



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

September 2022



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## Acknowledgements

Discussions were held with the following organisations in formulating the SAMP:

Sandwich Bay (Residents) Ltd, Sandwich Bay Bird Observatory, Kent Wildlife Trust, National Trust, Royal Society for the Protection of Birds, Princes Golf Course, The Royals St George's Golf Club and Bird Wise East Kent, Sandwich and Pegwell Bay National Nature Reserve Steering Group.

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Author – Sharon Bayne BSc MSc LLM CEnv MCIEEM

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# 1 Introduction

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## 1.1 The Thanet Coast and Sandwich Bay SPA within Dover District

- 1.1.1 The Thanet Coast and Sandwich Bay Special Protection Area (“the SPA”) covers parts of the coastline of north and east Kent from Herne Bay, around the coastline of the Thanet towns to Sandwich and Pegwell Bay in the south.
- 1.1.2 Sandwich and Pegwell Bay is a long, sweeping bay which stretches from north of Deal to Cliffsend in Thanet District, with the estuary of the River Stour dividing Pegwell Bay from Sandwich Bay. This SAMM covers Sandwich Bay; that part of the SPA which is within Dover District and south of the River Stour, see Plan 1.
- 1.1.3 Sandwich Bay begins north of Deal and continues to the mouth of the River Stour, with Shellness Point at the most northern point. The Dover District Council boundary crosses the northern part of Shellness Point and, although this area is within Thanet District, the Point is treated as one entity within the SAMM as visitors to this area must pass through Dover district. 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.
- 1.1.4 The Bay as a whole has ancient dune pasture and hosts many rare plants and animals. During spring it is a breeding area for passage migrant birds and in the winter it is home to over-wintering waders and wildfowl.
- 1.1.5 There are several protected areas in Sandwich Bay as well as the SPA, highlighting the overall importance of Sandwich Bay for biodiversity. These are the Sandwich Bay Special Area of Conservation (SAC) and the Thanet Coast and Sandwich Bay Ramsar Wetland<sup>1</sup>. There are also national and local designated areas – Sandwich and Pegwell Bay National Nature Reserve (NNR), Sandwich Bay to Hackinge Marshes Site of Special Scientific Interest (SSSI) and Princes Beachlands Local Nature Reserve (LNR). Many of these designations overlap, creating a complex layering of designations.
- 1.1.6 The qualifying features of the SPA are listed as European Golden Plover (*Pluvialis apricaria*, non-breeding), Ruddy Turnstone (*Arenaria interpres*, non-breeding) and Little Tern (*Sterna albifrons*, breeding). However, Little Tern have not bred at Sandwich Bay since approximately the late 1990’s and are therefore not included in this SAMM.
- 1.1.7 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

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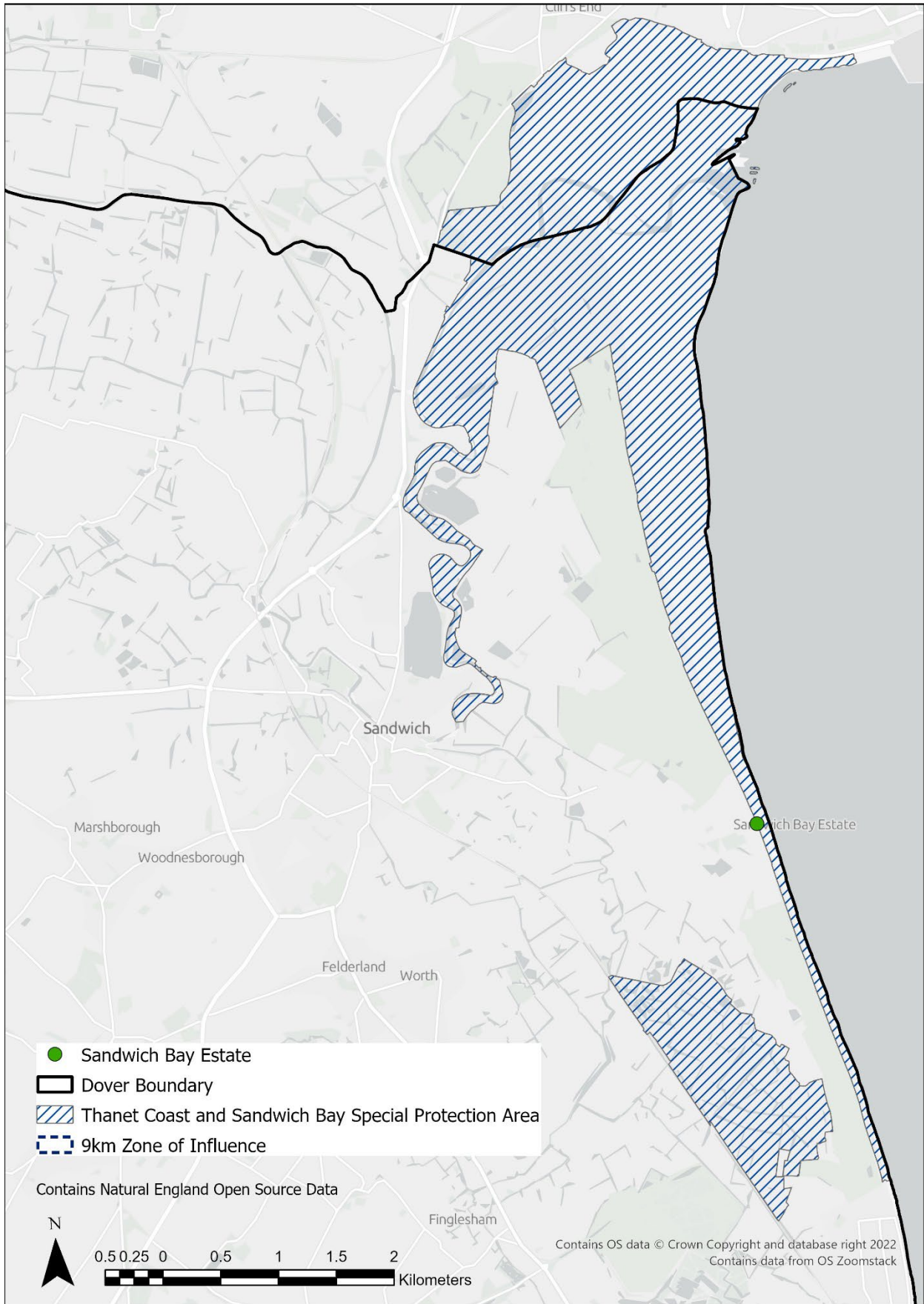
<sup>1</sup> The HRA of the Dover District Local Plan Regulation 19 concludes that “the mitigation measures required for the SPA will also ensure that there are no adverse effects on the integrity of both the SAC and Ramsar sites which overlap the SPA” (paragraph 5.101)

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3,392 homes. Windfall sites are expected account for 70 dwellings per annum from year 4 of the plan.



