

AGENDA

LOCAL DEVELOPMENT FRAMEWORK PANEL MEETING

Date: Monday, 2 March 2015
Time: 7.00 pm
Venue: Committee Room - Swale House

Membership:

Councillors Andy Booth, Derek Conway, Gerry Lewin (Chairman), Bryan Mulhern (Vice-Chairman), Prescott, Adam Tolhurst, Roger Truelove and John Wright.

Quorum = 3

	Pages
1. Apologies for Absence and Confirmation of Substitutes	
2. Minutes	
To approve the Minutes of the Meeting held on 28 October 2014 (Minute Nos. 306 - 308) as a correct record.	
3. Declarations of Interests	
Councillors should not act or take decisions in order to gain financial or other material benefits for themselves or their spouse, civil partner or person with whom they are living with as a spouse or civil partner. They must declare and resolve any interests and relationships.	
The Chairman will ask Members if they have any interests to declare in respect of items on this agenda, under the following headings:	
(a) Disclosable Pecuniary Interests (DPI) under the Localism Act 2011. The nature as well as the existence of any such interest must be declared. After declaring a DPI, the Member must leave the meeting and not take part in the discussion or vote. This applies even if there is provision for public speaking.	
(b) Disclosable Non Pecuniary (DNPI) under the Code of Conduct adopted by the Council in May 2012. The nature as well as the existence of any such interest must be declared. After declaring a DNPI interest, the Member may stay, speak and vote on the matter.	
Advice to Members: If any Councillor has any doubt about the existence or nature of any DPI or DNPI which he/she may have in any item on this agenda, he/she should seek advice from the Director of Corporate Services as Monitoring Officer, the Head of Legal or from other Solicitors in Legal Services as early as possible, and in advance of the Meeting.	

PART A REPORTS FOR RECOMMENDATION TO CABINET

4. Thames, Medway and Swale Estuaries Strategic Access Management and Monitoring Strategy 1 - 166

To agree the Thames, Medway and Swale Estuaries Strategic Access Management and Monitoring Strategy, 2014 and the Phase 1 Bird Disturbance Report, 2012 as part of the Swale Borough Local Plan evidence base and to agree the next steps.

5. Queenborough and Rushenden - Indicative Revised Land Use Plan: Addendum to 2010 Adopted Masterplan - Consultation Results 167 - 264

To consider the results of the public consultation on the proposed amendments to the Queenborough and Rushenden Masterplan Supplementary Planning Document (SPD).

Issued on Friday, 20 February 2015

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Corporate Services Director,, Swale Borough Council,
Swale House, East Street, Sittingbourne, Kent, ME10 3HT

Local Development Framework Panel Meeting	Agenda Item: 4
Meeting Date	2 March 2015
Report Title	Thames, Medway and Swale Estuaries Strategic Access Management and Monitoring Strategy
Cabinet Member	Cllr Lewin, Cabinet Member for Planning
SMT Lead	Pete Raine - Director of Regeneration
Head of Service	James Freeman - Head of Planning Services
Lead Officer	Gill Harris - Spatial Planning Policy Manager
Key Decision	No
Classification	Open
Forward Plan	Reference number: N/A
Recommendations	<ol style="list-style-type: none"> 1. Agree the Thames, Medway and Swale Estuaries Strategic Access Management and Monitoring Strategy 2014, and the Phase 1 Bird Disturbance Report 2012, as part of the Swale Borough Local Plan evidence base; and 2. Agree the next steps outlined within this report.

1 Purpose of Report and Executive Summary

1.1 This report is to update Members on work that has been ongoing with other North Kent Local Authorities regarding the recreational disturbance of birds at designated European wildlife sites in North Kent. It is to agree that the two documents can form part of the Swale Borough Local Plan evidence base and to outline the next steps.

1.2 The main points of this report are:

- that it is imperative that Local Plans and Development Plan Documents provide a clear policy steer for a suitable type, amount and location of development that can meet the aspirations of the growth agenda for the area, whilst being supported by Habitat Regulation Assessment (HRA) work to demonstrate that the suite of European sites across north Kent will not be adversely affected;
- in the absence of comprehensive HRA work at the local plan stage, conflicts are likely to occur when development proposals that accord with the growth agenda are presented, yet they are unable to proceed if they cannot accord with the requirements of the Habitats Regulations. Consistency across Local Planning Authorities (LPA) in both HRA and the application of

mitigation measures has been recommended, and this is the approach that the North Kent Environmental Planning Group is proposing;

- without this joint work, deficiencies in information would require application of the precautionary principle which could prevent the adoption of Local Plans; and
- without a commitment to the recommended strategic approach and next steps, the risk to the adoption of Swale's emerging Bearing Fruits 2031: The Swale Borough Local Plan Part 1 - Publication Version is extremely high.

2 Background

- 2.1 The continuous swathe of coastal habitat between Gravesend and Whitstable on the North Kent shore comprises three Special Protection Areas (SPAs) and Ramsar sites. The status of the Thames Estuary and Marshes, the Medway Estuary and Marshes, and the Swale as European designated sites reflects their importance for wintering waterfowl, breeding waterfowl, breeding and wintering raptors, and also a range of rare plant and invertebrate species. Much of north Kent lies within the Thames Gateway, a Government priority for regeneration and economic development, and therefore a way forward needs to be found to accommodate growth whilst protecting the environment.
- 2.2 The North Kent Environmental Planning Group was established in order to try to find a joint approach towards Local Plans and their HRA assessments. With the large levels of development proposed across north Kent, the statutory environmental bodies were becoming increasingly concerned about the impact of this level of development on the designated European wildlife sites.

Phase 1 Bird Disturbance Study

- 2.3 The North Kent Environmental Planning Group commissioned a phase 1 bird disturbance study (Appendix II) to provide summary information for Habitat Regulations Assessments of the relevant Local Development Frameworks, land allocations for development, and the creation of mitigation and access management strategies. The report covered Canterbury, Dartford, Gravesham, Medway, and Swale local authorities. It focussed on the impacts of recreational activities on the three SPA and Ramsar sites, and considered these impacts (individually and in-combination) in relation to new housing development.
- 2.4 The evidence from the bird disturbance study and visitor studies will be used to inform and review the Habitat Regulations Assessments (HRA) of Local Plans, Development Plan Documents, Appropriate Assessments of planning applications and, in future, the development of mitigation and access management strategies.

Strategic Access Management and Monitoring Strategy

- 2.5 The next step was to commission a Strategic Access Management and Monitoring Strategy (Appendix I). This report aimed to bring together information from a range of sources and to provide support for plan-making and site-specific Habitat Regulations Assessments (HRA). The report was commissioned to provide an overview of the issues, the scale of impacts, and the consequences with respect to legislation. Given the complexities of the ecological issues and strict requirements of the Habitat Regulations, a clear view of the implications and necessary next steps was required for the LPAs to adopt their respective Local Plans and Local Development Framework Documents and for development management purposes.
- 2.6 There was a strong body of evidence showing how increasing levels of development, even when well outside the boundary of protected sites, can have negative impacts on those sites.
- 2.7 The following broad conclusions were drawn in the Strategic Access Management and Monitoring report relating to development and the need for mitigation:
- (i) there have been marked declines in the numbers of birds using the three SPAs; particularly apparent on the Medway and at locations with the highest levels of access;
 - (ii) disturbance is a potential cause of the declines. The study shows birds are responding to the presence of people, and there is evidence that the busiest locations (which have seen the most marked bird declines) support particularly low numbers of birds. Detailed and costly fieldwork (involving assessment of invertebrate food supplies) and complex modelling would be necessary to explore in detail the impacts of disturbance on bird population size;
 - (iii) access levels are linked to local housing, with much of the access involving frequent use by local residents. Indicative data on future housing development, when used with the visitor data to estimate change in access levels between now and circa 2026, would suggest that the SPA/Ramsar sites would see a future increase of approximately 15 per cent. Given the results of the disturbance work to date and the likely scale of change in the future, it is clearly not possible to rule out any likely significant effects on the integrity of the European sites as a result of increased housing provision nearby. A suite of mitigation measures are therefore necessary to avoid potential adverse effects caused by future development;
 - (iv) all activities are potentially likely to contribute to additional pressure on the SPA sites and should be addressed within mitigation plans. Dog walking, and, in particular, dog walking with dogs off leads, is currently the main cause of disturbance (by far), and therefore should be a focus for mitigation. Other particularly intrusive activities are those that involve people on the mudflats or the water;

- (v) development within six km of access points to the SPAs is particularly likely to lead to an increase in recreational use of the SPAs. Local green or open space use such as dog walking, cycling, jogging, walking, and to some extent family outings will originate from people living within this radius;
- (vi) beyond six km from access points onto the SPA, large developments or large scale changes to housing levels will also result in increased recreational use. It would appear that visitors to the north Kent coast mostly originate from a zone north of the M2/A2 between Gravesend and Herne. People living within this broad coastal strip (i.e. beyond six km from SPA access points and north of the M2/A2) are likely to visit for more coastal specific activities; and
- (vii) development beyond six km (excluding large sites) can be potentially screened out of assessments and assumed to have no likely significant effect on European sites. For development that does fall within six km (or large sites beyond six km) it will not be possible to demonstrate no adverse effect on integrity of the European sites, and mitigation measures will need to be considered.

