

Strategic Access Management and Monitoring Plan

In respect of the Thanet section of the Thanet Coast and
Sandwich Bay SPA

Main Report

Final Report v1.0
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Executive Summary

About this Plan

This Strategic Access Management and Monitoring Plan (SAMM) provides a strategy to mitigate the potential in-combination impacts of new housing development in the vicinity of the Thanet Coast and Sandwich Bay Special Protection Area (SPA) arising from the Thanet District Local Plan. In the draft Local Plan Thanet District Council has allocated 12,000 new homes to be built by 2031, of which 835 have been built at the time of preparing this report; leaving 11,165 to be built and the subject of this report and proposed tariff. However, at the time of the final draft of this report (April 2016) Thanet District Council were considering an increase in the proposed housing numbers to a total of 15,660 in the Local Plan period, with a balance of 14,825 to be built. Although an increase in housing numbers has the potential to increase the recreational pressure on the SPA from that initially assessed and set out in this report, it is considered that the mitigation plan as described will be sufficient to provide the required mitigation for these additional numbers.

The Habitats Regulations Assessment (HRA) identified the Thanet Coast sites as being exposed and sensitive to recreational pressure as well as general proximity effects. The assessment stated the need for the Local Plan to develop mitigating policies and safeguards to minimise the effect of a potential increase in recreational use in the SPA during key periods as a result of development.

Draft Policy SP25 Protection of the European Sites, Sites of Special Scientific Interest and National Nature Reserve of the Thanet District Local Plan sets out requirements and expectations regarding effects on European sites, including the need for development to meet the requirements of the SPA Mitigation Strategy in respect of the Habitat Regulations¹.

This strategy provides detail on the mitigation measures required so that Thanet District Council meets its requirements under the Habitats Regulations 2010. Mitigation measures will also need to work in perpetuity, as long as the issue requiring mitigation remains.

Thanet District Council is applying a strategic mitigation approach, developed in line with current government guidance. This strategic mitigation approach covers strategic housing allocations included in the forthcoming Thanet Local Plan plus likely windfall sites. Other development which may come forward may require separate assessment at the discretion of the Local Planning Authority. Thanet District Council is also working with neighbouring Canterbury City Council on a co-ordinated mitigation approach for the SPA, in order both to secure the best outcome for the SPA and meet requirements under the 'duty to co-operate'.²

Thanet Coast and Sandwich Bay SPA and Recreational Impacts

This SAMM covers the entirety of the Thanet coast, from the Thanet District boundary east of Reculver to the boundary with Dover District at Pegwell Bay, a distance of approximately 29km. The SPA is not continuous throughout this length, with a short break at Viking Bay (Broadstairs Harbour) and a larger break at Ramsgate Harbour. However, Turnstones are present along the entirety of this coastline and, therefore, the whole of this coastline is covered by this strategy.

¹ These Regulations replace the previous Conservation (Natural Habitats &c.) Regulations 1994 normally referred to as the 'Habitats Regulations.' The original Habitats Regulations have had numerous amendments between 1994 and 2012.

² S. 110 Localism Act 2011.

Much of the coastline covered by this SAMM is part of the seafront of the seaside towns of Thanet District. The coastline is lined by a series of towns, almost continuously, between Minnis Bay and Ramsgate. These towns are busy coastal attractions, with access to the seafront, promenade and beach a key feature of their appeal to both visitors and residents. Pegwell Country Park, owned and managed by Kent County Council, is the only country park site within Thanet District and is an important access point to the coast. In 2014 it received around 69,000 visitors.³ Pegwell Bay and the neighbouring Kent Wildlife Trust site Stoneless are two of only a few semi-natural greenspace sites in Thanet District.

The Thanet Coast and Sandwich Bay SPA is used by large numbers of migratory birds. The site qualifies under Article 4.2 of the Birds Directive through supporting populations of European importance over-wintering Turnstone (*Arenaria interpres*) and European Golden Plover (*Pluvialis apricaria*).

Much of the coast is accessible for walking and cycling. There is a promenade along large stretches of the coast, bringing the Turnstones very close to users and potential disturbance stimuli.

Between 2001 and 2010 Turnstone numbers were relatively stable. However, the 2013 survey recorded a 50% drop in Turnstone numbers compared with previous surveys. The survey was repeated in 2014, reporting that “the apparent decrease has been genuine.”⁴

There is a body of evidence that supports recreational activity causing the disturbance of birds. In particular walking with dogs, predominantly in the intertidal area, close to roosts at high tide and with dogs off leads, are the most common disturbance stimuli. It is also this recreational activity which occurs in the highest volume and which is most likely to increase with increased housing. It is this recreational activity which is, therefore, considered as the primary activity for mitigation within this strategy.

A recent survey report⁵ concluded that the disturbance of Turnstones by dogs would need to be addressed in any disturbance avoidance measures. The report went on to recommend signage and interpretation as a means of informing beach users about the Turnstones and helping to reduce disturbance incidents, backed-up by frequent contact with on-site personnel in order to minimise future disturbance.

Area Covered by the Strategic Mitigation Approach

The zone of influence is the geographical area within which an impact on European site interest can be identified and where potential impacts need to be avoided or mitigation provided. The whole of Thanet District falls within around 6km of the SPA. The evaluation of available evidence has shown that 75% of visitors to the SPA sites originate from further than this distance. It is reasonable, therefore, to include the whole of Thanet District within a likely zone of influence and, therefore, to include all of the local authority area within the strategic mitigation approach.

³ Kent County Council.

⁴ Hodgson, I., (2014), Thanet Coast Turnstone (*Arenaria interpres*) Monitoring, Sandwich Bay Bird Observatory Trust.

⁵ Hodgson, I., (2013), Thanet Coast Turnstone (*Arenaria interpres*) Monitoring, Sandwich Bay Bird Observatory Trust.

The Mitigation Package

There are a range of potential measures which could be employed to mitigate negative impacts from recreational disturbance. These can include habitat interventions, access management, engagement with or enforcement action of on-site visitors and on and off-site measures.

Potential mitigation measures have been considered in relation to the specific issues and species relevant to this section of coastline, alongside the principles of mitigation in order to comply with the Habitats Regulations, to arrive at the most suitable mitigation package.

- A **wardening service** is required in order to provide an on-site presence throughout the SPA within Thanet District for the period of the year when Turnstones and Golden Plover numbers are at their peak i.e. between October and April. The wardening presence is the key mitigation action and it is essential that this is as effective as possible, with an enforcement role. This will be supported by education to ensure longer-term compliance;
- A **co-ordination role** will be required to manage the wardening presence and to co-ordinate activities throughout the year;
- There are some, limited, **access-management** possibilities;
- Regular monitoring of birds and visitors will be required.

The SAMM will be reviewed after a period of no more than ten years, or sooner if the results of the visitor or bird surveys highlight issues which are not being addressed by the SAMM.

Tariff

A tariff has been developed that will be applied to new housing according to the number of dwellings built within the zone of influence. The mitigation strategy will be monitored and kept under review and some adjustments to the tariff may be made to ensure that it remains effective.

The tariff will be funded by developer contributions and comprises of two elements. The first will fund annual expenditure to operate the mitigation actions during the Local Plan period, and the second will fund the capital investment required in order to fund the mitigation strategy in perpetuity.

A proportional or differentiated tariff, based on occupancy rates will be applied, as shown below. N.B. the table shows the figures for both of the current housing figures under consideration.

Tariff per dwelling – including requirement for in-perpetuity funding	Tariff per dwelling/ 12000 (11165) new homes	Tariff per dwelling/ 15660 (14825) new homes
1 bedroom flat	£311	£229
2 bed house or 2 bed flat	£492	£362
3 bedroom house	£653	£480
4+ bedroom house	£816	£600

THANET DISTRICT COUNCIL - STRATEGIC ACCESS MANAGEMENT AND MONITORING PLAN
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I: Introduction

About this Strategy

This Strategic Access Management and Monitoring Plan (SAMM) provides a strategy to mitigate the potential in-combination impacts of new housing development in the vicinity of the Thanet Coast and Sandwich Bay SPA arising from the Thanet District Local Plan.

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

- Evidence relating to the SPA features and potential impacts on these arising from increased housing in Thanet District;
- An evaluation of possible mitigation measures to address these impacts;
- Evidence to support the area within which new development will be required to pay a tariff contribution for mitigating the potential in-combination effects on the SPA;
- Details of the specific measures which will comprise the mitigation package;
- Details of the tariff, differentiated in respect of housing size.

Legal and Policy Requirements

Part 6 of the Habitats Regulations 2010⁶ relates to the assessment of plans and projects for their effects upon European sites, their interest features and conservation objectives and provides 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, which includes the production of Local Plans and other Development Plan Documents, Regulation 61(1)⁷ requires competent authorities, including local planning authorities, to consider whether such a plan or project is likely to have a significant effect upon a European site.

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.

⁶ These Regulations replace the previous Conservation (Natural Habitats &c.) Regulations 1994 normally referred to as the 'Habitats Regulations.' The original Habitats Regulations have had numerous amendments between 1994 and 2012.

⁷ '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.

Ensuring that the integrity of the site is maintained or restored⁸ is achieved by maintaining or restoring:

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features; and,
- The distribution of the qualifying features within the site.⁹

The Habitats Regulations apply the precautionary principle, i.e. consent cannot be given unless it is ascertained that there will be no adverse effect on the integrity of the site. A precautionary approach should be taken when there is the lack of information to rule out significant effects, coupled with sound justification for assuming that an impact could potentially occur, i.e. the impact is capable of having an effect because there is a logical pathway between impact and receptor. The precautionary approach should not, however, be so over-precautionary that it is not based on sound judgement.

Any plan or project, if shown to adversely affect the integrity of a European site, must include measures to mitigate this affect.

In 2012, regulation 9A was added to the Conservation of Habitats and Species Regulations 2010 which, in summary, requires the local planning authorities to take steps they consider appropriate to secure the objective of the preservation, maintenance and re-establishment of a sufficient diversity and area of habitat for wild birds in the UK, for example by means of the upkeep, management or creation of such habitat, whether in or outside a SPA.¹⁰

Requirement for this Strategy

The Habitats Regulations Assessment (HRA)¹¹ Section 3.3.1 Recreational Pressure states:

‘...given the size and shape of Thanet all allocations are within 6km of the Thanet Coast and Sandwich Bay SPA / Ramsar and most are within 6km of Sandwich Bay SAC; therefore all allocations are likely to contribute to increased visitor pressure on these sites ‘in combination’...’

Further in the summary of site screening in respect of Thanet Coast and Sandwich Bay SPA/Thanet Coast and Sandwich Bay Ramsar the report states:

The main current threat to the integrity of these sites is the disturbance of feeding and roosting waders, notably overwintering turnstones, by recreational activities (particularly dog walking, although other activities, such as kite sailing, are thought to have local impacts). The habitats of

⁸ And in the case of Special Protection Areas that it contributes to achieving the aims of the Wild Birds Directive.

⁹ Natural England guidance: European Site Conservation Objectives for SPA's.

¹⁰ 9A.—(1) Without prejudice to regulation 9(1), the appropriate authority, the nature conservation bodies and, in relation to the marine area, a competent authority must take such steps in the exercise of their functions as they consider appropriate to secure the objective in paragraph (3), so far as lies within their powers. (3) The objective is the preservation, maintenance and re-establishment of a sufficient diversity and area of habitat for wild birds in the United Kingdom, including by means of the upkeep, management and creation of such habitat, as appropriate, having regard to the requirements of Article 2 of the new Wild Birds Directive.

¹¹ Thanet District Council Local Plan Preferred Options - Information to support an assessment under Regulation 61 of the Conservation of Habitats and Species Regulations 2010 (as amended) - AMEC Environment & Infrastructure UK Limited January 2015

the SPA and Ramsar will be vulnerable to the same aspects as Sandwich Bay SAC and Thanet Coast SAC although the relationship between the habitat condition and the status of the SPA / Ramsar bird interest features is complex and effects on the habitats will not always directly and negatively affect these features (for example, nutrient enrichment would degrade some habitats but probably enhance foraging conditions for turnstone).

The main Local Plan issue for this site is therefore the overall quantum of development in Thanet (and neighbouring authorities) and the consequent potential for recreational use of the beaches to increase during key periods. The plan will need to develop mitigating policies and safeguards to minimise the effect of this.

Thanet District Council in their Draft Thanet Local Plan to 2031 – Preferred Options Consultation, makes specific reference to the potential for new housing development to increase the recreational impacts on the SPA resulting from the increase in population. The Local Plan responds to this issue with Policy SP25 - Protection of the European Sites, Sites of Special Scientific Interest and National Nature Reserve. The draft policy refers to this SPA mitigation strategy. This strategy provides further detail on the mitigation measures referenced in Policy SP25.

The draft policy SP25 is shown below. However, this policy is not yet finalised and the wording may change in the final version of the Local Plan

Policy SP25 – Protection of the European Designated Conservation Sites

Development that would result in a detrimental impact on nature conservation sites protected under European law referenced to as the network of Natura sites (SAC, SPA and Ramsar) will not be permitted. Development proposals should be screened to ensure that they have no impact on these sites. All developments that are likely to have a significant impact will be subject to Appropriate Assessment under the Habitats Regulations. Through this assessment process, exceptional development proposals with an imperative reason of overriding public interest (e.g. human health, public safety) may be permitted, if there are no alternative solutions and appropriate compensatory measures are implemented.

Planning permission may only be granted when it can be demonstrated that any harm to the European sites resulting from that development will be suitably mitigated, to remove any significant impacts (a Habitats Regulations assessment may be required to demonstrate this.).

Proposals for residential development will be required to comply with the Strategic Access Management and Monitoring Strategy (SAMM) in order to mitigate against the in-combination effect of new development on recreational pressure on the European designated sites. A financial contribution is required in-perpetuity towards an access management wardening scheme. Details of the tariff are set out in the SAMM and will be collected via a S106 payment.

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 2010.

Mitigation must address the issue or issues which is causing the significant effect. In terms of assessing development impact, the purpose of mitigation is to avoid potential impacts brought about by the development and not to ameliorate pre-existing impacts.¹²

It 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 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.

There are some key principles which underpin mitigation. Approaches should:

- **Be evidence based:** Measures should be based on evidence to justify need, appropriateness and effectiveness. Assumptions used, for example the effect of a project a particular distance from a European site, 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:**¹³ 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:**¹⁴ 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 but should not go further than this. 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.¹⁵ Approaches should also be fair in respect of, in this case, the sources of recreational activity;
- **Be compliant:** with planning law and policy, including the Habitats Regulations, European Directives, the NPPF, the Community Infrastructure Levy Regulations and the planning legislation and policy relating to the use of Section 106 Planning Obligations.

¹² Although a mitigation strategy may also have coincidental beneficial effects on pre-existing impacts.

¹³ In accordance with paragraphs 19, 190 and 205 of the NPPF.

¹⁴ In accordance with the Community Infrastructure Levy Regulations and paragraph 204 of the NPPF.

¹⁵ As required by Article 6(2) of the Habitats Directive or Article 4(4) of the Birds Directive.

Strategic Mitigation

Strategic approaches to mitigation seek to address issues affecting sites across all developments or a wider area 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 also needs to be implemented.

The scale of the strategic approach which is of greatest benefit needs to be determined. Depending on the specific issues and impacts on any given site, strategic mitigation could operate at a sub-district level through to sub-regional scale involving several district areas.

A strategic approach potentially has several advantages:

- Ideally it could mitigate against any in-combination significant effect and potentially therefore avoid the need for case by case appropriate assessment;
- Can operate over several sites which is more effective for mobile species such as birds;
- It can achieve multiple objectives;
- It can operate cross-boundary in a collaborative manner;
- Can be an integrated approach, which avoids moving the issue elsewhere;
- Cost effective as money spent on mitigation and avoidance not assessment;
- Sets a transparent approach for developers;
- Should minimise disruption or costs to developers in complying with law;
- Monitoring operates at an appropriate scale.

In addition to the principles applied to mitigation approaches previously outlined, strategic approaches must also: ¹⁶

- 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 don't conform to these assumptions they will require separate assessment;
- Offer **certainty**: Needs to be underpinned by secure financial and legal mechanisms.

¹⁶ <http://guidanceanddata.defra.gov.uk/strategicapproacheshra/deciding-whether-to-develop-a-strategic-approach/>

Cross-Boundary Approaches

Planning Policy Statement 9 relating to biodiversity has been repealed, but Circular 06/5: Biodiversity and Geological Conservation¹⁷ provides administrative guidance. The National Planning Policy Framework (NPPF) sets out streamlined policy guidance with respect to biodiversity conservation.

Paragraph 117 is of particular relevance. It sets out that local authorities should work at a landscape-scale and across local authority boundaries in order that planning policies should minimise impacts on biodiversity. Local authorities should:

- *Plan for biodiversity at a landscape-scale across local authority boundaries;*
- *Identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;*
- *Promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets and identify suitable indicators for monitoring biodiversity in the plan;*

Moreover, paragraph 114 states that local planning authorities should:

- *Set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure; and*
- *Maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as Heritage Coast and improve public access to and enjoyment of the coast.*

The Localism Act 2011 also introduces the Duty to Cooperate in relation to sustainable development,¹⁸ which is designed to ensure that all bodies involved in planning work together on issues which are of more than local significance. Local authorities must demonstrate how they have complied with the duty at the independent examination of their Local Plans. The cooperation should produce effective and deliverable policies on strategic cross boundary matters.

The Natural Environment and Rural Communities Act (2006) places a duty on local authorities to consider biodiversity in its functions.

¹⁷ Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within the Planning System, ODPM 06/2005

¹⁸ Localism Act 2011, Section 110.

Thanet Coast and Sandwich Bay Special Protection Area

The Thanet Coast and Sandwich Bay Special Protection Area (SPA)¹⁹ (see Plan 1) was designated in 1994. The site is used by large numbers of migratory birds. The site qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance over-wintering Turnstone (*Arenaria interpres*).²⁰

European Golden Plover (*Pluvialis apricaria*) is also listed as a qualifying species on the citation. Breeding Little Tern (*Sterna albifrons*) is also listed in the original citation and in a recent Natural England Conservation Objectives information note,²¹ although these have not bred since the 1990's.

The site is also a Ramsar, also designated in 1994.

Scope of this Strategy

Geographical Area

This strategy relates to the interest features of the Thanet Coast and Sandwich Bay SPA. The measures contained within this strategy will not necessarily be confined to within the boundaries of the SPA, or to within Thanet District Council local authority area. The qualifying features of interest may occur outside the SPA site boundaries and some of the measures may need to be applied beyond the SPA boundary to ensure effectiveness. To this end, Thanet District Council and Canterbury City Council are working co-operatively to deliver a joint approach to mitigation.

Relevant Impacts

This strategy considers the impacts of recreational activity on the interest features of the Thanet Coast and Sandwich Bay SPA. It does not consider other impacts which may arise from increases in housing. It is confined to the impacts on the qualifying features of the SPA and not to other potential impacts on species and habitats which may be present in the SPA.

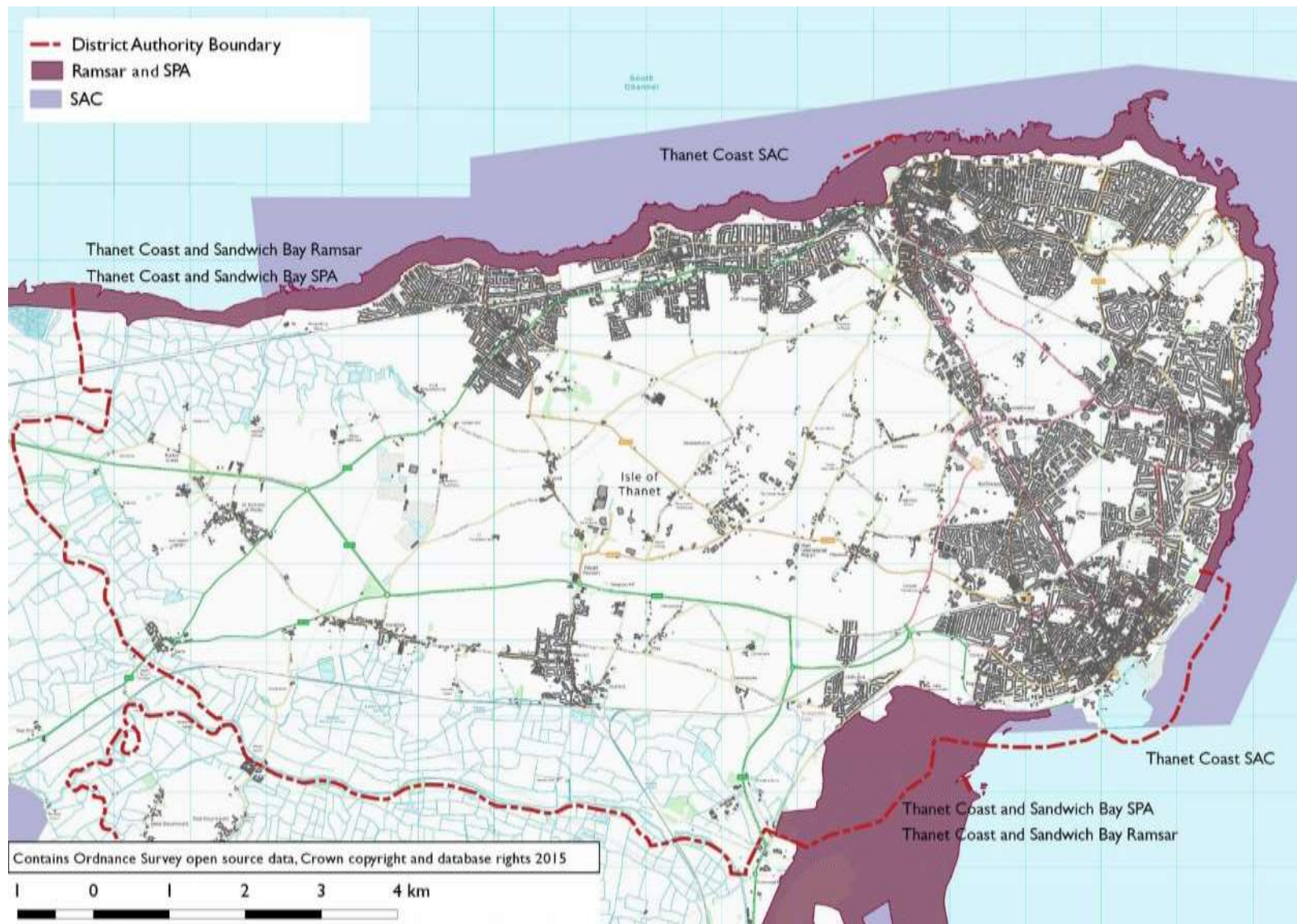
¹⁹ UK9012071.