Plan 1: Thanet Coast and Sandwich Bay Special Protection Area



## 1.2 Role and Scope of the SAMM

- 1.2.1 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 arising from the Dover District Local Plan. Strategic approaches to mitigation seek to address issues in a combined approach rather than dealing with effects on a case by case basis.
- 1.2.2 The mitigation measures in this SAMM will address the impacts arising from development within the Zone of Influence (see paragraph 1.4) whilst the effect of this impact remains. This has been taken as 80 years plus the Local Plan period - 98 years.
- 1.2.3 For development which falls outside of the strategic approach outlined in this SAMM, separate project level Habitat Regulations Assessment and potentially mitigation will be required, as determined by the competent authority, Dover District Council. This could include, but is not confined to, large sites within or beyond the Zone of Influence, tourism accommodation and other leisure development which could potentially increase visitors.
- 1.2.4 Key principles underpin mitigation approaches, as listed below, and which have been applied to this SAMM:
- Be based on evidence to justify need, appropriateness and effectiveness; however, evidence-gathering should be proportionate to the level of detail required;
  - Be necessary and include measures required to enable planning permission to be granted;
  - Be effective and provide certainty that development can proceed without adverse effects on the European sites;
  - Last in perpetuity – as long as the effect remains;
  - Be adaptive and able to respond to changing circumstances. Monitoring is, therefore, a fundamental component of any package;
  - Be specific to the situation and tailored to the specific situation;
  - Be proportionate and not seek to rectify existing impacts. However, 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. Mitigation measures may also have incidental beneficial impacts on pre-existing impacts;
  - Be compliant with planning law and policy.
- 1.2.5 The mitigation in this SAMM addresses the impacts arising from development within the Zone of Influence on the SPA. However, due to the unique features of the site and the evidence showing that there is a high probability of any new visitors adding to the disturbance of birds, it is essential that 'new norms' of behaviour are also established (see paragraphs 2.4.1 to 2.4.10) which the measures in this SAMM will deliver.

1.2.6 A separate report provides an evidence base for this SAMM.

1.2.7 This SAMM replaces the previous Thanet Coast SPA<sup>2</sup> Mitigation Strategy 2012 which set out actions to monitor the potential impacts from recreation at Sandwich Bay through a bird disturbance survey and visitor surveys.

### 1.3 Habitats Regulations Assessment

1.3.1 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. The Habitats Regulations Assessment (HRA) for Dover District Council's Regulation 19 Local Plan<sup>3</sup> sets out the need for the mitigation measures:

*4.59 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.*

*4.61 A number of housing units are proposed within the ZOI [Zone of Influence] 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.*

1.3.2 The HRA goes on to recommend that in relation to mitigation:

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

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

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<sup>2</sup> [sic] Document incorrectly names the designated site the Thanet Coast SPA rather than the Thanet Coast and Sandwich Bay SPA.

<sup>3</sup> Land Use Consultants. (February 2022). *Draft Dover District Local Plan (Reg 19) Habitat Regulations Assessment*.

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

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

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

### **Provision of Visitor Surveys and Bird Monitoring**

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

### **Financial Contribution**

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

- 1.3.3 Dover District Council's Local Plan Policy NE3: Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy' sets out the requirement for mitigation in respect of residential development that will result from the allocations and policies of this new Local Plan in order to address the recommendations of the HRA.

## **1.4 Zone of Influence**

- 1.4.1 This SMM applies to all new residential development applications coming forward within 9km of Sandwich Bay, within a 'Zone of Influence'. Development for other uses that would increase recreational activity causing disturbance to qualifying bird species, such as holiday accommodation, hotels and leisure uses, may be required to make full or partial contributions to the delivery of the SMM if appropriate. A Zone of Influence is the area within which residential development is clearly linked to recreational use of a site.