2.8 Mitigation measures are discussed within the report and include:

- raising awareness;
- on-site wardening;
- provision of signage and access infrastructure;
- provision/enhancement of green space away from the SPAs; and
- direct contact with users.

2.9 The challenge is that the way forward needs to provide for the mitigation measures necessary to address the in-combination impacts of a range of development (including many small developments) spread over a wide area and coming forward over an extended time period. It also needs to ensure that the impacts are resolved in perpetuity, which could be 80-125 years into the future.

2.10 The Strategic Access Management and Monitoring Strategy suggests that the most effective way forward is to undertake a strategic approach across all five LPAs through the implementation of a tariff system. An approach to implementing the strategy is to develop a tariff based on the overall quantum cost of measures required for the level of new development coming forward, and this tariff calculated on a per house contribution. The partnership/management board would then collect and allocate funds according to proposals that come forward.

2.11 Alongside the initial commencement of the scheme, there is continuing work needed to improve the detail of the SAMMS, get the monitoring established and continually review opportunities for refined or additional measures. This approach would allow SAMMS projects to be developed locally, collectively, and carefully planned to ensure success, encouraging proactive development of

measures by all partners, and maintaining a best value approach, whilst continuing to ensure that the funding was being allocated to measures that were appropriate.

- 2.12 The use of a tariff would provide transparency and clarity to developers who would know from the outset how much they would need to provide per dwelling to satisfy the HRA regulations.
- 2.13 The tariff could be collected either through S106 or CIL, once each LPA adopts a CIL schedule. The Strategic Access Management and Monitoring Strategy suggested that the tariff could be around £223 per dwelling, but this figure would be revised once the sub-group revise the list of suggested mitigation measures.

3 Proposals

- 3.1 Members agree the Thames, Medway and Swale Estuaries Strategic Access Management and Monitoring Strategy 2014, and the Phase 1 Bird Disturbance Report 2012, as a part of the Swale Borough Local Plan evidence base.
- 3.2 The North Kent Environmental Planning Group, which includes the other North Kent Local Planning Authorities, has agreed that the next step is to establish a sub-group to take this work forward. The sub-group will look at:
 - the most appropriate management structures/strategic management boards required to implement and manage the tariff, including possible legal agreements between the LPAs;
 - potential governance arrangements;
 - the establishment of a delivery board/organisation to deliver the proposed mitigation measures;
 - the establishment of an administrative body to be the 'banker' and to manage the collecting of tariff monies;
 - funding (and in perpetuity funding/endowments etc);
 - future monitoring arrangements to ensure the money spent is having a positive impact on the reduction in recreational bird disturbance;
 - the list of suggested mitigation measures (in partnership with Natural England) to establish the most effective methods and to establish which could be achieved in the short and long term; and
 - interim measures until all of the above are in place.
- 3.3 Members are asked to agree to Swale's participation in this sub-group and agree the suggested way forward.

4. Alternative Options

- 4.1 The alternative option is to not partake in this joined up approach with our neighbouring LPAs and to undertake a full HRA of Swale's Local Plan. This would be costly and time consuming, and it is highly likely that the Local Plan would receive an unfavourable HRA report, which in turn could prevent its adoption. The risk to the adoption of Swale's emerging Local Plan without a commitment to this strategic approach, and agreed next steps, is extremely high.
- 4.2 Without this joint work deficiencies in information would require application of the precautionary principle, which is highly likely to delay the adoption of Swale's Local Plan. It could also delay the determination of any planning applications within six km of an entry point to an SPA.

5. Consultation Undertaken or Proposed

- 5.1 A workshop was held by the Consultant, Footprint Ecology, in September 2013, with representatives from North Kent Local Planning Authorities and local and national environmental bodies to help inform the report.
- 5.2 Natural England, the Environment Agency, Kent Wildlife Trust, Kent and Medway Greening the Gateway, and the RSPB all sit on the North Kent Environmental Planning Group which reviewed the brief for this study and had the opportunity to comment on the draft document. As this study is a technical piece of evidence and forms a part of the evidence base for the emerging Local Plan, no further consultation is necessary.
- 5.3 If the suggested tariff is eventually proposed to become part of Swale's Community Infrastructure Levy (CIL), public consultation would take place following the statutory regulations for introduction of a CIL Charging Schedule.

6. Implications

Issue	Implications
Corporate Plan	Healthy environment; and Open for business.
Financial, Resource and Property	The costs of the next steps outlined in the report can be met from within existing budgets.
Legal and Statutory	The process will follow the statutory planning regulations where necessary.
Crime and Disorder	None identified at this stage.
Sustainability	Adoption of a strategic approach will ensure that the health and condition of the internationally designated wildlife sites are maintained at their current level. The two studies were also used to

	inform the Sustainability Appraisal/Strategic Environmental Assessment and the Habitat Regulations Assessment of the emerging Swale Borough Local Plan.
Health and Wellbeing	None identified at this stage.
Risk Management and Health and Safety	None identified at this stage.
Equality and Diversity	None identified at this stage.

7. Appendices

7.1 The following documents are to be published with this report and form part of the report:

- Appendix I: Thames, Medway and Swale Estuaries Strategic Access Management and Monitoring Strategy 2014.
- Appendix II: Phase 1 Bird Disturbance Report 2012.

8. Background Papers

8.1 None.

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Thames, Medway & Swale Estuaries - Strategic Access Management and Monitoring Strategy



Durwyn Liley and John Underhill-Day



Date: 22nd July 2014

Version: Final

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

Summary

This report sets out a strategy to resolve disturbance issues to wintering birds on the North Kent Marshes. The report focuses on the European Protected Sites (Thames Estuary and Marshes SPA/Ramsar Site, Medway Estuary and Marshes SPA/Ramsar Site, and The Swale SPA/Ramsar Site) and their internationally important bird interest features.

Previous studies show marked declines of key bird species, particularly on the Medway Estuary. There is currently insufficient evidence to adequately assess the cause of these declines. Disturbance is one potential factor, and studies have shown recreational activities to cause disturbance impacts to birds. The declines in birds have been detected at the SPA level. Within the Medway, the areas that have seen the most marked declines are the area north of Gillingham, including the area around Riverside Country Park. This is one of the busiest areas in terms of recreational pressure.

New development will further exacerbate the pressures. New development (in the region of 68,000 dwellings are set out in the relevant local plans) brings more people to the local area and access levels have been predicted to increase on the coastal sites by around 15%. Such an increase will be gradual and long-term, across a wide stretch of coast; robust solutions are required to ensure that this level of development, considered in-combination, does not have an adverse effect on the integrity of the European sites.

This strategy addresses disturbance impacts and provides a strategic, cross-boundary solution to issues relating to disturbance, there are two aims.

- To support sustainable growth whilst protecting the integrity of European wildlife sites from impacts relating to recreational disturbance
- To reduce the existing recorded recreation impact on birds on the European wildlife sites in order to meet duties relating to the maintenance and restoration of European sites, as required by Article 4(4) of the Birds Directive.