²⁰ 940 individuals representing at least 1.3% of the wintering Western Palearctic - wintering population (5 year peak mean 1991/2 - 1995/6.

²¹ European Site Conservation Objectives for Thanet Coast and Sandwich Bay Special Protection Area, dated June 2014.

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Plan 1: International Designated Sites Thanet District



2: New Housing in Thanet District Council Local Authority Area and Strategic Mitigation Area

Strategic Allocations

At the time of writing this report Thanet District Council's draft Local Plan has an allocation of 12,000 new homes to be built by 2031, of which 835 have already been built or have planning permission. The new homes are to be located in large, strategic sites (i.e. for Thanet District Council this means more than 500 dwellings), plus smaller developments across the district. However, at the time of the final draft of this report (April 2016) Thanet District Council were considering an increase in the proposed housing numbers to a total of 15,660 in the Local Plan period, with a balance of 14,825 to be built. Although an increase in housing numbers has the potential to increase the recreational pressure on the SPA from that initially assessed and set out in this report, it is considered that the mitigation plan as described will be sufficient to provide the required mitigation for these additional numbers.

The strategic sites are distributed across the district, at varying distances from the boundary of the SPA. All housing sites will be included within the area of the strategic mitigation approach detailed in this document (see next section) and will therefore be subject to the tariff (see Plan 2).

The four planned strategic sites are all located within 2.5km of the SPA and comprise:

- Manston Green, with 700 homes, 2km;
- Birchington, with 1000 homes, 1km;
- Westgate, with 1000 homes, 1km;
- Westwood, with 1450 homes, 2.5km.

In addition to the strategic sites, there are other non-strategic sites. These include:

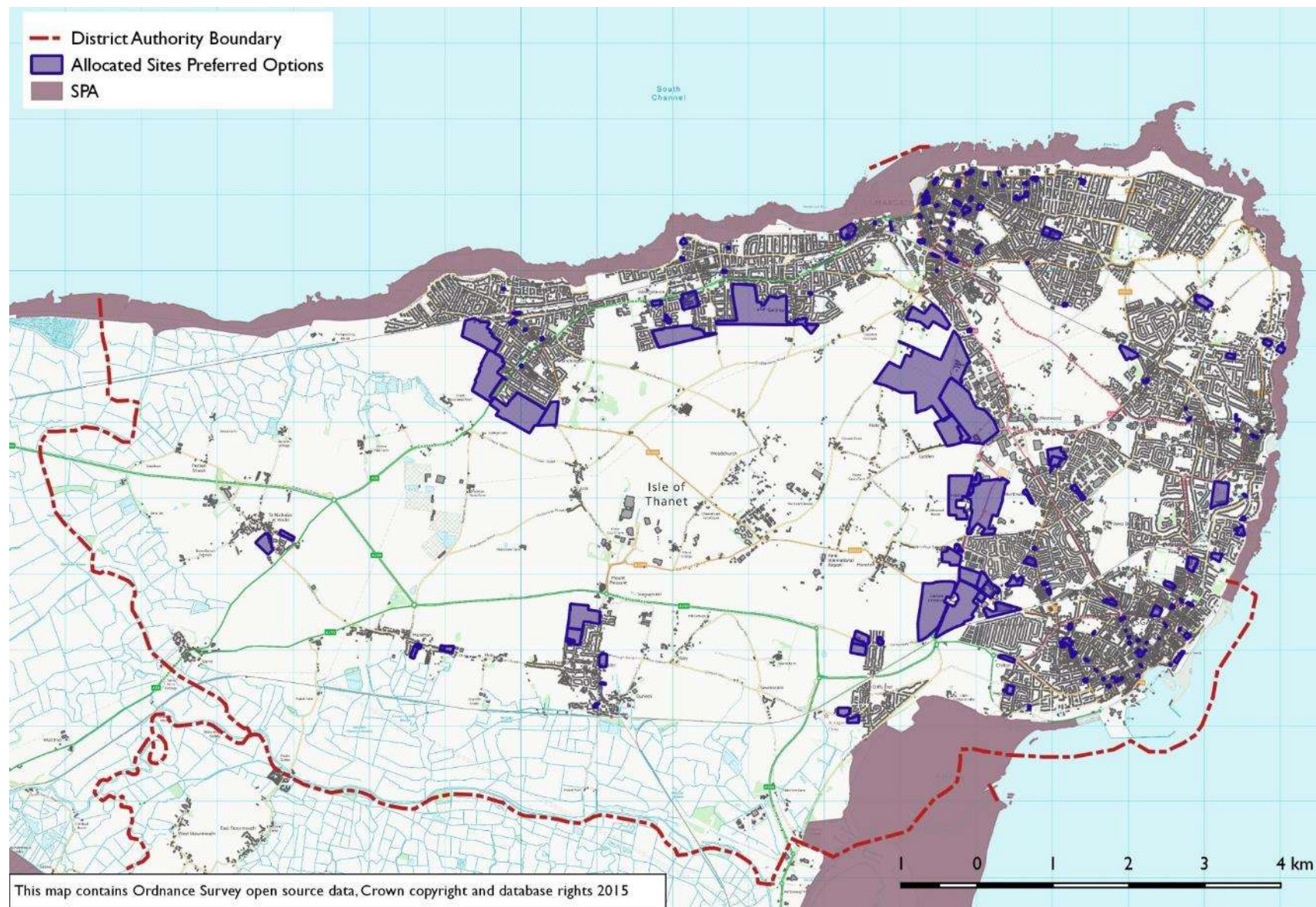
- Westwood, 1405 homes;
- Margate & Cliftonville, 1267 homes;
- Ramsgate, 1827 homes;
- Broadstairs & St Peters, 483 homes;
- Birchington-on-Sea, 138 homes;
- Westgate on Sea, 195 homes;
- Rural Settlements, 340 homes;
- Windfall/broad area, 1793 homes;
- Completed since 2011, 402 homes.²²

The strategic allocation sites and other non-strategic sites are shown in Plan 2.

²² Total 12,000. Proposed Housing for the Period 2011-2031 (from Draft Thanet Local Plan to 2031 - Preferred Options Consultation - January 2015).

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Plan 2: Strategic Sites and Other Non-Strategic Sites, Preferred Options Local Plan



Area Covered by the Strategic Mitigation Approach

In order to apply a strategic mitigation approach, a zone of influence needs to be established. The zone of influence is the geographical area within which new housing is located that would, when considered in combination, potentially have a significant impact on the interest features of a Natura 2000 site. Within this zone potential impacts need to be avoided or mitigation provided. Outside of this zone it is considered that significant effects on the European site are unlikely.

In the case of the strategic approach for Thanet District, the entire Thanet District Council local authority area is included within the zone of influence and therefore the entire district is covered by the strategic mitigation approach. This conclusion has been drawn from evidence from a number of visitor surveys carried out since 2011 which indicate that the entire district falls within a 'zone of influence' for the SPA.

The methodology of these surveys differs and therefore the results need to be treated with a degree of caution. The surveys, apart from the Canterbury City Council survey (2014) were not designed to enable a zone of influence to be calculated, but they do contain some information on the origin of visitors. The aim of this exercise is not to determine the precise extent of the zone of influence for the Thanet District section of the SPA, but to demonstrate conclusively that including the entire local authority area is an evidenced and reasonable approach.

There is no standardised method to determine a 'zone of influence', as each site and their surrounding physical features differ greatly. In terms of selecting criteria, the following are often used:

- The distance from the site within which 75% of all visitors live;
- The distance from the site within which 90% of all regular visitors live.

In reviewing the visitor survey data it appears that while the coast has a definite local draw, some visitors at the survey locations originate from Dover District and Canterbury District and some from further afield.

The results from the following surveys are shown in Plan 3. The distances within which the majority of visitors originated are shown in the form of a 'buffer line' from the SPA. These buffers therefore enter Canterbury and Dover local authority areas. The drawing of the buffer lines beyond the Thanet boundary is to show that the entirety of Thanet District is within the area from which most visitors originate and does not indicate that the mitigation approach outlined in this document applies to Canterbury or Dover local authorities. These authorities have developed their own approaches to mitigation and monitoring for the SPA.

Thanet Coast and Sandwich Bay SPA Visitor Survey (2014) for Canterbury City Council

The most recent was the surveying carried out at a number of key visitor sites in both Canterbury and Thanet sections of the Thanet Coast and Sandwich Bay SPA specifically to inform the evidence base for the Canterbury Strategic Access Management and Monitoring Plan.²³

This work provided information on the number of visitors, how far they have travelled to the site and other information such as the time of year they visited, how regularly they visited and whether they were accompanied by a dog.

The survey recorded the origin of regular²⁴ visitors to four different survey points along the coast from Hampton Pier in the west to Minnis Bay in the east.²⁵

The visitor distribution indicates that regular visitors live some distance from the SPA; as far away as Canterbury and Faversham for the locations on the western side of the SPA. Visitors living further east and within Thanet were the main regular visitors to the Minnis Bay survey site. The survey recorded a cluster of local, regular visitors close to Minnis Bay, although regular visitors to Minnis Bay also included residents of Whitstable, Sarre and Herne Bay.

The survey also found that the main influencing factor determining visitors' choice of site visit was that it was close to home. This was particularly prevalent amongst dog walkers, the majority of whom cited this as the main factor determining their choice of site to visit.

Visitors with dogs made up 76% of all regular visitors to the SPA, making them significant users of the sites. In addition the report notes that during interviews with dog-walking visitors, off-lead dogs were observed in 74% of the visitor groups.²⁶

From this survey, a 7.2km zone of influence was determined for the Canterbury City Council SAMM, which was the distance within which 90% of regular visitors originated.

Dover District Council Surveys – Winter 2011 and 2012

Dover District Council (DDC) also carried out two surveys in the winters of 2011 and 2012 as part of the evidence base for the Dover Core Strategy and ongoing evidence base requirements. The surveys were carried out at Pegwell Bay Country Park and Sandwich Bay.²⁷ The results for Pegwell Bay Country Park have been investigated for this SAMM.

Postcode data were available for the 2011 survey, which has been geocoded and the distance from Pegwell Bay Country Park calculated. There were 88 surveys.

²³ Fearnley, H, Liley, D and Floyd L. (2014). Thanet Coast and Sandwich Bay SPA Visitor Survey. Unpublished report for Canterbury City Council.

²⁴ Regular = one visit or more per week.

²⁵ Fearnley, H, Liley, D and Floyd L. (2014). Thanet Coast and Sandwich Bay SPA Visitor Survey. Unpublished report for Canterbury City Council; Map 9. 126 survey groups were recorded at Minnis Bay.

²⁶ Fearnley, H, Liley, D and Floyd L. (2014). Thanet Coast and Sandwich Bay SPA Visitor Survey. Unpublished report for Canterbury City Council, p19.

²⁷ With the 2011 survey also including Walmer and Deal castles.

From the survey data available it was not possible to differentiate between regular and non-regular visitors. Therefore the distance calculated has been derived from 75% of all visitors. From the 2011 survey the following distance was derived:

- 75% of all visitors originated from 15.2km of Pegwell Bay Country Park.

More data were available from the 2012 survey, with 245 survey results for Pegwell Bay Country Park. Postcodes were not available but origin towns and villages were recorded. The centre of the settlement was geocoded and the distance from Pegwell Bay calculated.

From the 2012 DDC survey the following distance was derived:

- 75% of all visitors originated from 11.7km of Pegwell Bay Country Park.

Kent County Council Survey – Summer 2012

Kent County Council (KCC) also carried out a visitor survey in the summer of 2012. Postcodes data were available for some responses, whilst only towns of origin were available for others. The locations were geocoded and the distances from Pegwell Bay calculated, as previously described. This survey contained 85 useful survey records. The surveys were primarily carried out when the Country Park opened, early in the morning, as the surveys were carried out by site wardens.

From the 2012 KCC survey the following distance was derived:

- 75% of all visitors originated from 7.6km of Pegwell Bay Country Park.

Other Examples

In drawing up a zone of influence other examples from around the UK have been referenced.

Pagham Harbour SPA is located across two district council areas. The zone of influence was derived from approaches by both Chichester and Arun Councils to their respective sections of SPA, with differing conclusions. Chichester District Council took an approach of interrogating the percentages of all visitors and, in particular, from specific Chichester district settlements from where most of the SPA visitors in that district area derived, to arrive at a 3.5km zone of influence. This conclusion was different to Arun Council's for the same SPA, where their decision on a 5km zone of influence was derived from the area with the largest contribution to visits to the SPA from the Arun district area.

In each case the local authority approach was based on the one most suited to the local situation:

- For the Ashdown Forest SPA and SAC the zone of influence was set at 7km, based on the area within which the majority (83%) of regular visitors originated;
- At the Thames Basin Heaths and Dorset Heaths, the zone of influence is 5km. The selection of 5km has been based on visitor data,²⁸ which shows that around 75% of visits originate from within this distance;²⁹
- For the Solent SPA, the zone of influence of 5.6km was based on the origin of the nearest 75% of visitors, excluding holidaymakers;
- A 6km zone of influence has been recommended in the neighbouring Thames, Medway and Swale Estuaries SARMP likely,³⁰ derived through an approach that identified a 'drop-off' in visitors beyond 6km.

Conclusion

The whole of Thanet District falls within approximately 6km of the SPA. The evaluation of available evidence has shown that 75% of visitors to the SPA sites originate from further than this distance. It is reasonable, therefore, to include the whole of Thanet District is within a likely zone of influence and, therefore, to include all of the local authority area within the strategic mitigation approach.

Development Exclusion Zones

In some areas development exclusions zones have been established to prevent development in close proximity to SPA or SAC sites in order to avoid the impacts relating to new development. In respect of the Dorset Heaths,³¹ the Ashdown Forest SPA and Thames Basin Heaths SPA, for example, a 400m development exclusion zone around the SPA has been adopted by local planning authorities. Within such a zone, new residential development is avoided.

Given the proximity of the urban area of Thanet to the coast, setting up such a zone in respect of Thanet District is clearly not feasible and therefore is not considered further.

Exclusions from this Strategy and Other Development

Only new housing development is considered in this strategy. Any new development of **one home or more** within Thanet District will be required to pay a tariff.

²⁸ Liley, D., Clarke, R., Tyldesley, D., Underhill-Day, J. & Lowen, J. (2006). Evidence to support Appropriate Assessment of development plans and projects in south-east Dorset. Unpublished report, Footprint Ecology Underhill-Day, J.C. & Liley, D. (2006b) Visitor patterns on southern heaths: A review of visitor access patterns to heathlands in the UK and the relevance to Annex I bird species. Footprint Ecology.

²⁹ Liley, D., Underhill-Day, J., White, J. & Sharp, J. (2009) Evidence Base relating to Cannock Chase SAC and the Appropriate Assessment of Local Authority Core Strategies. Footprint Ecology.

³⁰ Liley, D. & Underhill-Day, J. (2013). Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy. Unpublished report by Footprint Ecology.

³¹ Dorset Heaths SAC and Dorset Heathlands SPA.

It is possible, however, that other development which is not included as a housing allocation in this document will come forward which may have an effect, alone or in combination, on the protected sites and which is not covered by this tariff. Such development could include, but is not restricted to, those shown in the following list:

- A development of sufficient scale to generate additional significant effects, alone or in combination;
- A development of sufficient proximity to the protected site to generate additional significant effects, alone or in combination;
- Increases in holiday accommodation close to the coast;
- Extension of the period of residency at caravan parks close to the coast;
- Conversion of business use to residential in proximity to the coast;
- Conversion of business or residential, or beach huts, to holiday accommodation.

Thanet District Council as the competent authority will be required to consider such applications in the above cases (and in others which it considers may also have an effect on the issues outlined in this strategy) and require assessment and mitigation as appropriate.

Cross Boundary Issues

The recreational impacts from housing development do not necessarily stop at the boundary with the adjacent local authority. Proposed housing developments within Canterbury and Dover districts could potentially have an impact on the SPA within Thanet. In Canterbury in particular there may be a need to address the potential cross-boundary impacts from development.

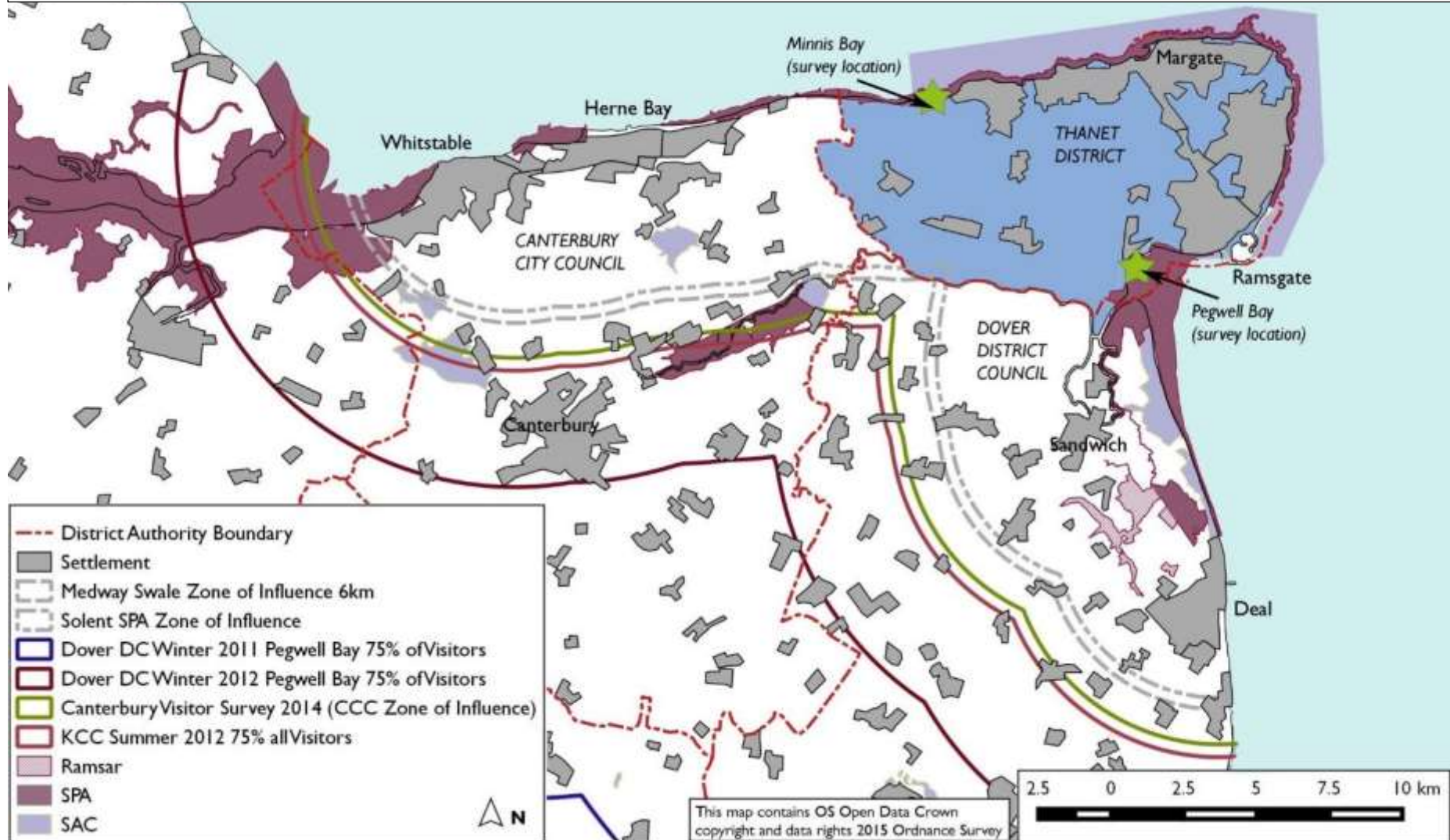
It is clear that the continuous coastline would suggest the need for a common approach between the mitigation plans for Thanet and Canterbury and the potential for joint actions. As a result Thanet District Council and Canterbury City Council are considering a co-ordinated approach to the delivery of their mitigation plans.

The two authorities are currently considering their joint objectives of the mitigation project, the principles of their collaboration, the governance structures which would need to be in place and their respective roles during the mitigation project.

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Plan 3: Origin of Visitors from Local Surveys and Comparator Zones of Influence

The drawing of the buffer lines beyond the Thanet boundary is to show that the entirety of Thanet District is within the area from which most visitors originate and does not indicate that the mitigation approach outlined in this document applies to Canterbury or Dover local authorities. These authorities have developed their own approaches to mitigation and monitoring for the SPA.



3: Access Mitigation and Monitoring – Background Information

The Coast under Consideration in this Strategy

This SAMM covers the entirety of the Thanet coast, from the Thanet District boundary east of Reculver to the boundary with Dover District at Pegwell Bay, a distance of approximately 29km. The SPA is not continuous throughout this length, with a short break at Viking Bay (Broadstairs Harbour) and a larger break at Ramsgate Harbour. However, Turnstones are present along the entirety of this coastline and, therefore, the whole of this coastline is covered by this strategy.