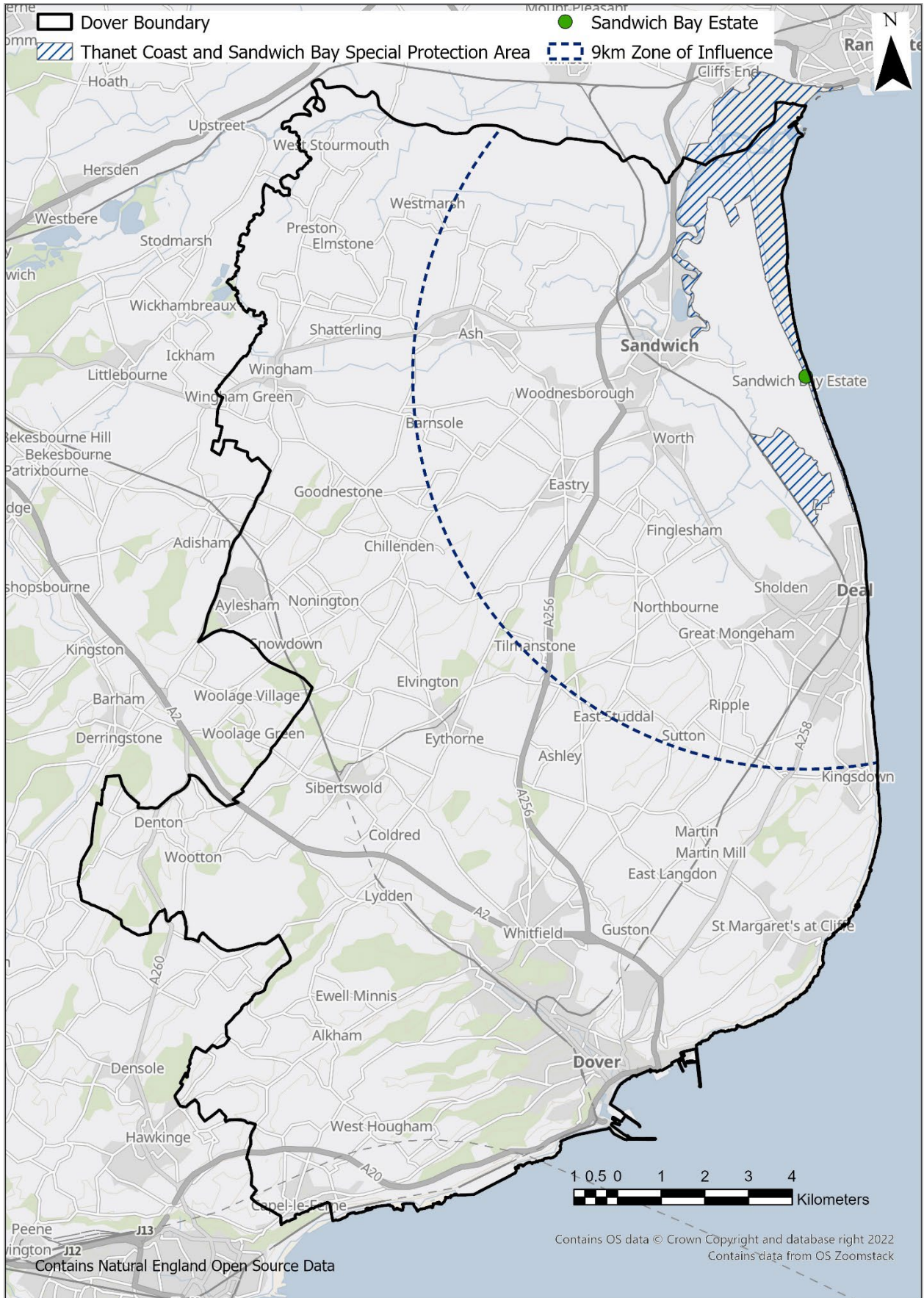


- 1.4.2 A Zone of Influence approach has been adopted by neighbouring Thanet and Canterbury districts in respect of this SPA. It was recommended that Dover District Council explored this approach.<sup>4</sup>
- 1.4.3 The Zone of Influence takes into account the visitor pattern, physical features of the site, current housing and other relevant local features. A standard 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. Visitor surveys carried out at Sandwich Bay in 2011, 2018 and 2020 were used to determine the Zone of Influence. The Zone of Influence covered by this SAMM is shown in Plan 2.
- 1.4.4 The 2011, 2018 and 2020 visitor surveys showed that there is a high level of correspondence between the origin of visitors to Sandwich Bay and the areas in which new development will take place within the Zone of Influence (see evidence report).

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<sup>4</sup> Land Use Consultants for Dover District Council (2018); *Thanet Coast SPA [sic] Mitigation Strategy – Review of Visitor Surveys*.

Plan 2: Zone of Influence



## 2 Factors Relevant to Determining the Measures within the SAMM

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### 2.1 Species

- 2.1.1 This SAMM sets out mitigation for Turnstone and Golden Plover which both overwinter in or near the SPA. The species are generally present between September and May although some individuals may be present all year round.
- 2.1.2 Natural England's Site Improvement Plan<sup>5</sup> 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.
- 2.1.3 The overwintering population of Turnstone arrive in the UK in the early autumn (although first arrivals may occur in July<sup>6</sup>). 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.
- 2.1.4 The UK is of major importance for Turnstones, supporting over 50% of the Greenland/Canada birds in winter. WeBS Core Counts<sup>7</sup> 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. 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' with high concern over the decline of the population.
- 2.1.5 Golden Plover (*Pluvialis apricaria*) also overwinters within and around the SPA on inland grassland and intertidal areas near the coast. A 2016 study surveyed areas around the SPA.<sup>8</sup> Inland areas around Sandwich Bay were found to have Golden Plover present with some areas holding some of the largest numbers of wintering birds. 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 has not been quantified.

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<sup>5</sup> Natural England. (2014). *Site Improvement Plan: North East Kent (Thanet)*.

<sup>6</sup> <https://app.bto.org/birdfacts/results/bob5610.htm>

<sup>7</sup> Wetland Bird Survey – British Trust for Ornithology

<sup>8</sup> Henderson, A. & Sutherland, M. (2017). *Numbers and Distribution of Golden Plovers in the Thanet Coast and Sandwich Bay SPA during the winter of 206/2017*. Report to Natural England.

## 2.2 Disturbance of Over-Wintering Birds

2.2.1 A bird disturbance survey (September 2018 to September 2019)<sup>9</sup> of coastal and intertidal habitats at Sandwich and Pegwell Bay showed high levels of disturbance by visitors and that, overall, Sandwich Bay was more regularly disturbed than Pegwell Bay.

2.2.2 Findings of particular relevance to this SAMM are:

- The surveyed areas in Sandwich Bay had a higher total of disturbance events and the most disturbance events per hour; greater than the surveyed areas in Pegwell Bay;
- 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);
- Disturbance was highest in the area nearest to the car park at the end of Princes Drive and got less as the distance from the car park increased;
- The distribution of water birds in Sandwich Bay was considered to be influenced by human disturbance;
- Most disturbance events were caused by dog walking;
- In Sandwich Bay, dog walkers caused more high disturbance reactions than in Pegwell Bay, probably because of the lack of separation of dogs and walkers from the feeding areas.

2.2.3 A further Kent Wildlife Trust disturbance study carried out in 2018-19 also had broadly the same findings, with dog walking off lead the greatest cause of bird disturbance.

## 2.3 Recreational Activity and Visitor Awareness

2.3.1 The 2020 visitor survey provided detailed information on visitors, their behaviour and awareness of nature which has been important in developing the SAMM approach.

2.3.2 A high proportion of visitors are frequent visitors with 47.2% visiting once a week or more often.

2.3.3 Dog walking was the most popular main activity and 73.8% of groups indicating this was their main reason for visiting. 86.4% of those visiting once a week or more had a dog with them and 88% of all dogs were off the lead.

2.3.4 The most popular route was from the end of Princes Drive heading north and then returning either along the beach or the dunes. The highest concentration of visitors was directly to the north of the car park at the end of Princes Drive, but high numbers also walked parallel to Princes Drive.

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<sup>9</sup> EcoNorth. (Draft January 2020). *Bird Disturbance Study – Pegwell and Sandwich Bay*.



- 2.3.5 Walking along the beach was more popular at low tide bringing visitors in close contact with feeding birds.
- 2.3.6 There was low awareness of the features for which Sandwich Bay is important. 29.2% thought Sandwich Bay was important for birds in general but could not name a group or species. 45.2% had not seen any information around why Sandwich Bay is important for wildlife; the highest response given.
- 2.3.7 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. There was low awareness of the existing recreational restrictions in place<sup>10</sup> or of the reasons they had been put in place.
- 2.3.8 Within the Zone of Influence there are limited greenspaces which offer a comparably attractive dog walking experience to that of 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. The 2020 visitor survey also recorded the importance of these factors for dog walkers at Sandwich Bay.