Elements within the strategy are:

- A North Kent Coast Dog Project
- Wardening/Visitor Engagement
- New Access Infrastructure
- Parking (Strategic Review and Changes to Parking)
- Codes of Conduct
- Interpretation/signage
- Work with local club/group
- Refuge
- Enhancement of existing sites to create hub
- Enhancement to existing GI away from SPA
- Enforcement
- Monitoring

The **dog project** and **wardening/visitor engagement** elements are generic and can be established quickly. The **dog project** focuses on the activity that is most associated with disturbance and will engage with local dog walkers. It will be able to promote particular sites to dog walkers and raise

awareness of disturbance issues. **Wardens/rangers** with a visitor engagement role can be mobile and deployed across a range of locations, targeting areas with particular issues or close to new development. **New access infrastructure** will involve a range of discrete, focussed projects that could be phased with new development. **A review of parking locations** will provide the necessary information to underpin long-term changes in parking capacity, charging and provision. Such changes can be phased over time and linked to available funding and locations where new development comes forward. **Codes of conduct** will provide guidance for a range of activities. In-line with these, **interpretation/signage** and **work with local clubs/groups** is envisaged. These three elements dovetail and should be undertaken simultaneously. They also link with the long term aim of creating **refuges** – ‘quiet’ areas within the Medway where recreation and other activities are discouraged. We also set out **enhancement to existing sites**: both those **within the SPA** and **outside**. In the long term access is best focussed away from the SPAs or in particular honeypots around the shore where it can be managed and engagement with visitors targeted. We therefore highlight sites outside the SPA that are close enough to potentially draw some visitors. Sites within the SPA, such as Riverside Country Park, already draw high numbers of visitors and are likely to always draw people. Measures are possible at such locations to reduce disturbance. **Monitoring** across the SPA sites will provide a check on success of measures and inform where further measures, such as enforcement (for example dog control orders) might be necessary.

The strategy therefore contains elements that can be initiated quickly and other elements that can be phased over time and are flexible. Based on the results of a workshop and some site visits we have set out some suggestions for specific locations and we identify the overall cost for the strategy. The costs are set out below (Table 1). While only indicative the costings should provide the opportunity to budget and source funding, but in the long term different elements of the strategy may change in emphasis and costs may need to be distributed differently. Elements of the strategy that relate to new development (and can be classed as mitigation) should potentially be funded through some means of developer contribution. Other elements within the strategy relate to existing impacts or are more aspirational. We therefore categorise elements within the strategy as:

- A. Clearly mitigation for new development as related to particular housing allocations/areas of notable growth or necessary to be confident of no adverse effect on integrity as a result of cumulative impacts of new development over a broad area.
- B. Clearly linked to a current issue or required to rectify current problem
- C. More aspirational or less defined at this stage. This may be a potential opportunity to avoid or mitigate for impacts but could be implemented in a number of ways, with a variety of partners providing input, or may be such that it is best refined over time, informed by new information. At this stage therefore difficult to categorise and possibly elements that could be developed as an external funding bid.

Using the above criteria, elements that are categorised as A are those that could form part of a tight, clearly defined mitigation plan. Implementation of such a plan should ensure that a significant effect on the relevant European sites as a result of impacts from increased recreational disturbance (linked to new development) on wintering/passage waterfowl is avoided. The total capital cost for these elements is £185,300, plus an annual figure of £95,500.

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

Table 1: Summary of all elements of the strategy. Costs are indicative and approximate, drawn where possible from examples elsewhere, but not based on actual quotes. Total costs are given at the end of the table. These costs are also summarised as a per dwelling figure. This is calculated assuming 35,000 dwellings within 6km of the SPA boundaries and annual costs scaled to apply annually for 80 years (included the three ranger posts). No discounting or contingency is applied.

Recommendation	Set-up/Capital Cost	Annual Cost	Notes	Category
Dog Project	£15,000	£2,000	Staff time not included in cost as assumed undertaken by warden/rangers. Set up cost to cover web design, production of membership packs, launch event. Running costs for web hosting, updates to website, further events.	A
Senior ranger post		£45,000	Long-term post. Includes office and vehicle costs.	A (but some of warden time may end up focussed on existing impacts)
Two seasonal rangers		£40,000	Potentially short-term (c.10 years). Includes office and vehicle costs.	A (but some of warden time may end up focussed on existing impacts)
Path links	£5,000		Cost would depend on surfacing, route etc.	A
Structures to inhibit vehicles.	£3,500	£750	Range of different gate styles or designs possible. Costs need to cover installation. Annual maintenance/checking required	B (could possibly be argued that further development would increase pressure)
Additional planting at various locations	£1,800		Planting relatively low cost, but will need regular checks to ensure gaps are not developing and further planting may be required	A
Horrid Hill path management and screening	£5,000		Will need regular maintenance and checks to ensure new paths are not developing and further work (planting/screens) may be required	A
Dog training area	£3,000		Cost depends on area fenced.	A
Fencing at Motney Hill	£3,000	£500	Cost depends on type of fencing. Will need checking and maintenance	A
Fencing and signs around Shellness	£2,000	£500	Cost dependent on scale of fencing. New fencing may be required each year depending on flooding/changes in bird use etc.	A
Review of Parking	£0		No cost allocated as assumed review conducted by warden/ranger team	A
Changes to Parking	£20,000		Depends entirely on outcome of the review. £20000 would allow one or two small projects to probably be achieved.	A
Interpretation boards	£25,000	£2,500	Estimate based on 10 outdoor panel	A

Thames, Medway and Swale Estuaries – Strategic Access Management
and Monitoring Strategy

Recommendation	Set-up/Capital Cost	Annual Cost	Notes	Category
			interpretation boards (A0 size); £2500 per board. Annual fee allows for replacement of boards over 10 year period	
Signs	£20,000	£1,000	10 signs. £2000 per sign, plus £1000 per year for replacement/maintenance	A
Codes of Conduct developed	£10,500		8 codes produced as a pack for printing and as interactive document; cost estimated at £8,000. £2,500 additional cost for revision and further print runs	A
New Visitor Centre and other facilities at Cliffe Pools RSPB	£4,000,000		Very approximate cost. Aspirational rather than an essential element of the strategy. Range of funding sources may be possible.	C
Enhancements at Northward Hill RSPB	£20,000		Improved parking and other infrastructure	A
Enhancements to Riverside Country Park	£25,000		Enhancements to areas away from shoreline such that access can increase here without further disturbance	A
Enhancements to existing GI away from the SPA	£420,000		Cost assumes around five projects at an average cost of £84,000	C
Speed monitoring equipment including digital camera and speed gun	£10,000		Approximate cost	A
Setting up dog control orders	£10,000		Estimate of costs required for legal advice, administration etc	A
Monitoring visitor numbers at set locations	£10,000	£1,500	Most of the counts every five years, undertaken by warden staff. Budget for automated counters and casual staff/consultancy support as required and included as an annual figure	A
Monitoring visitor activities, motivation, profile and		£1,000	Questionnaire work undertaken every 5 years (i.e. annual budget of £1000 equates to £5000 every 5 years).	A
Continued monitoring of wintering waterfowl		£500	Undertaken already as part of WeBS. Small annual fee to ensure data collated by local co-ordinators	A
Disturbance monitoring		£1,000	Could be undertaken at set intervals - e.g. every 10 years or on an annual basis	A
TOTAL (all categories)	£4,608,800	£96,250	Equates to £351 per dwelling	
A	£185,300	£95,500	Equates to £223.58 per dwelling	
B	£3,500	£750	Equates to £1.81 per dwelling	
C	£4,420,000	£0	Equates to £126.29 per dwelling	

Contents

Summary	3
Contents	7
Acknowledgements	10
1. Introduction	11
North Kent’s international wildlife designations.....	11
Previous studies	13
Growth in North Kent.....	13
Other projects of relevance.....	14
Structure of the Report.....	14
2. A framework for the Plan	15
Legal and policy requirements	15
Geographical area	16
Activities	16
Timescale	16
General Principles	17
Drawing a distinction between current impacts and the effects of new development	17
Maintaining and restoring the European site network by resolving existing impacts	17
Suggested approach to identifying responsibility for measures relating to new and existing impacts	18
3. An overview of possible mitigation measures: the long-list	20
A ‘long list’	20
Assessment of the long list	20
Habitat Management.....	20
Planning and off-site measures	21
On-site Access Management	22
Education and Communication/Awareness Raising	23
Enforcement	23
4. Locations that are a focus for the strategy	25

Thames, Medway and Swale Estuaries – Strategic Access Management
and Monitoring Strategy