Relevant Studies and Surveys

There is limited data on visitors or qualifying species for this specific section of the coast. The sources of information of primary importance are the visitor surveys previously outlined and the Turnstone monitoring which has been carried out since 2001, along with evidence on bird disturbance authored by Kent Wildlife Trust.

Visitor Survey 2014 – Canterbury and Thanet Districts

In 2014 a visitor survey was carried out at four sites of relevance to Thanet District Council local authority area, within the Thanet Coast and Sandwich Bay SPA.³² The site in Thanet District which was surveyed was Minnis Bay, along with Hampton Slipway (Pier) and Reculver (two sites – Reculver East and West) (in Canterbury City Council area).

Specific findings of relevance to formulating the mitigation approach are included throughout this report as necessary, but overall key findings were:

- Most (90%) of interviewed groups were making a visit from home;
- 41% of interviewed groups made their visit either most days or daily;
- 65% of visitors arrived by car and 32% on foot;
- 58% of interviewed groups were accompanied by a dog;
- 62% of groups stated they visited to site equally all year;
- 42% of visitor groups made their visit to the survey location mainly because the site was 'close to home';
- 170 visitor routes were mapped with an average route length of 3.7km;
- 20% of all visitor routes crossed onto the beach;
- 15% of visitors groups stated they would exercise their dog at a new inland site that was closer to their home, 22% stated they wouldn't and the remaining 63% were unsure.

Minnis Bay had the highest total number of dogs and average per group recorded across the four sites, with an average of just under one dog per group.³³ Around 65% of groups stated their main activity was dog walking, slightly above the overall average of 57%. The routes of visitors was

³² Fearnley, H, Liley, D and Floyd L. (2014). Thanet Coast and Sandwich Bay SPA Visitor Survey. Unpublished report for Canterbury City Council.

³³ 116 dogs entering site, 126 groups.

plotted, indicating that the preferred walk for Minnis Bay visitors was west towards (but not reaching) Reculver and back to Minnis Bay, following the coastal path.

Visitor Surveys at Pegwell and Sandwich Bay, Winter 2011 and 2012, Dover District Council

Both surveys interviewed visitors at Pegwell Bay and Sandwich Bay during the winters of 2011 and 2012.

In 2011, 98 interviews were carried out at Pegwell 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 and Sandwich and Deal being the main origin for visitors to Sandwich Bay. Most visitors (56%) were accompanied by a dog, with 87% of dog walkers coming specifically to let their dog off the lead. The survey indicated a high level of regular visitation, with 57% of visitors to Pegwell Bay Country Park visited once a week or more.

In 2012, 245 interviews were carried out at Pegwell 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 (60%) were accompanied by a dog. This survey indicated a higher level of regular visitation, with 75% of visitors to Pegwell Bay Country Park visited once a week or more.

University of Southampton – Summer 2011

Visitor surveys were carried out in Sandwich and Pegwell Bay during summer 2011 for an undergraduate Environmental Science degree.³⁴ The survey also tested the awareness of visitors of designated sites and the impact of recreational and visitors on these sites.

Turnstone Monitoring

Monitoring of Turnstones has been carried out within the Thanet and Sandwich Bay SPA between 2001 and 2015 by the Sandwich Bay Bird Observatory Trust (SBBOT).³⁵ The survey records Turnstone in 21 sectors between Pegwell Bay and Whitstable. As well as recording roost sites, the survey records disturbance responses and source of disturbance.

Between 2001 and 2010 Turnstone numbers were relatively stable. However, the 2013 survey recorded lower numbers of Turnstones than in previous surveys; 620 versus an average of 1,227 between 2001 and 2010. It is unclear whether this reduced number indicates the beginning of a sustained reduction in Turnstone numbers. The report states:

“Seven surveys have now been conducted since 2001 and results from this year’s survey are of particular concern. The apparent serious decline in Turnstone numbers does not seem to be matched by increased numbers elsewhere around the Kent coast, so it does not appear that the missing birds have moved to other sites away from the Thanet and Sandwich Bay SPA.”³⁶

³⁴ Milnes, J. (2012); Visitors’ Perceptions of Popular Recreational Activity and Awareness of Sensitive Flora, Fauna and Associated Habitats at Sandwich and Pegwell Bay, Kent. University of Southampton.

³⁵ In 2001, 2002, 2003, 2006, 2008, 2010, 2013 and 2014.

³⁶ Hodgson, I., (2013), Thanet Coast Turnstone (*Arenaria interpres*) Monitoring, Sandwich Bay Bird Observatory Trust, p 8.

The survey was repeated in 2014, reporting that:

“Despite concerns that some birds may have been missed in the 2013 survey, results from two co-ordinated counts in 2014, supported by a programme of roost site monitoring, confirmed that the apparent decrease has been genuine.”

The report states that it is not possible to conclude the reasons for the decline.

The report notes the increased willingness of Turnstones to tolerate human activity, but also notes a high number of dogs off leads, speculating that this is likely to be a significant factor in the decline of the wintering Turnstone population.

In 2014 and 2015 two surveys were undertaken during the winter months to increase the available data. The surveys of 2014 recorded total numbers of 583 and 664, with the 2015 survey recording 527.³⁷

Pegwell Bay Bird Disturbance Study

No specific bird disturbance study has been carried out for the stretch of coastline under consideration in this strategy, but a study of bird disturbance at Pegwell Bay, which is part of the Thanet Coast and Sandwich Bay SPA, was carried out in a two year period between January 2010 and December 2011 by the Kent Wildlife Trust.³⁸ This study had the aim of assessing the impact of recreation activities on bird populations. The key conclusions of the study of relevance to this strategy were:

- The ‘No Bait Digging Zone’ affords a degree of protection for large numbers of lapwing and Golden Plover;
- The most frequent source of disturbance to birds was ‘walkers with dogs off leads’, with other significant sources of disturbance being avian predators (13%), walkers (12%), bait digging (7%) and kite surfers (7%);
- The activities which produced the highest levels of disturbance response from birds were motorcycling, motorboats, bait digging, yachts and kite surfing;
- The presence of kite surfers in the recording area had a significant impact on the numbers of water birds counted.

The report provides a useful survey of bird disturbance events during the two year study period at Pegwell Bay and as such is a useful baseline survey. However, definitively making the link between disturbance events and the population size of birds was beyond the scope of the report.

³⁷ 373 birds were recorded in the second survey, but this was an incomplete survey, omitting Long Rock/Hampton (20), historically one of the sectors recording higher numbers.

³⁸ Swandale, T., Waite, A. (October 2012), Pegwell Bay, Kent: Bird Disturbance Study 2010-2011.

2001 Turnstone Study

A report into the effects of human activity on Turnstones in the Thanet Coast and Sandwich Bay SPA was published in 2002.³⁹ This report found that of all the activities recorded, dogs in the intertidal zone invoked the highest level of disturbance response. Disturbance was greatest at high tide. 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.

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 2014.⁴⁰ The catalyst for the report was the need to reduce any negative impacts arising from the implementation of the All 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 with regard to access management in order to avoid displacement of visitors to more sensitive areas for example through implementing dog control orders on beaches.

There is recognition of the primary role of Pegwell Bay Country Park in accommodating dog exercise and the need for this to be continued in balance with the need of Kent County Council to widen the visitor base and attract more visitors. It recognises the ability of the country park to accommodate more dog walking visitors but that this will require zoning, path improvements, signing and areas specifically for dog walking.

³⁹ Webb, K; 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 R570.

⁴⁰ Jenkinson, S. (2014), *Managing walkers with dogs at Sandwich and Pegwell Bay National Nature Reserve*. Report for Natural England and The Kennel Club.

Qualifying Species

Turnstones

The overwintering population of Turnstones arrive in the UK in the early autumn (around October) and 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 Thanet and Canterbury coastline can be a staging post for migrating birds.⁴¹

The UK is of major importance for Turnstones, supporting over 50%⁴² of the Greenland/Canada birds in winter. WeBS⁴³ Core Counts show that the UK's winter population has decreased by 44% in 25 years, with a ten-year trend of an 11% decrease and the core count of 2013/14 falling to its lowest point since 1981/82. The Turnstone population of the Thanet coast had appeared to be shielded from this trend until 2013, when the population fell by 50%.⁴⁴

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.⁴⁵ 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.⁴⁶ This is also supported from evidence from the Thanet Turnstone survey of 2010, 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.

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 this is due to absolute loss of habitat or loss of habitat capacity due to reduced ability to feed.⁴⁷

The 2002 study into Turnstone disturbance on the Thanet Coast SPA 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.

Anecdotal reporting from the Thanet SPA Turnstones survey has inferred that Turnstones may be becoming more tolerant of disturbance and feeding regularly in proximity to human activity especially around Whitstable harbour and fishermen. This may indeed be the case but does need to be treated with some caution, as a 2004 study showed that disturbance responses were greater in

⁴¹ Note 39.

⁴² C. A. Holt *et al* (2015), Waterbirds in the UK 2013/14, The Annual Report of the Wetland Bird Survey, BTO, RSPB & JNCC in association with WWT.

⁴³ The Wetland Bird Survey (WeBS) carried out by the British Trust for Ornithology. C. A. Holt *et al* (2015), Waterbirds in the UK 2013/14, The Annual Report of the Wetland Bird Survey, BTO, RSPB & JNCC in association with WWT.

⁴⁴ I Hodgson (2015), *Thanet Coast Turnstone (Arenaria interpres) Monitoring January – March 2015*.

⁴⁵ Including N. B. Metcalfe & R. W. Furness (1985) Survival, winter population stability and site fidelity in the Turnstone *Arenaria interpres*, *Bird Study*, 32:3, 207-214; Rehfish M.M., H. Insley & B. Swann 2003. Fidelity of overwintering shorebirds to roosts on the Moray Basin, Scotland: implications for predicting impacts of habitat loss. *Ardea* 91(1): 53-70; N.H.K. Burton & P.R. Evans (1997) Survival and winter site-fidelity of Turnstones *Arenaria interpres* and Purple Sandpipers *Calidris maritima* in northeast England, *Bird Study*, 44:1, 35-44.

⁴⁶ Burton (1997) recorded occasional moves of 20-30km.

⁴⁷ Rehfish, Burton and Evans, note 45.

those birds which were well-fed.⁴⁸ Those which had restricted food did not show as great a flushing response to disturbance stimuli. Turnstones are at maximum stress in mid-winter when energy demands are greatest and there is the shortest daylight foraging time.⁴⁹

Golden Plover

Golden Plover (*Pluvialis apricaria*) also overwinters on the Thanet Coast, utilising inland grassland and intertidal areas.

There is less data available for Golden Plover on the Thanet Coast and Sandwich Bay SPA in comparison to that for Turnstones, but a report on Golden Plover was published in 2003.⁵⁰ This study reported that the birds use various inland and intertidal sites.

At the time, Pegwell Bay was identified as a major roost site, but there was no evidence of significant feeding in the bay. The birds also use various fields inland from the coast. Roosts and feeding grounds were primarily recorded in the farmland to the west of Sandwich Bay, but the farmland close to Pegwell Bay and in the wider Thanet District also provides habitat for the birds (functionally linked land). However, consideration of access management on this wider land is beyond the scope of this report.

⁴⁸ C.M. Beale & P. Monaghan (2004), Behavioural responses to human disturbance: a matter of choice? *Animal Behaviour*, 68, 1065-1069.

⁴⁹ Metcalfe and Furness (1985).

⁵⁰ M. Griffiths (2003), Numbers and distribution of the wintering golden plover population in and around the Thanet Coast and Sandwich Bay SPA 2002/2003, English Nature Research Report 569.

Turnstone Survey Sectors

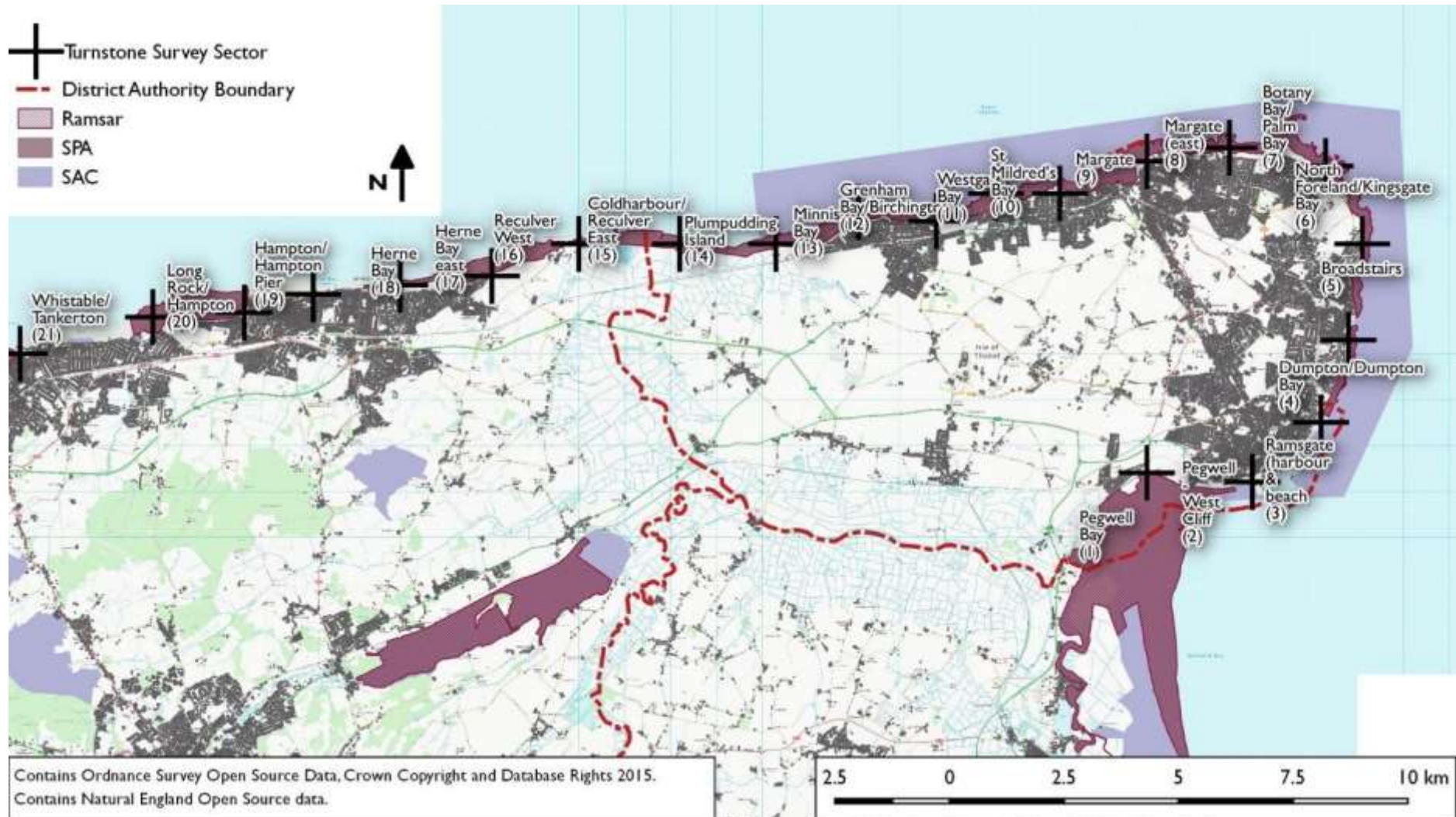
For ease of description and to link with the existing evidence base, the coastline is considered in the sectors used for the Turnstone monitoring. There are fourteen complete sectors along this stretch of coast; 14 (Plumpudding Island) to 1 (Pegwell Bay), plus part of sector 15 (Coldharbour/Reculver East), see Table 1 and Plan 4. Each sector is approximately 2km in length.

Table 1: Turnstone Survey Sectors

Sector	Name	Grid ref (western/ northern extent of sector)	Grid ref (eastern/ southern extent of sector)
15	Coldharbour/ Reculver East (part)	TR 230 694	TR 252 694
14	Plumpudding Island	TR 252 694	TR 273 694
13	Minnis Bay	TR 273 694	TR 291 701
12	Grenham Bay/Birchington	TR 291 701	TR 308 699
11	Westgate Bay	TR 308 699	TR 321 705
10	St Mildred's Bay	TR 321 705	TR 335 705
9	Margate	TR 335 705	TR 354 712
8	Margate (east)	TR 354 712	TR 372 715
7	Botany Bay/Palm Bay	TR 372 715	TR 393 711
6	North Foreland/Kingsgate Bay	TR 393 711	TR 401 694
5	Broadstairs	TR 401 694	TR 398 673
4	Dumpton/Dumpton Bay	TR 398 673	TR 392 655
3	Ramsgate (harbour and beach)	TR 392 655	TR 377 642
2	Pegwell – West Cliff	TR 377 642	TR 354 644
1	Pegwell Bay	TR 354 644	TR 342 628

THANET DISTRICT COUNCIL - STRATEGIC ACCESS MANAGEMENT AND MONITORING PLAN
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Plan 4: Turnstone Study Sectors Thanet Coast SPA



Thanet Coast and Sandwich Bay SPA

Commentary at time of Natura 2000 designation (compiled 1994, updated 1999) records (alongside others) the following potential vulnerabilities:

- High potential for disturbance of wintering birds due to recreational use on and off water;
- Particular disturbance potential for high tide roosts and breeding colonies, especially Little Tern.

Commentary for the Thanet Coast and Sandwich Bay Ramsar (compiled 1994) records (alongside others) the following vulnerabilities:

- Recreational/tourism disturbance: Disturbance of Turnstones *Arenaria interpres*, especially by dog walking and kite surfing/boarding, which can result in loss of condition to birds if unmanaged;
- Urban use;
- Kite surfing causes bird disturbance.

Units 11, 12, 14, 16, 18, 20, all within Thanet District are recorded as being in unfavourable recovering condition (last survey 2009), with the commentary for all: "Unit remains unfavourable recovering due to effects of dog walkers on birds feeding and roosting."⁵¹ Unit 3 (Pegwell Bay) contains additional commentary from 2012 on results from the Bird Disturbance Study (2011) and lists a number of recreational activities.⁵²

WeBS Alerts

Thanet Coast and Sandwich Bay SPA, winter 09/10 (latest data):

Medium alert for Turnstone							
Species	First winter	Ref Winter	Short term % change	Medium Term % change	Long term % change	All time % change	% change since classification
Turnstone	84/85	09/10	-49%	-38%	-38%	-	-46%

Summary of commentary from WeBS:

- Numbers of over-wintering Turnstone have shown short-term decrease having previously been stable;
- The trend does not appear to be tracking British or regional trend;
- The decline is likely to be due to site specific pressures.

⁵¹ Views about management (2005): The birds that use mud and sandflats for feeding and roosting are vulnerable to disturbance from human activities, for example, bait digging, dog walking and wildfowling. These activities can lead to reduced time spent feeding, or individuals being restricted to areas with a poor food supply. Disturbance should therefore be minimised, especially at times when bird populations may be stressed, such as during severe winter weather.

⁵² Commentary from condition assessment (2012), Unit 3: *Bird Disturbance Study 2010-11 published by Kent Wildlife Trust Oct 2012 provides strong evidence indicating that recreational and commercial activities including dog walking, walking without dogs, bait digging and kite surfing are having a detrimental impact on bird populations in Pegwell Bay. The most disturbing activity, particularly in the north section of the bay, is dog walkers with dogs off leads. This is being addressed through a dog management strategy which aims to provide alternative open space for dogs off leads. The voluntary agreement over kite surfing also needs to be reviewed given disturbance levels associated with this recreational activity. Continued monitoring is required particularly with regard housing development within Dover and Thanet Districts. Mitigation measures are being sought with regard these development plans including monitoring and possible wardening if monitoring indicates increased disturbance activity.*

Description of the Coastline

Much of the coastline covered by this SAMM is part of the seafront of the seaside towns of Thanet Districts. The coastline is lined by a series of towns, almost continuously, between Minnis Bay and Ramsgate. These towns are busy coastal attractions, with access to the seafront, promenade and beach a key feature of their appeal to both visitors and residents.

The coastline has many beaches and bays. There is public access along much of this coastline, either on promenades or access to the beaches and bays. Cycling as well as walking is permitted and promoted along the Viking Coastal Trail. This route follows the promenade in some sections, see Plan 5.

The number of visitors this coastline receives is not recorded. Pegwell Bay is the only country park within Thanet District, receiving around 69,000 annual visits.⁵³

Despite visitor numbers not being available, it is clear that this is a popular and busy seafront, both with local and tourist visitors, with excellent and easy access on the promenade for most of the length. This continuous access has the result that there are few places where Turnstone can seek refuge.

The sectors of the coast are described in further detail from page 40.

Pegwell Bay Country Park

Pegwell Country Park, owned and managed by Kent County Council, is the only country park site within Thanet District and is an important access point to the coast. In 2014 it received around 69,000 visitors.⁵⁴ Pegwell Bay and the neighbouring Kent Wildlife Trust site Stoneless are two of only a few semi-natural greenspace sites in Thanet District.

A review of the park was undertaken in 2013, highlighting the need for improvements in the infrastructure and to increase income to cover running costs. Following the review, Kent County Council has invested in the park to improve the facilities on the site, including the installation of a children's play area. This has widened the appeal of the park, making it popular with not only its previous visitor base of regular dog walkers and bird watchers, but with families.

There is recognition in the "*Managing walkers with dogs at Sandwich and Pegwell Bay National Nature Reserve*" report⁵⁵ of the primary role of Pegwell Bay Country Park in accommodating dog exercise and the need for this to be in balance with the need of Kent County Council to widen the visitor base and attract more visitors. It recognises the ability of the country park to accommodate more dog walking visitors but that this will require zoning, path improvements, signing and areas specifically for dog walking.

