as visitors park all along this coastline. Some visitors began their visits from beyond Sandwich Bay – from Sandwich and entering the Bay using footpaths, or from Deal. The average length of route taken was 4.42 km.

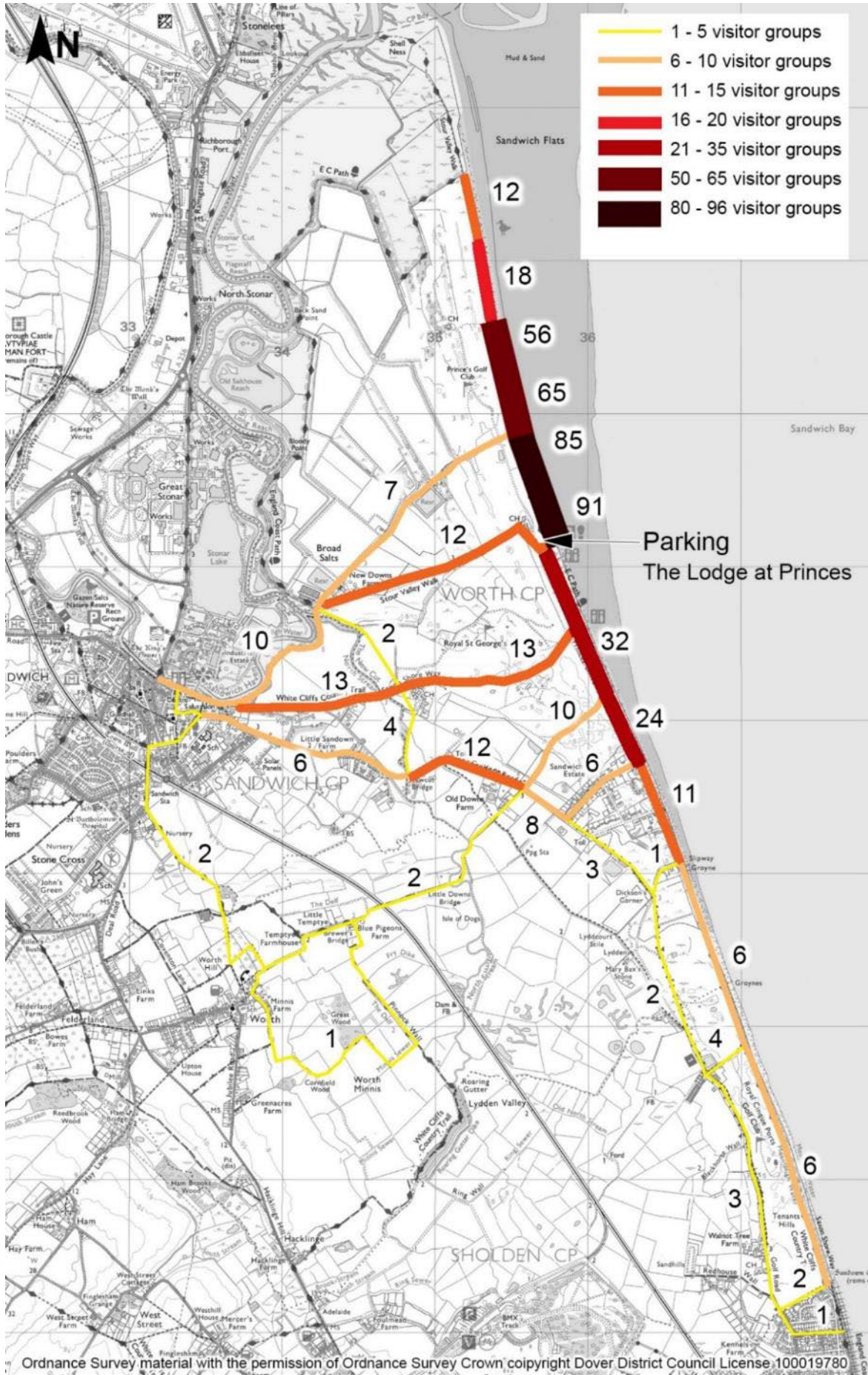
Most visitors headed north from the parking area at The Lodge at Prince's for a distance, before returning. Visitors were asked whether they walked on the beach or the dunes. Visitors tended to walk on the beach at low tide and were more likely to walk on the dunes at high tide. Many walked out along the beach and back along the dunes, or vice versa.

As the distance from the car park increases, the number of visitors drops. The Prince's Golf Course Club House serves as a turning point for many visitors, who indicated they would walk to the club house and turn back. Others indicated that they would walk to 'the posts' which marked the entrance to Shellness Point. No visitors reported that they walked beyond the posts and no visitors were observed beyond the posts, although horse riders were observed on the beach / intertidal area.

Some visitors who parked further south walked up and down the coast. The area between Sandwich Bay Estate and the parking area at The Lodge at Prince's was the second most highly trafficked area. Fewer people walked inland on the footpath network.

An indicative 'heat map' of routes walked is shown in Plan 4.

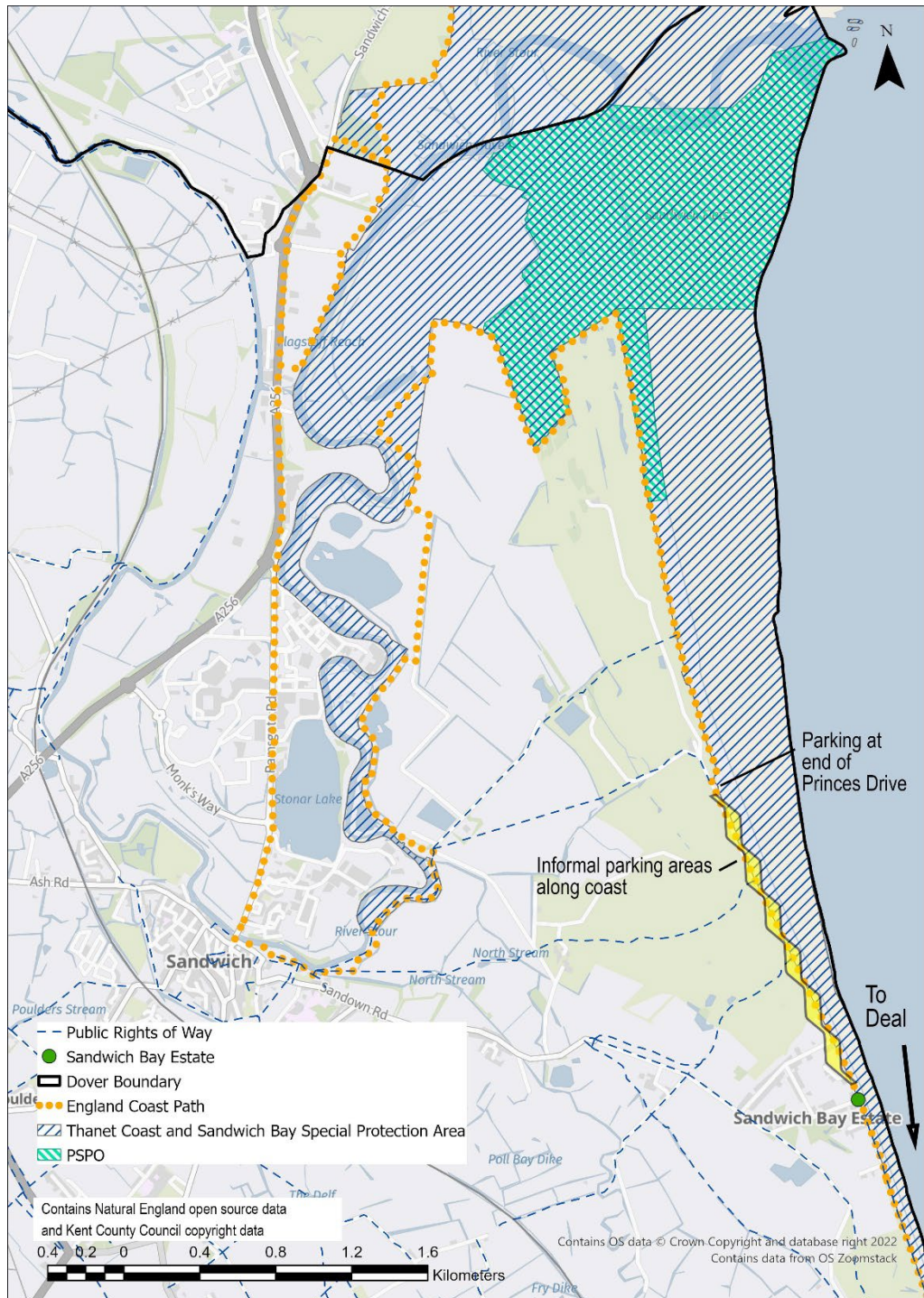
Plan 4: Heat Map of Visitor Groups – Visitor Survey 2020



Existing Access Restrictions

A Public Space Protection Order (PSPO) is in place.²⁵ This requires that dogs be kept on leads on an area of dunes at Prince's Golf Course and that no dogs are allowed to enter the northern section of the Bay at Shellness Point. The area of the PSPO is shown in Plan 5.

(Right) Plan 5:
Existing Public
Space
Protection
Order



²⁵ An initial PSPO came into force 27 July 2015 and was agreed by Dover District Council Cabinet on 3 June 2019 to be varied to include areas at Sandwich Bay, following a consultation exercise.

Reports and Surveys

Introduction

A range of reports and surveys have been used in evidence. The documents reported on detail in this section are:

- Sandwich and Pegwell Bay National Nature Reserve Management Plan 2021 - 2030 (Draft 2021);
- Bird Disturbance Study - Pegwell and Sandwich Bay 2019 (EcoNorth);
- Shore-bird Behavioural Disturbance Study 2018-19 (Citizen Science);
- Draft Dover District Local Plan (Regulation 19) Habitats Regulations Assessment (HRA);
- Managing Walkers with Dogs at Sandwich and Pegwell Bay Report.

Sandwich and Pegwell Bay National Nature Reserve Management Plan 2021 - 2030 (Draft 2021)

The management plan for the National Nature Reserve (NNR), produced by the NNR Steering Group, sets out management priorities and actions for the habitats, species and access provision of the NNR.

In line with the other reports described in this section, disturbance is listed as an important factor influencing whether the targets for habitat and species conservation are achieved.

The management plan describes a sustainable approach to access management. In Sandwich Bay, this is through a zoned approach to the reserve:

- The most southerly section provides a 'buffer zone' to the rest of the reserve, and public access is not constrained;
- In the next section to the north, access is permitted, but there are some restrictions. Currently, a Public Space Protection Order requires that dogs be kept on leads on the dunes at Princes Beachlands Local Nature Reserve;
- At Shellness and the most northerly section, access is not permitted.