5. Elements of the Plan	26
A North Kent Coast Dog Project	29
Overview.....	29
Justification.....	29
Detailed Recommendations	29
Indicative Costs and Implementation	30
Wardening/Visitor Engagement.....	31
Overview.....	31
Justification.....	31
Detailed Recommendations	31
Indicative Costs and Implementation	32
New Access Infrastructure.....	35
Overview.....	35
Justification.....	35
Detailed Recommendations	35
Parking: Strategic Review and Changes to Parking.....	39
Overview.....	39
Justification.....	39
Detailed Recommendations	39
Indicative Costs and Implementation	40
Interpretation/signage	42
Overview.....	42
Justification.....	42
Detailed Recommendations	42
Indicative Costs and Implementation	43
Codes of Conduct	45
Overview.....	45
Justification.....	45
Detailed Recommendations	46

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

Indicative Costs and Implementation	46
Work with local club/group	46
Overview.....	46
Detailed Recommendations	46
Indicative Costs and Implementation	47
Refuges	49
Overview.....	49
Justification.....	49
Detailed Recommendations	49
Indicative Costs and Implementation	49
Enhancement of existing site to create hub	52
Overview.....	52
Justification.....	52
Detailed Recommendations	52
Indicative Costs and Implementation	53
Enhancement to existing green infrastructure sites away from SPAs	55
Overview.....	55
Justification.....	55
Detailed Recommendations	55
Indicative Costs and Implementation	56
Enforcement	58
Overview.....	58
Justification.....	58
Detailed Recommendations	58
Indicative Costs and Implementation	58
Monitoring.....	59
6. Implementation	61
Delivery.....	61
Phasing	62

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

Implementing a cross boundary approach to protecting European sites	63
Developer contributions for the impact of new development	65
Community Infrastructure Levy (CIL)	65
Section 106 agreements	66
On-site provision on development sites	67
Other funding sources	68
Delivering measures relating to existing impacts.....	68
Implementation next steps.....	68
7. References	70
8. Appendix 1: Interest Features of the three SPAs	72
9. Appendix 2: Previous Studies.....	74
10. Appendix 3: Our Approach.....	76
11. Appendix 4: A ‘long list’	77
12. Appendix 5: Main Matrix	80
13. Appendix 6: Spatial Context: Identifying areas that should be a focus for the strategy	85
14. Appendix 7: Summary Map and Tables for Elements of the Plan	92

Acknowledgements

This report was commissioned by North Kent Environmental Planning Group. We are grateful to Andrea Wright (Gravesham Borough Council) for overseeing the commission. Our thanks also to the other members of the steering group: Martin Hall (Greening the Gateway), Nigel Jennings (Natural England) and Debbie Salmon (Kent Wildlife Trust). Our thanks also to Kevin Duvall (Kent Wildlife Trust) for useful discussion regarding Oare Marshes.

A wide range of people participated in a workshop in September 2013, and our thanks to all those who attended and shared ideas about the management of recreation and disturbance impacts to birds.

1. Introduction

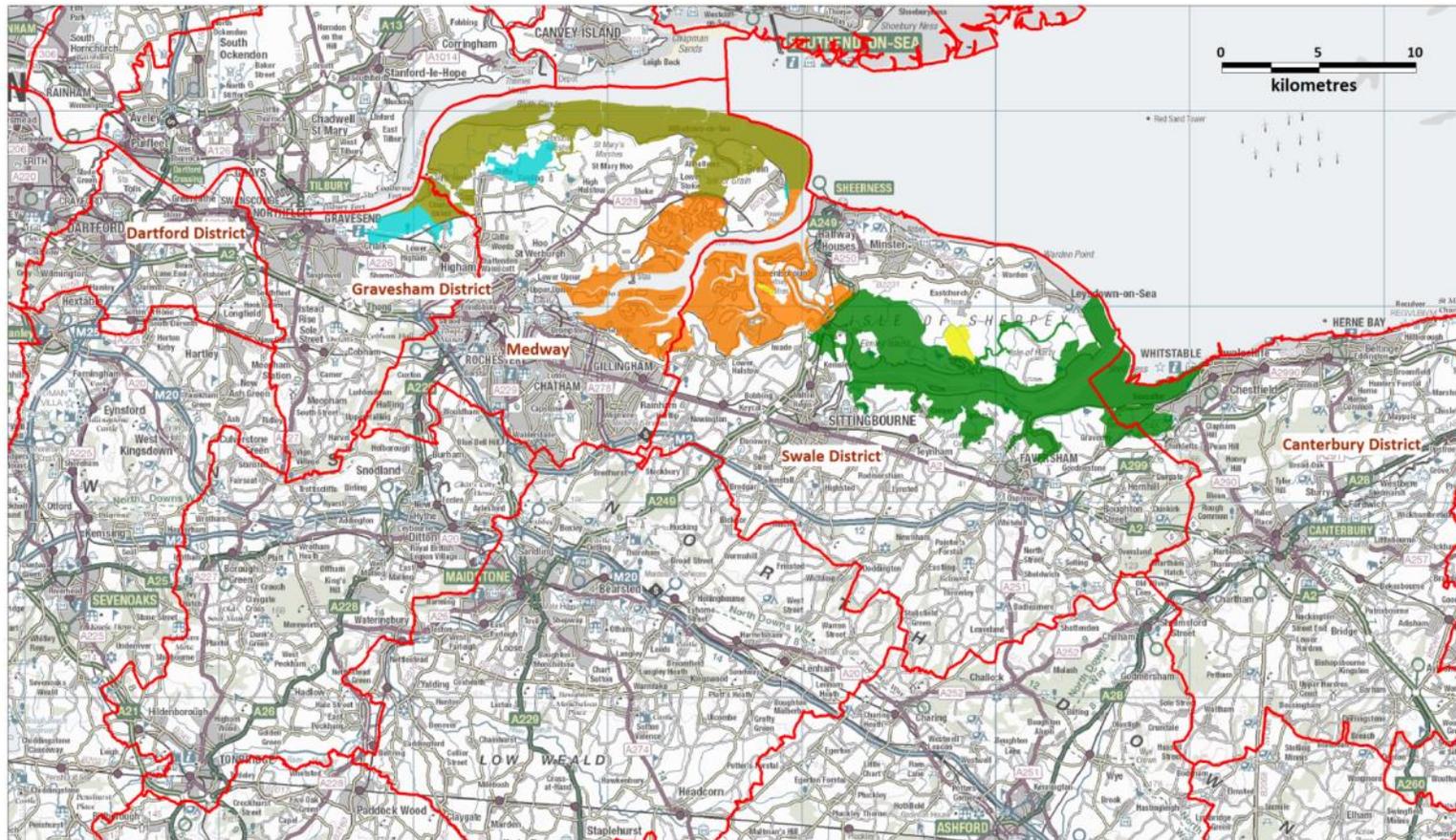
- 1.1 In this section we set out the background to this report, summarising why a strategy is required and providing the necessary context for the rest of the document.

North Kent's international wildlife designations

- 1.2 This stretch of shoreline encompasses three Special Protection Areas (SPAs): the Thames Estuary and Marshes SPA, the Medway Estuary and Marshes SPA and the Swale SPA (Map 1). All three sites are also listed as Ramsar¹ sites, for their wetlands of international importance. The Ramsar site boundary does not quite match the SPA boundary, notably near Gravesham where the Ramsar boundary extends beyond the western boundary of the SPA (see Map 1).
- 1.3 The three sites are classified as SPAs in accordance with the European Birds Directive (Council Directive 79/409/EEC on the conservation of wild birds, updated by Council Directive 2009/147/EC in 2009). This European legislation requires Member States to classify sites that are important for bird species listed on Annex 1 of the European Directive, which are rare and/or vulnerable in a European context, and also sites that form a critically important network for birds on migration.
- 1.4 All three of the north Kent sites are classified for their waders and waterfowl, both Annex 1 and migratory species. The bird interest features for which each site has been classified varies slightly across the three sites, but all three sites provide on passage, overwintering, and breeding habitat to an array of species of European Importance. The sites therefore provide habitat for European wildlife throughout the year, with particular interest varying at different times of the year, and it is clear that the three European sites together provide a vast and linked expanse of critically important habitat to the SPA network around the British coast. Details of the interest features of each of the sites are summarised in [Appendix 1](#).
- 1.5 The additional Ramsar site listing for all three sites arises from the recognition of the international wetland importance of each, under the Ramsar Convention. It is common for SPAs to also be listed as Ramsar sites, and the Ramsar designations do include interest features that are not birds.
- 1.6 Also of relevance are areas of land identified as compensatory measures for adverse effects on European sites. These sites are given the same protection as SPAs/Ramsar sites². There are two areas in N Kent that meet this criteria and they are also shown in Map 1.