Pegwell Country Park has long been regarded as an important site for access to the coast and as such it has a pivotal role to play in successful delivery of the SAMM.

⁵³ Kent County Council car park counter 2012.

⁵⁴ Kent County Council.

⁵⁵ Jenkinson, S. (2014), *Managing walkers with dogs at Sandwich and Pegwell Bay National Nature Reserve*. Report for Natural England and The Kennel Club.

Several surveys have been carried out at the park and there are good data available for the park, in comparison with other coastal sites. The site is very popular with dog walkers⁵⁶ and the report commissioned by Natural England into managing dogs at Sandwich and Pegwell Bay National Nature Reserve recognised the

Possible Increase in Visitors to the Coast

It would be useful to be able to predict the likely increase in visitor numbers to the SPA as a result of new housing developments. However, it is generally very difficult to predict changes in visitor numbers and the reasons for any increase or decrease may vary.

Although there may be increases in the local population as a result of new housing, other factors may also affect visitor numbers to the SPA, such as demographic changes across a wider area, or changes in the leisure and tourism markets.

The visitor surveys previously detailed provide valuable data on visitors to the SPA, but it has not been possible to use the survey data with sufficient accuracy to extract and interpret visitor numbers from the areas of proposed housing development.

However, measures proposed in this mitigation strategy will be introduced to avoid effects on the SPA in the future. This package of measures will include provision for on-going visitor surveys at intervals over the Local Plan period in order to assess and keep under review any changes in visitor numbers. The surveys will supplement other actions including legal enforcement and activities designed to change visitor behaviour.

Existing Dog Control Measures

There are existing seasonal restrictions on dog access on some parts of the coast. Access to the beaches with dogs is restricted during the summer months between 1st May and 30th September, with some beaches not permitting dogs at all and some only permitting access with dogs before 10am and after 6pm. In addition, dogs must be kept on a lead on the promenade next to these beaches between 1st May and 30th September.

There are several beaches on which there are no dog access restrictions at any time.

Thanet District Council states that dogs 'are welcomed' on all beaches between 1st October and 30th April, the peak time for Turnstones.

A summary is shown in Figure 1.

⁵⁶ Over half of visitors in surveys had a dog with them – 56% in the 2011 survey and 60% in the 2012 survey.

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Plan 5: Viking Coastal Trail



Figure 1: Dog Control Orders in Force 2015



DOGS ON BEACHES

EXISTING BYELAWS – TOTAL BAN	EXISTING BYELAWS – PARTIAL BAN
<p>From the 1st May to 30th September dogs are NOT ALLOWED during any part of the day/evening on the following beaches:</p> <p>MINNIS BAY, BIRCHINGTON (main area) MARGATE MAIN SANDS WALPOLE BAY, CLIFTONVILLE VIKING BAY, BROADSTAIRS RAMSGATE MAIN SANDS (main area)</p> <p>All dogs on lower promenades adjacent to these beaches MUST BE KEPT ON A LEAD from the 1st May to the 30th September.</p>	<p>From 1st May to 30th September dogs will NOT BE ALLOWED during the hours of 10.00hrs to 18.00hrs on the following beaches:</p> <p>WEST BAY, BIRCHINGTON ST MILDRED'S BAY, BIRCHINGTON WESTBROOK BAY, MARGATE STONE BAY, BROADSTAIRS BOTANY BAY, BROADSTAIRS JOSS BAY, BROADSTAIRS LOUISA BAY, BROADSTAIRS</p> <p>All dogs on the lower promenades adjacent to these beaches MUST BE KEPT ON A LEAD from the 1st May to the 30th September.</p>

Dog owners are able to take their dog(s) onto the following beaches and promenades anytime during the year:

GRENHAM BAY, BIRCHINGTON
FULSAM ROCK, MARGATE
PALM BAY, CLIFTONVILLE
KINGSGATE BAY, BROADSTAIRS
DUMPTON GAP, BROADSTAIRS

EPPLER BAY, BIRCHINGTON
SACKETTS GAP, CLIFTONVILLE
FORENESS POINT, CLIFTONVILLE
WESTERN UNDERCLIFF, RAMSGATE
EASTCLIFF, RAMSGATE

Owners are requested to ensure their dog(s) are kept under control at all times and do not cause distress to other beach/promenade users, and are reminded to **ALWAYS CLEAN UP AFTER THEIR DOG (S)**. It is an offence not to do so and penalties will be given to those caught not adhering to this rule. This can include **£50 FIXED PENALTY NOTICES** or **PROSECUTION** with a maximum fine of **£1,000**.

From 1st October until 30th April dogs **ARE WELCOMED** on all beaches subject to the same dog-fouling request.

Thanet District Council would like to take this opportunity to ask for all persons to respect the above rules and regulations laid down and **WATCH OUT FOR SIGNS**.

Should you have any concerns regarding any of the above, please do not hesitate to contact Thanet District Council Community Dog Wardens on (01843) 577658.

Turnstone Distribution and Numbers

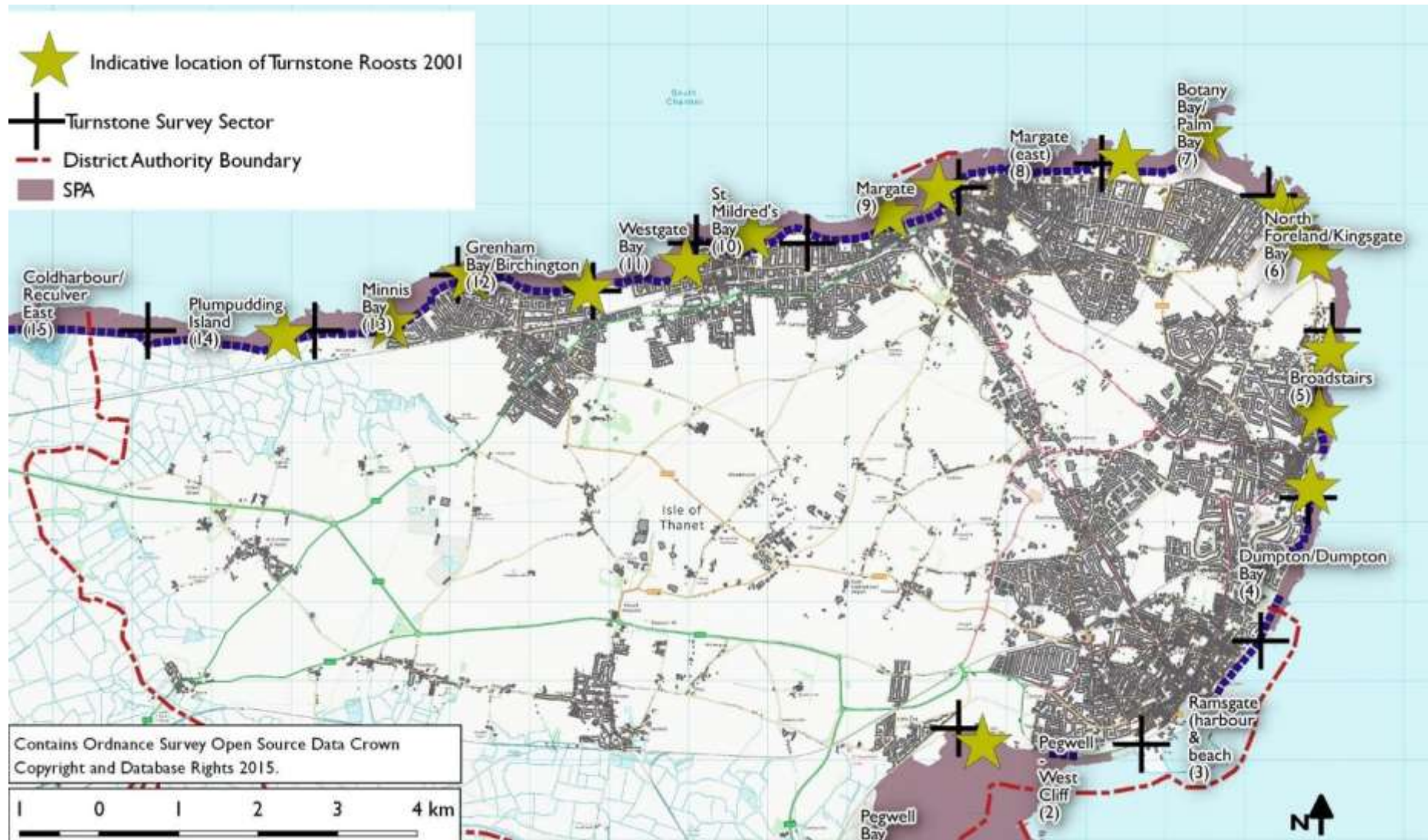
The Turnstone survey of 2001-2002 recorded the indicative location of several Turnstone roost sites, shown in Plan 6. The survey highlighted roosts along the length of the Thanet coastline, in all sectors except Margate (east) (8), Dumpton (4) and Ramsgate (3).

This plan provides an indication of roosting sites of Turnstones in 2001. Subsequent surveys have revealed that these roosts are not fixed in location. Later surveys have also indicated a general movement of birds from the east to the west of the SPA. Further observations were made in 2015 which confirmed the westerly movement of birds when moving to their roosts. It also is apparent that the birds feed and roost along the length of the coast, either in larger roosts or smaller groups and that disturbance occurs both during feeding and roosting.

The mean number of Turnstone recorded in the surveys between 2001 and 2015 is shown in Figure 2. A large number of Turnstone, 927, were recorded in Pegwell Bay (recorded in sector 2, Pegwell Bay undercliff) in 2010, and with low numbers recorded in all other sectors. It is believed that this was due to birds sheltering in the bay due to adverse weather conditions. All results are shown in Figure x, although the high value for Pegwell Bay in 2010 obscures the variation in other sectors. Therefore, in Figure 3, the 2010 value is omitted in order to show more clearly the variation in numbers across the other sectors (although the standard deviation has not been altered and uses all data).

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Plan 6: Turnstone Study Sectors Thanet Coast SPA



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Figure 2: Turnstone Survey Results 2001-2015, Including Anomalous Sector 2 Result (2010)

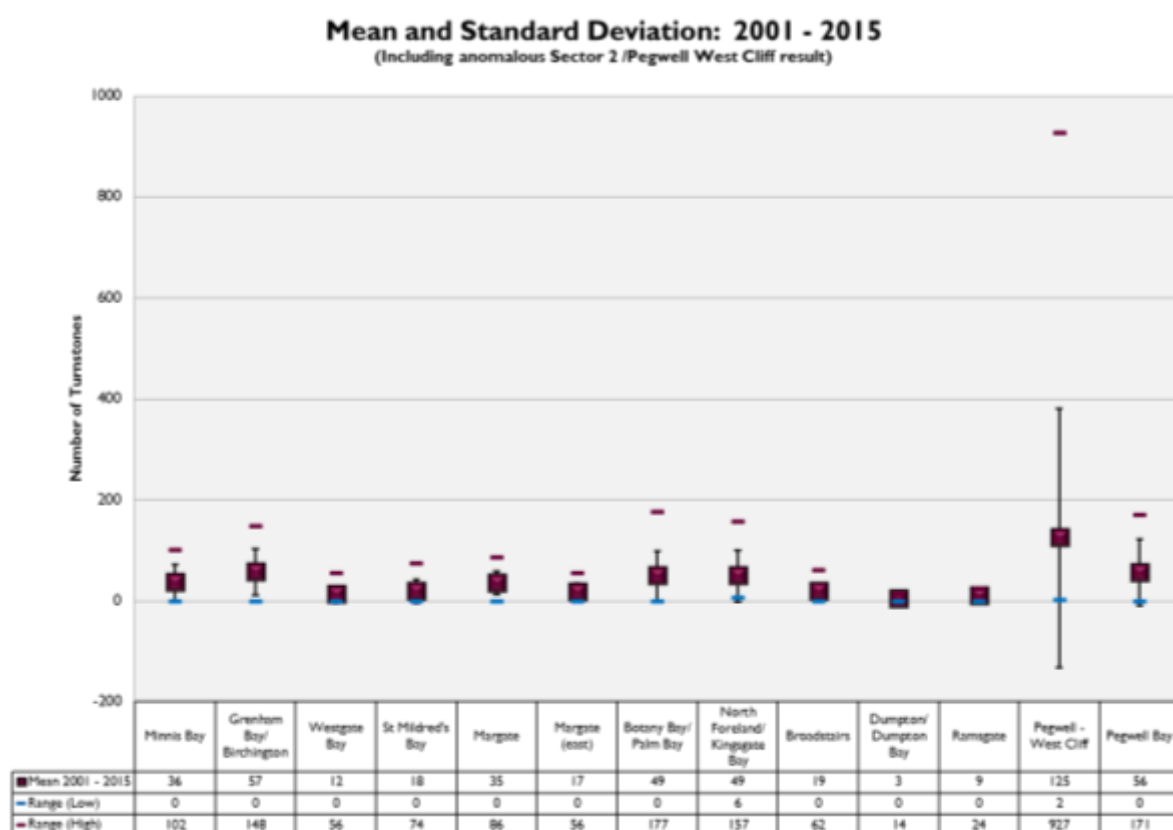
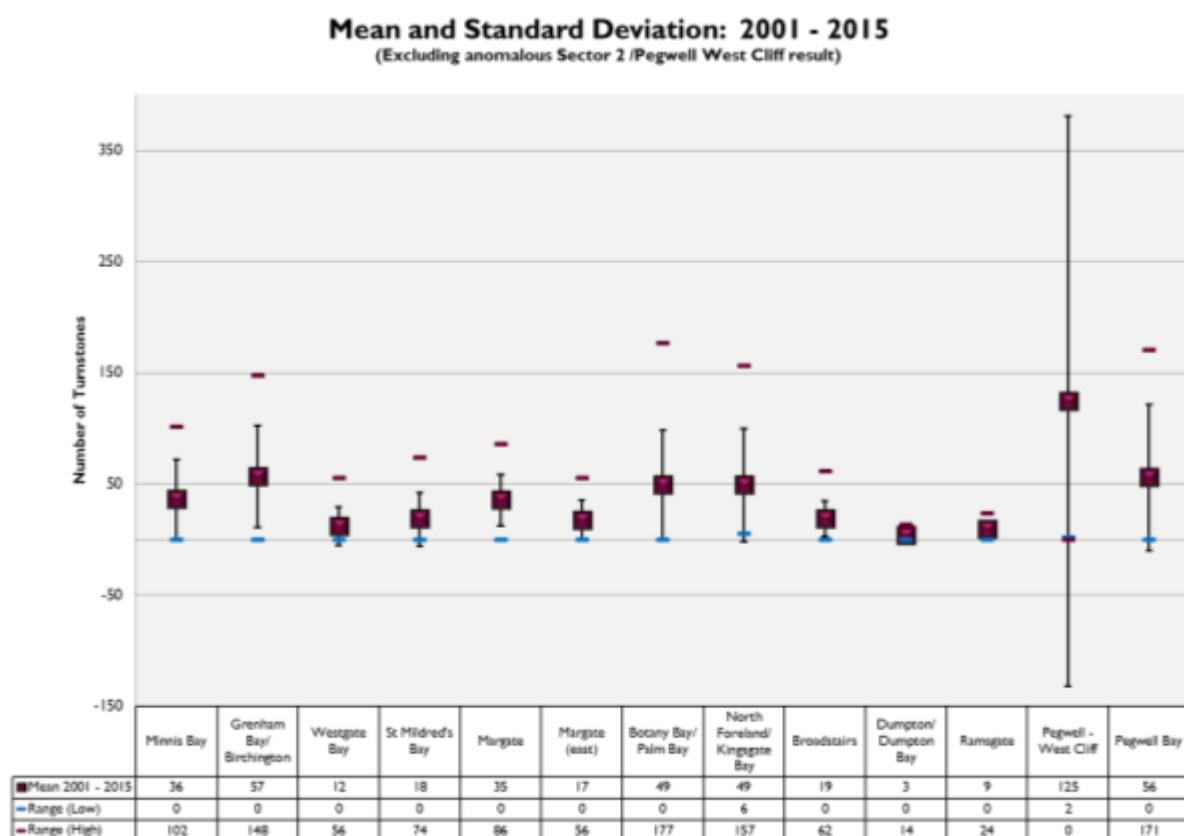


Figure 3: Turnstone Survey Results 2001-2015, Excluding Anomalous Sector 2 Result (2010)



The data reveal the high variation in the Turnstone numbers recorded since 2001. However, some general observations can be made:

- The numbers of birds recorded has declined in all sectors since 2008 or 2010, depending on the sector. The average number of Turnstones for 2008 to 2015 is lower than the average between 2001 -2010 for all sectors, apart from Pegwell Bay Westcliff (2), which is affected by the anomalously high count in 2010 (shown in Figure 7);
- Pegwell Bay (1) and Pegwell Bay Westcliff (2) have consistently been a stronghold for Turnstone. However the numbers recorded show high variation. Until 2006 sector 1 held more birds, but since 2006 the numbers have declined. Sector 2 now holds more birds but (apart from the anomalous result previously described) the total for the bay has declined overall (shown in Figure 4);
- North Foreland (6) and Botany Bay (7) around Foreness Point had previously been a stronghold for the birds, but again numbers have decreased since 2010 (shown in Figure 5);
- Plumpudding Island (14) had also historically been a sector with a high number of birds. Again, numbers have declined since 2008 (shown in Figure 6);
- The numbers in the Grenham Bay/Birchington sector (12) have a similar average between 2001-2008 and 2010-2015. In 2014 in particular, this sector held a high proportion of birds across the SPA, particularly in Epple Bay.
- There have been consistently low numbers recorded in Dumpton (4) and Ramsgate (3) since 2001;
- Recorders have observed a general movement towards the western part of the SPA, with no sectors to the east of Westgate Bay holding more than 10% of birds in the last three co-ordinated counts.

Further commentary for each of the sectors was made in the 2014 survey. This reveals how the numbers recorded in the 2014 count compared to the average to that point since 2001, see Table 2. It is noted that although the numbers recorded in 2014 were below average for several sectors, this is in the context of a general decrease. There was no detailed commentary made for each sector in the 2015 survey.