The management plan raises the following as the first of nine important issues affecting the NNR:

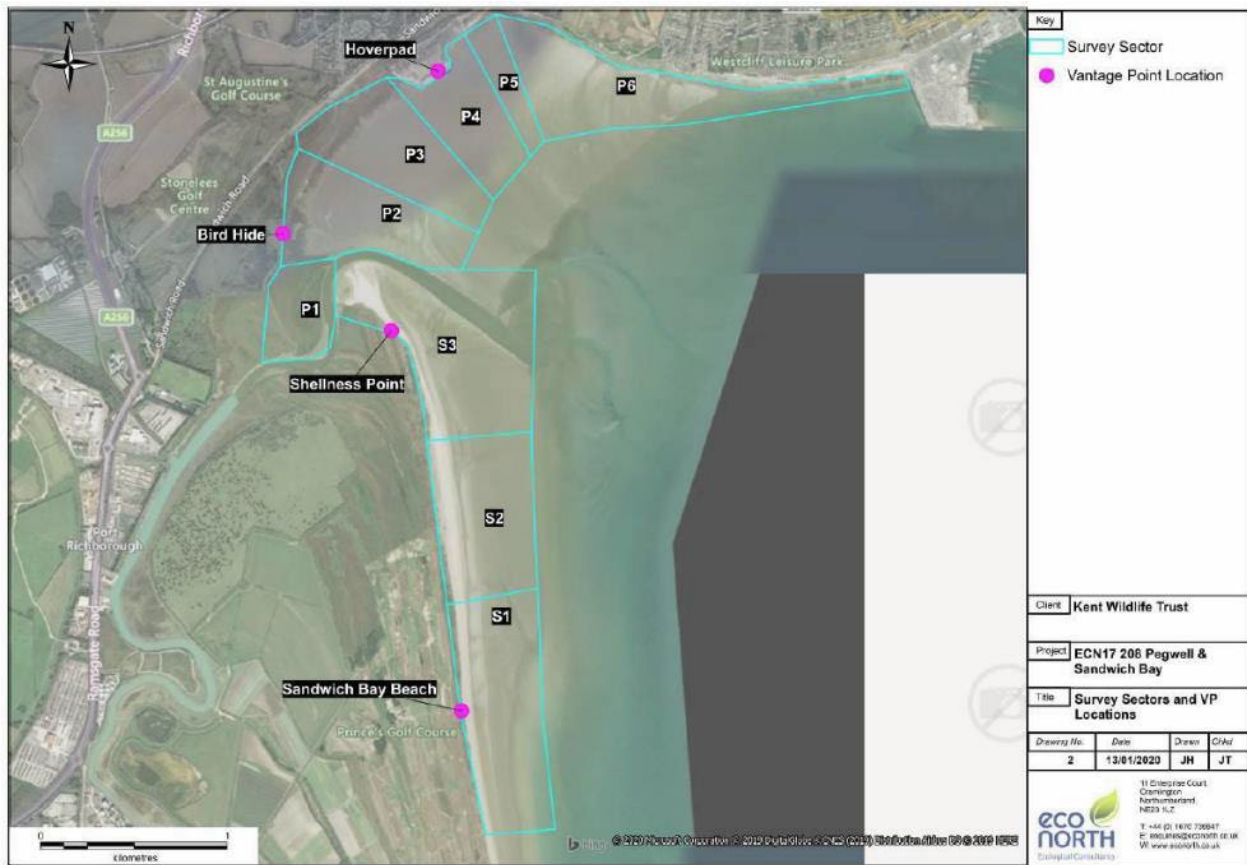
“Effective visitor management to reduce the impact of disturbance on sensitive habitats and wildlife, which is increasingly important given the predicted population growth with the surrounding areas and the alarming declines in a number of key bird species.”

Bird Disturbance Study - Pegwell and Sandwich Bay 2019 (EcoNorth)

An ornithological monitoring programme, including bird disturbance survey, of coastal and intertidal habitats at Sandwich and Pegwell Bay has been carried out. An interim report was produced in January 2019 detailing surveys between September 2018 to September 2019.²⁶

Sandwich Bay was split into three sectors – two on Sandwich Beach (sectors 1 and 2) and one at Shellness Point (sector 3), see Figure 1.

Figure 1: Survey Sectors - Bird Disturbance Study 2019



²⁶ EcoNorth. (Draft January 2020). *Bird Disturbance Study – Pegwell and Sandwich Bay*.

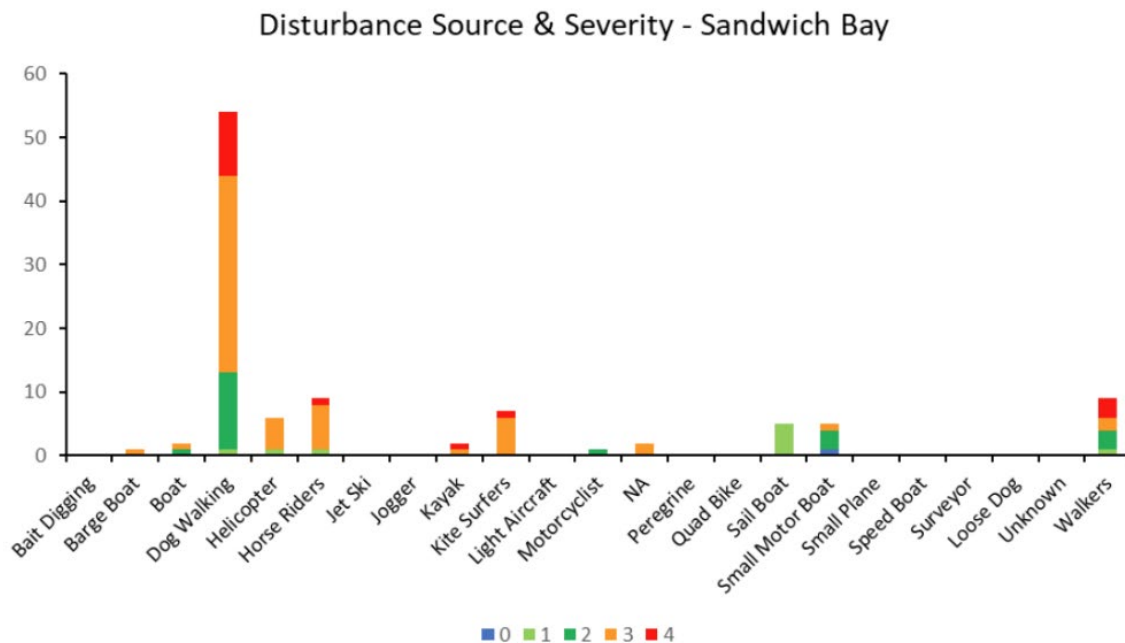
Peak counts were carried out from vantage points over three hours, during 13 monthly visits. Surveys focused on target species which typically comprised the interest features of the designated sites.

Overall, Sandwich Bay was more regularly disturbed than Pegwell Bay. Important findings are:

- Of the 134 disturbance events recorded, 60% (80) were in Sandwich Bay;
- The Sandwich Bay sectors had a higher total of disturbance events than the Pegwell Bay sectors;
- The Sandwich Bay sectors also had the highest rate of disturbance events per hour, with all sectors higher than any Pegwell Bay sector;²⁷
- The number of disturbance events was higher in the autumn and winter months (September to February) than the spring and summer months (March to August);
- Sector 1, Sandwich Bay, had the most disturbance events, followed by sector 2 and then sector 2;
- The maximum monthly peak counts were most frequently made in the sectors around the River Stour channel on both sides of the Bay, i.e. sector 3/Shellness Point for Sandwich Bay;
- Whilst habitat availability is a possible factor in a reduced species richness in comparison to Pegwell Bay, the distribution of water birds in Sandwich Bay is also thought to be influenced by anthropogenic disturbance;
- Most disturbance events were caused by dog walking (Figure 2);
- In Sandwich Bay, dog walkers caused more high level reactions than in Pegwell Bay, possibly due to the lack of separation of dogs and walkers from the feeding areas. Although there were more potential disturbance sources in Pegwell Bay there were more disturbance events at Sandwich Bay.

²⁷ Mean disturbance events per hour. Sandwich Bay sector 1: 0.82; sector 2: 0.51; sector 3:0.48. Pegwell Bay sector 1: 0.10; sector 2:0.28; sector 3:0.18; sector 4:0.46; sector 5 – 0.26; sector 6: 0.15.

Figure 2: Disturbance Sources and Severity - Sandwich Bay²⁸



The authors note that:

It is apparent that Sandwich Bay is much more prone to anthropogenic disturbance events than Pegwell Bay. Within Sandwich Bay, Sector S1 experiences the highest levels of disturbance of the entire study area. This is likely due to the context of the location: the area is an attractive length of beach that is easily accessible with a large car park. From observations made during the surveys, most walkers utilising Sandwich Bay tended to walk on the beach itself as opposed to the dunes and are thus more likely to encounter waterbirds.

Sector 3 at Sandwich Bay had the second highest number of disturbance events despite Shellness Point being restricted access. This may be due to the area having two pathways for disturbance: terrestrial access to the area, and access via boats/watercraft via the River Stour. Events recorded for the sector include dog walkers (who ignored the signs), horse riders, and five types of watercraft including motor and sailing boats, kayaks, and kite surfers. Furthermore, Sector S3 experiences a comparatively higher abundance of water birds than other sectors, whereas other sectors have fewer birds to be disturbed. It is noted that this distinction may be brought about by habitat types present or due to higher levels of anthropogenic disturbance experienced in other sectors.²⁹

²⁸ Disturbance levels – 1 increased vigilance, no movement away from source; 2 – minor disturbance, birds move away but return to same location or very close by; 3 – local displacement, birds move away but remain within sight; 4 major displacement – birds abandon area.

²⁹ Page 29-30.

Shore-bird Behavioural Disturbance Study 2018-19

A study was carried out by volunteers for Kent Wildlife Trust as part of the CoastLife Citizen Science project, using methodology approved by Natural England.³⁰ The report referenced contains the results of year 1 of the study.

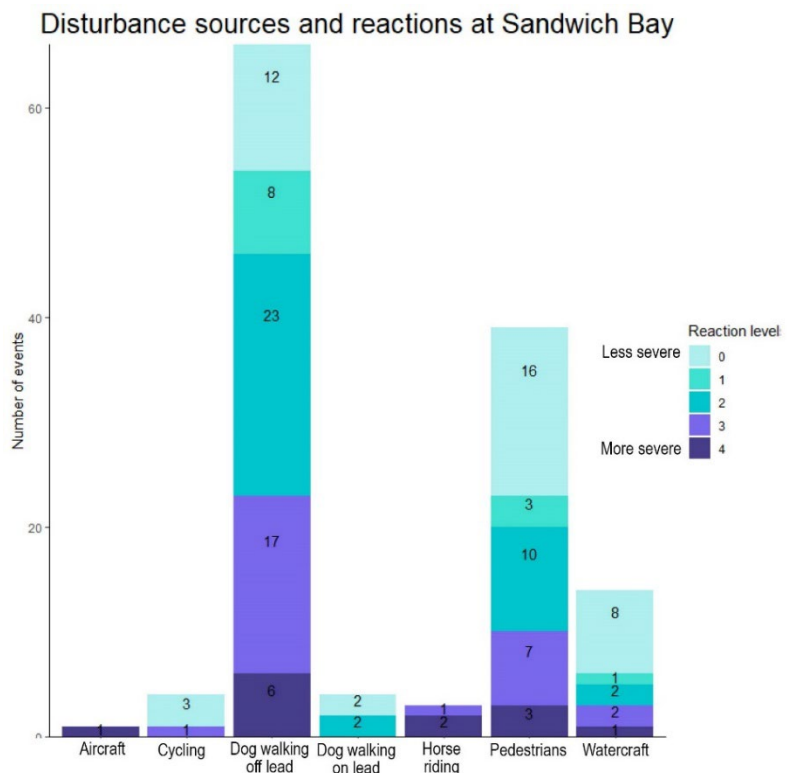
It is a partner report to the EcoNorth survey (see previous, page 26). In line with the EcoNorth report, transects on both sides of the Bay were surveyed. The sectors were roughly comparable to the EcoNorth survey, although numbered in reverse.

The most frequent source of disturbance was dog walking with dogs off leads, representing 50.7% of all disturbances. 25% of all disturbances were caused by pedestrians. Watercraft caused 9% and 6.5% was caused by walking dogs on leads.

60.8% of the events that resulted in the most severe disturbance (reaction level 4) were caused by dogs walked off-lead and pedestrians, with each activity type accounting for 30.4% of the total. 17.4% were attributed to watercraft. Dog walking off-lead caused more than half of the events across the remaining disturbance ranks (reaction levels 1-3). Pedestrian activities explained between 19% and 27% across these ranks.

Levels of disturbance by type are shown in Figure 3.

(Right) Figure 3: Survey Sectors - CoastLife Citizen Science Bird Disturbance Study 2018-9



³⁰ Campodonico, A., Juan, C. & Tinsley-Marshall, P. (Draft 2020). *Shore-bird Behavioural Disturbance Study 2018-19: Sandwich and Pegwell Bay National Nature Reserve*. Kent Wildlife Trust

Dover District Local Plan (Regulation 19) Habitats Regulations Assessment (HRA)

The Dover District Local Plan (Regulation 19) Habitats Regulations Assessment (HRA)³¹ sets out the screening and Appropriate Assessment of the 'Regulation 19' Local Plan.

The Appropriate Assessment of the HRA identifies that the main threats to the Thanet Coast and Sandwich Bay SPA and Ramsar are from the disturbance of wetland birds from recreational activities. It states that the increase in development in the district, given that the most recent visitor surveys (2020) indicate that 91% of visitors originate from within Dover District, has the potential to result in an adverse effect and will require mitigation measures, as set out in this strategy.

Managing Walkers with Dogs at Sandwich and Pegwell Bay Report

A report making strategic recommendations for the management of access for walkers with dogs in and around Sandwich and Pegwell Bay National Nature Reserve was published in 2014.³² The catalyst for the report was the need to reduce any negative impacts arising from the implementation of the England Coastal Path.