¹ Convention on wetlands of international importance especially as waterfowl habitat, Ramsar, Iran, 2/2/71 as amended by the Paris protocol of 3/12/92 and the Regina amendments adopted at the extraordinary conference of contracting parties at Regina, Saskatchewan, Canada 28/5 – 3/6/87, most commonly referred to as the 'Ramsar Convention.'

² See paragraph 118 of the National Planning Policy Framework



**Map 1: Relevant European Sites
(South side of Thames only)**

Contains Ordnance Survey data © Crown database and database right 2013

- Medway Estuary & Marshes SPA & Ramsar
- Thames Estuary & Marshes SPA & Ramsar
- Ramsar outside of SPA
- Compensation sites
- District Boundaries

Previous studies

- 1.7 Previous studies (Banks *et al.* 2005) show marked declines of key bird species, particularly on the Medway Estuary (these previous studies are listed and summarised in [Appendix 2](#)). There is insufficient evidence to adequately assess the cause of these declines (some of which are long-term, going back 25 years), they may relate to a range of factors. However previous studies (see summary in [Appendix 2](#)) do show disturbance impacts to birds and disturbance may be a component factor.

Growth in North Kent

- 1.8 This strategy focuses on the administrative areas of Canterbury, Dartford, Gravesham, Medway and Swale local authorities. A review of the progression of local plans across the administrative areas of Canterbury, Dartford, Gravesham, Medway and Swale local authorities has identified that plans have progressed across the area since work on the European site mitigation requirements began. The following bullets provide a brief summary of the current progression of the relevant planning documents and indicate that around 68,000 new homes are likely to come forward in the next few decades³:
- **Canterbury** – The preparation of the Canterbury Local Plan by Canterbury City Council is underway, with a recent consultation on the draft plan being undertaken in the summer of 2013. The plan period of 2011 to 2031 is allocated a total of 15,600 dwellings. Land to the south of Canterbury takes up an allocation of 4,000 dwellings, with other large strategic sites at Hillborough and Sturry/Broad Oak.
 - **Dartford** – Dartford Borough Council adopted its Core Strategy in September 2011, with a plan period up to 2026. The plan supports new housing provision up to 17,300 dwellings over the plan period. Key development sites are identified in the plan, with Ebbsfleet to Stone accommodating 7,850 new homes, Dartford 3,070 and the Thames waterfront allocated 3,750.
 - **Gravesham** – The Council is planning for 6,170 houses over its plan period (to 2028), with the Core Strategy for the Borough currently at examination stage. Most of the new housing will be accommodated within the urban area of Gravesend.
 - **Medway** – Medway Council withdrew its draft Core Strategy from Examination in November 2013, following designation of an extended SSSI at Lodge Hill, Chattenden. The Council is in the early stages of preparing a new Local Plan, working to a programme of adoption in 2017. The Council is required to carry out a comprehensive objective assessment of development needs to inform the growth allocations in the new plan that will cover the period up to 2035. Currently, it is premature to indicate the level of the housing provision that will be made in the new plan.
 - **Swale** – the draft Local Plan for Swale proposes a housing target of 10,800 new homes over the plan period, primarily as extensions to the larger towns such as Sittingbourne.

³ The plans for the area have different plan periods with end dates which range from 2026 to 2035.

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

- 1.9 Given this level of growth there is a clear need for a strategic strategy for mitigation measures relating to new growth.

Other projects of relevance

- 1.10 There are a number of other projects or initiatives that provide some cross-over or links to the SARMP, which include:
- Thames Estuary 2100 (TE2100)⁴, which sets out the strategic direction for managing flood risk in the Thames estuary.
 - The Greater Thames Marshes Nature Improvement Area (NIA)⁵ which is one of twelve landscape scale NIA projects in England. Elements within the NIA include habitat management and creation; work with local businesses, community engagement and securing long-term funding.
 - Shoreline Management Plans⁶.
 - Marine and Coastal Access Act: enhanced coastal access will provide a right of access (with ‘spreading room’) around England Work is planned to start on the stretch of coast between Ramsgate and London in 2014/15.

Structure of the Report

- 1.11 Background to the methods we have used to produce this strategy are set out in [Appendix 3](#). Subsequent sections of this strategy are structured with separate sections that describe:
- An overview of possible measures: the long list, with a review of each of the options within the list
 - Locations that are the focus for the strategy
 - The short-list of measures
 - The detailed strategy.

⁴ <http://www.environment-agency.gov.uk/homeandleisure/floods/125045.aspx>

⁵ <http://gtgkm.org.uk/greater-thames-marshes-nia/>

⁶ <http://www.environment-agency.gov.uk/research/planning/105014.aspx>

2. A framework for the Plan

2.1 In this section we define the aims of the strategy, how those aims are distinguished within the strategy and we set out the guiding principles that provide a framework for the strategy.

Aims of the Plan

2.2 The strategy has two broad aims:

- It will support sustainable growth whilst protecting the integrity of European wildlife sites from impacts relating to recreational disturbance
- It will reduce the existing recorded recreation impact on birds on the European wildlife sites in order to meet duties relating to the maintenance and restoration of European sites, as required by Article 4(4) of the Birds Directive.

Legal and policy requirements

2.3 The National Planning Policy Framework (NPPF) provides the Government’s policy framework within which sustainable growth should come forward. It is fundamental to the success of any strategic mitigation strategy for European sites that such a strategy is founded on sound planning principles. This strengthens the strategy and ensures its deliverability in the planning system.

2.4 The first aim of this strategy relates to new development and the need for competent authorities to ensure that new growth will not adversely affect the integrity of the North Kent European sites. This is in accordance with Article 6(3) of the Habitats Directive, transposed into Regulation 61 of the Habitats Regulations, whereby competent authorities are required to ensure that any plan or project for which they are authorising, or undertaking themselves, will not adversely affect the integrity of a European site. This is met by a competent authority in one of two ways. Firstly, the Habitats Regulations allow for a competent authority to be able to screen out the proposed plan or project from any further detailed assessment if it can be determined that it will not be likely to have a significant effect on any European site due to the nature of the proposal or any measures built into the proposal to avoid the likelihood of significant effects.

2.5 Where proposals cannot be initially screened out, the competent authority will proceed to a more detailed level of assessment, known as the ‘appropriate assessment,’ gathering the best scientific information to determine whether an adverse effect on the integrity of the European site can be ruled out. Measures that can adequately mitigate for any identified effects are considered during this detailed assessment, and added to the proposal where necessary, usually through the use of planning conditions or legal agreements.

2.6 Local planning authorities are increasingly seeking strategic approaches to securing mitigation for new growth, where the potential impact on European sites is similar for each individual development. Such an approach includes detailed appropriate

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

assessment work undertaken upfront, followed by an agreed approach to mitigation that can be consistently applied to development coming forward. This is normally supported by local plan policy, and often with a partnership across administrative boundaries and drawing on input from Natural England and both national and local nature conservation bodies or established partnerships.

- 2.7 Defining potential impacts and making sound decisions relating to when a plan or project is likely to have a significant effect, whether there will be an adverse effect on site integrity and the need to take a precautionary approach whilst not being unjustifiably over precautionary, is a challenging and sometimes very difficult task. These decisions are important not only because they relate to the highest level of wildlife protection, but also because the conclusions may ultimately determine whether a plan or project should proceed or not.

Geographical area

- 2.8 The strategy will relate to the interest features of the following European Sites: the **Medway Estuary and Marshes SPA/Ramsar; the Swale SPA/Ramsar; Thames Estuary and Marshes SPA/Ramsar**. The strategy will not necessarily be limited to measures implemented within these sites, as the interest features may well occur outside the site boundaries at certain times, and in addition, measures relating to access may well be relevant well-outside the site boundaries (for example the provision of new routes or new green infrastructure).

Activities

- 2.9 The strategy will address the impacts of **recreational activities**, and not to impacts relating to other activities (for example there may additional impacts from industrial development, shipping, etc.). New housing may also have other impacts that are outside the scope of the strategy – for example effects on water quality. Impacts that relate solely to other (i.e. non-avian) interest features of the European Sites are also beyond the scope of the strategy.