Figure 4: Pegwell Bay Bird Counts 2001 – 2015

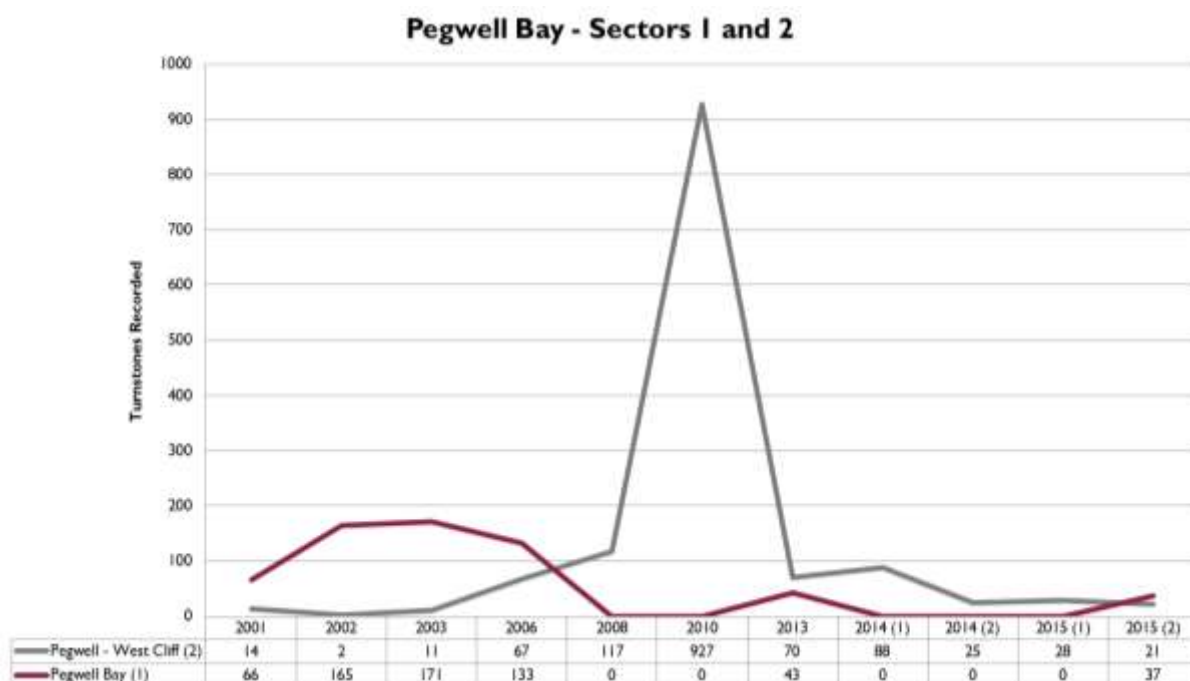


Figure 5: Botany Bay and North Foreland Bird Counts 2001 -2015

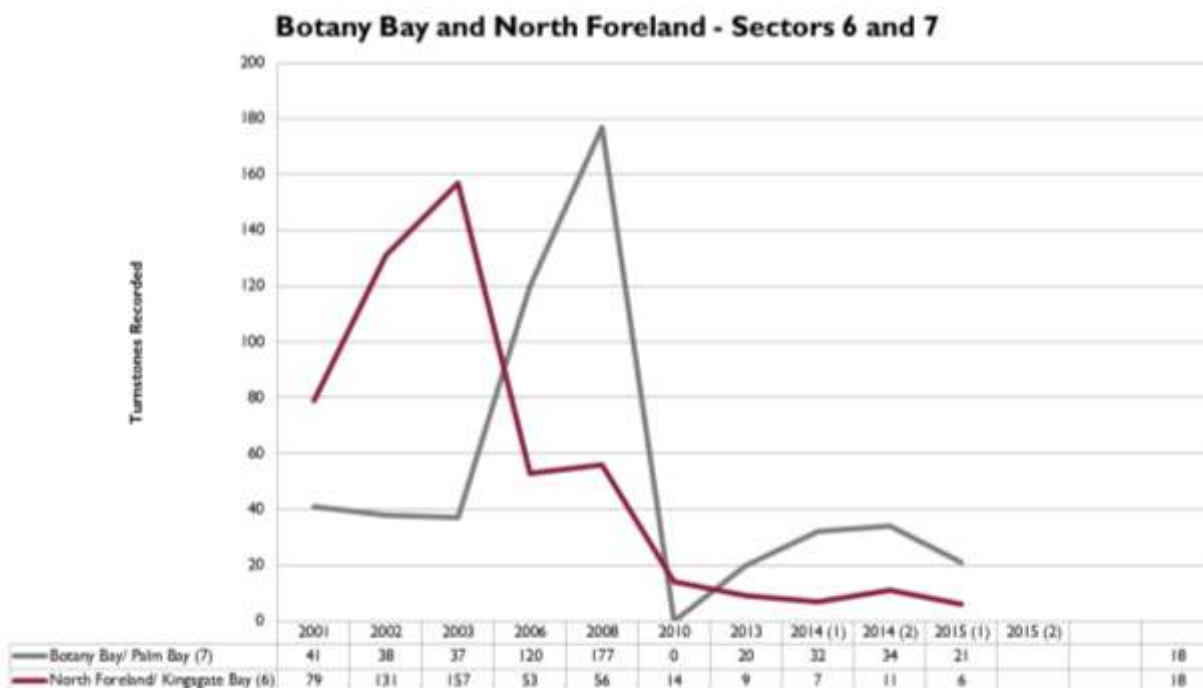


Figure 6: Plumpudding Island Bird Counts 2001 – 2015

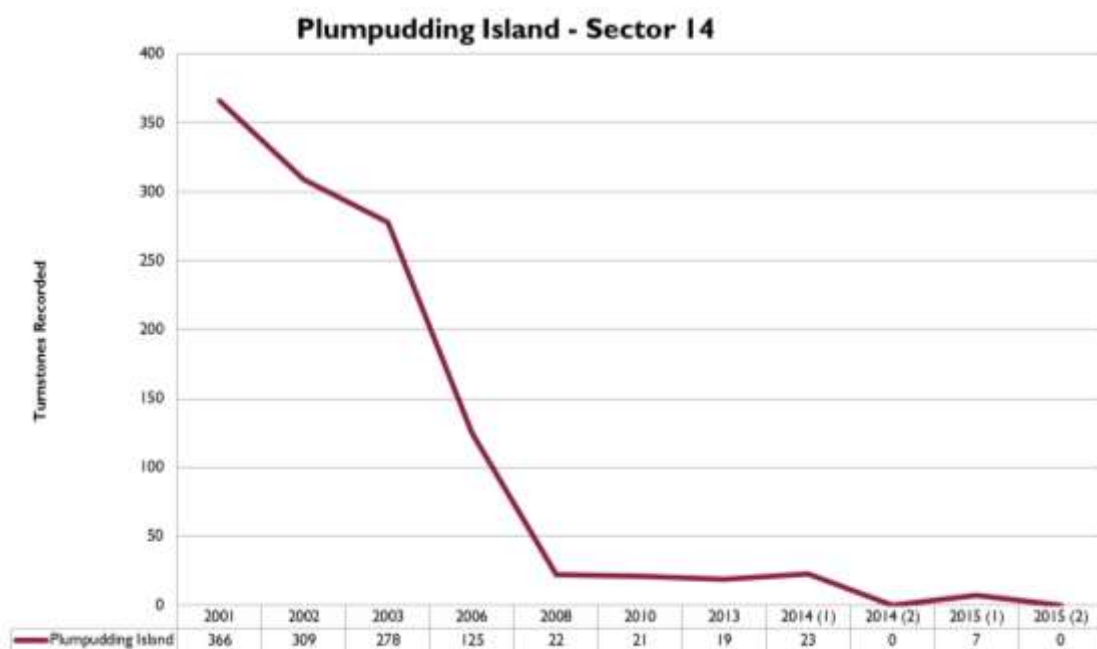


Figure 7: Average Counts 2001 - 2008 and 2010 - 2015

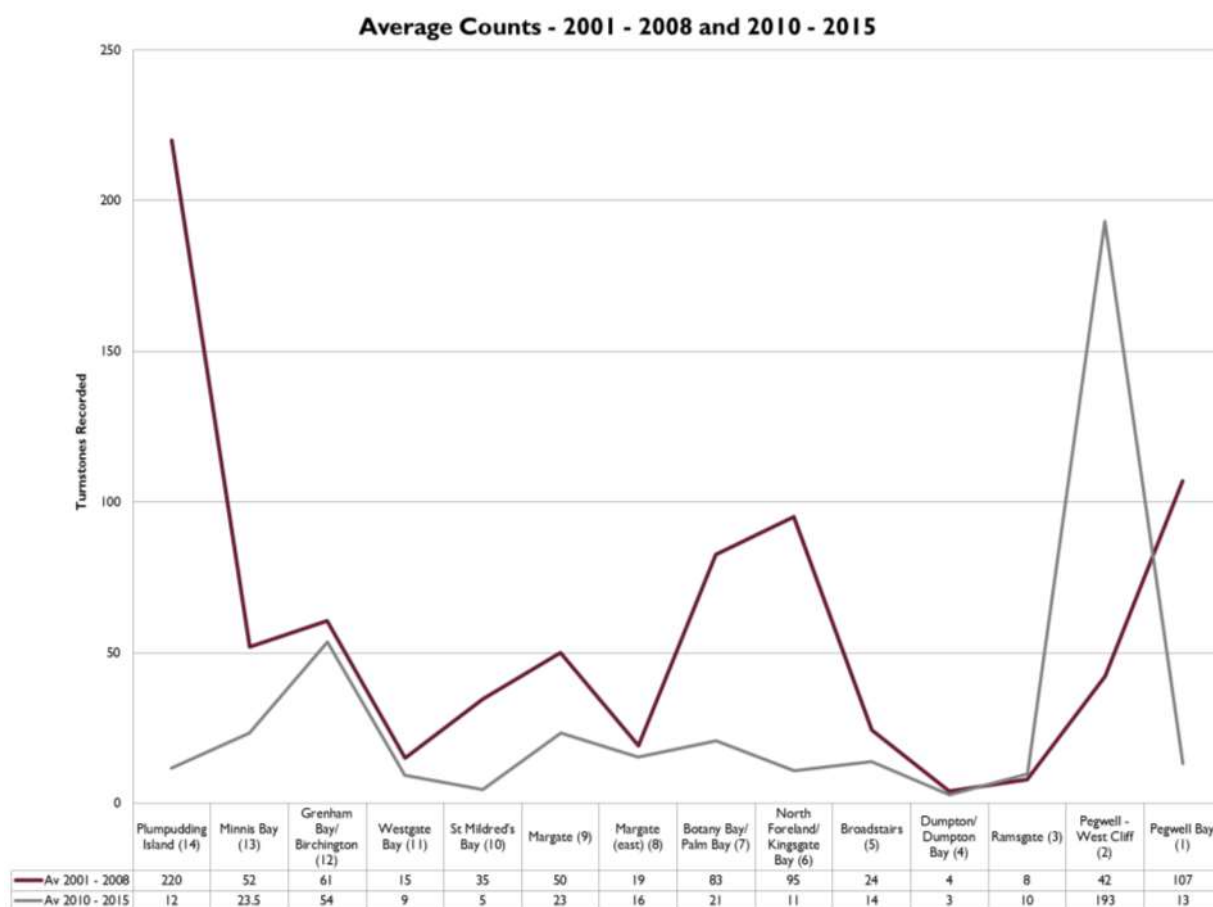


Table 2: Commentary on 2014 Turnstone Numbers

Sector	Name	Commentary 2014 Turnstone Survey
15	Coldharbour/ Reculver East (partly in Thanet)	Numbers were significantly below average for this sector, although numbers have steadily decreased since 2001 to levels more in line with those found this winter.
14	Plumpudding Island/ Coldharbour	Numbers were significantly below average for this sector, although numbers have steadily decreased since 2001 to levels more in line with those found this winter.
13	Minnis Bay	Well below average
12	Grenham Bay/ Birchington	Numbers found were consistently higher than average.
11	Westgate Bay	Not surveyed.
10	St Mildred's Bay	The numbers found were fractionally below average for this section.
9	Margate	Numbers found in this section were slightly above average.
8	Margate (east)	Numbers were found to be above average, but well within the range recorded for this sector in co-ordinated counts between 2001 – 2013.
7	Botany Bay/ Palm Bay	Numbers in this sector were lower than the average of the co-ordinated counts between 2001 – 2013, but in line with generally low numbers recently evident at the eastern end of the Thanet SPA.
6	North Foreland/ Kingsgate Bay	These numbers were well below average, but in line with the downward trend apparent from the previous four co-ordinated counts.
5	Broadstairs	Numbers were below average for this section.
4	Dumpton/ Dumpton Bay	This is a sector with historically low numbers and the result is in line with previous surveys.
3	Ramsgate (harbour and beach)	Numbers were found to be slightly below average.
2	Pegwell – West Cliff	Numbers were found to be slightly below average.
1	Pegwell Bay	No birds were found on either visit. On the first visit activity from dog walkers and a kite surfer would have disturbed any birds likely to have been present, though no disturbance was evident during the second visit. The accretion of the saltmarsh in this section has rendered it much less suitable than previously and high levels of disturbance almost certainly mean that the majority of Turnstones roosting in Pegwell Bay will use Sector 2.

Description of Sectors

Coldharbour/Reculver East (sector 15)

Summary:

- Numbers of Turnstones have steadily decreased since 2001;
- Disturbance by dogs recorded in all surveys;
- No houses in proximity but busy due to access from Reculver.

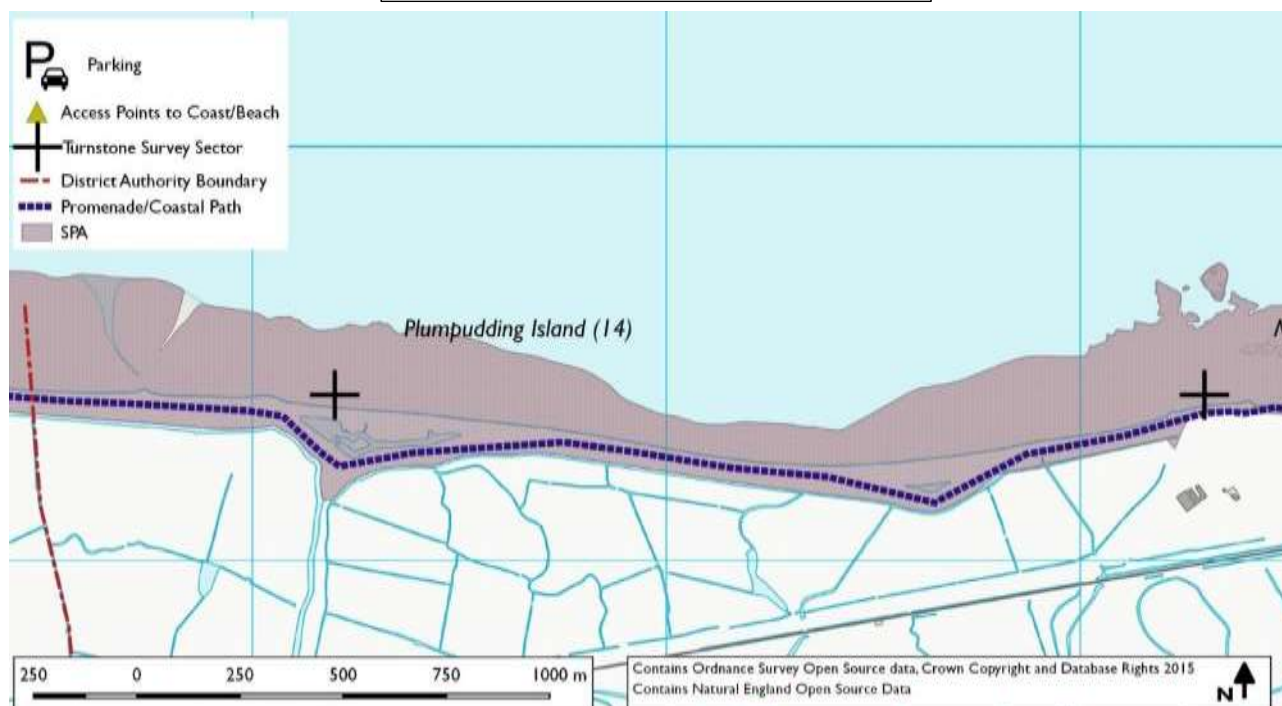
Plumpudding Island (sector 14)

Summary:

- Has one of the highest numbers of Turnstone recorded, but numbers are highly variable and have declined since 2008;
- Roost recorded at Plumpudding Island;
- Numbers in 2014 and 2015 well below average.
- No houses in proximity but busy due to access from Reculver;
- Cycling permitted, popular link between Minnis Bay and Reculver.



Sectors 15 and 14



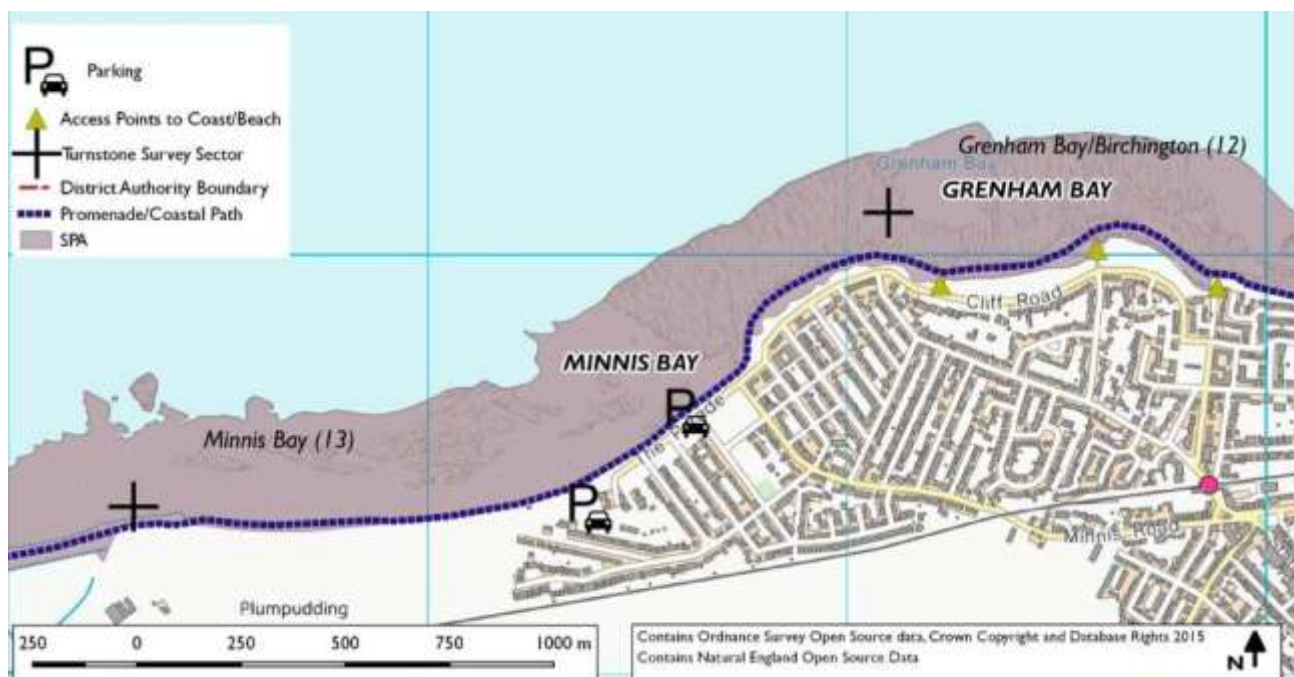
Minnis Bay (sector 13)

Summary:

- Minnis Bay popular seaside location with open bay, popular with dog walkers;
- Cliffs to the northeast of sector, with promenade running below the cliff;
- Numbers of Turnstone below average in 2014 survey;
- Held over 10% of Turnstones in 2015 survey;
- Disturbance by dogs recorded in all surveys.



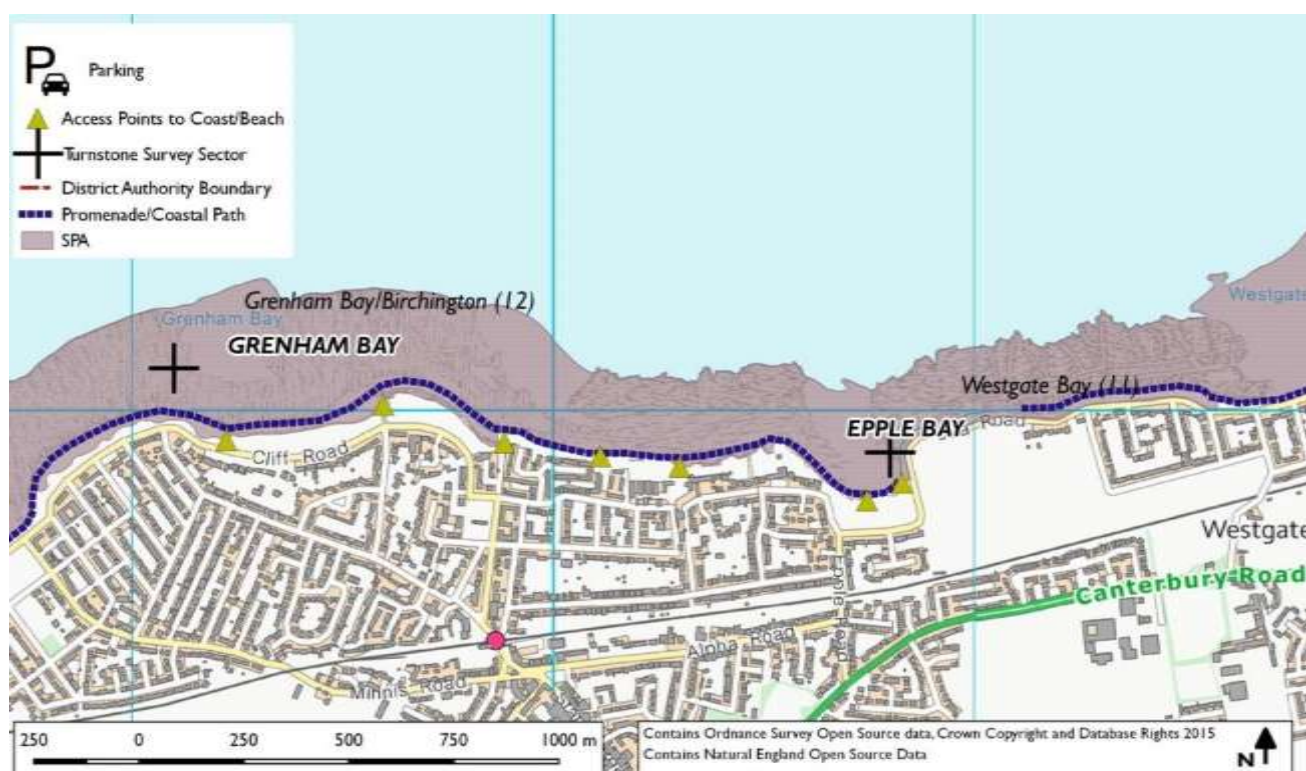
Minnis Bay



Grenham Bay/Birchington (sector 12)

Summary

- Averages for 2001-2008 and 2010-2015 similar, although there is variation of Turnstones recorded in individual years;
- In the two 2014 surveys, this sector held over 10% and over 20% of birds;
- Epple Bay is a small, sheltered bay, which in some years holds high numbers of birds both feeding and roosting;
- The urban area of Birchington is in close proximity to the coast;
- There is a promenade along the cliff base between Minnis Bay and Epple Bay;
- There are areas of clifftop greenspace along this section adjacent to Cliff Road and at Epple Bay, but this is unfenced and therefore less suitable for safe dog exercising;
- There is no other greenspace in close proximity for these residents;
- There are several access points through the cliff onto the promenade.



Westgate Bay (sector 11)

Summary:

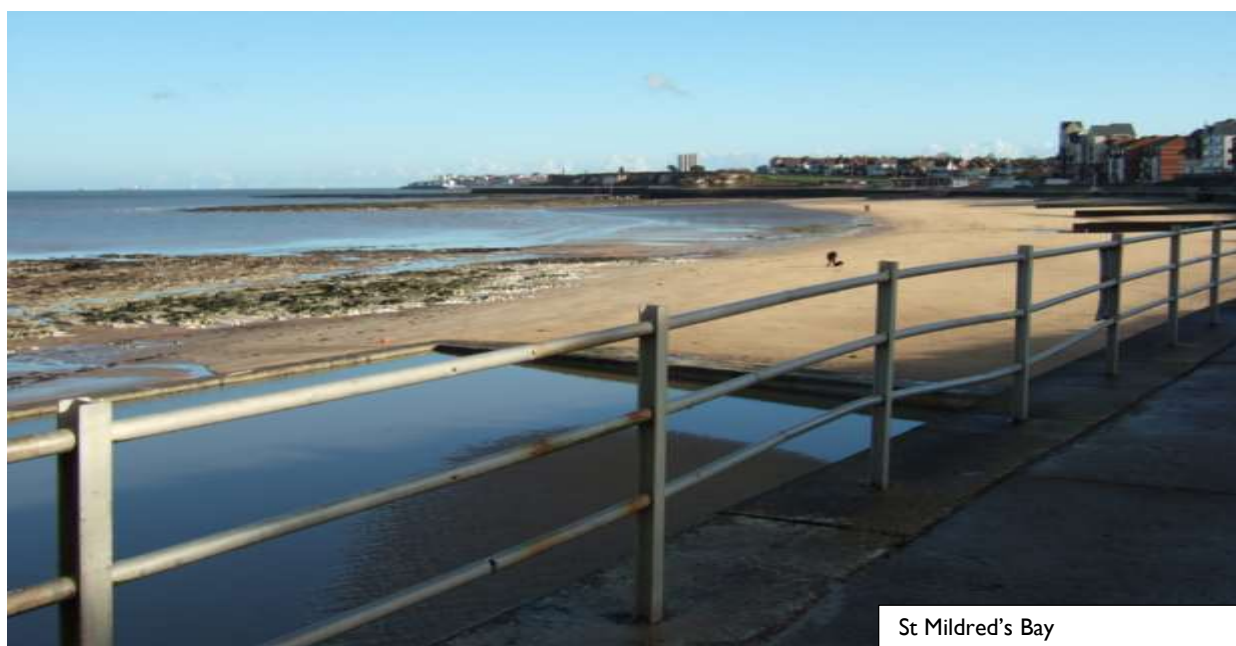
- Popular sandy bay, with cliffs to east and west of the beach;
- Variable numbers of Turnstone. Although in some years no Turnstone were recorded, in others roosts of 40-50 birds have been recorded;
- The promenade ends at Epple Bay before restarting at Westgate Bay;
- There is no access to the promenade through the cliffs, with the next access point at Westgate Bay;
- There is a spur to the promenade heading west back towards Epple Bay, which is a dead end. There may be potential to restrict access to this section during the winter.