## 2.4 Summary

- 2.4.1 The population of over-wintering turnstone in the SPA has declined. The decline in the SPA is greater than the wider UK population and therefore there are likely to be reasons for this decline specific to the SPA which need to be addressed within the SPA.
- 2.4.2 It is well-established that recreational disturbance is a factor which may contribute to a decline in over-wintering birds. Studies have shown that Sandwich Bay has higher levels of disturbance, more disturbance events and higher disturbance reactions from birds than at Pegwell Bay and is a highly disturbed area within the SPA. The area with the most disturbance in the whole of Sandwich and Pegwell Bay, with high levels of disturbance, is the area immediately to the north of the car park at the end of Princes Drive.
- 2.4.3 The main source of disturbance is walking with dogs off leads, followed by walking without a dog or with a dog on a lead. Dog walking is the most popular activity at Sandwich Bay with nearly three quarters of people surveyed saying this was their main reason for visiting. Most dogs (88%) are off the lead.
- 2.4.4 Disturbance in Sandwich Bay is likely to be higher due to direct access onto the beach and lack of separation between people, dogs and the feeding birds.

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<sup>10</sup> A Public Space Protection Order (PSPO) is in place which 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.

- 2.4.5 Given the evidence of high levels of disturbance due to the existing visitor types and behaviour patterns, any increase in the number of visits is highly likely to lead to an increase in disturbance events, if new visitors follow the behaviour patterns of existing visitors.
- 2.4.6 There is a high degree of correspondence between the home locations of existing visitors and the location of new development proposed in the Local Plan. It is reasonable, therefore, to conclude that new residents are likely to visit Sandwich Bay.
- 2.4.7 It is also reasonable to conclude that, given the existing profile of visitors, the majority of these will be visiting with dogs and that they would, unless behaviour is modified, follow the same visiting patterns as existing visitors which are leading to high levels of disturbance.
- 2.4.8 It is not reasonable to expect new visitors to adhere to behaviours which will reduce bird disturbance if existing visitors do not, as visitors are likely to follow the norms of existing behaviour. The SAMM must, therefore, ensure that a 'new norm' of visiting behaviour is established.
- 2.4.9 There is low awareness amongst existing visitors of the features for which Sandwich Bay is designated. There is low awareness that recreational activity causes disturbance to over-wintering birds. Over half of visitors had not seen or sought information. There is therefore a need for education and engagement to create modified behaviour patterns.
- 2.4.10 There is evidence that Golden Plover may also be disturbed by recreational activity within the SPA. These are more likely to be found inland from the coast and therefore incorporating the wider bay area may be necessary.

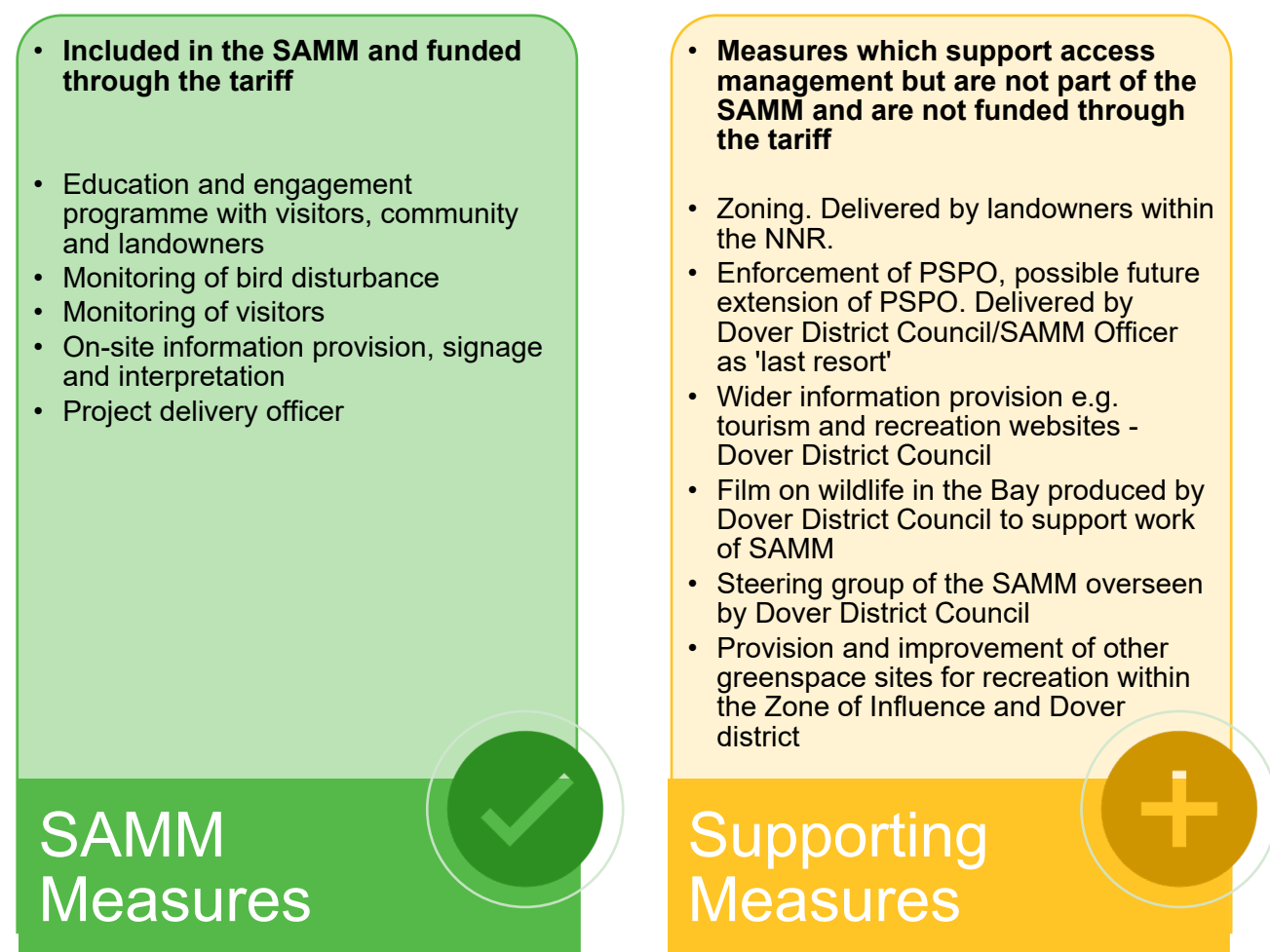


## 3 The Mitigation Measures

### 3.1 Summary of the SAMM

- 3.1.1 An evaluation of the suitability of a wide range of mitigation measures was carried out and is detailed in the evidence report.
- 3.1.2 Figure 1 shows a summary of the elements which are included in the SAMM and those which are supporting measures.
- 3.1.3 Further evidence on best practice is provided in the evidence report in order to aid effective delivery.
- 3.1.4 The supporting measures will be delivered by Dover District Council and will not be funded by the tariff. These measures add value to the SAMM but the effectiveness of the SAMM is not contingent on their delivery, i.e. the SAMM will be effective as a stand-alone package of measures. Further detail on supporting measures is included in the evidence report.