Timescale

- 2.10 The interest features of the above sites include breeding birds, as well as passage and wintering birds. The declines in birds particularly relate to wintering (though note that the number of little terns has declined, see Liley *et al.* 2011). Following the recommendation of Natural England the strategy will relate only to the winter.
- 2.11 Mitigation measures will need to be secured in perpetuity, and therefore there is a need for the strategy to last and look to the **long-term**. The strategy should be robust enough to give certainty that European site interest will be protected, but at the same time **flexible** enough to be reviewed and modified over time, in line with results indicated by monitoring. It is difficult to be confident of how the coastline, the distribution of birds, the distribution of prey and access patterns may change over long time periods. Different weather conditions may result in people using the coast differently and result in seasonal shifts in bird numbers and access levels. As such the strategy needs to be able to respond to circumstances and carefully monitor changes.

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

General Principles

- 2.12 The following principles underpin how the strategy has been prepared. The strategy should be **cost effective** in terms of management, collection, fund-holding, distribution and accounting. It should seek to put in place measures that are required, but not those that are over and above that which is necessary to give certainty that the European sites will be adequately protected, and not those that deliver other objectives for the local area. Requirements of new development should be fairly and reasonably related in scale and kind to the development, as required by paragraphs 204 and 206 of the NPPF.
- 2.13 The strategy should be **fair** in that it is applied fairly to development, proportionate to the potential impact that will be generated. Measures should not target particular types of development and leave other types free to proceed without adequately contributing to the mitigation for their impacts. Equally, the measures should be fair in respect to the types of recreation and the impacts associated with those activities. It is important to note that the local planning authorities, as competent authorities are responsible for securing the necessary mitigation and funding for some measures may need to be raised from other sources (this accords with the solutions focussed approach advocated in paragraph 187 of the NPPF).
- 2.14 The measures within the strategy should be included on the basis of **evidence** to justify their need and their appropriateness and likely effectiveness, and therefore in accordance with the requirements of paragraph 158 of the NPPF. The strategy should not include measures that may be considered desirable to achieve other objectives.
- 2.15 The strategy should be **implementable** with a good degree of certainty that the required measures can be delivered in a timescale that is related to the commencement of the development and the avoidance of potential impacts, taking account of the gradual change in recreational use over time. This will require considerable forward planning for the strategy to be implemented in a timely manner. Some measures will need to be secured in-perpetuity to ensure that impacts are avoided into the long term.

Drawing a distinction between current impacts and the effects of new development

- 2.16 The two broad aims for the SARMP are interlinked aims and very difficult to separate. However, it is important to clarify how they should be addressed as two different requirements of the legislation, as described above in Section 1, and where responsibility lies for securing the achievement of each.

Maintaining and restoring the European site network by resolving existing impacts

- 2.17 The overriding principles of the European legislation in terms of the European site network is the establishment, maintenance, restoration and protection of a coherent network that secures the favourable conservation status of the habitats and species of European importance, listed in the Directives. Article 6(2) of the Habitats Directive particularly requires each Member State to avoid the deterioration of habitats and disturbance of species for which European sites have been designated. It is this requirement that is the reason for the second aim of the strategy, which is to reduce the impact of existing levels of recreation on the North Kent European sites. There

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

have been marked declines in the bird interest on some of the sites for a number of years, and disturbance levels may be a factor in these declines.

- 2.18 Meeting the requirements of Article 6(2) of the Habitats Directive is a Member State responsibility, and it is therefore a government wide responsibility, which logically extends to all public bodies and individuals holding public office whether their statutory remit includes duties that are relevant to the Article 6(2) requirement. It is worth noting that similar duties in national legislation exist for public bodies with regard to furthering the conservation and enhancement of Sites of Special Scientific Interest (SSSIs).
- 2.19 Whilst the first aim of the SARMP is specifically met by measures provided by new development, the second aim of the strategy is to contribute to the achievement of Article 6(2) objectives, and this can be achieved by the collective input of a range of authorities, bodies and partnerships. There may therefore be a number of options and opportunities for funding and resourcing measures contributing to this requirement.

Suggested approach to identifying responsibility for measures relating to new and existing impacts

- 2.20 The intention is to set out a single strategy that addresses the issue of recreational disturbance across the board, from both new development as well as existing development. The strategy aims to provide the right balance between the two aims, apportioning measures to each with logical and justified distinctions, whilst also seeking a realistic and implementable way forward that does not separate out the two aims to the extent that implementation becomes overly complicated and burdensome. Responsibility for existing deterioration should not be borne by new development, and at the same time, where new development will lead to additional impacts, fair and proportionate responsibility should be taken.
- 2.21 Our approach to seeking to identify responsibility will be to produce a single strategy that addresses disturbance impacts. Within the strategy we will – as far as possible – identify and split measures that relate to the two different aims. These splits will be identified as follows:
- Some measures within the strategy will be applicable to both aims, but it may be possible to subdivide or apportion them. **As far as possible some elements within the strategy may therefore be split according to whether they address new impacts from new development or solely relate to existing access.**
 - Some of the measures will be those that are clearly and urgently required and those will therefore highlight existing issues requiring rectification. Such measures are likely to be location specific, and need to be very clearly defined. **This will need to relate back to ecological information to focus on locations in most need of urgent action.**
 - Housing allocations may identify where particular measures will be required to prevent any new impacts from occurring. **A check of allocations should identify any such hotspots.** However windfall development and high levels of growth a few

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

kilometres from the coast will mean that changes in access will also occur across a wide area.

- Some measures within the strategy may be less structured at this stage, being opportunities to mitigate for impacts but ones that may be implemented in a number of ways, with a variety of partners providing input, or may be those that can be refined over time. Some of these measures may even be more aspirational in nature. **These types of measures do not offer the necessary certainty to enable new development to meet the requirements of the legislation, but may provide positive opportunities to contribute towards rectifying existing issues.**
- Some measures will not necessarily have a clear allocation to either existing or new development impacts, but there may be logical reasons why their implementation is with one or the other. There will be activities that are best implemented by local planning authorities or other partners, and others that would be very difficult without developer led funding. Additionally, some projects may be of a type that meet external funding bid criteria, and therefore best pursued for existing impacts, leaving developer contributions to fund other important and necessary mitigation. **The most appropriate implementation path should be followed to maximise outcomes, and this will be a consideration in highlighting where responsibility may lie.**
- In checking that the burden on new development is fair and proportionate, consideration should be given to the expected increases in housing, and how that relates to the existing level of impact. **Checks should also be made across to other established strategic mitigation schemes, to assess whether impact, mitigation requirements and costs, and the levy placed on developers is in line with other approaches.**

3. An overview of possible mitigation measures: the long-list

3.1 In this section we provide an overview of the different measures to reduce disturbance impacts at coastal sites: measures that could form part of a strategy. We then review each in terms of cost, deliverability, effectiveness and timescale to implement to provide context to later stages of the report.

A 'long list'

3.2 We set out a summary 'long' list of possible options in [Appendix 4](#). These options range from soft measures and proactive work with local residents, to enforcement. The table simply sets out all the possible ways in which disturbance might be reduced. Some measures can be described as either off-site or on-site measures. Others, such as the promotion of visitor awareness of issues, or habitat creation, may fall into both categories. Therefore this distinction is only made where useful in organising the measures presented in the table. The measures listed are not necessarily compliant with the habitat regulations in terms of mitigation.

Assessment of the long list

3.3 In [Appendix 5](#) we provide a table assessing each of the measures in the long list ([Appendix 4](#)) in terms of effectiveness, deliverability, time frame to implement and cost. The colours facilitate comparison – rows that are mostly green indicate more positive assessment while those rows with dark brown cells indicate approaches with less merit.

3.4 From this assessment we can draw the following broad conclusions.

Habitat Management

3.5 Habitat management measures could include creation of artificial, undisturbed roost sites, creation of additional feeding areas (e.g. managed retreat or new lagoons) or enhancement of habitats to provide better feeding sites (for example changes of management of wet grassland). Problems with these measures include:

- Some are large infrastructure projects which are complex and expensive to deliver,
- There are existing roost sites on islands that are largely free from disturbance,
- Wet grassland habitats (the obvious focus for changing management) are not used during the winter by many of the waders that have been declining (such as knot, grey plover, dunlin and ringed plover)
- They may be dependent on opportunities and other plans (managed retreat),
- Some should be taking place anyway (management of the European sites to achieve favourable condition),
- They are not necessarily compliant with the Habitat Regulations if new habitat is being created outside the SPA to compensate for deterioration of the SPA.