The report identifies seven themes where action is recommended:

- i. Access management within the NNR;
- ii. Access management on land surrounding the NNR;
- iii. Impact of new developments on the NNR and surrounding land;
- iv. Management of Pegwell Bay Country Park;
- v. Impact and influence of Natural England's roll out of coastal access;
- vi. Engagement of local dog walkers;
- vii. Practical access management, information and interpretation.

The report recognises the need for co-ordination of all the actions being undertaken in the area regarding access management in order to avoid displacement of visitors to more sensitive areas for example through implementing dog control orders on beaches.

³¹ Landuse Consultants for Dover District Council. (Draft December 2020). *Draft Dover District Local Plan (Reg. 18) Habitats Regulations Assessment*.

³² Jenkinson, S. (2014). *Managing Walkers with Dogs at Sandwich and Pegwell Bay National Nature Reserve*. Report for Natural England and The Kennel Club.

New Housing, 'Zone of Influence' and Access to Greenspace

Strategic Allocations

Dover District Council's Regulation 19 Local Plan sets out provision for 10,998 new homes to be built by 2040. The existing planned urban extension at Whitfield is expected to deliver 3,320 homes over the Plan period. Other allocated sites are identified to deliver 3,392 homes. Windfall sites are expected account for 70 dwellings per annum from year 4 of the plan.

The proposed allocations are shown in Plan 6.

Cross Boundary Issues

The recreational impacts from housing development do not necessarily stop at the boundary with the adjacent local authority. Visitors to the coastal sites of east Kent do cross local authority boundaries, although a very high majority of visitors to Sandwich Bay originate from within Dover district (see Table 4). However, due to the commonality of issues, the potential for displacement of visitors and the benefits of a co-ordinated approach to education and engagement, co-ordination between Dover, Canterbury and Thanet councils is essential.

Application of a 'Zone of Influence'

As part of the revision of the 2012 mitigation strategy, it was evaluated whether the whole district approach taken in 2012 remains appropriate, or whether a 'zone of influence' approach was more applicable. A zone of influence is the area within which residential development is clearly linked to recreational use of a site.

A zone of influence approach has been adopted by neighbouring Thanet and Canterbury districts in respect of the Thanet Coast and Sandwich Bay SPA, as well as by many other local authorities in respect of coastal sites. It was also recommended as an approach to explore further in review of visitor surveys carried out for Dover District Council.³³

There is no standardised method to identify a zone of influence. The zone of influence should take into account the visitor pattern, physical features of the site, current housing and other relevant local features. The exercise is one of pragmatism; identifying a boundary which seems

³³ Land Use Consultants for Dover District Council (2018); *Thanet Coast SPA [sic] Mitigation Strategy – Review of Visitor Surveys*.

logical and representative of visitor pattern. However, a common approach to determine a zone of influence is to base the zone on the area from which 75% of visitors originate or 90% of regular visitors.

Analysis of all the visitor surveys since 2011 was carried out. The 2011, 2018 and 2020 surveys provided full postcode data and therefore could be used to calculate a zone of influence. These surveys were all carried out during the winter period when the over-wintering birds of the SPA are present.³⁴

The distance to site was calculated as a straight line from the Sandwich Bay Estate. All visitor vehicle traffic must pass through this point to reach the seafront. Most visitors (83% in the 2020 visitor survey) arrive at the site by vehicle.

Important findings from this analysis were that:

- In the most recent 2020 survey, 75% of all visitors and 90% of regular visitors both originated from 8.9 km from home;
- In the 2011 and 2018 surveys the distance from which 75% of all visitors and 90% of regular visitors originated was larger. This was due to a higher proportion of visitors originating from within Dover District in the 2020 survey (see next);
- There was a high level of consistency in the cumulative spread of the distances travelled to Sandwich Bay between the surveys analysed.

³⁴ All are available on Dover District Council website at:

<https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-Visitor-Survey-Pegwell-Bay-and-Sandwich-Bay-2012.pdf>

<https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/visitor-survey-for-sandwich-bay-pegwell-bay-2018.pdf> and

<https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/sandwich-bay-visitor-surveys-january-march-2020.pdf>

Chart 1: Distribution of Distance All Visitor Groups

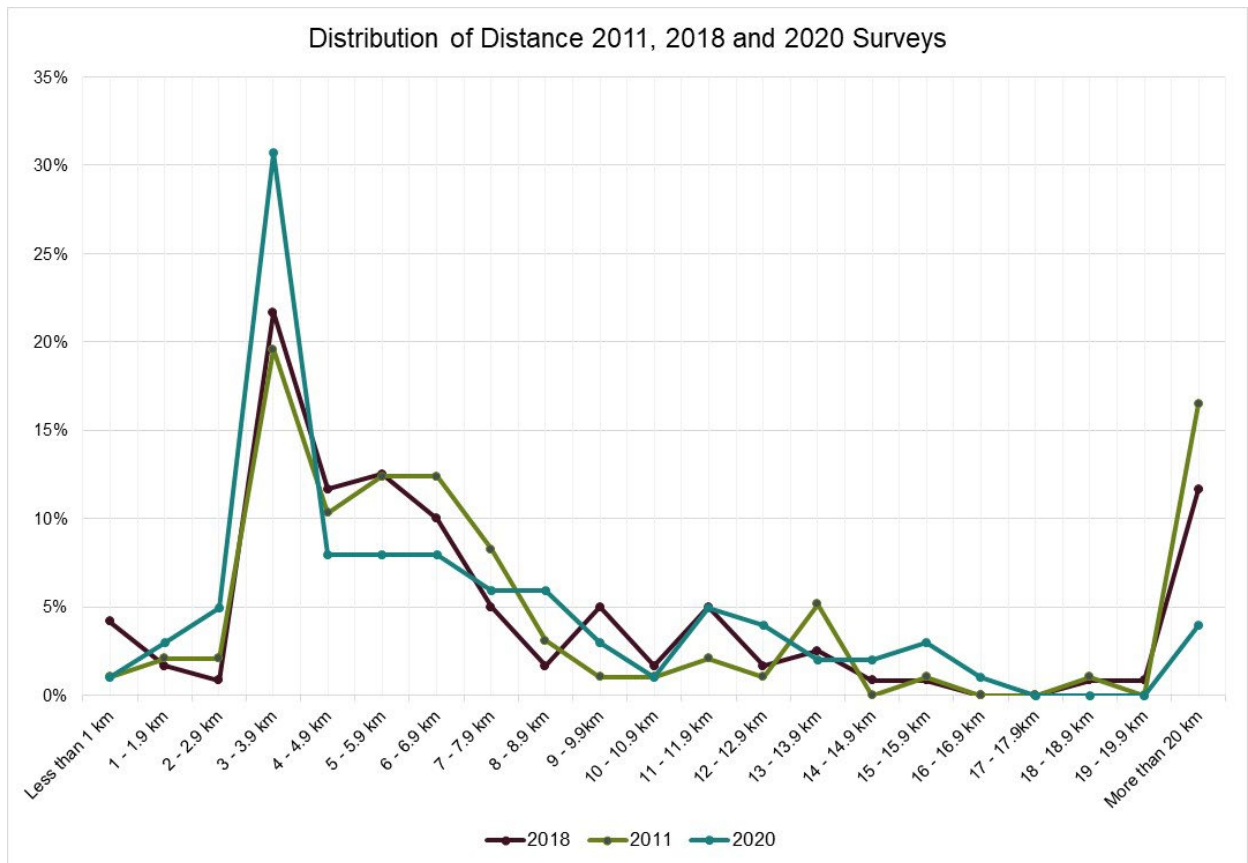
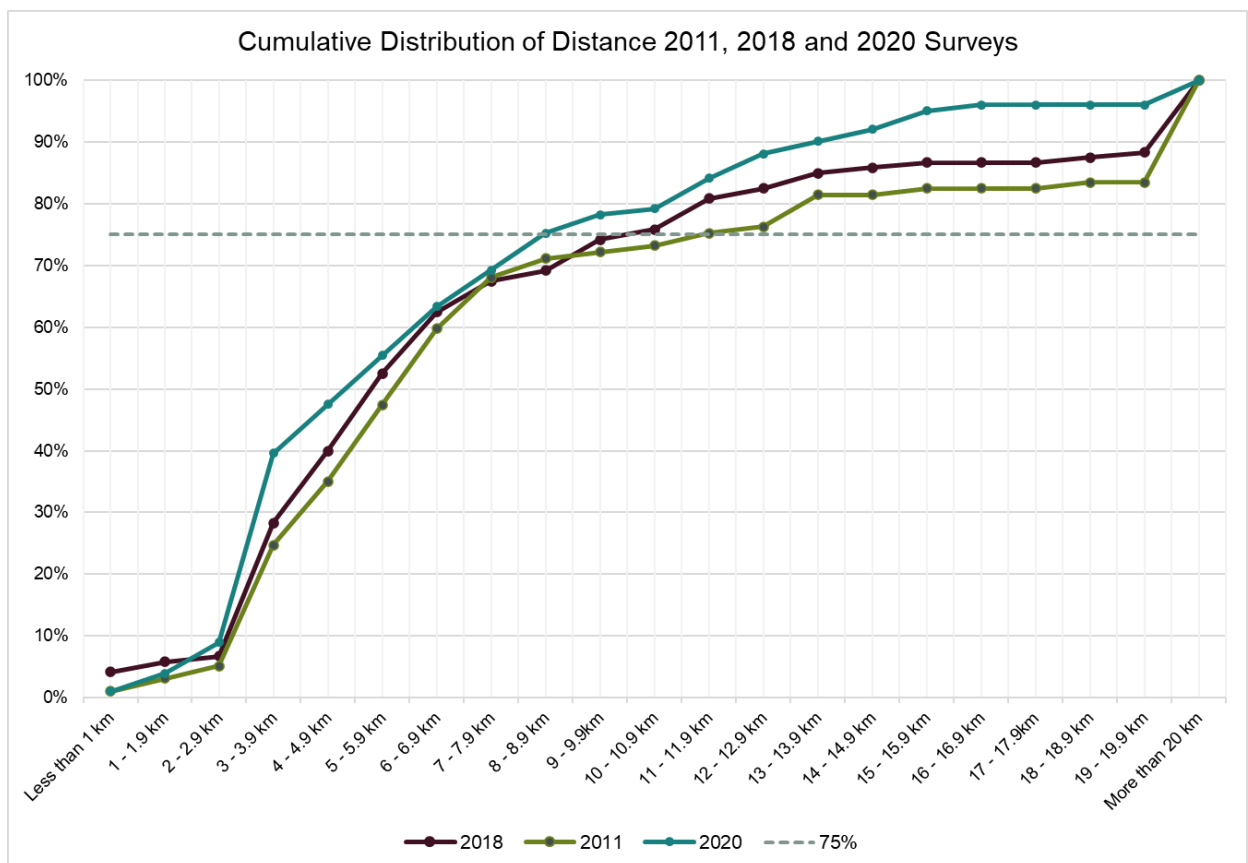


Chart 2: Cumulative Distribution of Distance 2011, 2018 and 2020 – 75% Indicated



The zone from within which residential development is clearly linked to recreational use of a site was determined to be 9km. This is the distance within which 75% of all visitors and 90% of regular visitors both originated from in the 2020 visitor survey.

- Most visitor groups originated from Dover District. The proportion from Dover District increased in each survey. In the 2020 survey, 91% of visitors originated from within Dover District (see Table 4).

Table 4: Origin of Visitors by Local Authority

		2011	2018	2020
Originating from Dover District	n.	68	94	92
	%	70.1%	78%	91.9%
Originating from Thanet District	n.	12	9	5
	%	12.4%	7.5%	5.0%
Originating from Canterbury district	n.	6	4	0
	%	6.2%	3.3%	0%
Originating from Folkestone and Hythe District	n.	2	0	1
	%	2.1%	0%	0.1%
Originating from Dover and neighbouring authorities	%	90.8%	88.8%	97%

The appropriate response and policy position in the Local Plan was therefore decided to be that mitigation and monitoring contributions will be required from within a zone of influence of 9km.