St Mildred's Bay (sector 10)

Summary:

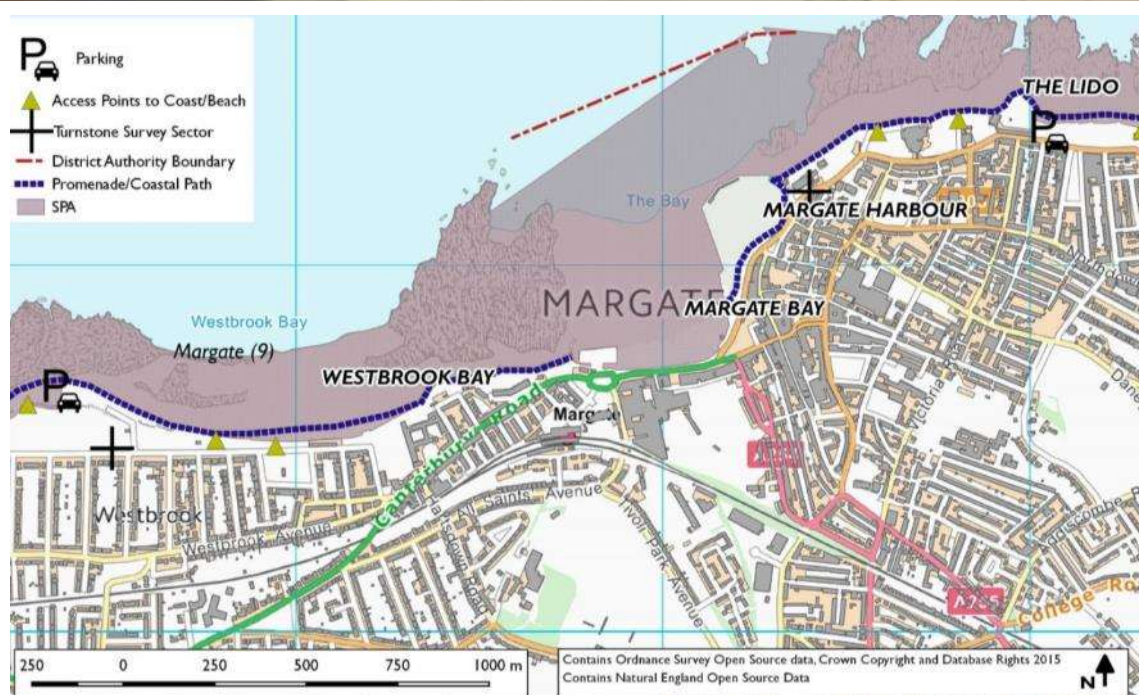
- Generally low numbers of Turnstone in recent years, but has been as high as 74 (2003), 51 (2001) and 41 (2008);
- Urban area in close proximity to the coast;
- Promenade along cliff base with sandy beach at St Mildred's Bay;
- There are areas of clifftop greenspace along this section adjacent to Sea Road and Royal Esplanade, but this is unfenced and therefore less suitable for safe dog exercising;
- There is no other greenspace in close proximity for these residents;
- There are several access points through the cliff onto the promenade.



Margate (sector 9)

Summary:

- Generally around 50 Turnstones in this sector, particularly favouring feeding on the seaweed of Margate harbour;
- Also includes Westbrook Bay;
- Busy and main tourist beach close to main urban area of Margate;
- Promenade at cliff base around Westbrook Bay;
- New flood defence scheme at Margate harbour may bring visitors in closer proximity to Turnstones in the harbour;
- Key sector for information and education as high footfall for visitors.



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Margate (east) (sector 8)

Summary:

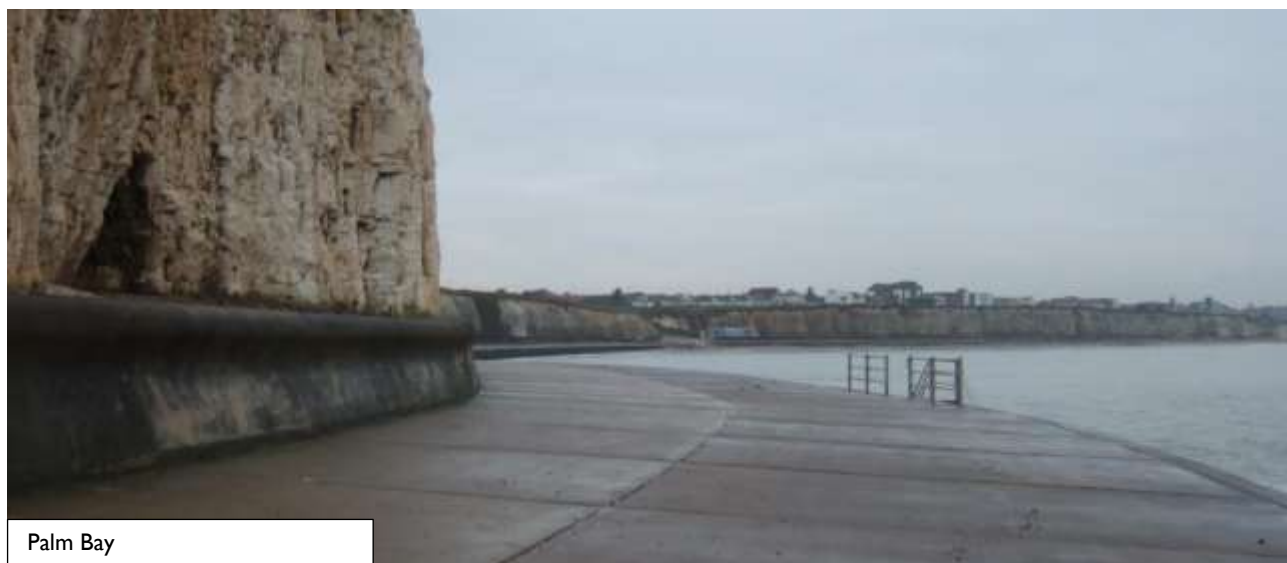
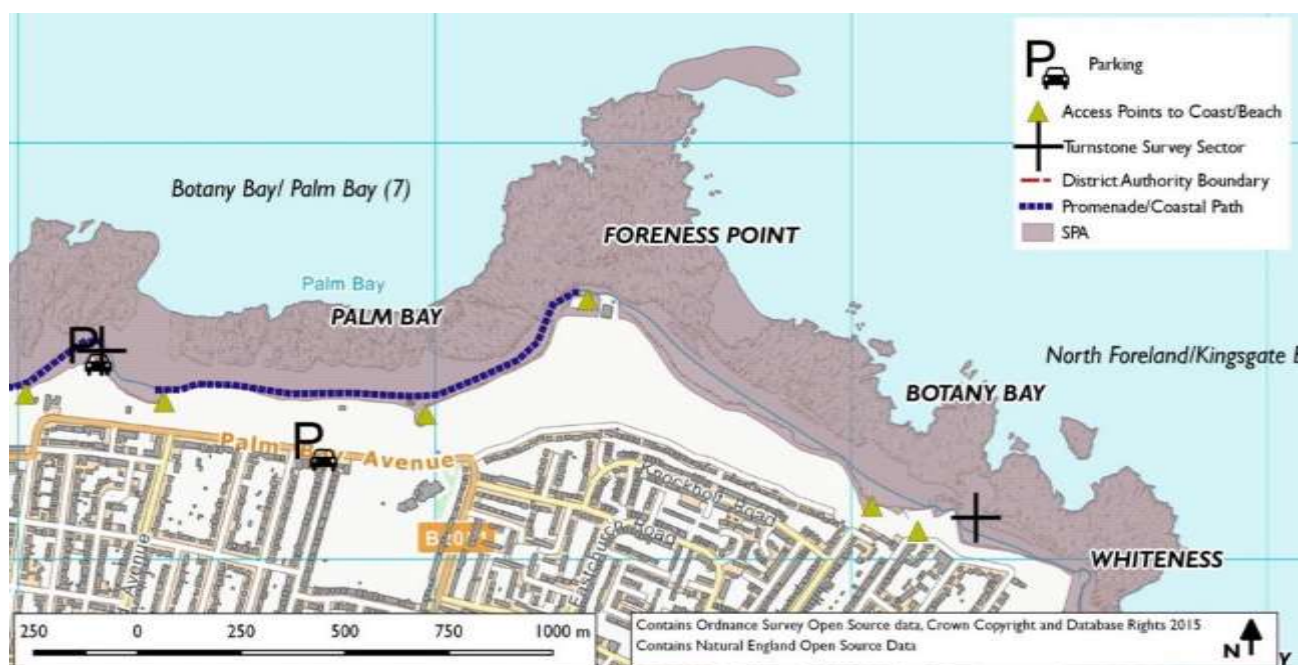
- Promenade along entire sector;
- Many access points from cliff and adjacent to extensive urban area of Margate and
- Average of 17 Turnstones in this sector, with as many as 56 (2006);
- Turnstones distributed throughout sector with movement within sector.



Botany Bay/Palm Bay (sector 7)

Summary:

- This sector includes Foreness Point, which was once one of the most important sectors for Turnstone;
- Two roosts were recorded around the Point;
- Numbers reached a peak in 2008 with 177 birds, falling to zero in the subsequent count in 2010;
- Although there is a promenade only on the western side, the Point is not secluded with walkers also reaching the point from Botany Bay;
- There is a footpath entrance directly on the Point and a new informal access point has been worn by visitors midway between Botany Bay and the Point;
- Close to extensive residential area;
- Extensive grassed area on the cliff top has potential to be made more attractive for dog exercise as it is adjacent to quiet roads and already partly hedged.



Palm Bay

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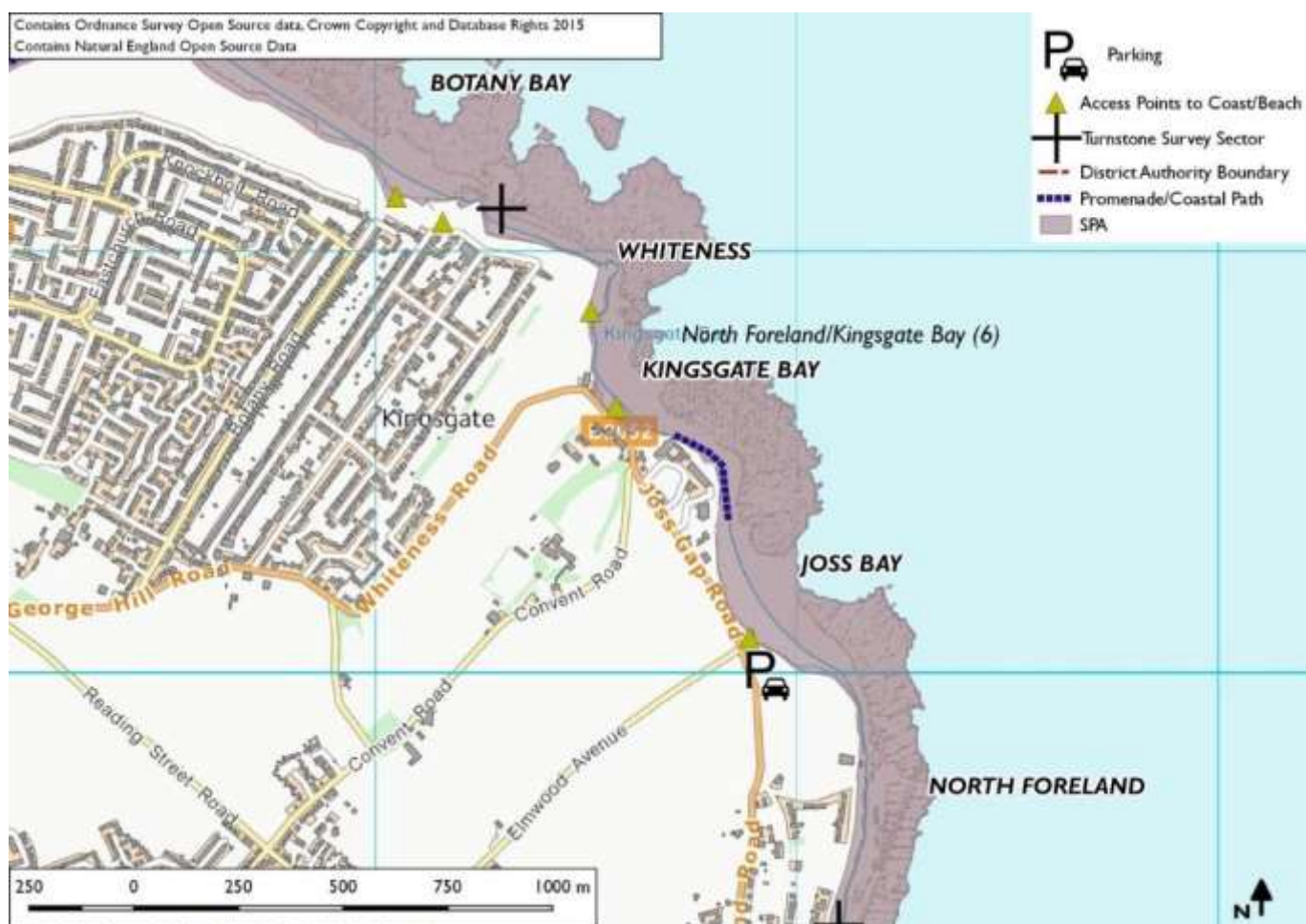


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North Foreland/Kingsgate (sector 6)

Summary:

- Another formerly important sector for which Turnstone numbers have declined (a maximum of 157 in 2003, with an average of 10 per count in 2014-2015);
- Four roosts recorded in this sector 2002;
- Joss Bay popular summer beach;
- There are fewer houses in proximity to the coast in this section;
- To the south of Joss Bay there is no promenade and no access points from the cliffs above, making this one of the few stretches of coastline where access to the beach is limited.

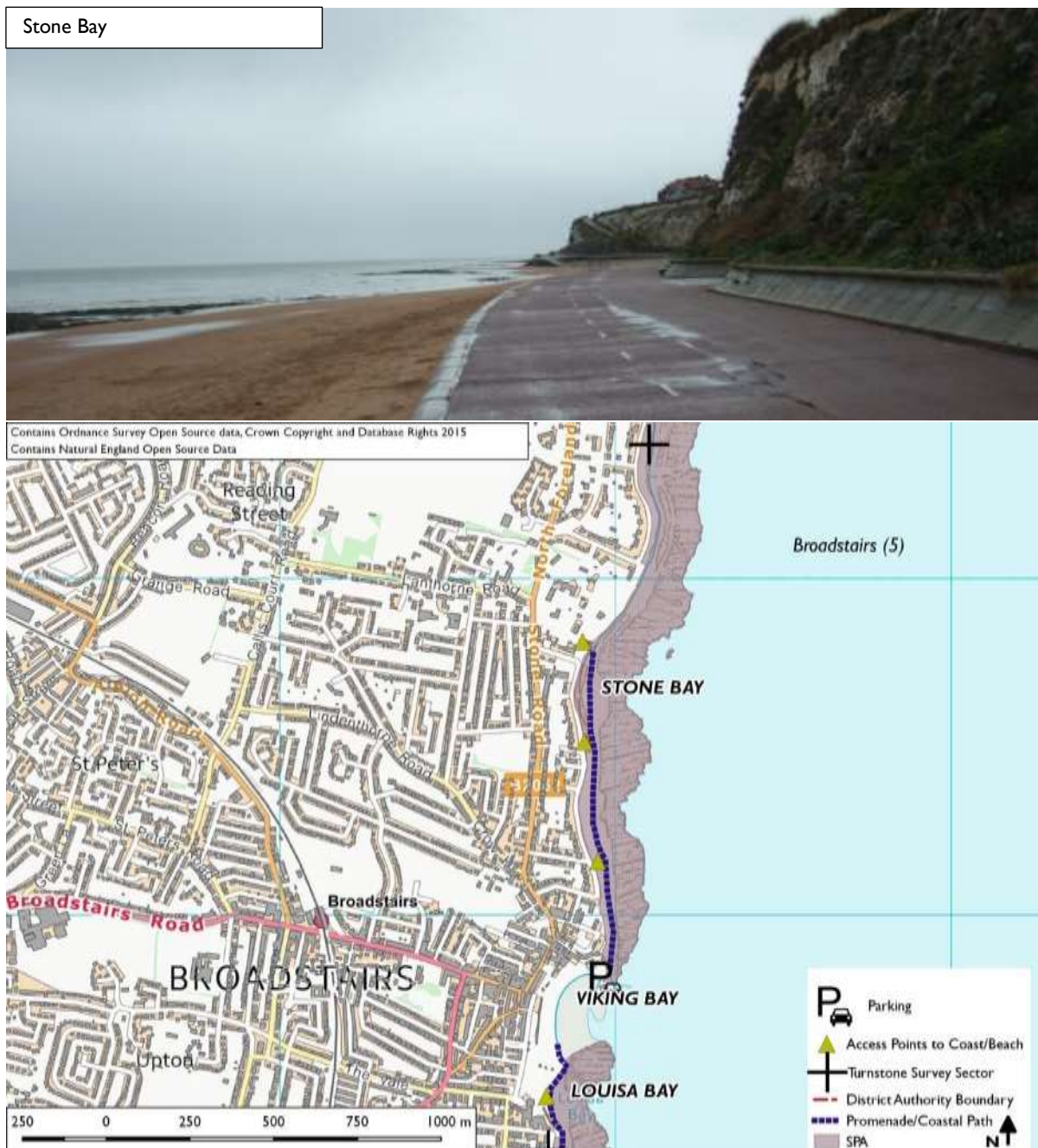


Broadstairs (sector 5)

Summary:

- There is no access points onto the beach at the northern extent of this sector, until Stone Bay;
- Access on a promenade from Stone Bay to Broadstairs Harbour and beyond to Louisa Bay;
- Turnstone numbers variable, with the highest 62 in 2008, but an average well below this (19);
- Birds occur around the harbour at Broadstairs (Viking Bay), although outside of the SPA.

Stone Bay



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Dumpton/Dumpton Bay (sector 4)

Summary:

- Historically this sector has contained low numbers of birds in all surveys since 2001.



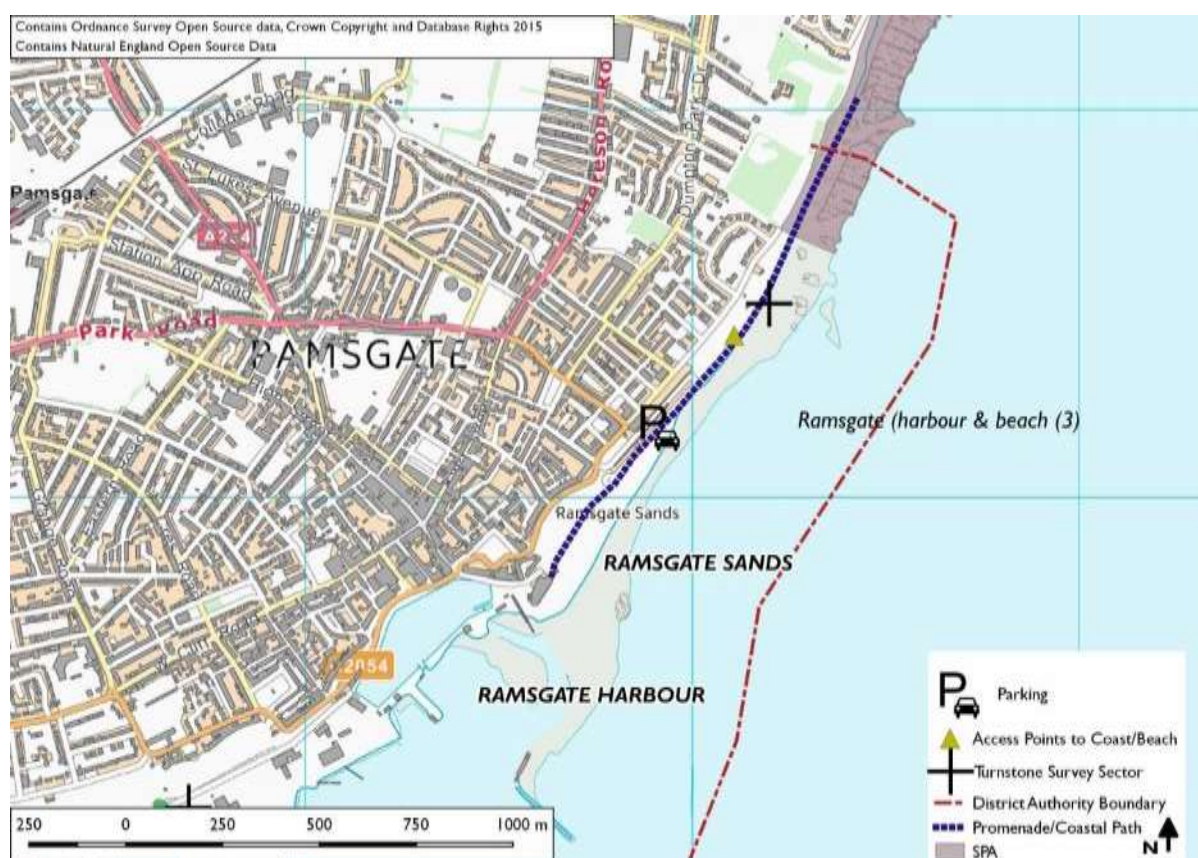
Dumpton Bay



Ramsgate (harbour and beach) (sector 3)

Summary:

- SPA ends to the north of Ramsgate sands;
- Typically low numbers of birds in all surveys since 2001 (maximum 24 in 2006);
- Birds found around harbour;
- Busy beach in summer and busy harbour.