Figure 1: Summary of the SAMM and Supporting Measures



## 3.2 Education and Engagement

- 3.2.1 An education and engagement programme will be the core of the SAMM package of measures. This will be implemented by the SAMM Officer.
- 3.2.2 Sandwich Bay is highly valuable and attractive to visitors and it meets many of the desired criteria of dog owners. It has been common 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 required.<sup>11</sup> 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. A range of measures are needed to promote the behaviours sought. These revolve around visitor management, education and information provision, and as a last resort, enforcement.
- 3.2.3 A wider outreach project will be delivered, both on site and in local communities within the Zone of Influence, raising awareness of the wildlife of the SPA and of the impacts of recreation on designated features and the need for visitors to alter behaviour.
- 3.2.4 There will be an on-site engagement presence in the SPA between September and April. The SAMM Officer will engage with visitors within the SPA to raise awareness of the designated features and how visitors can modify behaviour so that birds are not disturbed. They will make visitors aware of any restrictions in place.
- 3.2.5 This will be through a mixture of direct engagement with visitors on site (a wardening-type role) and through activities and events. The most effective type of engagement is likely to change over time and therefore this SAMM is not overly-prescriptive. The most appropriate engagement at any given time will be decided by the SAMM Officer and SAMM Steering Group based on effectiveness.
- On-site within the SPA engaging directly with visitors;
  - Schools' visits at the Bay, educational visits, Wild Beach;
  - Guided walks;
  - Training, wildlife awareness courses;
  - Engagement with commercial dog walkers.

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<sup>11</sup> Jenkinson, S. (2016). *Mitigation Options for Influencing the Behaviour of Walker with Dogs in the Solent Area*. Solent Recreation Mitigation Partnership.



3.2.6 Activities will also be carried out with wider communities in the Zone of Influence. The most appropriate engagement at any given time and the split between on-site and wider community engagement will be decided by the SAMM Officer and SAMM Steering Group based on effectiveness, but the approximate split is 1 – 2 days per week on site in the SPA and up to 2 days per month in wider engagement, between September and April.

- Visits to schools and awareness raising;
- Talks and walks with community organisations, clubs, societies, interest groups and local councils;
- Engagement with local dog groups;
- Recruiting volunteers for wardening, surveying or other supporting activities;
- Setting up responsible dog owners clubs.

3.2.7 The SAMM Officer will also engage with local communities through social media. This will be supported by Dover District Council communications team at nil cost to the SAMM. Dover District Council will also produce a film showing the importance of the Bay for birds and wildlife which can be used to support the SAMM and which can be used on websites and social media. This will be at nil cost to the SAMM.

3.2.8 There is a consumables and marketing budget which can be used for items such as leaflets or targeted social media advertising or for other related uses as deemed appropriate by the SAMM Officer and SAMM Steering Group.

3.2.9 The primary focus of the SAMM Officer will be to engage and educate visitors. However, as a Dover District Council employee the Officer could be able to enforce restrictions in the Public Space Protection Order area. However, this will only be done as a very last resort for those visitors who cannot be persuaded to voluntarily adhere to the rules in place.

3.2.10 The Bay is under multiple ownership with a range of interests and perspectives.<sup>12</sup> Dover District Council does not own any of the land at Sandwich Bay. It is imperative, therefore, 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.

3.2.11 A landowner partnership will be formed to ensure that the SAMM measures are delivered. The precise format and scope of this partnership should be explored with the partners and adapted to fit the needs and capacity of the partner organisations. The SAMM officer will take forward this partnership approach.

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<sup>12</sup> 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.

3.2.12 The SAMM officer will sit on the Pegwell and Sandwich Bay NNR Steering Group and will be responsible for providing annual monitoring reports for the District Council to contribute to the monitoring of the Local Plan.

3.2.13 Further information on the landowner partnership is detailed in the evidence report.

### 3.3 Monitoring Bird Disturbance

3.3.1 Bird disturbance monitoring will be carried out every five years from year 2 (April 2024 – March 2025) of the SAMM. This will measure the effectiveness of the SAMM measures in reducing bird disturbance events and enable the programme to be adjusted if necessary.

3.3.2 A bird disturbance study was carried out at Sandwich Bay and Pegwell Bay beginning in 2018.<sup>13</sup> In this survey three hours of surveying was carried out at two vantage points within Sandwich Bay – at 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. The methodology was approved by Natural England.

3.3.3 This survey will be repeated using the same methodology every five years during the Local Plan period.<sup>14</sup> Surveys will be carried out in years 6, 11 and 16. A standardised methodology will enable full comparison between surveys and to identify trends.

3.3.4 It would be beneficial for a concurrent survey of Pegwell Bay and other areas of the SPA which are under SAMM measures to be carried out at the same time, using the same methodology. Bird Wise East Kent is delivering SAMM mitigation measures for Thanet District and Canterbury City Councils.<sup>15</sup> The surveys in Dover District Council's SAMM are timetabled to be carried out in the same years as those being delivered by Bird Wise East Kent.

3.3.5 It may be possible to involve volunteers in the surveys, or to work with the Sandwich Bay Bird Observatory.

3.3.6 Timetabling and budgets are shown in section 4.3.

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<sup>13</sup> EcoNorth. (Draft January 2020). *Bird Disturbance Study – Pegwell and Sandwich Bay*.

<sup>14</sup> Programmed for every five years, in the same year as the visitor survey.

<sup>15</sup> A meeting was held with Bird Wise East Kent in the formulation of the SAMM and there will be ongoing liaison in delivery.

## 3.4 Monitoring Visitors

- 3.4.1 Visitor surveys will monitor the effectiveness of SAMM measures.
- 3.4.2 The survey must record the of origin of visitors using full postcodes, the frequency, seasonality and duration of visits, the activities undertaken, the reasons for visiting, visits with or without a dog, number of dogs and the number of dogs off lead, awareness of nature conservation features, awareness of recreational impacts on nature conservation features, self-reported compliance with any restrictions in place or voluntary self-regulation, whether they had seen information on wildlife and restrictions, and where, and recording the routes taken across the whole bay area.<sup>16</sup>
- 3.4.3 Methodology for the visitor surveys should be standardised to enable full comparison between surveys and to identify trends.
- 3.4.4 This survey will be repeated using the same methodology every five years during the Local Plan period.<sup>17</sup> Surveys will be carried out in years 6, 11 and 16.
- 3.4.5 It would be beneficial for a concurrent survey of Pegwell Bay and other areas of the SPA which are under SAMM measures to be carried out at the same time, using the same methodology. Bird Wise East Kent is delivering SAMM mitigation measures for Thanet District and Canterbury City Councils. The surveys in Dover District Council's SAMM are timetabled to be carried out in the same years as those being delivered by Bird Wise East Kent.
- 3.4.6 Timetabling and budgets are shown in section 4.3.