Allocations within the 'Zone of Influence'

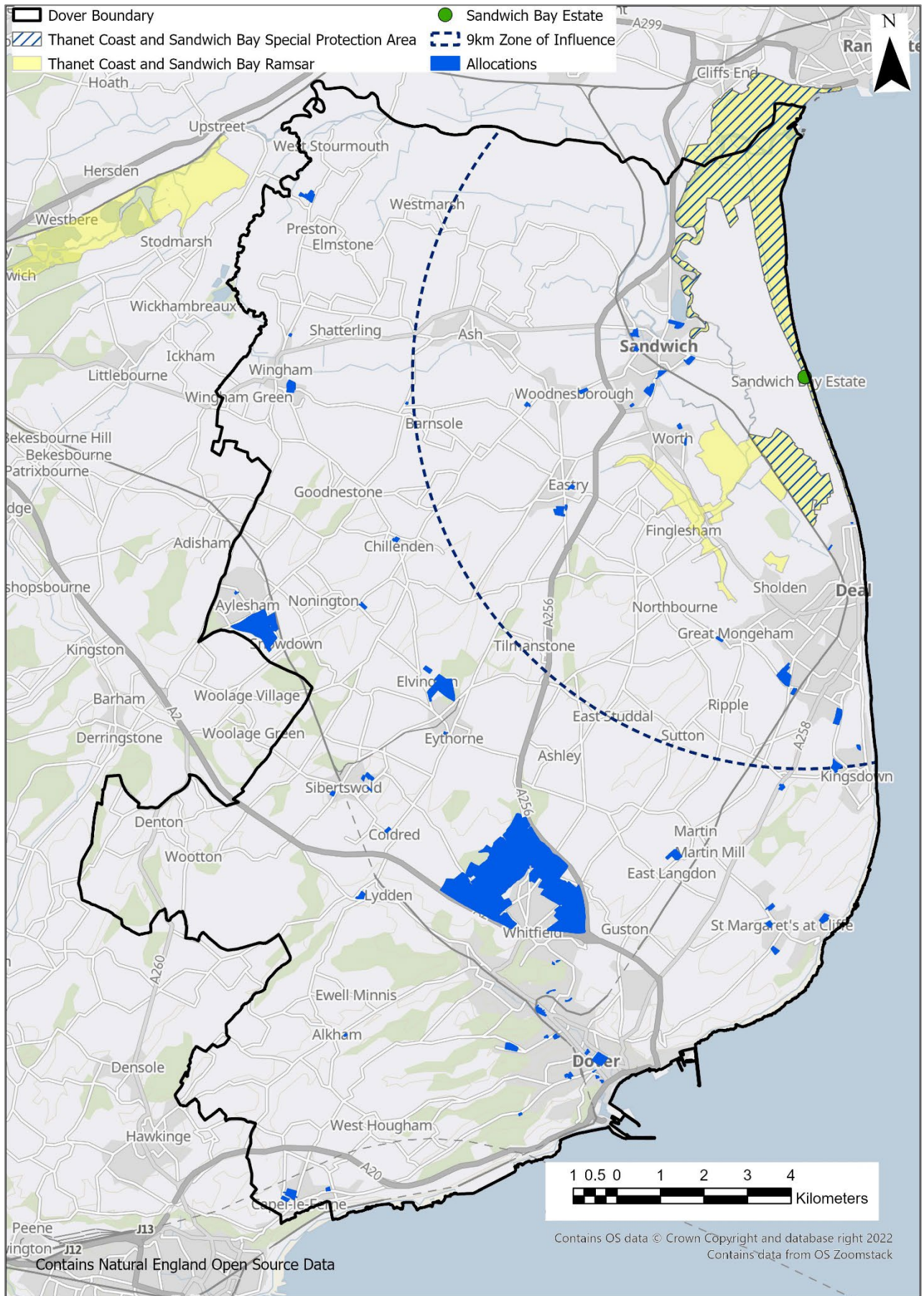
Allocations in the Regulation 19 Local Plan within the 9km Zone of Influence are show in Plan 6 and Table 5.³⁵

Table 5: Allocations within the 9km Zone of Influence

Reference	Location	Parish	Units
SAP21	Land adjacent to Sandwich Technology School, Deal Road, Sandwich	Sandwich	40
SAP33	Eastry Court Farm, Eastry	Eastry	5
SAP32	Land at Buttssole Pond, Lower Street, Eastry	Eastry	80
SAP18	Sandwich Highway Depot/Chippies Way, Ash Road, Sandwich	Sandwich	32
SAP19	Land known as Poplar Meadow, Adjacent to 10 Dover Road, Sandwich	Sandwich	35
SAP20	Woods' Yard, rear of 17 Woodnesborough Road, Sandwich	Sandwich	35
SAP34	Land at Woodhill Farm, Ringwould Road, Kingsdown	Ringwould with Kingsdown	50
SAP22	Land at Archers Low Farm, St George's Road, Sandwich	Sandwich	35
SAP14	Land off Cross Road, Deal	Deal	100
SAP15	Land at Rays Bottom between Liverpool Road and Hawksdown	Walmer	75
SAP49	Land to the East of former Bisley Nursery, The Street, Worth	Worth	15
SAP17	Land south of Stonar Lake and to north and east of Stonar Gardens, Stonar Road, Sandwich	Sandwich	40
SAP16	Bridleway Riding School, Station Road Deal		25
SAP33	Land adjacent to Cross Farm, Eastry, Near Sandwich	Eastry Parish Council	10
SAP16	Ethelbert Road garages, Deal	Deal Town Council	5
SAP16	104 Northwall Road, Deal	Deal Town Council	8
SAP35	Land adjacent Courtlands, Kingsdown	Ringwould with Kingsdown Parish Council	5
SAP16	Land to the east of Northbourne Road, Great Mongeham	Great Mongeham	10
SAP23	Sydney Nursery, Dover Road, Sandwich	Sandwich	10
SAP55	Beacon Lane Nursery, Beacon Lane, Woodnesborough	Woodnesborough	5
SAP55	Land south of Sandwich Road, Woodnesborough	Woodnesborough	10
SAP49	Land to the east of Jubilee Road	Worth	10

³⁵ KIN002 crosses the Zone of Influence boundary. It has been fully included within the Zone of Influence.

Plan 6: 9km Zone of Influence and Regulation 19 Local Plan Allocations



The number of new houses that will be delivered over the Plan period in the Zone of Influence is 1,156 including windfalls. At an occupancy of 2.27 people per dwelling, this results in an increase of 2,624 within the Zone of Influence.

Distribution of Visitors in Relation to the Zone of Influence

The home location of visitors who gave full postcodes in the 2011, 2018 and 2020 visitor surveys are shown in Plan 7, along with the proposed Local Plan strategic allocations. This shows the higher number of visitors from within the Zone of Influence vs. beyond the Zone of Influence, as well as the clustering of visitors originating close to the allocation sites. It is therefore reasonable to conclude that visitors to Sandwich Bay will also originate from the new housing sites.

Access to Suitable Dog Walking Areas Within the Zone of Influence

Dover District Council's Open Space Assessment³⁶ shows there is only one park and garden within the zone of influence; Victoria Park in Deal. The 15 minute walkable distance from this park covers central Deal only. There is no park in Sandwich.

There are also accessible semi-natural greenspace sites within the zone of influence. Only three of these are greater than 2 hectares. The largest is Betteshanger Country Park north of Deal, with smaller sites at Gazen Salts Nature Reserve in Sandwich and Hawkshill Freedown in Walmer. The primary function of the latter two sites are as nature reserves, which also provide some access for people. Natural England accessible natural greenspace standards (ANGSt) indicate that a 300m catchment area is appropriate for sites under 20 hectare size which only covers small adjacent areas of Sandwich and Walmer respectively.

There are also amenity areas in Sandwich, Deal and Walmer, but these are of small size.

Guidance from Natural England on the provision of suitable alternative natural greenspace sites (SANGs) for dog walking includes a list of criteria which make sites attractive to dog walkers. The unique features of the coast which attract recreational activity cannot be fully replicated by an inland site and therefore the provision of SANGs is not appropriate as a mitigation measure for the Thanet Coast and Sandwich Bay SPA. However, the criteria are useful in setting out the features of a site which would make it attractive for dog walkers to use.

³⁶ Knight, Kavanagh and Page. (2019). *Dover District Council Open Space Assessment Report* and Knight, Kavanagh and Page. (2019). *Dover District Council Open Space and Play Standards Paper*.

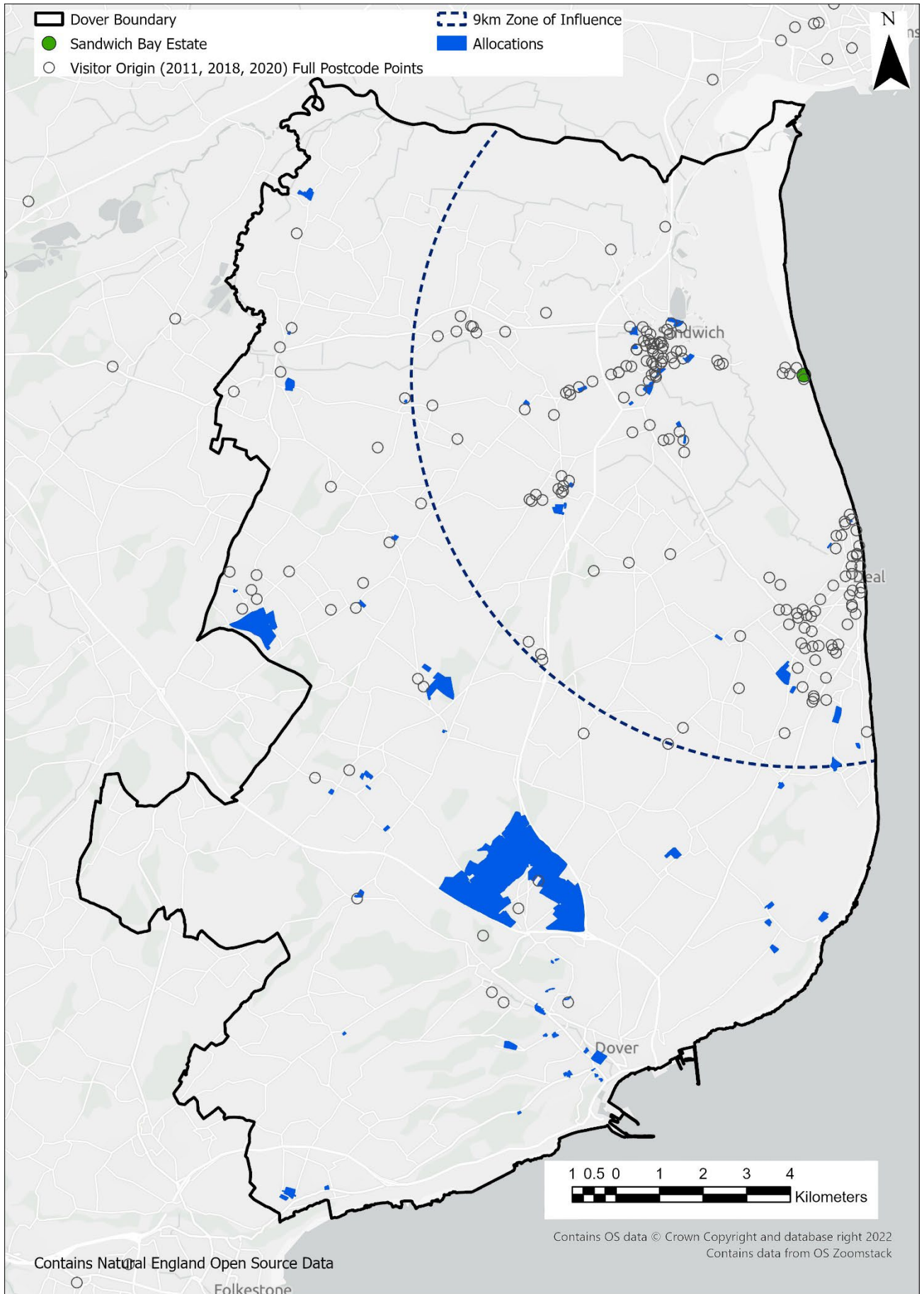
In particular:

- It should be possible to complete a circular walk of 2.3-2.5km around the SANGs;
- SANGs must be perceived as semi-natural spaces with little intrusion of artificial structures, except in the immediate vicinity of car parks;
- Access within the SANGs must be largely unrestricted with plenty of space provided where it is possible for dogs to exercise freely and safely off lead;
- For all sites larger than 4ha there must be adequate parking for visitors, unless the site is intended for local use, i.e. within easy walking distance (400m) of the developments linked to it. The amount of car parking space should be determined by the anticipated use of the site and reflect the visitor catchment of both the SANGs and the SPA;
- It is desirable that SANGs provide a naturalistic space with areas of open (non-wooded) countryside and areas of dense and scattered trees and shrubs. The provision of open water on part, but not the majority of sites is desirable.