3.6 We therefore suggest that opportunities may arise, such as managed retreat. Such opportunities will depend on other plans and circumstance, and whenever possible maximum potential should be made to enhance habitats and minimise disturbance for the bird interest. As such, habitat management measures are not a main element of this strategy, but should be recognised as important in their own right.

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

Planning and off-site measures

- 3.7 Ensuring development does not take place around sensitive sites effectively avoids issues relating to the impacts of new development. There are now precedents around the UK where SPA and SAC sites have a development exclusion zone clearly set out within overarching plans. For example local authorities around the Dorset Heaths, Thames Basin Heaths, Breckland, Ashdown Forest and Wealden Heaths have all included 400m zones around their heathland sites. Establishing such a zone with respect to disturbance issues and coastal sites is much more difficult, as recreational users travel from a wide area to visit and use coastal sites (previous work has suggested a 6km zone from which the majority of recreational use originates). There are also practical considerations as each local authority is at different stages in their relevant plans. A ‘sterile’ zone of no development around the three North Kent SPAs would encompass ports, town centres, very built up residential areas and contaminated brownfield sites. Development would potentially be halted or pushed to greenfield sites whilst also preventing regeneration of urban centres. We therefore suggest this approach does not merit further consideration with any large buffer. While not included as a main mitigation element within the strategy, local authorities may wish to consider small exclusion zones (say 400m) around main access points.
- 3.8 The provision of Suitable Alternative Natural Greenspace ‘SANGs’ and other additional green infrastructure is a potentially appealing solution to resolving disturbance impacts. By providing additional space for visitors, it would seem intuitive that an area can support more visitors. In terms of visitors to the coast, alternative sites are most likely to work for types of access that are not dependent on particular coastal features – for example visitors who are simply drawn to sites because it is the nearest open space to their home, or because it is a convenient place to walk the dog and let the dog off a lead. The options to create alternative sites that provide coastal scenery, locations to kite surf or beautiful beaches are likely to be limited. Given the high cost of purchasing land and securing management in perpetuity, SANGs are not ‘quick wins’ and should be carefully selected, targeted and planned. Taking a long view, SANGs may have a longer term and more strategic role in mitigation compared to other measures, and must clearly be carefully considered on a site-by-site basis.
- 3.9 Opportunities for SANGs delivery may come forward through existing sites (potentially already in local authority or county council ownership) which could be enhanced to provide access or when directly linked to individual, large developments. Sites that are linked to development will be likely to be close to new housing (in some ways ideal – but likely to mean a particularly ‘urban’ feel) and need to be considered very carefully on their merit (an area of grassland on the edge of a large development is unlikely to provide a good alternative to the SPA sites). We therefore suggest that provision of new green space sites does have a role in mitigation, but that it is a long-term one and one that needs to be carefully planned. Given the high cost of such measures, they are dependent on local opportunities.

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

- 3.10 Other off-site measures relate to more local approaches, enhancing sites outside the European sites, managing visitor flows on adjacent sites, essentially drawing visitors away from European sites. These approaches have merit, but are small in scale and local.

On-site Access Management

- 3.11 The matrix in [Appendix 5](#) indicates that most on-site measures are relatively easy to implement, effective and relatively low cost. The one measure with concern regarding effectiveness is fenced exercise areas for dogs.
- 3.12 There are a range of management measures that relate to shore based access which would be relatively easy to implement and potentially low-cost, but they are mostly quite local and site specific. As such they could work to resolve issues in particular locations, enhance access in particular places and be carefully targeted. They all require some work 'on the ground', working with local landowners, rights of way officers and other relevant stakeholders, and as such could be considered as a series of individual small, discrete projects:
- Management of visitor flows on adjacent land
 - Paths rerouted inland/below seawall
 - Screening
 - Path management
 - Restricting access at particular locations (such as temporary fencing near wader roosts)
- 3.13 These kind of approaches have merit, but require careful planning and design. Many can be targeted to resolve particular issues at sites or be tailored to particular access types. For example low screening or low fencing at particular locations may provide opportunities to keep dogs away from key areas for birds. These kinds of measures can be phased/targeted as resources allow and as issues arise.
- 3.14 Management of parking (reducing/redistributing spaces/closing parking locations/review of charging) is a means of managing access over a wide area, and applies to a wide range of different access types. Changes to car-parks can take place both on and off-site. In order to ensure success, careful work is needed initially to review existing parking, map parking and identify changes. An important element is the need to ensure a consistent approach across local authorities and others responsible for parking. Changes to parking may also be unpopular with some users, so would need to be undertaken carefully and considerately. It would be necessary to predict and monitor likely displacement to ensure that the pressure did not merely move from one sensitive area to another. Conducting a review, producing a car-parking 'plan' and liaising with users would all necessitate a degree of staff resources.
- 3.15 Zoning is particularly relevant to watersports and there are numerous examples around the country where watersport zones have been established. Zoning works where users spread over a wide area and there are issues with disturbance at particular points. Zoning is positive in that it creates a dedicated space for users, but zones require some careful

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

consideration and consultation in order to get right. As such the approach is not a ‘quick win’.

Education and Communication/Awareness Raising

- 3.16 Education initiatives, such as interpretation, guided walks, wardening, school visits, community events etc., are widely undertaken at many countryside sites and enhance people’s visits to sites and their understanding of the local area. Such approaches are proactive, rather than reactive, but unlikely to solve problems in the short term and depend largely on the audience and style of communication. In general, therefore, education and awareness raising measures are likely to have wider conservation benefits, but there is relatively little evidence that such measures on their own will bring about rapid changes in people’s behaviour and reduce disturbance. Good communication is however likely to be important when linked to other measures, to ensure visitors understand issues and to ensure clear guidance for people on where to go, how to behave etc.
- 3.17 Voluntary codes of conduct provide a means of clearly conveying messages about where to undertake different activities and how to behave, and provide a foundation to other measures such as enforcement.
- 3.18 Wardens appear twice in the matrix, as people out ‘on-site’ can have an engagement role (talking to visitors, showing people wildlife, explaining issues etc.) and/or an enforcement role. Establishing a warden presence is relatively easy to implement, but employment costs over a long-period (in perpetuity) are high. If wardens have an enforcement role, then there is a need for clear guidance to users and legislative support to provide the scope for enforcement.
- 3.19 The presence of a warden on-site, asking people to behave differently, and the wardens on-site to show people wildlife are relatively ‘quick wins’ in that a wardening team can be established quickly. There is published evidence of their effectiveness, for example in resolving impacts from access for breeding terns (Medeiros *et al.* 2007). Given that warden/rangers could undertake monitoring and also work closely with stakeholders on other projects, an on-site presence, at least in an early part of the strategy, would seem a sensible use of resources. It will be important to ensure that the warden/rangers have powers to enforce byelaws etc. as required over time.

Enforcement

- 3.20 A range of legal mechanisms are relevant. Byelaws can be applied to enforce zones, limit speeds and dog control orders provide a range of options for fines to be levied to dog owners (for example requiring dogs to be on leads; requiring dog owners to put their dogs on leads when asked etc.). In general these measures require a little time to set up – involving consultation, evidence gathering etc. – and (not surprisingly) can be unpopular. Users need to be made aware of any changes and some way of monitoring, checking and enforcing (such as wardens, see above) is required. Measures relating to enforcement are therefore ones which have a high likelihood of success, but require some time to set up and establish. We therefore suggest legal mechanisms such as dog control orders and byelaws are elements that potentially feature later in any strategy, after other (more positive) measures have been implemented.

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

- 3.21 Capping visitor numbers is problematical. Permits or similar systems are used in other countries (see Newsome, Moore & Dowling 2002 for details and a review), and occasionally within the UK. In general, however, the approach is applicable to wilderness areas or sensitive nature reserves and has largely lost favour within the UK. At most locations around the SPA there are existing rights of access and controlling access in such a way along the coastline is probably not worth further consideration.
- 3.22 Covenants relating to pets in new development is also not worth further consideration. It is difficult to have confidence that covenants can be applied and be effective in the long term. The checks, monitoring and legal costs of ensuring residents do not keep pets are complicated.