## 3.5 On-site Information

- 3.5.1 The signing programme will support the engagement and education activities through providing consistent and supporting messages on site. Dover District Council do not own land in Sandwich Bay and the final design and location will be decided with the co-operation and agreement of landowners.

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<sup>16</sup> The 2020 visitor survey was the most comprehensive survey carried out and included questions around all of these areas.

<sup>17</sup> Programmed for every five years, in the same year as the visitor survey.

3.5.2 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;
- 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).

3.5.3 Further information on best practice in on-site provision of information is detailed in the evidence report.

3.5.4 There is provision in the SAMM to provide a new interpretation board. The proposed location is at the entrance to the beach immediately to the north of the end of Princes Drive. Other high traffic areas may also be appropriate. The final design and location will be decided with the co-operation and agreement of landowners. Provision of this interpretation is programmed for year 1 with funding to update or replace in year 11.

3.5.5 Smaller entrance boards will be installed at public rights of way and other entrances on the approaches to the Bay or in the areas where people park. These signs will help to reinforce messages and will reinforce that the visitor is entering an area which is protected for its wildlife. Provision of this signing is programmed for year 1 with funding to update or replace in year 11.

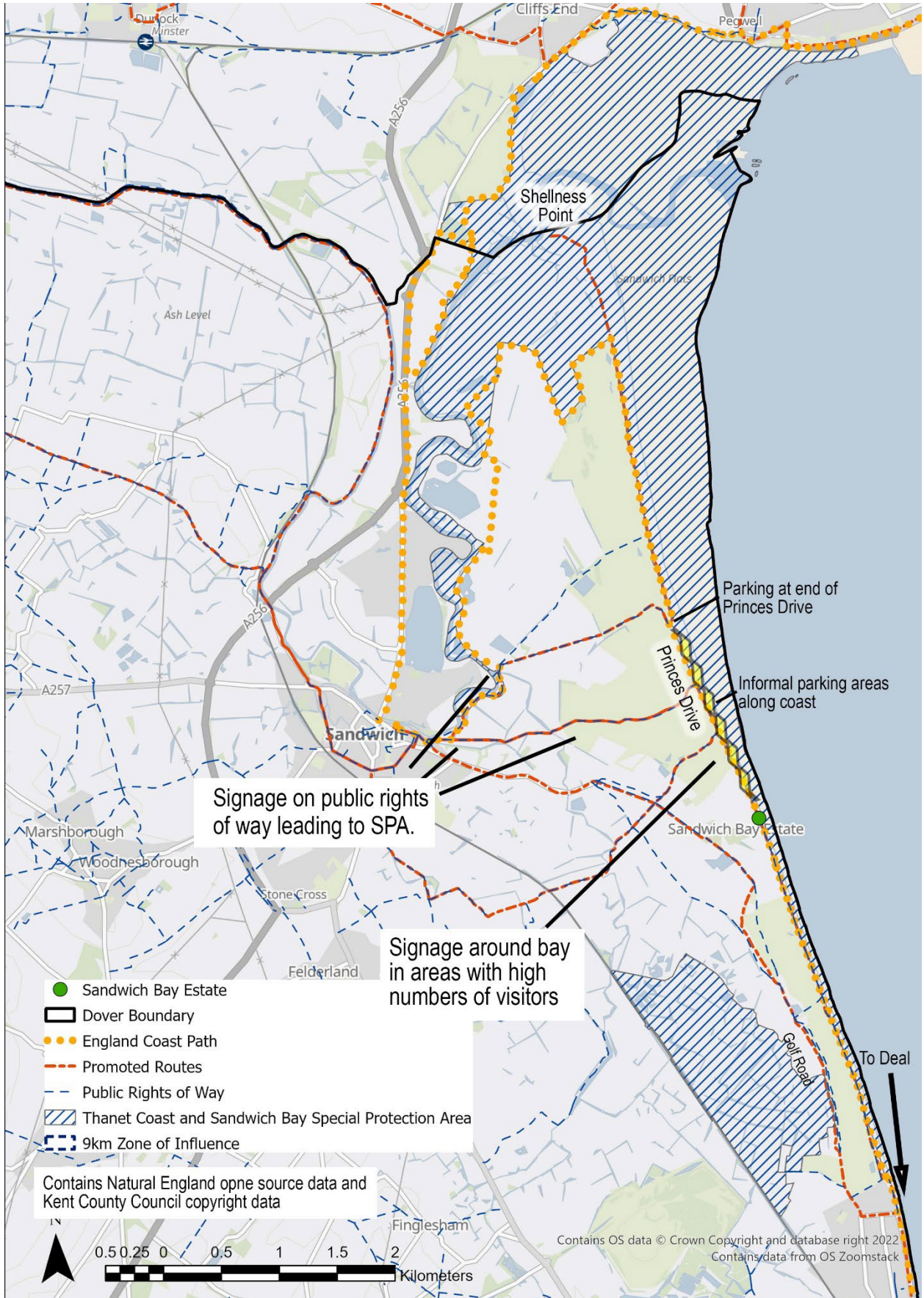
3.5.6 Other smaller signing will be installed at points around the Bay, with the co-operation and agreement of landowners. Funding is included for smaller signs, for example, near the parking areas along Princes Drive, in the toilets, on the PSPO bollards or other locations. The precise location and design will be agreed with landowners. Signing is programmed for year 1, with funding to update or replace in years 6, 11 and 16.

3.5.7 Proposed locations are shown in Plan 3.

3.5.8 Timetabling and budgets are shown in section 4.3.



Plan 3: Wider Access and Potential Signing





## 3.6 SAMM Officer

3.6.1 The SAMM Officer will be a part time role, *pro rata* 44% of a full time equivalent.

3.6.2 The role provides 115 working days per annum. Some flexibility can be applied to the delivery of the role and the days allocated to each task depending on need and evidence of effectiveness, but a broad breakdown is shown in Table 1. Engagement on site will be carried out mainly between September and April when the bird species are present. In broad terms the role will involve:

- Visits to site between September and April to engage with visitors. There is provision for 1 – 2 days per week;
- Delivery of engagement outreach and education events between September and April. There is provision for up to 2 days per month;
- Attendance at partnership and Steering Group meetings, 6 days per annum;
- Provision of annual monitoring reports;
- Project management, arranging events and outreach, 39 days per year.