These factors have also been highlighted as important by the dog walkers who choose to visit Sandwich Bay to exercise their dogs – namely that they can walk their dogs off the lead, that it is perceived as a good place for their dog, they can take long walks and it is the closest place with these facilities (top four responses in order).

The existing greenspaces in the zone of influence do not provide facilities for dog walkers which are comparable to Sandwich Bay. In particular, the coast provides the opportunity for dogs to run free, safely and away from traffic and for a lengthy walk, off-lead, to be taken. There are also limited greenspace sites which offer good facilities for dog walkers. Therefore it is reasonable to conclude that Sandwich Bay will continue to be a draw for dog walkers due to the lack of greenspace in the area which can offer the full range of features which dog walkers value. The development within the zone of influence will not provide large greenspaces which will absorb dog walking demand.

Plan 7: Visitor Origin - 2011, 2018 and 2020 Visitor Surveys



Evaluation of Mitigation Approaches

Factors Relevant in Formulating the SAMM

The evidence outlined in the previous sections highlights those issues which are of particular relevance to the mitigation approach needed at Sandwich Bay. These are summarised below.

Table 6: Factors Relevant in Developing the SAMM

Factor	Factors Important in Developing the SAMM
Disturbance sources and disturbance events	<ul style="list-style-type: none"> • The Appropriate Assessment of the HRA identifies that the main threats to the Thanet Coast and Sandwich Bay SPA are from the disturbance of wetland birds from recreational activities. It states that the increase in development in the district, given that the most recent visitor surveys (2020) indicate that 91% of visitors originate from within Dover District, has the potential to result in an adverse effect and will require mitigation measures, as set out in this strategy; • The disturbance studies³⁷ clearly identify that the main sources of disturbance to over-wintering birds at Sandwich Bay are, first, dog walking off the lead and, second, pedestrians (both with dogs on leads or without dogs); • Dog walkers in Sandwich Bay caused more severe reactions from birds than in the Pegwell Bay area of the SPA; • The Sandwich Bay sectors also had the highest rate of disturbance events per hour, with all sectors higher than any Pegwell Bay sector. There were fewer walkers but more disturbance events in Sandwich Bay. This may be due to the proximity of birds to visitors – access is directly onto the beach; • The number of disturbance events were higher in the autumn and winter months (September to February) than the spring and summer months (March to August). This is the time of year when the qualifying birds of the SPA are present; • The most disturbance events occurred in the section immediately to the north of the parking at the end of Princes Drive.

³⁷ EcoNorth. (Draft January 2020). *Bird Disturbance Study – Pegwell and Sandwich Bay* and Campodonico, A., Juan, C. & Tinsley-Marshall, P. (Draft 2020). *Shore-bird Behavioural Disturbance Study 2018-19: Sandwich and Pegwell Bay National Nature Reserve*. Kent Wildlife Trust.

Factor	Factors Important in Developing the SAMM
Distribution of species	<ul style="list-style-type: none"> The highest peak counts of over-wintering birds were made in the area around the River Stour and Shellness Point. The NNR management plan highlights these areas as particularly important for over-wintering birds (the focus of the SAMM) and ground nesting birds (outside the scope of the SAMM as Little Terns, the only breeding qualifying bird species, have not bred here for over 20 years).
Access	<ul style="list-style-type: none"> Access to the sea front by vehicle is through the Sandwich Bay Estate; There is also access to the area on public rights of way, with several promoted routes passing through the area as well as the England Coastal Path; All areas are privately owned; Most of the greenspaces in the zone of influence are small. There are no greenspace sites within the zone of influence that offer an equivalent experience to the access provided at Sandwich Bay - where dog walkers can go for a long walk and let their dogs off the lead safely.
Visitor behaviour	<p>In the latest visitor survey (2020):</p> <ul style="list-style-type: none"> Most visitor groups originated from Dover District. Surveys were carried out in 2011, 2012 and 2018 and the proportion of visitors originating from Dover district increased in each survey. In the 2020 survey, 91% of visitors originated from within Dover district; A high proportion of visitors are frequent visitors. 47.2% of visitor groups visited once a week or more frequently; Dog walking was the most popular main activity at Sandwich Bay, with 73.8% of visitor groups indicating this was their main reason for visiting; 88% of dogs were off the lead; Visits usually began from the parking area at the northern end of Princes Drive, but could start from anywhere along the coast between the Sandwich Bay Estate and the northern end of Princes Drive; Most visitors head north from the parking area at the northern end of Princes Drive for a distance, before returning. The visitor traffic in the first section to the north of the car park was therefore significantly higher than in other areas. The Prince's Golf Course Club House serves as a turning point for many visitors and they did not reach Shellness Point.

Factor	Factors Important in Developing the SAMM
Visitor awareness	<p>In the latest visitor survey (2020):</p> <ul style="list-style-type: none"> • There was low awareness that visitors have an impact on bird species through recreational activity in the SPA. 27% of groups thought that visitors may affect birds in general but could not be more specific around how affects may arise or on what species; • Most visitors did not have any suggestions around how recreation management could be improved – likely to be related to the lack of knowledge of the impact of recreation on SPA birds (they did not know which recreational activity should be modified); • There was low awareness of most of the features for which the SPA is important. 29.2% of visitor groups thought Sandwich Bay was important for birds (stated in general terms), but could not name a type of bird or a species; • Many visitors had not seen any information around why Sandwich Bay is important for wildlife. 45.2% of respondents had not seen any information, either onsite or online – the highest response. 42.8% of respondents had seen the notice boards on site. Few visitors had visited websites to find out information;

Evaluation of Potential Mitigation Approaches

Table 7 shows a range of mitigation approaches and an evaluation of their suitability the Thanet Coast and Sandwich Bay SPA, based on the evidence reviewed.

The key to the shading in the table is show below:

Not suitable	Complementary and supporting measure	Mitigation measure
Not suitable – not to be taken forward.	Likely to make a positive and complementary contribution to overall aims, but evidence or effectiveness insufficient or not a proportionate response, therefore not a mitigation measure and not included in the SAMM.	Taken forward as mitigation measure in the SAMM.

Table 7: Summary – Summary of Evaluation of Potential Mitigation Approaches

Potential Mitigation Approach	Examples of Measures	Commentary	Actions	Suitability	Included in SAMM
Habitat management / creation	Artificial roost sites, creation of feeding areas	Not suitable for these species.	None	Not suitable	No
Planning Measures	Locate development away from sensitive sites through a development exclusion zone	Not practicable as catchment area of site is too large and would exclude a large part of the district (see next section).	None	Not suitable	No
Planning Measures	Provision of Suitable Alternative Natural Greenspace (SANG) to draw visitors away from sensitive sites	Effectiveness in displacing recreational coastal visits is unproven. There is a high level of 'faithfulness' to visiting Sandwich Bay, as evidenced by the 2020 visitor survey. However there may be a willingness for some dog walkers to visit alternative greenspace if it meets their needs. If this deflects a proportion of visits with dogs, this will provide a complementary measure. Provision of greenspace in and around new development could help to deflect a proportion of coastal visits. There is currently low provision of such greenspace in the zone of influence area.	Where possible, ensure mechanisms to provide greenspace of sufficient size and quality to attract users is provided for in new development, following best practice. ³⁸ Consider provision of new sites as part of green infrastructure strategy. Ensure larger strategic development sites on inland urban edge provide greenspace sites suitable for dog exercise to deter travel to the coast.	Supporting measure	No

³⁸ E.g. Hampshire County Council. (2013). *Planning for Dog Ownership in New Developments*.

Potential Mitigation Approach	Examples of Measures	Commentary	Actions	Suitability	Included in SAMM
Management / deflection of visitors off-site	Deflection of visitors onto adjacent land	The adjacent land is primarily golf courses, farmland or other nature conservation land. Increased visitors here would be detrimental to these interests. Adjacent land can only be accessed from public rights of way. Off-lead access across the golf courses is not permitted for safety reasons. Access on adjacent land does not provide a comparable experience to access on the coast and beach.	Adjacent land is not suitable for increasing access provision.	Not suitable	No
Management / deflection of visitors off-site	Management of visitors on adjacent land	Combined information provision and signage across the wider bay area, including land adjacent to the coast and inland on the routes into the Bay, would be beneficial in providing consistent and clear information for visitors on the features of importance in the SPA. Golden Plover is not confined to coast and roost in proximity to public rights of way therefore signing in wider area would be beneficial.	Visitor information to be provided across the Bay area and on approaches to the Bay.	Mitigation measure	Yes

Potential Mitigation Approach	Examples of Measures	Commentary	Actions	Suitability	Included in SAMM
Management / deflection of visitors off-site	Improvement of access provision on other sites in the area	Analysis of accessible open space provision shows that there is a deficit of accessible greenspace in the Deal and Walmer area. ³⁹ There are no large green spaces in Sandwich which offer the same quality of dog walking space as the coast. Betteshanger Park does offer alternative facilities. New housing development should offer high quality, dog-friendly spaces. Evidence is insufficient for this to be considered as mitigation. Delivery is long-term.	Ensure new development provides or contributes to greenspace which are attractive to dog walkers. Ensure quantity standards of accessible greenspace provision are met. Improve access to Betteshanger Park, especially from Deal. Support these actions through inclusion in Dover's Green Infrastructure Strategy and Local Plan.	Supporting measure	No
Management / deflection of visitors off-site	Management of car parking (price / location)	A high proportion of visitors arrive by car (83% in 2020 visitor survey). There is already a charge for entry into the Bay and a clear willingness to pay by visitors. Car parking currently along the sea front. This could be managed to limit damage to habitats, but this is beyond the scope of this plan.	None	Not suitable	
Management / deflection of visitors off-site	Limiting visitor numbers	Could only be achieved with the co-operation of the Sandwich Bay Estate.	None	Not suitable	
Management / deflection of visitors off-site	Restricting access in some areas	The Bay is extensive and there is scope to restrict access to some areas without severely detracting from the enjoyment of most visitors. The 2020 visitor survey showed that most visitors heading north from the final parking area did not reach Shellness Point. It is also possible to restrict off-lead access while allowing a significant area for dogs off lead.	Access restrictions in a zoned approach, which is already being implemented by landowners in the northern Bay area. Some areas requiring dogs to be on-lead.	Supporting measure	No

³⁹ Knight, Kavanagh and Page Ltd. (December 2019). *Dover District Council Draft Open Space and Play Standards Paper*

Potential Mitigation Approach	Examples of Measures	Commentary	Actions	Suitability	Included in SAMM
Management of visitors on-site	Routing and design of paths	The public rights of way are not the primary route into the Bay and most visitors arrive by car. The public rights of way cross golf courses and do not add to damage of habitats. There are not defined routes along the sea front. It is not feasible to install physical barriers on the coast.	None	Not suitable	No
Management of visitors on-site	Zoning	Zoning degrees of dog 'freedom' would support some areas being undisturbed. The greatest restrictions would be appropriate in the most important and / or sensitive areas. These are also areas which are the least visited. Zoning may need to be considered for other activities, e.g. watersports or horse riding.	A zoned approach is already being implemented by landowners in the northern Bay area.	Supporting measure	No
Education and Enforcement	Education and engagement	A comprehensive approach will be needed. Many current visitors have a long relationship with the site and have 'established' views on access and the impact of recreation on designated features. As additional and new people start to use the Bay for recreation, a 'new norm' needs to be established, with both new and existing visitors. A wider outreach project both on site and in local communities, raising awareness of the SPA features and the need for visitors to alter behaviour will underpin other measures. This would aim to alter attitudes and behaviour. Liaison with schemes in neighbouring authorities would be beneficial. The scheme will also need to engage with all landowners in the Bay.	Develop a comprehensive education and engagement programme	Mitigation measure	Yes