Pegwell – West Cliff (sector 2)

Summary:

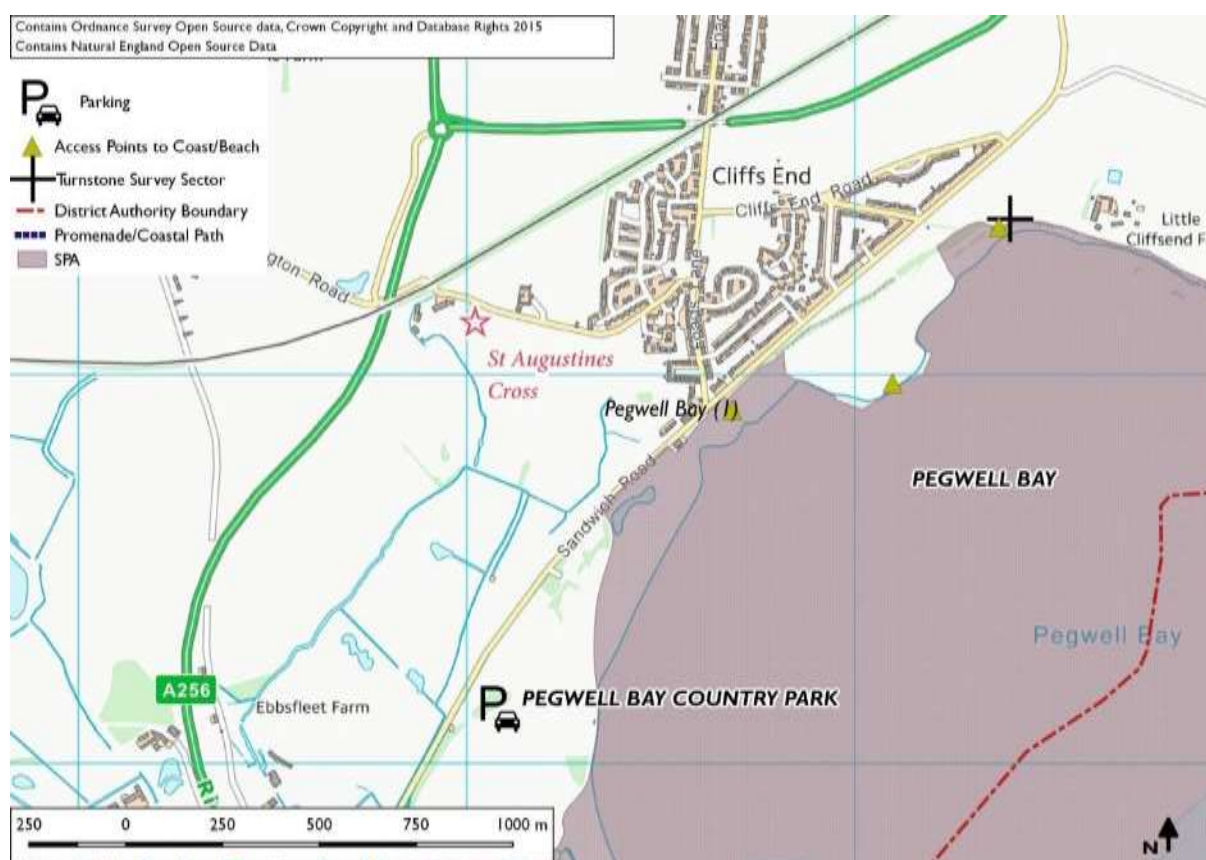
- Entire Pegwell Bay important area for many birds;
- Historically an important sector for birds and since 2006 has held more birds than neighbouring sector 1 (Pegwell Bay);
- Coastal path (footpath) along cliff top past Little Cliffsend Farm, which will also be the route of the All England Coastal Path;
- Spreading room for All England Coastal Path (due to come into force in 2016) on foreshore, with a dogs on leads restriction being implemented;
- Other access points from former hoverport access road and informal access below Pegwell Road.



Pegwell Bay (sector I)

Summary:

- Entire Pegwell Bay important area for many birds;
- Historically an important sector for birds but since 2006 has held more birds than neighbouring sector I (Pegwell Bay);
- Pegwell Bay Country Park an important draw for visitors and an important resource for dog exercise;
- Access points from the former hoverport and behind petrol garage;
- Sustrans route and paths follow the edge of saltmarsh.



Summary of Issues Relevant in Formulating the Strategy

Access to the countryside and coast is important and brings many benefits to health and well-being. Mitigation measures may reduce or limit access to certain area, but the overall aim is to maintain a recreation experience and not to put recreation and wildlife into conflict.

A range of measures may be employed to mitigate negative impacts from recreational disturbance. These can include habitat interventions, access management, engagement with or enforcement action of site visitors and both on and off-site measures. Not all of these measures will be suitable, effective and therefore applicable in all scenarios. A range of measures have been considered in relation to the specific issues of the section of the coastline of Thanet Coast and Sandwich Bay SPA covered by this strategy.

The available evidence base and visitor surveys were reviewed and site visits carried out to observe activity at the sites. From this, the key issues that are of particular relevance to this coastline and strategy are:

- Turnstone disturbance including:
 - Distribution of Turnstone over-wintering feeding sites and roosts;
 - The proximity of visitors and disturbance to Turnstone areas;
 - The availability of 'refuge' areas for Turnstones;
- Visits with dogs;
- Visitor awareness and behaviour;
- Visitor access;
- High visitation sites;
- Cross-boundary issues;
- Sustainability.

Co-ordinated Implementation with the All England Coastal Path

Natural England has a statutory duty under the Marine and Coastal Access Act 2009 to improve access to the English coast. The duty includes securing a long-distance walking route around the whole coast, known as the England Coast Path.

The coastline has been divided into sections for this purpose. The Thanet coast is included in two of Natural England's England Coast Path sections; Folkestone to Ramsgate and Ramsgate to Whitstable.

There are already a number of access routes along the Thanet coast, including the Thanet Coastal Path which runs between Ramsgate and Birchington and the Viking Coastal Trail cycle way which forms part of Regional Cycle Route 15.

With regard to European sites, a Habitats Regulations Assessment was carried out on the England Coastal Path proposal. It was concluded that the proposals will not have a likely significant effect on any of the qualifying features of the European site, either alone or in combination with other plans or projects.

In reaching this conclusion Natural England identified specific measures which they considered would be necessary in some places on the coastal stretch to prevent any likely significant effect on turnstone population within the Thanet Coast and Sandwich Bay SPA and Ramsar. These proposals include:

- Information at key locations to highlight the presence of Turnstone roosts, where they occur near the trail;
- A short section of fencing and further signage at two locations along the Northern Sea Wall;
- A number of measures around Sandwich and Pegwell Bay, considered necessary to prevent impacts on important populations of wintering, passage and breeding birds as well as mammals which are known to be sensitive to disturbance by people and dogs.

These measures will include the siting of information signboards at points along the Thanet coast. The boards will convey messages regarding the protection of wildlife interests and in Pegwell Bay they will include information on access rights.

It is likely that the mitigation plan will include interpretive and informative signage along the coast. Other organisations may also be developing their plans for signage along this coast.

In planning informative and interpretive signage along the Thanet coast it is important to consider the effectiveness of the message on the visitors. Accordingly a coordinated approach should be taken to the development of the messages and the implementation of signage plans along the Thanet coast. This will ensure that key messages are conveyed in ways which are the most appropriate for the visitors. In addition a joint approach may also provide better value for money as it will reduce the likelihood of duplication.

Disturbance of Qualifying Species

There is a body of evidence, that walking with dogs, particularly in the intertidal area, close to roosts at high tide and with dogs off leads are the most common disturbance stimuli. It is also this recreational activity which occurs in the highest volume and which is most likely to increase with increased housing. It is this recreational activity which is, therefore, considered as the primary activity for mitigation within this strategy. Other recreational activity which has been shown to disturb coastal birds, such as kitesurfing and other watersports, should be monitored as part of the visitor monitoring approach.

The factors listed are of particular importance in relation to Turnstone as data for this species, both for population characteristics and disturbance, are more readily available and this species occurs along the entire length of the coastline. It is considered that Golden Plover on the coast will also be adequately protected through the mitigation measures outlined as they also over-winter on the coast and will be disturbed by the same activities. Any issues which need to be addressed on inland functional land for this species are beyond the scope of this SAMM.

Important factors to consider:

Distribution of Turnstone over-wintering feeding sites and roosts: Although several important roost sites have been identified, Turnstones are not solely confined to these discrete areas. The roosts are also liable to change and the surveys have shown that the numbers both at previously identified roost sites and in any given sector can vary considerably.⁵⁷ Therefore a mitigation approach is required to reflect this variable distribution, being flexible to adapt to the locations of the Turnstone in any given year and due to varying conditions;

The proximity of visitors and disturbance to Turnstone areas: For much of the coastline of Thanet District the promenade is, quite obviously, close to the beach. At high tide the sea is virtually at the promenade in some sectors. This brings Turnstones very close to users and potential disturbance stimuli;

The availability of 'refuge' areas for Turnstones: The entire coast is accessible. Apart from a the coast between Joss Bay and Stone Bay, which is accessible but does not have direct access points from the cliff top or a promenade, there is easy access to all of the coastline (see Plans in previous section detailing access points and location of promenade for each Turnstone survey sector). Any areas where there is not a promenade are areas where refuge could potentially be sought, but this is limited to the Joss Bay to Stone Bay section.

Visits with Dogs

Surveys of coastal visitors show that visiting to walk dogs is a popular activity.

In the 2014 winter visitor survey undertaken for Canterbury City Council, over half of all visitors surveyed were accompanied a dog and over half cited dog walking as the main reason for their visit. Of the latter group, over half stated that 'close to home' was the most influential factor in their choice of location, followed with the 'ability to let the dog off the lead.'⁵⁸ Over 80% of regular visits,⁵⁹ i.e. at least once per week, are made to walk the dog. Further, 17% of dog walking visits included walking on the beach.

In the 2012 Dover District Council survey (winter), 60% of respondents were accompanied by a dog and 57% of those interviewed at Pegwell Bay Country Park stated that dog walking was their main reason for visiting. In the 2011 Dover District Council survey (winter), 56% of respondents were accompanied by a dog, with 87% of people interviewed at Pegwell Bay Country Park stating they visited the site specifically to let their dogs off the lead.

A recent report of a survey of Turnstones⁶⁰ concluded that the disturbance of Turnstone roosts by dogs would need to be addressed in any disturbance avoidance measures implemented in future. The report went on to recommended signage and interpretation as a means of informing beach users about the Turnstones and helping to reduce disturbance incidents, backed-up by frequent contact with on-site personnel in order to minimise future disturbance.

⁵⁷ Also demonstrating the need for a cross-boundary approach.

⁵⁸ Although this was the main choice for only 13% of this group.

⁵⁹ 83.5%.

⁶⁰ Hodgson, I., (2013), Thanet Coast Turnstone (*Arenaria interpres*) Monitoring, Sandwich Bay Bird Observatory Trust.

At present there are no restrictions to dogs in force along the Thanet coast during the winter months when Turnstones are present. As part of the mitigation strategy it is likely that dogs will need to be restricted along stretches of the Thanet coast, either by introducing dogs on lead requirements or exclusion. Opportunities will therefore need to be taken to support dog owners in terms of education, information and in providing alternative sites where dogs can be exercised freely.

In particular, free-to-access visitor sites along the coast are likely to become more popular with dog owners in exercising their dogs.

It is important to take a strategic approach to the provision of information and dog exercise facilities, in order to anticipate and prevent displacement activity from existing stretches of coastline to particular sites.

Pegwell Bay Country Park is identified as a key site for dog walkers. This site provides an ideal alternative to the coast as dogs are contained within the Country Park. It is also a good entrance point to the coast from where to inform and educate dog owners about the reasons for restrictions regarding over-wintering birds. It is crucial for sites such as Pegwell Bay Country Park to provide this range of services for dog-owners and for the capacity of the park to accommodate more dog walkers to be improved. This needs to be achieved whilst retaining the park's growing attraction for families. Investment in the site is required to extend capacity for dog walkers, to educate them and to minimise conflict with other visitors.

Visitor Access

The Canterbury City Council visitor survey (2014) indicated that a significant proportion of regular visitors who arrived on foot lived close to their destination in the SPA; 90% lived within 1.8km and half lived within 0.5km across all sites. A large proportion of all regular visitors were walking a dog. Almost half the visitors indicated that proximity to home was the factor that had the most influence over their choice of site to visit and dog walkers in particular selected locations based on their proximity to home.

The responses from dog-walking visitors, when asked if they would consider using an alternative open space inland from the coast, indicated that a new dog walking site could draw somewhere between 15% and 78% of local dog walkers. To be successful the site would need to be safe for the dog, where the dog can be off the lead and be considered by dog-owners to be safe and attractive for their dogs.

A review of greenspace near to the coast shows limited availability of such spaces for recreational use in Thanet District. Although there are areas of cliff top greenspace this is unfenced and therefore currently not suitable for off lead dog exercise. There are few parks in Thanet District and, as previously outlined, only one country park, located at Pegwell Bay.

To help support and complement the specific mitigation measures new developments must also include sufficient and appropriate on site green infrastructure to meet development contributions needs. Although it is unlikely that the coastal experience can be replaced by open space provision on development sites, some pressure relief maybe provided by provision of onsite locally accessible recreation and dog walking space. It is therefore important to ensure that new open space is provided for residents in close proximity to homes at the strategic Local Plan sites within the zone of influence. Such open space should provide multiple benefits delivering biodiversity gain,

contributing to sustainable development and quality of life and to seek to create new links to the non-designated countryside via the public rights of way network.

The Thanet District public open space strategy is currently undergoing revision and provides an opportunity to assess more fully open space requirements and provision to complement this strategy.⁶¹ Any future green infrastructure strategy would also help to identify needs and potential delivery mechanisms for greenspace. This could be further supported through an East Kent wide approach to green infrastructure planning.

Cross Boundary Issues

The Thanet Coast and Sandwich Bay SPA also includes most of the Canterbury District coastline and continues into Dover District at Sandwich Bay. There are similar issues arising from recreational use in many parts of the SPA.

A mitigation approach for Thanet District developed in isolation could have the potential to place additional recreational stress on the adjoining parts of the SPA in Thanet or Dover district. In particular, as a result of proposals that may affect visitor access there is a risk that visitors may be displaced from one part of the SPA to another. A mitigation plan for the SPA ideally requires strategic joint working by both the affected Local Authorities and working with Dover District Council and others on a Green Infrastructure Strategy for East Kent as a whole.

It is therefore proposed that the project be coordinated strategically across local authority boundaries. Canterbury City Council is also working with its neighbouring local authorities to the east of its boundary on the development and implementation of the Thames, Medway and Swale Estuaries Strategic Access Management and Monitoring Strategy.

Sustainability

Mitigation measures will need to work in perpetuity, as long as the issue requiring mitigation remains and, therefore, there is a need to take a sustainable approach to the funding of mitigation measures.

It is difficult to be confident of how the coastline, the number and distribution of birds, access patterns and other factors may change over time. To address this, any mitigation package needs to monitor and evaluate changes and be flexible and adaptive in responding to these changes. Accordingly surveys of visitors and bird populations will be carried out at regular intervals to provide baseline information and to help measure the benefits of mitigation actions.

This SAMM has determined the level of financial contribution required from new residential development, based on the current information. In order to ensure it remains effective, it is proposed that this SAMM is reviewed after a period of no more than ten years or if monitoring of bird and visitor numbers highlights issues that are not being addressed by the current SAMM.

⁶¹ Draft Open Space Strategy for the Thanet District 2014 to 2019.

Evaluation of Potential Mitigation Approaches

Table 3: Potential Mitigation Approaches and Suitability

Key to Suitability/Actions (see table)

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 within this strategy.	Recommended to be taken forward as a mitigation measure.
Mitigation Approach	Examples of Measures	Commentary	Suitability/ Actions
Habitat management/ creation	Artificial roost sites, creation of feeding areas.	Not suitable for these species.	Not suitable.
Planning Measures	Locate development away from sensitive sites through a development exclusion zone.	Not practicable in this case for reasons outlined previously.	Not suitable.
	Provision of Suitable Alternative Natural Greenspace (SANG) to draw visitors away from sensitive sites.	Effectiveness in displacing coastal visits is unproven, however the results of the visitor survey indicated there may be willingness for some dog walkers to visit alternative sites if provided. ⁶² Provision of SANG alone unlikely to be proven to be sufficiently effective as a mitigation measure, but provision of greenspace in and around new development could in reality deflect a proportion of coastal visits.	Ensure greenspace of sufficient size and quality to attract users is provided for in new development, following best practice. ⁶³ 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.
Management / deflection of visitors off-site	Management of visitors on adjacent land.	Pegwell Bay Country Park key site which will need to accommodate more dog walkers. Infrastructure, signage and education improvements required to ensure the site can accommodate increases in dog walking visitors.	Infrastructure, signage and education improvements at Pegwell Bay Country Park.
		There is limited opportunity to manage visitors on adjacent land. For most of this coastline the adjacent land is urban. There are some areas of clifftop greenspace but this would require substantial infrastructure works to make this attractive and suitable for safe dog exercise. The lack of alternative greenspace in the district is likely to be a contributory factor in the attractiveness of the coastline for access, alongside the inherent attraction of the coast in its own right. It is not possible with current data to understand the relative importance of these drivers in the choice of dog walkers to use the coast for recreation.	Adjacent land is not suitable for increasing access or is urban, but some longer-term opportunities in the 'Green Gap' and at Reculver Country Park, see following.

⁶² 16% would exercise their dog at an alternative inland site, with an additional 68% responding they would perhaps/sometimes/maybe choose an alternative inland site.

⁶³ E.g. Hampshire County Council (2013), Planning for Dog Ownership in New Developments.

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Mitigation Approach	Examples of Measures	Commentary	Suitability/ Actions
	Improvement of access provision on other sites in the area.	See points above for 'SANG' and in row above on increasing access on adjacent farmland. Evidence insufficient to be considered as mitigation and delivery is long-term.	Develop robust green infrastructure and open spaces strategies to address this issue. Consider existing provision and ways to improve access to existing sites. Plan for the provision of new sites and improvement of existing sites as part of Potential for increase in provision of greenspace sites on inland urban edge in the longer term and in the 'Green Wedges' (SP20) which could help to relieve pressure on the coast.
	Management of car parking (price/location).	This may have an effect on the sites visitors use. A high proportion of overall visitors visited to Pegwell Bay Country Park visit by car (c80-90%) and therefore visitor patterns may be sensitive to changes in parking charges. There is little data on how many visitors drive to the sites for other areas of the coast. This issue needs to be considered strategically as such measures could lead to displacement to other parts of the SPA (in Canterbury or in Thanet). Further evidence required on sensitivity of visitors and likelihood of changing patterns, plus the development of a car-parking plan. Monitoring required.	Investigate likely visitor sensitivity further in future visitor surveys and as part of a strategic approach with Canterbury City Council.
	Limiting visitor numbers.	The only site where visitors could be restricted is Pegwell Bay Country Park, which would simply displace visitors to other places on the coast due to lack of alternative greenspace.	Not suitable.
Management of visitors on-site	Restricting access in some areas.	There is limited opportunity to restrict access along the seafront as access to most of this coastline access is on an open access promenade. However, there are some limited possibilities, for example to prevent access to the beach between Joss Bay and Stone Bay, to limit access to the 'dead end' of the promenade at Westgate Bay and restrict access to the beach at Plumpudding Island. Access restrictions during the October to April period may need to be considered, for example restricting dogs being off-lead or being permitted on the beach in certain areas. It is likely that this will need to be enforced.	Consider restrictions between Joss Bay and Stone Bay and promenade at Westgate Bay. Restrictions on dog access between October and April; either on-leads or prohibition.
	Routing and design of paths.	As previously outlined, limited opportunity to re-route or create new paths. May be possible to improve access within 'Green Wedges', for example in Joss Gap and consider improvements to right of way links inland and improvements and provision of sites on inland urban edge.	Consider provision and improvement of routes inland from Reculver Country Park.
	Zoning.	Zoning is most usually considered in relation to watersports. The zoning of degrees of dog 'freedom' may be required, with the greatest restrictions in the most important and/or sensitive areas.	Develop a hierarchy of restriction approaches.