3.6.3 The elements of the SAMM Officer role are show in Table 1.



Table 1: Elements of SAMM Officer Role

<b>Project Managing SAMM</b>
Producing annual work plan, monitoring reports, finance projections and overseeing implementation of the SAMM
Attendance at SAMM Steering Group meetings
Produce monitoring of the SAMM, finance and implementation
<b>Partnership Working</b>
Setting up a landowner partnership, arrange and attend meetings
Liaising with SAMM Officers in neighbouring districts (Birdwise East Kent) to share best practice and co-ordinate visitor and bird surveys
Attend NNR steering group meetings
<b>Outreach / Education / Implementation</b>
Project managing interpretation and signage
Arranging / commissioning visitor and bird surveys
Attending site to liaise with visitors on site in winter months – September to April
Arranging educational walks / wildlife spotting etc. around the Bay
Outreach in wider community, e.g. talks to town councils, community and interest groups
Visiting schools and giving educational talks
Specific walks / educational talks for dog walkers and professional dog walkers
Setting up social media accounts, keeping this up to date with regular posts, targeting particular markets, joining local groups and interest groups
Developing any 'Code of Conduct' or 'Doggy Dos / Doggy Don'ts' as necessary
Working with partners within Dover District Council to support messages on responsible visiting across social media and multiple web pages
Recruiting and overseeing work of any volunteers

## 3.7 SAMP Steering Group

- 3.7.1 Delivery of the SAMP will be the responsibility of Dover District Council. The council will have ultimate oversight of delivering the SAMP, monitoring its effectiveness and making any updates.
- 3.7.2 The SAMP officer(s) will be employed by Dover District Council.
- 3.7.3 An oversight SAMP Steering Group will be established to oversee and manage delivery and monitor effectiveness of the SAMP. This will consist at a minimum of officers from Dover District Council planning department and the SAMP delivery officer(s). Other officers from within Dover District Council or from partner organisations (e.g. Natural England) may be co-opted onto the Steering Group as necessary. The Steering Group will draw on technical, commercial, legal and other resources as necessary.
- 3.7.4 The Steering Group shall meet at least every 6 months or more often as agreed between the parties. The purpose of the meetings will be to ensure that the SAMP is being delivered as set out, to forward plan, to monitor budgets and delivery, make adjustments to delivery, to report on activities and any other issues related to the delivery of the SAMP. The SAMP Officer will provide an update on progress of workstreams and delivery to these meetings.



## 4 Funding the SAMM

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### 4.1 Development and Application of the Tariff

- 4.1.1 All residential development within the Zone of Influence will require mitigation to ensure there are no significant recreational impacts on the features of the SPA; namely over-wintering birds.
- 4.1.2 Development for other uses that could increase recreational activity and potentially result in an increase in the disturbance of qualifying species, including but not limited to holiday accommodation, hotels and leisure uses, will be assessed on a case by case by Dover District Council in regard to the need for a separate habitats regulation assessment. Such development may be required to put in place or contribute to mitigation measures.
- 4.1.3 Other development which falls outside of the strategic mitigation approach in this SAMM will be assessed on a case by case by Dover District Council regarding the need for a separate habitats regulations assessment. Such development may be required to put in place or contribute to mitigation measures.

### 4.2 The Tariff

- 4.2.1 1,1566 homes will be built within the Zone of Influence between 2022 and 2040. These are included in allocations in the Local Plan, Ash Neighbourhood Plan and approved sites.<sup>18</sup> Windfall dwellings have been estimated at 40 per year from year 4. .
- 4.2.2 All homes (including windfall units) will make a contribution to the tariff. The tariff will apply to all developments – it will apply from developments of 1 home.
- 4.2.3 Monies accrued from the tariff during the period of the Local Plan (to year 19 of the Local Plan) will be invested in order to generate the funding required to ensure the SAMM measures will be delivered for the lifetime of the houses (80 years). After year 19 of the plan the SAMM will be delivered using the reserves accumulated until the end of the Local Plan period and the 80 year lifetime of the houses is reached, i.e. 99 years.
- 4.2.4 Annual funding requirements do not increase after 19 years. Inflation rate is not applied after 19 years. Funding after the Local Plan term is ‘ticking over’ only - based on the average annual cost during the Local Plan period (no inflation). Assumptions are required for inflation and interest rates. These start at 1.4% rising to 2.5%.<sup>19</sup>

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<sup>18</sup> 640 allocations in Regulation 19 Local Plan; 196 through Ash Neighbourhood Plan and 320 approved planning consents.

<sup>19</sup> Interest rates applied are: 1.4% years 1 to 5; 1.8% years 6 to 10; 2% years 11 to 20; 2.25% years 21 to 40; and 2.5% for the remaining years 41 to 99.

Interest rates used are taken from <http://www.worldgovernmentbonds.com/bond-forecast/united-kingdom/20-years/>

4.2.5 Monies already accrued in respect to monitoring and mitigation under the previous mitigation strategy will be allocated to the revised SAMM. The SAMM can therefore be implemented from year 1 of the Local Plan.

4.2.6 A summary of the forecast for the accumulation of reserves and drawdown of funds to deliver the SAMM is shown in Table 2.

Table 2: SAMM Contributions and Reserves by Year of Local Plan to Year 99

Year(s)	Existing S106 Monies	SPA Mitigation Funding Required	Balance of S106 Reserves	No. Dwellings built	Reserve Investment	Reserve Spend	Interest Rate	Cumulative Balance of Investment
Opening	£194,198	£0	£194,198	0	£0			£0
1 <sup>20</sup>		£17,275	£176,923	91	£27,626		1.40%	£28,013
2	£22,553	£23,909	£175,567	91	£27,626		1.40%	£56,418
3		£12,651	£162,916	91	£27,626		1.40%	£85,221
4	£29,814	£12,904	£179,826	131	£39,769		1.40%	£126,740
5		£13,162	£166,663	131	£39,769		1.40%	£168,841
6		£13,867	£152,796	91	£27,626		1.80%	£200,003
7		£26,397	£126,399	90	£27,323		1.80%	£231,418
8	£63,447	£13,968	£175,878	90	£27,323		1.80%	£263,397
9		£14,247	£161,630	90	£27,323		1.80%	£295,953
10		£14,532	£147,098	90	£27,323		1.80%	£329,094
11		£21,058	£126,040	90	£27,323		2.00%	£363,545
12		£29,145	£96,895	90	£27,323		2.00%	£398,685
13		£15,422	£81,473	90	£27,323		2.00%	£434,528
14		£15,730	£65,743	90	£27,323		2.00%	£471,088
15		£16,045	£49,698	90	£27,323		2.00%	£508,378
16		£16,904	£32,794	90	£27,323		2.00%	£546,415
17		£32,178	£616	90	£27,323		2.00%	£585,212
18		£17,027	£0	90	£27,323		2.00%	£624,785
19		£17,367	£0	90	£27,323		2.00%	£665,150
20		£0	£0	0		£18,094	2.00%	£659,997
21 - 40		£0	£0	0		£18,094 per year	2.25%	£656,346 reducing to £574,607
41 - 99		£0	£0	0		£18,094 per year	2.50%	£569,035 reducing to £0

As at 29/9/2021 - "The United Kingdom 20 Years Government Bond Yield is expected to be 1.392% by the end of December 2021." "A farther forecast of the yield, for September 2022, is 1.771%". These rates have been used as a guideline only and have been cross-referenced to closing gilt prices on Tradeweb.com.