Potential Mitigation Approach	Examples of Measures	Commentary	Actions	Suitability	Included in SAMM
Education and Enforcement	Enforcement	Wardening with an enforcement role can usefully support an educational and engagement programme. However, this needs to be carefully implemented as 'heavy-handed' enforcement could undermine efforts to change behaviours through engagement.	Enforcement is a 'last resort' option which can be implemented by Dover District Council.	Supporting measure	No
Education and Enforcement	Codes of conduct / responsible behaviour	Voluntary codes of conduct and clarity on recreational behaviour which does not disturb designated features will help to convey clear messages, although they are not enforceable.	Develop codes of conduct for Sandwich Bay, in partnership with all landowners	Mitigation measure	Yes
Education and Enforcement	Signs, interpretation, leaflets.	There is currently some signage around the Bay but further work is required to ensure consistency and effectiveness of messages. On its own, signage is unlikely to be sufficient to change behaviour but is essential to reinforce messages to ensure education and engagement is successful.	Integrated signage and interpretation	Mitigation measure	Yes
Education and Enforcement	Legal controls	There is a Public Space Protection Order in place which restricts access with dogs in some parts of the site. The PSPO provides an element of enforceability to restrictions. However, this needs to be carefully implemented as 'heavy-handed' enforcement could undermine efforts to change behaviours through engagement. There is potential for this to be extended if necessary and proportionate, subject to consultation. However, some areas of land are unregistered, which may hinder extension of a PSPO.	Retain existing PSPO. Consider extending, if necessary, proportionate and subject to consultation.	Supporting measure	No

Potential Mitigation Approach	Examples of Measures	Commentary	Actions	Suitability	Included in SAMM
Offsite measures	Information on sensitivities of sites, where to visit and responsible visiting	There are many actions which are needed to promote responsible visiting to the east Kent coast - at Sandwich Bay and at other sites. Tourism promotion from Dover District Council should include messages on responsible visiting and how visitors can enjoy the coast whilst not damaging the environment. This action should ideally be co-ordinated across east Kent.	Dover District Council to promote responsible visiting alongside enjoying the coast. Co-ordinate messages across east Kent, as much of the coastline has sensitivities.	Supporting measure	No

Further Background on Access Management and Relevance to Thanet Coast and Sandwich Bay SPA

Introduction

This section gives further detail on best practice in access management and additional information of relevance to the SPA and the mitigation measures contained in the SAMM. Not all of the approaches discussed in this section form part of the SAMM (see previous Table 7) but are provided as context and as elements which might be included as part of a wider access management approach outside of the measures included in the SAMM.

Influencing the Behaviour of Walkers with Dogs

In designing mitigation approaches to influence the behaviour of walkers with dogs it is important to understand why a particular place is important to these visitors, their motivations and the likely efficacy of different approaches. In addition, the local characteristics of each place, its visitors and management structures also need to be taken into account.

Dog owners are highly motivated to find and use off-lead access, close to home and away from traffic.⁴⁰ These factors are the highest priority for dog walkers in making their decisions around where to visit. At Sandwich Bay, the 2020 visitor survey also showed the importance of these factors, see Table 8.

Table 8: Reasons for Visiting Sandwich Bay - Walkers with Dogs - Visitor Survey 2020

Answer Category	# Answers	% Answers
Dogs can be off lead	70	27.7%
It is good for my dog	69	27.3%
I can take long walks	61	24.1%
It is the closest place with these facilities	24	9.5%
Other	14	5.5%
The beach and sea is a draw	6	2.4%
Safety	4	1.6%
Not dog related	4	1.6%
Cleanliness	1	0.4%
Grand Total	253	100.0%

⁴⁰ Sport Industry Research Centre. (2008). *Assessment of perceptions, behaviours and understanding of walkers with dogs in the countryside*. SIRC, Sheffield, quoted in Jenkinson, S. (2016). *Mitigation Options for Influencing the Behaviour of Walker with Dogs in the Solent Area*. Solent Recreation Mitigation Partnership.

Sandwich Bay is highly valuable and attractive to dog walkers. It meets many of the desired criteria of dog owners. There is a long, sandy beach, where dogs can safely run without the threat of traffic. Playing in the sea is enjoyable for some dogs. In the winter it is not muddy. Many of the visitors are regular, forming a community of dog walkers. There is the opportunity for refreshments, easy parking and toilets.

Traditionally it has been common for land managers to assume that education will be sufficient to modify unwanted behaviour – when visitors understand more about negative impacts they will comply with restrictions. However, while education is important, and can help to justify the need for restrictions, education and information alone is not likely to illicit the change in behaviour sought.⁴¹ It is highly unlikely to educate dog owners out of wanting off lead access, close to home, and away from traffic, as those are the highest priorities. Furthermore, information which tries to influence dog walkers using negative messages, signage or information is unlikely to succeed in controlling unwanted behaviours to a sufficient extent. Nor will telling these visitors that they are a ‘problem.’

The reasons why dog walkers may not comply with restrictions can be varied, as shown in Table 9.⁴² Mitigation approaches need to bear in mind the range of reasons why a visitor may not wish to comply with restrictions.

⁴¹ Jenkinson, S. (2016). *Mitigation Options for Influencing the Behaviour of Walker with Dogs in the Solent Area*. Solent Recreation Mitigation Partnership.

⁴² Brown, K. (2014). *The Role of Landscape in Regulating (Ir)responsible Conduct: Moral Geographies of the ‘Proper Control’ of Dogs*. Landscape Research. Available from: www.tandfonline.com/doi/full/10.1080/01426397.2013.829811 quoted in Jenkinson, S. (2016). *Mitigation Options for Influencing the Behaviour of Walker with Dogs in the Solent Area*. Solent Recreation Mitigation Partnership.

Table 9: Reasons for Non-Compliance

Dog walker type	Disposition leading to lack of compliance
The 'don't know enough'	Don't know what to do and/or why.
The 'know-it-all' (or 'I know already')	Likely to be knowledgeable to a high degree regarding access laws and/or conservation, so don't think they need to know more, don't read signs, etc.
The 'science sceptic'	Those who do not believe the scientific justification for a restriction
The 'don't blame recreation'	Those who feel dog walkers proportionately cause very little impact in an overall sense; problems are much more to do with climate change, predation, etc.
The 'justice seeker'	Those who say, 'why should dog walkers pay the price for house builders making profits?'
The distracted	Distracted by thoughts, troubles, mobile phone, companions, children, other animals, etc.
The stressed	'I just need to be able to relax (a dog tugging at lead is not going to cut it).'
The empiricist or 'impact denier'	Those who say, 'I see more birds here than ever,' people who want proof for themselves.
The unskilled optimist	Those possessing less skill or control in dog handling than they think.
The unaware optimist	Those possessing less awareness for anticipating and reading access situations than they think.
The fearful/role-reverser	Those who feel they are potential victims as much as the wildlife (e.g. 'The new housing will spoil the environment anyway').
The landscape responder	Those who would normally comply but deem behaviours acceptable in particular landscapes (e.g. 'wild', 'spoilt' or 'industrial').

A range of approaches may be used to promote the behaviours sought. These revolve around visitor management, education and information provision and enforcement. However, the following principles must be considered to ensure these approaches are successful when implemented:

- Dog walkers will avoid conflict if given a palatable and informed choice;
- Dog walkers are unlikely to be educated out of the experiences they currently enjoy, especially if they have been carried out for decades without opposition or apparent harm;
- Dog walkers are most influenced by their peers;
- Individual site management staff do not always have the time, abilities or resources to understand or apply the most effective approaches to influencing behaviour;
- Making it easy for dog walkers to do the right thing is more likely to be effective and avoid unwanted displacement, than telling them what not to do;
- Dog walkers can also provide useful site surveillance and informal wardening if engaged with in the right way.⁴³

⁴³ Jenkinson, S. (2016). *Mitigation Options for Influencing the Behaviour of Walker with Dogs in the Solent Area*. Solent Recreation Mitigation Partnership.

An evaluation of a range of possible mitigation approaches is outlined in Table 7.

Response to this Evidence

Sandwich Bay is an attractive destination for dog walkers with features which are unique in the area and highly sought after by dog owners. The SAMM must deliver a package of education and engagement measures which follow best practice in modifying the behaviour of dog walkers, that reflects understanding of the motivations of dog walkers and their possible reasons for non-compliance and to succeed in increasing awareness of and limiting disturbance of the designated features of the SPA.

Displacement and the Provision of Alternative Sites

The potential of displacement must be considered when implementing mitigation measures. The application of restrictions in one place may result in a proportion of visitors seeking other areas to carry out the same activity. With the adoption of Dover district's SAMM for the Thanet Coast and Sandwich Bay SPA, the entire SPA will be under some form of strategic access management strategy to mitigate the negative effects on designated features. It is therefore important that actions in any one of the SAMM approaches does not to cause displacement of visitors to other sensitive sites within the SPA or other sensitive designated sites. It is important to consider actions carefully across the whole SPA and to take a strategic approach to the information provision, education and restrictions.

There are some areas of the coast which are potentially more able to accommodate dog walkers. A co-ordinated approach across east Kent would be beneficial to identify these sites and to provide co-ordinated information on responsible dog walking on the coast of east Kent.

The effectiveness of displacing coastal visits to alternative inland greenspaces is unproven. The coast offers some unique features making it attractive to dog walkers.

The 2020 visitor survey showed a high degree of 'faithfulness' to Sandwich Bay. Around 43% of dog walking visitors went to Sandwich Bay for half or more of their weekly dog walks, see Table 10.

Table 10: Number of Weekly Dog Walking Visits Taken at Sandwich Bay, 2020 Visitor Survey

Answer Category	# Answers	% Answers
a. < 25%	25	25.5%
b. 25% - 49%	13	13.3%
c. 50% - 74%	12	12.2%
d. > 75%	20	20.4%
e. 100%	10	10.2%
f. Not sure	6	6.1%
g. Other	12	12.2%
Grand Total	98	100.0%

While it may be possible to deflect some of these visits to high quality greenspace sites, if they successfully meet the needs of dog walkers, the provision of greenspaces along is unlikely to be sufficiently effective as a mitigation measure. Moreover, there are limited sites within the zone of influence which provide all of the features of Sandwich Bay which may it important to dog walkers. However, the provision of greenspace in and around new development is still important and could absorb a proportion of coastal visits, but will not mitigate impacts.

Response to this Evidence

It is unlikely that dog walkers will be displaced to other nearby greenspace sites due to the attractiveness and unique features of Sandwich Bay and the high level of fidelity indicated by the visitor surveys. Visitor surveys show little crossover from people living south of the River Stour to sites north of the River Stour, on a regular basis. The situation, however, should be monitored through liaison with neighbouring authorities and co-ordination of visitor surveys. There are also limited alternative greenspace sites in the area which offer a comparably attractive area for dog exercise. The SAMM must therefore concentrate on modifying behaviour.

Zoning between Sandwich Bay Estate and Shellness Point

A zoned approach to visitor access in the northern section of the Bay has been proposed by the landowning and managing organisations and is outlined within the Sandwich and Pegwell Bay Nature Reserve Management Plan 2021 – 2030 (draft).

A zoned approach enables visitors to continue to enjoy the Bay whilst aiming to reduce levels of disturbance. The Bay is extensive and there is scope to restrict access to some areas without severely detracting from the enjoyment of most visitors. The 2020 visitor survey showed that most people park along the sea front along Princes Drive, at various locations. Visitors mainly walk along this section of sea front or head north towards Shellness Point. Most visitors do not reach Shellness Point but turn back before reaching this furthest extent at a line of posts (which

is around 2.5km from the closest car park). A Public Space Protection Order also stipulates that dogs must be on leads in the Princes Beachlands Local Nature Reserve area and that there is no access with dogs at Shellness Point.

The zoning is static and does not change throughout the year.⁴⁴ Static zoning is most suitable in this location because:

- There are features of conservation interest throughout the year. In the winter months, over-wintering birds are present. In the summer months ground-nesting birds are present;
- Dynamic zoning must be clearly marked at all times and the information provided must always be clear and up to date. This is demanding of resources, which are not available at this site;
- It is difficult to clearly mark the zones at this site and the only practical options are posts across the beach or buoys. It not physically easy to move demarcation lines.

The zoning extends in three bands. Plan 8 shows indicative areas.