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Mitigation Approach	Examples of Measures	Commentary	Suitability/ Actions
Education and Enforcement	Wardening (enforcement).	Wardening with an enforcement role is likely to be more effective in eliciting behaviour change than a purely educational/ community role alone (although both aspects are important to ensure success). Due to the limited availability of other mitigation measures, a wardening presence will need to be as effective as possible and, therefore, an element of enforcement role will be required.	Key element of the mitigation approach.
	Wardening (education).	An important element of any wardening scheme and essential to ensure compliance. Unlikely in itself to be sufficiently effective as mitigation without a supporting enforcement role.	Key element of the mitigation approach.
	Signs, interpretation, leaflets.	There is currently some signage around the coast but further work is required to ensure consistency and effectiveness of messages and to co-ordinate with other partners (National Nature Reserve, All England Coastal Path, Canterbury City Council and Dover District Council). On its own is unlikely to be sufficient to change behaviour but is an essential component of ensuring a wardening scheme is successful.	Essential to support the wardening and education programmes.
	Community and user group engagement.	A wider outreach project raising awareness of the sensitivity of the coast and the need for visitors to alter behaviour would support other measures. This would aim to alter attitudes and behaviour in the longer term but is unlikely on its own to produce the shorter term changes required. A 'Dog Project' specifically aimed at dog walkers would support the mitigation package, but this is best developed strategically across the whole Thanet Coast in conjunction with Canterbury and Dover Councils and Natural England in the development of the England Coastal Path.	Part of the wardening role should be to carry out engagement with users and the local community. Develop a community engagement and awareness programme and progress a 'Dog Project' with neighbouring authorities.
	Voluntary Code of Conduct.	Voluntary codes of conduct help to convey clear messages and have a supporting role, although they are not enforceable. Voluntary codes of conduct for a range of recreational uses have been drawn up by the Thanet Coast Project. ⁶⁴ These codes may need to be strengthened.	Further develop voluntary codes of conduct to support the mitigation approaches.
	Byelaws, Dog Control Orders (legal enforcement).	Dog control orders provide a range of options, for example limiting dog access to on-lead only, through to prohibition. These may, however, take time to put in place, but are considered necessary to maximise the likelihood of compliance.	Extend Dog Control Orders to specific sections of the coastline.

⁶⁴ Now the North East Kent European Marine Sites Management Scheme.

Monitoring

Visitor Monitoring

Surveys of visitors to the SPA will be required to help understand and assess the effectiveness of the mitigation strategy and determine if there is any increase in recreational pressure on the SPA as a result of the increase in population from new housing development within the agreed zone of influence.

It is proposed that visitor surveys are carried out at regular intervals during the Local Plan period and in particular after the strategic sites begin to be built out. This activity should be funded from developer contributions.

On-going visitor surveys at regular intervals will provide essential information which will help to monitor trends in visitor usage and visitor origins.

Bird Surveys

Regular surveys and counts of the qualifying species of over-wintering birds at the SPA are essential in monitoring trends in bird numbers, distribution and event disturbance. Bi-annual surveys have been carried out across the entirety of the SPA for a number of years, moving to annual surveys following the decline in population in 2013. It is important to ensure that these surveys are carried out consistently (i.e. year-on-year).

This essential element of the mitigation plan will help provide information that can be used to assess the impacts of an increase in visitors as well as the effects of the mitigation plan activities. The bird surveys are a key element of the mitigation plan and one which requires certainty in delivery and a consistent approach. It is considered that this activity should be funded from developer contributions.

A more rigorous approach to recording bird disturbance events in the annual Turnstone survey should be developed and adopted across the entire SPA.

Summary of Mitigation and Monitoring

From the preceding analysis of the specific features and issues of this coastline, in order to mitigate for increased recreational disturbance to the qualifying species the following elements will be taken forward in:

- Wardening presence and co-ordination roles;
- Enforcement and education: to include legal enforcement, interpretation, on-site signing and web presence;
- Access management;
- Provision of sites which are attractive for dog exercise;
- Monitoring of visitors and qualifying species.

These elements are considered in further detail in section 5.

5: The Access Management and Monitoring Strategy

Table 3 provided an assessment of the suitability of various mitigation options. The following section examines these mitigation actions in more detail.

Wardening

The wardening service is required in order to provide an on-site presence throughout the SPA within Thanet District for the period of the year when Turnstones and Golden Plover numbers are at their peak i.e. between October and April. As other mitigation options are limited (see Table 3), the wardening presence is the key mitigation action. It is therefore essential that this is as effective as possible, with an enforcement role supported by education to ensure longer-term compliance. The wardening will provide a positive, friendly presence, to educate and inform visitors, but also to provide an enforcement role in terms of local byelaws and legal orders in relation to the protection of the SPA.

Due to the extent of the Thanet coast it is proposed that two wardens will be required.

Winter roost and feeding sites will be a priority for the wardens, with the key sectors previously outlined,⁶⁵ but it is important that they also cover the entire coastal area within Thanet District in their enforcement and educational roles and can accommodate a degree of flexibility in location, as the qualifying species are neither confined to these roosts or to the SPA.

The wardening service can be established quickly either directly by the local authority or through a partner organisation. Any partner organisation should have the legal authority to enforce the local byelaws or Dog Control Orders.

Note: Although October to April are considered the peak months for Turnstone numbers and in terms of mitigation this is the period through which there will be wardening presence, the birds are evident on site earlier than October. All year round wardening would help to protect these smaller populations and to reinforce key messages and behaviour. This is particularly important as around half of all visits to the SPA are made regularly and, of these, the greatest majority are made by visitors with dogs. An all year round presence would help to build up a positive relationship with regular site users and provide a consistent approach to the enforcement of the Dog Control Orders. An all year round educational role would help to help change the behaviours of other activity users and reinforce the message consistently through the year. This will also help to reduce the risk of disturbance, as well as promoting local voluntary codes of conduct and improving local signage and interpretation.

Project Coordination

Management and supervision of the wardens will be required, including directing the wardens to priority locations and co-ordinating activities throughout the year. In considering the range of activities required from the mitigation plan it is clear that a coordinating role or organisation is also required. This role would not only manage the wardens' activities but also support the delivery of the other elements of the mitigation plan.

⁶⁵ Viz., Pegwell Bay (1) and Pegwell Bay Westcliff (2), North Foreland (6) and Botany Bay (7), Plumpudding Island (14) and Minnis Bay (13) Grenham Bay/Birchington sector (12), particularly in Epple Bay.

Enforcement and Education

Enforcement

It is apparent that dogs off the lead can cause disturbance to birds. In addition there are stretches of the coastline where there are few options for the Turnstones in terms of protection or escape from disturbance and where there are no alternative route options to offer dog walkers. Therefore, in order to reduce the levels of disturbance at critical periods of the year, it is essential that there is a means of restricting access to dogs in the areas where the birds are present.

Public Space Protection Orders⁶⁶ provide a range of options, for example limiting dog access to on-lead only, through to outright prohibition. Thanet District Council already has legal restrictions on the actions of visitors with dogs in various places along the coast, notably beaches through Dog Control Orders. These extend across stretches of the coast within the SPA, although there are some gaps in coverage. However, the current restrictions only apply in the summer months, as their purpose is to maintain clean, dog-free beaches for the benefit of summer visitors to Thanet's beaches.

The existing byelaw is not helpful in the protection of Turnstones as it is in force at times when the Turnstones are not present. In addition a number of stretches of coastline, such as Epple Bay, are not currently subject to the byelaw. In order to be effective the existing byelaw, or a Public Space Protection Order, would need to be extended to the period of October to March and covering the specific sections of the coastline that are key elements of the mitigation plan. This may, however, take time to put in place, but is considered necessary to maximise the likelihood of compliance. Other enforcement options should also be explored.

The enforcement actions will not be effective unless they are accompanied by efforts to change visitor behaviour. Whilst the provision of new greenspace sites does not constitute mitigation under this SAMM, it is considered that enabling existing sites away from the coast to retain or improve their attractiveness to dog walkers is an appropriate mitigation approach, constituting an improvement to access management. As previously stated, there are few opportunities to achieve this, but the key site of Pegwell Bay Country Park should be included in the mitigation strategy. It is important that this site continues to accommodate safe dog exercise and will also be a key access point for education activity. The works to be included in the mitigation plan will be those necessary to zone areas of the park for dog exercise and signage.

Education

It is essential to provide a pro-active approach to informing and engaging both occasional and regular visitors in order to provide a coherent, consistent set of messages in relation to the sensitivity and responsible use of the SPA. This will include a programme of interpretation and signage, promotional leaflets and flyers and activities to engage site users and the local community.

There is a need to reinforce the messages at places where high numbers of people gain access to the coast. These access points include Minnis Bay, Epple Bay, Foreland, Broadstairs Harbour, Pegwell Bay and Cliffsend. At these points a combination of permanent and seasonal signage, temporary displays and events plus the presence of a Warden will strengthen the messages and engage

⁶⁶ Or dog or other restrictions under the Anti-social Behaviour, Crime and Policing Act 2014.

positively with site users. This type of intervention is particularly important where site users visit regularly and signage alone will quickly become part of the landscape.

An initial interpretation study will assess the audience and current interpretive activities to help guide the messages and delivery.

Natural England is developing its England Coastal Path and as part of the delivery of the Folkestone to Ramsgate and Ramsgate to Whitstable sections there will be a number of information signs. It is proposed that the implementation of the mitigation strategy project takes account of these and other proposals and attempts to rationalise the number, style and message of the signage along the whole Thanet coastal strip.

A further aim of this work will be to encourage responsible dog ownership. Experience from other parts of the UK supports the development of a Dog Project; preferably a project that applies to the whole Thanet Coast and Sandwich Bay SPA. Although this proposal is not suggested as part of this mitigation strategy, it is recommended in order to support and strengthen other actions. It is considered that a Dog Project would be more effective if developed for the whole SPA (i.e. alongside Canterbury District) and accordingly the project could be considered at a later date if this joint approach takes effect.

Alongside the strengthening of legal orders, voluntary codes of conduct would provide guidance for a range of activities in order to convey clear messages and have a supporting role, although they are not enforceable. Voluntary codes of conduct for a range of recreational uses have been drawn up by the (former) Thanet Coast Project. These codes may need to be amended and strengthened as required and they could be developed and delivered as part of the education programme in order to present a consistent approach and message to site users.

Access Management and Zoning

As previously outlined, there are limited opportunities to re-route or create new paths due to the narrowness of the coastal strip, together with limited access possibilities on adjoining land.

There are extensive grass areas above the cliffs and behind the beach at several locations.⁶⁷ These areas are currently open to the public, but are considered to be currently unattractive for safe dog-exercise as they are all unfenced and open to the road. However, they have the potential to provide alternative dog exercise areas but would need to be fenced to protect dogs from accessing the road. Also, dog owners may not willingly adapt to the use of these areas in preference to the beach. This is unlikely to be sufficient to be effective mitigation, but may help in practical terms to provide an alternative for regular dog walkers to avoid users accessing the beach and it could have a supporting role in mitigation should access to the beach need to be restricted.

The cliff-top area to the south east of Foreness Point perhaps offers the greatest potential to create a safer dog-exercise site, as it already has hedging adjacent to the Ridings, which in itself is a quiet cul-de-sac. However, the entire site would require fencing and in itself is unlikely to deter dog-walkers from using the beach.

⁶⁷ In particular adjacent to Cliff Road, Birchington; above Epple Bay; around Westgate Pavilion; adjacent to Royal Esplanade, Westbrook Bay; extensive greenspace around Foreness Point.

Zoning of degrees of dog 'freedom' may be required, with the greatest restrictions in the most important and/or sensitive areas. The zoning work will develop a hierarchy of restriction approaches as appropriate.

6: Elements of the Scheme and Tariff

Elements of the Scheme and Outline Costs

Elements of this proposal that relate directly to the mitigation of recreational impacts as a result of new housing development within the zone of influence, should be funded through developer contributions and are listed in Table 3.

In drawing up the costs for a mitigation package it is clear that an approach that included both Canterbury and Thanet districts would benefit from economies of scale; in particular for those elements of the mitigation plan that require the input of personnel (i.e. the wardens and the co-ordinating role) as staff costs form a large proportion of the mitigation costs.

Assumptions:

- Costs are assumed over a period from 2017/18 to 2030/31 (the end of the plan period);
- For the purposes of demonstrating the costs of the package, a rate of 2% inflationary increase per annum is applied to all staff costs and 2.5% to goods and services.

Wardening Service

A proposed model for taking forward wardening, enforcement, education and engagement comprises:

(a) Wardens

- Two warden posts employed by a local authority or other organisation with experience in the sector and the authority to enforce legal orders and local byelaws;
- Responsible to a co-ordinating role/organisation;
- Required for the peak period of time when Turnstones are present i.e. October to April;
- The full-time presence during the winter months will enable the role to cover the Thanet coastline within the SPA.

Responsibilities will include:

- Education and awareness role, to reduce the risk of disturbance, promote voluntary codes of conduct, improve signage and interpretation and oversee access management and other minor works relating to the protection of the SPA;
- Development and management of Volunteer Scheme;
- Management of bird survey monitoring;
- Enforcement of any legal orders and byelaws relating to the SPA;
- The warden will be required to work in liaison with the relevant local authority(ies), other relevant organisations (e.g. SBBOT, TCP, KWT, NE and RSPB), visitors and the local community.

Costs: To include salaries and related costs and capital costs of items including PC plus other equipment.

(b) Co-ordination Role

- Based in the same organisation as the wardens;
- Responsible to the client local authority (and a small steering group comprising TDC, NE and others);
- Activities, preparation of plans and operating the Volunteer Scheme are all year round tasks need to operate the mitigation scheme, so this role is required to a greater or lesser extent all year round to manage staff, volunteers and activities and act as main liaison point for the mitigation scheme;
- Half-time for October to April and quarter-time for May to September.

Responsibilities include:

- Management of wardens;
- Planning, developing, resourcing and co-ordinating all mitigation activities and works relating to the SPA in Thanet district;
- Development and management of education and engagement activities;
- Liaison role at a senior level with the client;
- Management of Volunteer Scheme when wardens not in post;
- Continuity of project from May to September.

Costs: To include salary and related costs and capital costs of items including PC plus other equipment, plus costs of running a Volunteer Scheme and community engagement.

Education and Enforcement

- Interpretation programme - to include an initial interpretive study to better understand the key messages and audiences; plus interpretive signage at intervals throughout the period;
- Review of all information signage along the coastal strip (see also previous point);
- Leaflets and web presence;
- Interpretive display at focal points e.g. Pegwell Bay Country Park, plus mobile displays;
- Amendments/extensions to existing legal dog controls through Public Space Protection Orders and associated (and improved) signage; legal costs and advertising.

Costs: To include capital costs and charges for legal orders.

Monitoring

(a) Bird Surveys

The mitigation model assumes that annual bird surveys will take place.

There are 21 survey sectors of 2km length for the whole SPA (i.e. Canterbury included). The Thanet section of the SPA comprises 14 survey sectors x 4 visits each. The tariff calculations assume the staff are hosted by one of local authorities and includes the use of volunteers i.e. it also assumes the development of the volunteer scheme.

Costs: To include all preparation of surveys, carrying out bird counts and monitoring disturbance events, data entry and reporting for annual surveys (i.e. 14 no surveys).

(b) Visitor Surveys

The mitigation model assumes that visitor surveys of the Thanet section of the SPA will be necessary in order to monitor the effects of the impact of new development. A visitor survey early on in the mitigation strategy project would help support baseline data. Accordingly it is proposed that the programme of visitor surveys starts in the first year of the mitigation strategy project. Surveys will therefore take place in year one of the Local Plan period year (2017/18), year 5 (2021/22), year 9 (2025/26) and year 13 (2029/30) in order to assess changes in visitor numbers and patterns.

This will comprise surveys at 8 survey sites x 2 visits to each site (Minnis Bay; Epple Bay; St Mildred's Bay; Foreland (2 sites); Broadstairs Harbour; Ramsgate Harbour; Pegwell Bay/Ciffs End).

Costs: To include all preparation of surveys including methodology, forms and maps, carrying out visitor surveys, data entry and reporting. On-site surveys to be carried out four times during the period of the mitigation strategy project.

Management of Visitors – On-site

- Minor works to modify access and path routing throughout the period;
- Zoning - to comprise physical works and signage;
- Off-site modifications and zoning to accommodate dog exercising (e.g. Pegwell Bay Country Park);
- Minor works to protect and/or provide Turnstone refuges.

Costs: To include one-off costs and periodic repairs and replacements during the mitigation strategy period for minor works to modify access and path routes, on-site works and signage, works to protect Turnstone refuges and fencing and gates to provide off-site dog exercise areas.

Total Costs of Mitigation Package

The total cost of operating the mitigation strategy up to 2031 (the Plan period) is estimated at £1,446,957 (£1,315,415 plus 10% contingency). This equates to an annualised average of £94,000 over the Local Plan period. N.B. some adjustment may be required to reflect any delays in the commencement of the collection of the tariff, variations in the amounts levied during the period or changes in rates of inflation.

Table 4 provides the breakdown of the cost elements of the mitigation plan proposal.

Table 4: Summary of Mitigation Plan costs

Elements of proposed mitigation plan	
Wardening service	£1,036,000
Education, public engagement, enforcement and interpretation programme	£115,000
Monitoring	£82,000
Access management	£82,000
Total	£1,315,415
Total plus 10% contingency	£1,446,957

Development of the Tariff

In order to fund the mitigation strategy a tariff has been developed that will be levied to housing developers according to the number of dwellings built within the zone of influence.

The mitigation strategy will be monitored and kept under review. It is likely that there will be some adjustments to the tariff to ensure that it remains relevant and up-to-date.

The tariff will be funded by developer contributions, comprising two elements; the first will fund annual expenditure to operate the mitigation actions and the second will fund the capital investment required in order to fund the mitigation strategy in perpetuity.

A proportional or differentiated tariff, based on occupancy rates is being applied. This follows guidance developed by Natural England for the Thames Basin Heaths SPA.⁶⁸ In that example, legal opinion sought as part of the development of the guidance stated that a tariff which included the number of bedrooms and/or distance would be proportionate and acceptable; and further that the tariff can be established by reference to the overall sum needed to deliver the required mitigation.

The methodology used for this mitigation strategy tariff has been based on examples from other parts of the UK and from guidance produced by Natural England to inform the tariff developed at the Thames Basin Heaths.

The Thanet District Council Mitigation Strategy tariff payable uses the occupancy rate⁶⁹ of dwellings to arrive at a cost per dwelling. A differentiated tariff is proposed, based on varying local occupancy rates for different types of dwelling, calculated for the period 2017 to 2031 for Thanet District. This provides a scale of tariff that proportionate to the number of bedrooms in a dwelling.

The list of dwelling types and occupancy rates is shown in Table 5.

Table 5: Occupancy by Dwelling Size

	Occupancy per household type	Average
All categories: No of bedrooms		2.2
1 bedroom	1.2	
2 bedrooms	1.9	
3 bedrooms	2.52	
4+ bedrooms	3.15	

In line with some other UK examples it is proposed that the payment of such contributions should normally be required on commencement of the development (e.g. Surrey Heaths).

The tariff calculations assume that development contributions will be collected with immediate effect and in advance of the commencement of the mitigation strategy project.

⁶⁸ Thames Basin Heaths Strategic Access Management and Monitoring Project - Tariff Guidance: Natural England.

⁶⁹ Data supplied by Research & Evaluation, Kent County Council and further information derived from the 2011 UK Census.

This approach will ensure that funds are available at an early stage, enabling the high priority elements of the Mitigation Plan to start immediately and providing cash flow to cover on-going revenue costs.

Contributions may be updated from time to time to reflect increased costs or works.

Mechanism for Calculating the Tariff

The tariff is based on the cost of operating the mitigation strategy for the Local Plan period, plus the cost of building a capital investment fund that will finance the mitigation plan in perpetuity thereafter.

In calculating the costs of the mitigation strategy and the tariff the best available figures have been used throughout, together with estimates based on realistic comparator costs.

The annual figure for the operation of the mitigation plan has been assessed for the whole Local Plan period. This figure is used to calculate the average tariff per dwelling (see Table 6 below).

Table 6: Summary of the Tariff

Item	Cost £	Notes
Mitigation Strategy	£1,315,415	Total implementation cost estimated for the Local Plan period (excludes in-perpetuity)
Contingency @ 10%	£131,542	10% contingency
Overall Implementation Cost over Plan period	£1,446,957	Overall Total Implementation Cost
Revenue Funding per dwelling (cost to operate mitigation plan during the Local Plan period)	£130 (£98)	Overall Total Implementation Cost divided by expected development total of 11,165 (14,825) dwellings
Capital Investment per dwelling	£412 (£310)	Amount of capital investment required to fund the mitigation strategy in perpetuity divided by expected development total of 11,165 (14,825) dwellings
Total Average Tariff per dwelling	£542 (£408)	Revenue funding per dwelling + Capital investment per dwelling [100% of tariff contribution]
Total Required over Plan Period	£6,046,937	Total revenue (overall total implementation cost) and capital invested for in-perpetuity fund over whole Plan period.

The combined costs of the Mitigation Plan (overall total cost) together with the cost of the capital investment fund are divided by the number of dwellings to be built, to arrive at an average tariff cost per dwelling (see table above). N.B. This table is based on 11,165 new homes; the costs of the Tariff for the option of 14,825 new homes are shown in brackets in the table.

The average tariff is then used together with the average occupancy figure to calculate the standard cost i.e. the cost of the tariff per person, based on the number of dwellings to be built. This is shown in Table 7. N.B. This table is based on 11,165 new homes; the costs of the Tariff for the option of 14,825 new homes are shown in brackets in the table.

Table 7: Differentiated Tariff

Item	Cost	Notes
Total required over Plan period	£6,046,937	Total revenue and total invested for in-perpetuity fund over whole Plan period.
Total number of residents	23336 (31725)	Number of dwellings multiplied by occupancy for each of the dwelling sizes.
Standard Tariff per person	£259 (£190)	Original total divided by Total number of residents = Tariff per person

The Standard Tariff per person is then multiplied by the occupancy rates for each type of development to calculate the tariff per dwelling type (see Table 5).