<sup>20</sup> April 2023 – March 2024

4.2.7 The tariff is differentiated based on the number of bedrooms per dwelling. The average tariff per dwelling and the different tariff rates by bedroom number is shown in Table 3.

Table 3: Average Tariff per Dwelling

Item						
'Revenue' (Delivery) Funding Required per Dwelling						£191
Impact of accrued S106 contributions						-£173
Average 'Capital' (Investment) Funding Per Dwelling						£304
Average Funding per Dwelling						£322
Total Funding per Dwelling Type						
No. Beds	Proportion	No. Dwellings	Total Beds	Total Funding	Funding (Tariff) per Dwelling	
1	12.20%	219	219	£24,570	£112	
2	20.40%	367	734	£82,348	£224	
3	35.20%	632	1896	£212,713	£337	
4	32.20%	578	2312	£259,384	£449	
	100%	1796	5161	£579,015		

### 4.3 SAMM Budget

4.3.1 The SAMM budget is shown in Tables 4 and 5.

Table 4: SAMM Budget Years 1 to 10

Category	Element	Year									
		1	2	3	4	5	6	7	8	9	10
		April 2023 – March 2024	April 2024 – March 2025	April 2025 – March 2026	April 2026 – March 2027	April 2027 – March 2028	April 2028 – March 2029	April 2029 – March 2030	April 2030 – March 2031	April 2031 – March 2032	April 2032 – March 2033
Outreach, Education and Access Management and Education	Entrance signs at footpath entrances <sup>21</sup>	£2,975									
	Marketing and consumables budget	£200	£204	£208	£212	£216	£221	£225	£230	£234	£239
	Main entrance interpretation board <sup>22</sup>	£1,500									
	Smaller signs to reinforce message <sup>23</sup>	£440					£442				
<b>Outreach, Education and Access Management and Education Total</b>		<b>£5,315</b>	<b>£204</b>	<b>£208</b>	<b>£212</b>	<b>£216</b>	<b>£662</b>	<b>£225</b>	<b>£230</b>	<b>£234</b>	<b>£239</b>
Monitoring	Visitor Surveys		£6,732					£7,433			
	Bird Disturbance Surveys		£4,774					£5,270			
<b>Monitoring Total</b>			<b>£11,506</b>					<b>£12,703</b>			
Staff Costs	£20,000 per annum starting, increase in line with inflation. 44% pro rata, budget includes mileage and oncosts.	£11,960	£12,199	£12,443	£12,692	£12,946	£13,205	£13,469	£13,738	£14,013	£14,293
<b>Staff Costs Total</b>		<b>£11,960</b>	<b>£12,199</b>	<b>£12,443</b>	<b>£12,692</b>	<b>£12,946</b>	<b>£13,205</b>	<b>£13,469</b>	<b>£13,738</b>	<b>£14,013</b>	<b>£14,293</b>
<b>Grand Total per annum</b>		<b>£17,275</b>	<b>£23,909</b>	<b>£12,651</b>	<b>£12,904</b>	<b>£13,162</b>	<b>£13,867</b>	<b>£26,397</b>	<b>£13,968</b>	<b>£14,247</b>	<b>£14,532</b>

<sup>21</sup> Example GRP sign, posts, A2. Artwork and layout by DDC graphics at nil cost to SAMM scheme.

<sup>22</sup> Example GRP sign, posts, A0. Artwork and layout by DDC graphics at nil cost to SAMM scheme.

<sup>23</sup> Design and number dependant on location. Basic aluminium or GRP signing. Artwork and layout by DDC graphics at nil cost to SAMM scheme.

Table 5: SAMM Budget Years 11 - 19

Category	Element	Year									Grand Total
		11	12	13	14	15	16	17	18	19	
		April 2033 – March 2034	April 2034 – March 2035	April 2035 – March 2036	April 2036 – March 2037	April 2037 – March 2038	April 2038 – March 2039	April 2039 – March 2040	April 2040 – March 2041	April 2041 – March 2042	
Outreach, Education and Access Management and Education	Smaller entrance signs at footpath entrances	£3,627									£6,602
	Marketing and consumables budget	£244	£249	£254	£259	£264	£269	£275	£280	£286	£4,568
	Main entrance interpretation boards	£1,828									£3,328
	Smaller signs to reinforce message	£781					£538				£1,868
<b>Outreach, Education and Access Management and Education Total</b>		<b>£6,479</b>	<b>£249</b>	<b>£254</b>	<b>£259</b>	<b>£264</b>	<b>£808</b>	<b>£275</b>	<b>£280</b>	<b>£286</b>	<b>£16,898</b>
Monitoring	Visitor Surveys		£8,206					£9,060			£31,431
	Bird Disturbance Surveys		£5,819					£6,425			£22,288
<b>Monitoring Total</b>			<b>£14,025</b>					<b>£15,485</b>			<b>£53,719</b>
Staff Costs	£20,000 per annum starting, increase in line with inflation. 44% pro rata, budget includes mileage and oncosts.	£14,579	£14,871	£15,168	£15,472	£15,781	£16,097	£16,419	£16,747	£17,082	£273,173
<b>Staff Costs Total</b>		<b>£14,579</b>	<b>£14,871</b>	<b>£15,168</b>	<b>£15,472</b>	<b>£15,781</b>	<b>£16,097</b>	<b>£16,419</b>	<b>£16,747</b>	<b>£17,082</b>	<b>£273,173</b>
<b>Grand Total</b>		<b>£21,058</b>	<b>£29,145</b>	<b>£15,422</b>	<b>£15,730</b>	<b>£16,045</b>	<b>£16,904</b>	<b>£32,178</b>	<b>£17,027</b>	<b>£17,367</b>	<b>£343,790</b>