- Zone A – closest to Princes Drive (heading north). No restrictions to walkers; dogs off lead. Allowing unfettered access to this area acts as a buffer to the areas further to the north;
- Zone B – mid section, north of Zone A. No restrictions to walkers. Dogs on lead restrictions, currently in place along sand dunes (Princes Beachlands Local Nature Reserve) along western edge under the Public Space Protection Order. The Sandwich and Pegwell Bay National Nature Reserve Steering Group may seek to extend dogs on leads restrictions across the entire zone in the future, subject to landowner agreement and consultation;
- Zone C – Shellness Point, north of Zone B. Currently no dogs permitted in this area under the Public Space Protection Order. The Sandwich and Pegwell Bay National Nature Reserve Steering Group may seek restrict access to this area in the future due to the sensitivity of the area, subject to landowner agreement.

This zoned approach is appropriate for the site. The exact areas of the zones are a matter for the landowning/land managing group. However, the retention of an area in which there are no restrictions is essential otherwise compliance is likely to be reduced. There are no restrictions along the seafront adjacent to Princes Drive to Sandwich Bay Estate (this area being managed by the Sandwich Bay Estate and outside of the management of the Sandwich and Pegwell Bay

⁴⁴ The alternative, dynamic zoning, changes, for example at different times of year due to the presence or absence of species or changes in management such as the introduction of grazing animals.

National Nature Reserve Steering Group). Zoning may also need to be considered for other activities, e.g. watersports or horse riding.

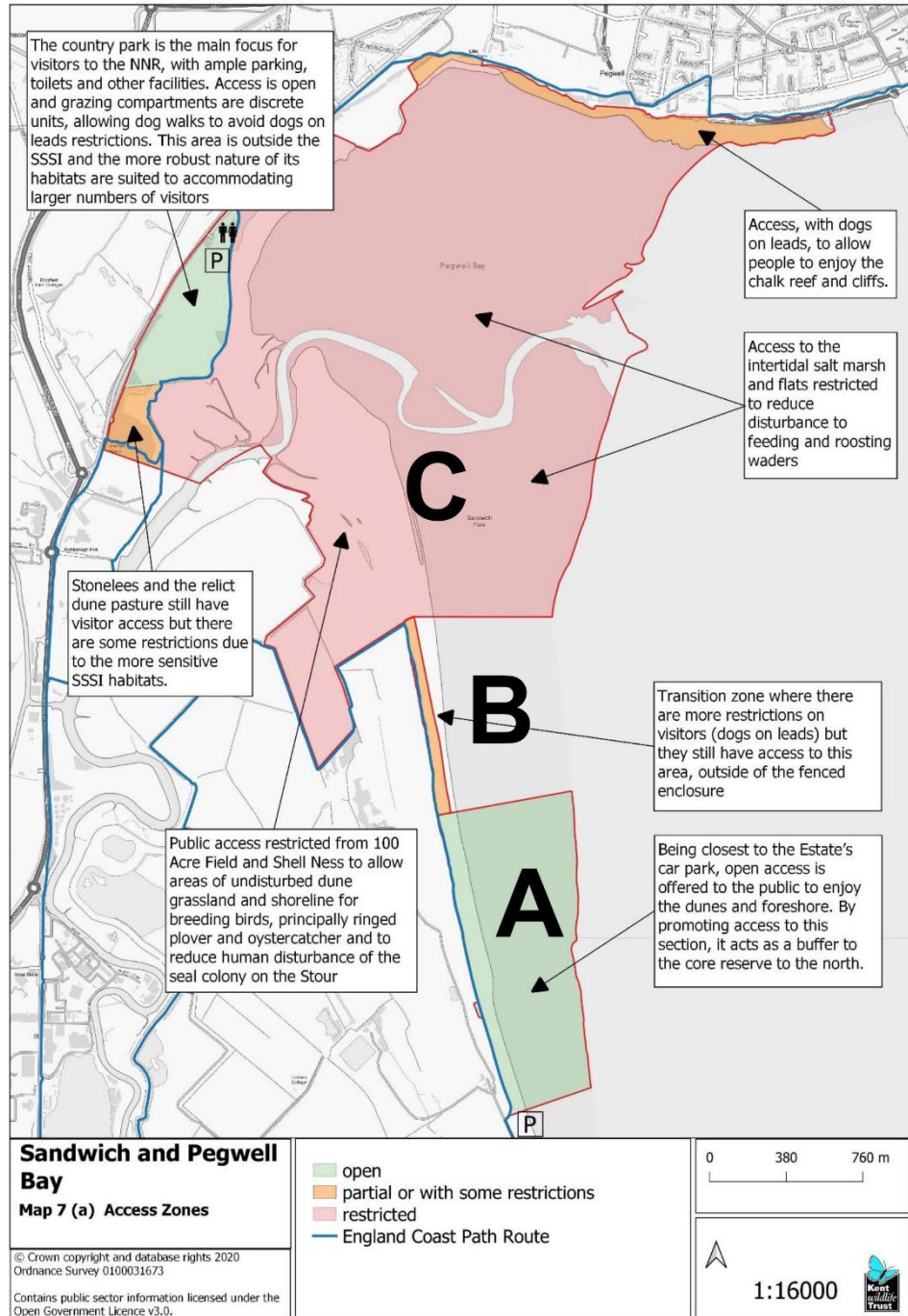
The 2020 visitor survey showed that clear communication around the need for the existing PSPO and the area it covered was needed. Further engagement is needed with visitors, especially regular visitors, to explain the need for the PSPO. The signage on site is also unclear and many visitors indicated that they found it confusing and did not understand where the zones were on the ground. It must be clear to all visitors what behaviours are expected in each of the zones.

There is a need for education and clear information provision around any zoning approach. Enforcement may also be needed if education and engagement measures do not succeed.

Response to this Evidence

The basis of a zoning approach is already in place and being taken forward by the Sandwich and Pegwell Bay National Nature Reserve Steering Group. Zoning is useful in supporting access management in Sandwich Bay but does not form a mitigation measure and therefore is not part of the SAMM. The PSPO is the only area in which non-compliance can be enforced. Any changes to the zoning approach, for example further restrictions being put in place, could have an impact on the effectiveness of the SAMM. Continued liaison with the Sandwich and Pegwell Bay National Nature Reserve Steering Group is therefore needed.

Plan 8: Proposed Zoning Sandwich and Pegwell Bay (Ref: Kent Wildlife Trust, Sandwich and Pegwell Bay National Nature Reserve Management Plan 2021 - 2030 (Draft 2021))



Engagement and Education

All landowners consulted during the development of this plan welcome visitors to Sandwich Bay. The Bay is an important part of the tourism offer in east Kent. The Bay is important for many people and the visitor survey highlighted how special it is for many people to find peace and to access wild spaces. The important message to be conveyed is that visitors should continue to enjoy the Bay but should do so responsibly without causing harm to the wildlife.

It is clear from the 2020 visitor survey that there is a low level of awareness of the features for which the SPA is designated. There was also low awareness of the actions which would cause negative impacts to designated features. Whilst there was generally good awareness of the importance of not disturbing ground-nesting birds (not an SPA feature)⁴⁵ there was very low awareness of disturbance of over-wintering birds (which are an SPA feature).

Many visitors are regular and many have a long relationship and connection with Sandwich Bay. This is a good basis from which to begin engagement, as visitors already care about the place. The aim of an engagement programme is to alter attitudes and behaviour to comply with some restrictions to access. It is important that the engagement programme alters the behaviour of existing visitors as well as new visitors in order to set up 'new norms' for the Bay. People will respond to peer pressure and will also take their lead from others on what behaviour is acceptable. Therefore high levels of compliance are needed if new visitors are to adopt behaviours which limit disturbance to the designated features of the SPA.

Important aspects of this will be:

- Development of peer pressure and the creation of new 'norms' is essential, i.e. that not complying with the access zones and responsible visiting is not how most people are behaving;
- Ensure that information around what is expected in terms of behaviour, and where, is very clear and consistent;
- Support messages with information so people can understand the reasons for the restrictions;
- Provide areas for the activity to continue;
- Do not blame or marginalise groups of visitors;
- Foster understanding and appreciation of how special the Bay is and show people how they can help to keep it this way.

⁴⁵ In SPA citation but Little Tern no longer nest here.

Measures specifically aimed at dog walkers is an important aspect of the mitigation package. Neighbouring authorities are also delivering similar approaches and therefore co-ordination and communication is needed.

A wider outreach project both on site and in local communities within the zone of influence, raising awareness of the impacts of recreation on designated features and the need for visitors to alter behaviour should underpin other measures. There are a range of options which have been implemented in other schemes:

- Codes of Conduct for a range of users;
- Visits to schools and awareness raising;
- Talks and walks with community organisations, clubs, societies, interest groups and local councils;
- Schools' visits at the Bay, educational visits, Wild Beach;
- Guided walks;
- Training, wildlife awareness courses;
- Recruitment and training of volunteer wardens;
- Volunteer wildlife surveyors;
- Engagement with user groups;
- Engagement with commercial dog walkers;
- Dog walking clubs;
- Engagement with local dog groups;
- Engagement with horse riders (e.g. very active on social media);
- Pit-stops to engage with dog walkers and other visitors;
- Engagement through social media and on websites to reach a wide audience.

Response to this Evidence

A programme of engagement and education activities is needed at Sandwich Bay to engage with visitors. This engagement and education needs to set up 'new norms' of behaviour for all visitors. This engagement also needs to extent to communities living within the zone of influence. A range of engagement and education activities are possible. Engagement and education are core elements of the SAMM.

A Partnership of Landowners

Taking a 'whole-bay' approach to further developing and delivering this strategy is essential. The Bay is an important area for recreation – for golf, for walking, cycling, horse riding and visiting the beach. Through the SAMM, a new partnership of landowners will be set up to ensure the effective implementation of the SAMM and to build a strong working relationship with Dover District Council. The partnership will also provide a link to the existing Sandwich and Pegwell Bay National Nature Reserve Steering Group.

The Bay is under multiple ownership with a range of interests and perspectives.⁴⁶ The income from visitors and users of the facilities is important for some of these owners.

As previously stated, the aim is to support visitors in enjoying the Bay without harming the nature conservation interest of the area. Increasingly visitors are aware of severe declines in biodiversity across the UK and the need to protect wildlife and many have an increased desire to see nature protected following increased engagement with nature during the Covid-19 pandemic. The visitor survey showed a high level of concern and regard for the natural world and its protection. It is likely that visitors will be supportive of measures to protect wildlife and that, if information provision and engagement is carried out in a constructive and encouraging way, this will be viewed as positive action being taken by landowners. A co-ordinated approach to sustainable tourism in this outstanding natural environment will provide these businesses with reputational advantage and support their existing work to conserve the nature of the Bay.

It is imperative that landowners across the Bay are engaged in partnership in the process of further developing the SAMM and implementing measures such as the installation of signage. In the future, outside of the SAMM, there are other potential wider access management actions. The landowners are clearly the organisations who understand the issues and opportunities in the greatest detail. The golf courses and the Sandwich Bay Estate are not part of the Sandwich and Pegwell Bay National Nature Reserve Steering Group and the Sandwich Bay Bird Observatory are guest members only. These organisations need to be more involved in supporting responsible recreation in the area. Dover District Council is well-placed to bring these landowners together and to form a link with the other landowners on the Sandwich and Pegwell Bay National Nature Reserve Steering Group, of which Dover District Council is a member.

⁴⁶ The northern part of the Bay is owned by conservation charities – the National Trust, the Royal Society for the Protection of Birds and the Kent Wildlife Trust. Around the middle of the Bay is the Sandwich Bay Estate with Sandwich Bay (Residents) Ltd owning the roads and foreshore to the high water mark. There are three golf courses situated on the dunes - Princes Golf Course, The Royals St George's Golf Club and to the south the Royal Cinque Ports Golf Club. The Sandwich Bay Bird Observatory is located towards the northern part of the Bay and also owns some areas of land.

The establishment of this new partnership approach for the Bay is entirely new and has the potential to bring significant and long-standing benefits to the area and to all parties. The precise format and scope of this partnership should be explored with the partners as each may have different priorities, levels of interest and availability of time. Whether each of the partners wishes to be involved in regular meetings or not, channels for communication should be created and maintained with the Dover District Council SAMP officer. Some of the landowners also form part of the Pegwell and Sandwich Bay National Nature Reserve Steering Group and the SAMP officer should also retain contact with this wider grouping. It may also be appropriate to engage other organisations into the partnership in an advisory role (for example Natural England).

The landowners who should be engaged (in whatever way is appropriate) in a Sandwich Bay Partnership are:

- Sandwich Bay (Residents) Ltd (Sandwich Bay Estate)
- Princes Golf Course
- The Royal St George's Golf Club
- Sandwich Bay Bird Observatory
- Royal Cinque Ports Golf Club
- Royal Society for the Protection of Birds
- Kent Wildlife Trust
- National Trust

Response to this Evidence

For Dover District Council to set up a Sandwich Bay partnership of landowners – the golf courses, Sandwich Bay Estate and the Sandwich Bay Bird Observatory – and to provide a link with the Sandwich and Pegwell Bay National Nature Reserve Steering Group. This will be part of the role of the SAMP officer as the co-operation of landowners who are not on the Sandwich and Pegwell Bay National Nature Reserve Steering Group is needed to ensure the SAMP is effective. The SAMP officer will be responsible for providing annual monitoring reports to the District Council to contribute to the monitoring of the Local Plan and Policy NE3 in particular.

Voluntary Codes of Conduct and Enforcement

Voluntary codes of conduct help to convey clear messages and have a supporting role, although they are not enforceable. Codes of conduct for Sandwich Bay, whilst not enforceable, would help to set out clearly how visitors can enjoy the site without disturbing wildlife. Sandwich

Bay Estate already produces 'Terms and Conditions'⁴⁷ which could also include information on how to enjoy the Bay without harming its wildlife interest and which could be taken forward through a new landowner partnership as previously described. This advice could be disseminated with information on why the Bay is important and features of interest. This should be done in partnership with all landowners in the Bay.

There is an existing Public Space Protection Order (PSPO) in place. Enforcement can usefully support an educational and engagement programme as a 'last resort'. However, this needs to be carefully implemented as 'heavy-handed' enforcement could undermine efforts to change behaviours through engagement. There is potential for the existing PSPO to be extended if necessary and proportionate, subject to consultation. However, some areas of land are unregistered, which may hinder extension of a PSPO. Provision of information around the PSPO, its extent and the reasons for it need to be improved.

Response to this Evidence

Voluntary codes of conduct may be useful in regularising information on visitor behaviour to limit disturbance. Enforcement of the PSPO in terms of the application of sanctions remains an option which could be applied, if necessary, if other approaches are not successful. This needs to be carried out by Dover District Council officers. Voluntary codes of conduct may be included in the SAMM as part of the education and engagement programme. Enforcement is a potential supporting measure and does not form part of the SAMM.

On-Site Information

The provision of information is unlikely on its own to elicit behaviour change, but it is needed to provide clarity in regard to sensitive areas, provide further information on the reasons for restrictions in access, in types of recreational activity and expected behaviours and to enable visitors to understand what they can do in different parts of the Bay.

The 2020 visitor survey showed that few people consulted websites to find out information about Sandwich Bay.⁴⁸ This means that the information provided on-site will be crucial in supporting behaviour change.

⁴⁷ <https://www.sandwichbay.estate/terms-and-conditions/>

⁴⁸ Sandwich Bay Bird Observatory website – 3.2%; Kent Wildlife Trust website 2.6%; Dover District Council and Sandwich Bay Estate websites 0%.

There are many different signs around Sandwich Bay. These include signs provided by Kent Wildlife Trust for the National Nature Reserve, signs provided by Dover District Council for the PSPO and signage for the England Coastal Path.

To increase effectiveness on site signage should:

- Be very clear with simple and easy to understand messages about what visitors should and should not do;
- Provide information on which access and behaviours can take place in different areas and where the different zones begin and end, and what is appropriate in the zones;
- Use precise language (e.g. avoid terms such as 'dogs under control' – rather, be specific and indicate that dogs must not disturb feeding birds; be specific around seasons and months of the year rather than 'winter');
- Be positive and say what visitors can do, not just what they should not do;
- Provide consistency of messages across the Bay and between different landowners (a 'whole bay' approach and ideally branded and endorsed by all landowning interests);
- Be attractive to dog walkers and designed to gain their attention (not just be appealing to those already interested in wildlife);
- Apply 'interpretation principles' (e.g. telling a story, relating to the audience, consistency of themes, being clear on the understanding and behaviours the interpretation should result in).

Options for on-site information include:

- Improved signage at the entrance to the National Nature Reserve at the end of Princes Drive;
- Potentially signage in the toilet blocks (with the agreement of the Sandwich Bay Estate);
- Public footpath entrances to the Bay;
- Clearer signage of the PSPO and zone boundaries;
- Information in the Sandwich Bay Bird Observatory.

Other measures such as information given to those entering through the toll booth could be considered in future under discussion and with agreement with the Sandwich Bay Estate.

Response to this Evidence

Information on site needs to follow best practice to ensure that messages are clear, effective and reach the target audience. A consistent approach across the whole bay and adopted by all landowners will reinforce messages and help to instil 'new norms' of behaviour. On-site signing forms part of the SAMM.

Off-Site Information

Off-site information is important in order to provide information prior to any visits and will be particularly important for people finding out information before their first visit. The websites of Dover District Council should carry clear and consistent messages about the need for responsible recreational enjoyment of Sandwich Bay. Other partners and organisations should also be encouraged to do the same.

An audit of landowner and other relevant websites is shown in Table 11.⁴⁹ Some of the websites state the wildlife importance of the Bay, others do not. Importantly, Dover District Council's own tourism promotion website does not include sufficient information on wildlife or how visitors can enjoy the area responsibly, and this needs to be rectified.

Table 11: Important Local Websites

Website	Additional notes / comments	Mentions that area is designated for nature conservation	Mentions important wildlife in the area	Mentions importance of responsible visiting / not disturbing wildlife
Sandwich Bay Estate ⁵⁰		No	Yes	No
Kent Wildlife Trust ⁵¹		Yes	Yes	Yes
White Cliffs Country ⁵²	Dover Council's tourism website. The website states Sandwich Bay is dog friendly.	No	No	No
Sandwich Bay Bird Observatory ⁵³	Details SBBO sites and not visiting the wider bay area	Yes	Yes	No
Royal St George's Golf Club ⁵⁴	Details of Golf Club and not wider area.	No	No	No
Princes Golf Club ⁵⁵	Details of Golf Club. Includes links to some local attractions.	No	No	No
Visit Kent	Visit Kent links to SBBO and White Cliffs Country without detail on the Bay itself.	-	-	-

⁴⁹ Accessed in 2020.

⁵⁰ <https://www.sandwichbay.estate/>

⁵¹ <https://www.kentwildlifetrust.org.uk/nature-reserves/sandwich-and-pegwell-bay>

⁵² <https://www.whitecliffscountry.org.uk/things-to-do/nature-and-outdoors/sandwich-bay>

⁵³ <https://sbbot.org.uk/>

⁵⁴ <https://www.royalstgeorges.com/>

⁵⁵ <https://www.princesgolfclub.co.uk/>

There are several other websites listing beaches to visit.⁵⁶ The information on these websites is inconsistent. Some of these list Sandwich Bay as a dog friendly beach all year round whilst others mention that it is important for nature. It would be beneficial to strive for consistent messaging across these websites, but as these websites are hosted by many different organisations this may not be possible.

Social media is a crucial tool in raising awareness. There are many local Facebook groups, for example, as well as groups representing types of visitors (e.g. horse riders). An engagement programme would need to include social media. The use of engaging media, such as films, would help to support engagement and raise awareness.

Response to this Evidence

The SAMM will include utilising social media to engage with visitors and local people before they visit Sandwich Bay. Engaging material will be produced to convey messages on responsible visiting to the Bay. As a supporting measure, outside of the SAMM, Dover District Council-controlled websites will be updated with information on wildlife value and how to visit the area responsibly, other partner organisations will be encouraged to include this information on their websites and hosts of other websites will be approached where possible to ensure correct information on responsible recreation is provided.

Visitor Monitoring

Surveys of visitors to the SPA will be required to help understand and assess the effectiveness of the mitigation strategy. These surveys will continue to monitor the area from which visitors originate, the frequency of visits, the number of dogs and other information on the overall characteristic of visits. They will also update information on the areas visited and the levels of awareness of wildlife and knowledge of and compliance with recreation restrictions. This will be essential to understand how effective the mitigation measures are and enable the programme to be adjusted if necessary.

Visitor surveys will be required at regular intervals during the period covered by the SAMM. Within the SAMM programme these have been timetabled to coincide with surveys carried out for the SAMMs in neighbouring authorities on other parts of the Thanet Coast and Sandwich

⁵⁶ For example <https://www.thebeachguide.co.uk/south-east-england/kent/dogs-allowed> which lists Sandwich Bay as a dog friendly beach all year round; <https://britishbeaches.uk/sandwich-bay-beach-kent-england#.YD-Eao77SUK> which mentions the Bay is a nature reserve.

Bay SPA.⁵⁷ This will enable comparison across the whole SPA, using the same questions and methodology. This will enable comparable information to be built up across the SPA as a whole.

Response to this Evidence

Monitoring visitors, in co-ordination with the SMM timetable of neighbouring authorities, is an essential element of the SMM to monitor and evaluate the effectiveness of its measure and to enable the programme to be adapted as necessary. A survey which includes monitoring of awareness of behaviours and areas visited, in line with the survey of 2020, should be carried out. Timings and survey methodology and questions should be in co-ordination with the SPA SMM visitor surveys of neighbouring authorities.

Bird Disturbance Surveys

A two year bird disturbance study of over-wintering birds was carried out at Sandwich Bay and Pegwell Bay, beginning in 2018, detailed earlier.⁵⁸ In this survey:

- Three hours of surveying was carried out at two vantage points - Shellness Point and Sandwich Beach;
- Two surveyors were present on each survey day, at both vantage points, on one day each month;
- Surveys were carried out over 8 months – September to April.

Repeating this survey using the same methodology, at regular intervals,⁵⁹ will enable longitudinal, consistent data to be built up for Sandwich Bay. It would be beneficial to include a concurrent survey of Pegwell Bay using the same methodology, but this would need to be delivered in partnership with Thanet District and Canterbury City Councils. It may be possible to involve volunteers in the surveys, or to work with the Sandwich Bay Bird Observatory.

Bi-annual or annual surveys of turnstone have been carried out across the SPA within Thanet and Canterbury for several years. Comparable surveys have not been carried out within Sandwich Bay. Such surveys are not an essential part of the SMM but counts of birds, if regular and using a consistent methodology, could help to add more understanding of the bird population in the Bay. Volunteers could be used to deliver these surveys.

⁵⁷ The visitor surveys for the SPA within Canterbury and Thanet districts are programmed for winter 2024-25 and thence every five years.

⁵⁸ EcoNorth. (Draft January 2020). *Bird Disturbance Study – Pegwell and Sandwich Bay*.

⁵⁹ Programmed for every five years, in the same year as the visitor survey.

Response to this Evidence

This essential element of the mitigation plan will provide information that can be used to assess the impacts of an increase in visitors as well as the effectiveness of the SAMM activities. The bird disturbance and visitor surveys are a core element of the SAMM. The mitigation package includes funding to carry out bird disturbance surveys using the same methodology that was used in the EcoNorth surveys⁶⁰ within Sandwich Bay.

Project Coordination and Implementation

Delivery of the SAMM will be the responsibility of Dover District Council. SAMM delivery officer(s) will be employed by Dover District Council. The council will have ultimate oversight of delivering the SAMM, monitoring its effectiveness and making any updates. An oversight SAMM Steering Group will be established for this function which should consist at a minimum of officers from Dover District Council planning department and the SAMM delivery officer(s).

⁶⁰ EcoNorth. (Draft January 2020). *Bird Disturbance Study – Pegwell and Sandwich Bay*.

Summary of the SAMM

The diagram below shows a summary of the elements which are included the SAMM and which are supporting measures. Detail on delivery is provided in the main SAMM document.

• **Included in the SAMM and funded through the tariff**

- Education and engagement programme with visitors, community and landowners
- Monitoring of bird disturbance
- Monitoring of visitors
- On-site information provision, signage and interpretation
- Project delivery officer

SAMM Measures



• **Measures which support access management but are not part of the SAMM and are not funded through the tariff**

- Zoning. Delivered by landowners within the NNR.
- Enforcement of PSPO, possible future extension of PSPO. Delivered by Dover District Council/SAMM Officer as 'last resort'
- Wider information provision e.g. tourism and recreation websites - Dover District Council
- Film on wildlife in the Bay produced by Dover District Council to support work of SAMM
- Steering group of the SAMM overseen by Dover District Council
- Provision and improvement of other greenspace sites for recreation within the zone of influence and Dover district

Supporting Measures