4. Locations that are a focus for the strategy

4.1 In this section we summarise spatial data relevant to the strategy. [Appendix 6](#) includes a series of maps and summarises background information relating to spatial context. It contains the following maps:

- Map 11: Areas important for particular bird species: WeBS sectors holding more than 10% of the count of interest features of the SPAs
- Map 12: Areas that are potentially vulnerable to disturbance/sensitive to disturbance (high tide roosts)
- Map 13: Priority habitats within the SPAs, highlighting habitats relevant to the SPA interest features
- Map 14: Areas where access may increase in particular
- Map 15: Current access
- Map 16: Areas where particular activities are focussed

4.2 The key areas for birds – based on WeBS core count data – are the northern parts of the Swale and the inner part of the Medway (islands). These are some of the quietest areas in terms of access and development pressure. These areas also hold a high proportion of wader roosts. The largest areas of intertidal habitat (the richest feeding for many of the birds) are in the Medway and the outer Thames. The area with the most new housing likely to come forward (within a 6km radius) is the South-west corner of the Medway, between Lower Upnor and Gillingham. Areas near Gravesend and the upper reaches of the Swale are also likely to see a marked increase in housing within 6km. Current access levels are highest near Whitstable (mouth of the Swale) and the upper parts of the Medway.

5. Elements of the Plan

5.1 The following elements form the basis of the strategy. Each are discussed in detail within this section.

- A North Kent Coast Dog Project
- Wardening/Visitor Engagement
- New Access Infrastructure
- Parking: Strategic Review and Changes to Parking
- Codes of Conduct
- Interpretation/signage
- Work with local club/group
- Refuge
- Enhancement of existing sites to create hub
- Enhancement to existing GI away from SPA
- Enforcement
- Monitoring

5.2 The **dog project** and **wardening/visitor engagement** elements are generic and can be established quickly. The **dog project** focuses on the activity that is most associated with disturbance and will engage with local dog walkers. It will be able to promote particular sites to dog walkers and raise awareness of disturbance issues. **Wardens/rangers** with a visitor engagement role can be mobile and deployed across a range of locations, targeting areas with particular issues or close to new development. The level of wardening can be flexible over time and the posts can supplement existing visitor engagement and range posts.

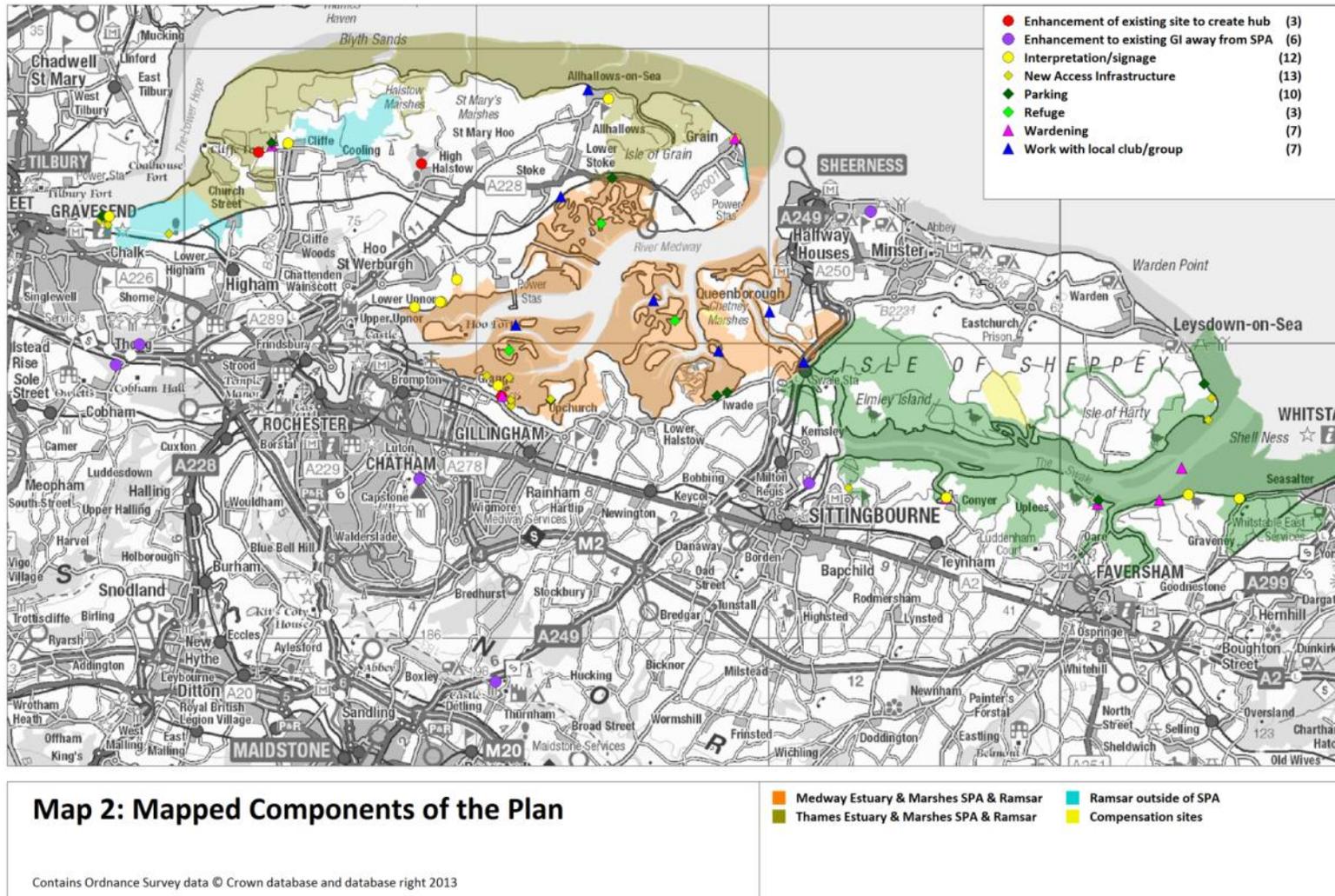
5.3 **New access infrastructure** will involve a range of discrete, focussed projects that could be phased with new development. **A review of parking locations** will provide the necessary information to underpin long-term changes in parking capacity, charging and provision. Such changes can be phased over time and linked to available funding and locations where new development comes forward. **Codes of conduct** will provide guidance for a range of activities, in particular making it clear how users should behave and where to undertake particular activities (important ground work should legal enforcement be required in later years). In-line with these, **interpretation/signage** and **work with local clubs/groups** is envisaged. These three elements should be undertaken in tandem and it is important they interlink, for example the maps on the codes of conduct could also be used on the interpretation. Also linked is the long term aim of creating **refuges** – ‘quiet’ areas within the Medway where recreation and other activities are discouraged. We also set out **enhancement to existing sites**: both those **within the SPA** and **outside**. In the long term access is best focussed away from the SPAs, and the more that existing green infrastructure away from the SPA can absorb access pressure and people’s access requirements the better. Particular honeypots within the SPA will be likely to continue to draw access and coastal sites will always have a particular draw. These sites therefore need to be made more robust, with

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

additional resources made available and management measures targeted to reduce disturbance impacts. Measures are possible at such locations to reduce disturbance.

Monitoring across the SPA sites will provide a check on success of measures and inform where further measures, such as enforcement (for example dog control orders) might be necessary

- 5.4 Elements which can be mapped are shown in Map 2, which provides an overview of the different elements. Note that some parts of the strategy cannot be specifically plotted and for some elements (such as wardening) some suggested locations are indicated on the map but there may be additional locations over time. We also summarise the strategy spatially in [Appendix 7](#). In this Appendix we set out a summary map (Map 17) showing all components of the strategy and an accompanying table that summarises the spatial elements of the strategy.



A North Kent Coast Dog Project

Overview

5.5 A dog project would provide the opportunity to actively engage with local dog walkers and establish a means for dog walkers and conservation/countryside staff to communicate with each other. The approach has been successfully used in other parts of the country where there are concerns about the impacts of dogs on European sites.

Justification

5.6 Dog walking was the most common activity people were undertaking at the survey points included in the disturbance study (Liley & Fearnley 2011). Dog walking accounted for 55% of the major flight events recorded during the disturbance study and the study showed that it was dogs off-lead that were a particular issue. A dog project aimed at establishing communication with dog walkers, providing a means to engage with users, raising concerns, highlighting sites to visit (and sites where dogs are not so welcome) etc. is a positive, proactive and cost effective approach.

Detailed Recommendations

5.7 We recommend that a project is established that has its own identity/branding and is something that is free. The project would be a strategic, over-arching element of the strategy – in that it is not location specific. The main element to the project would be a website that is aimed at those interested in dogs. As such the website could provide:

- social networking opportunities for dog walkers,
- a forum for users to share information on places to walk and local issues,
- help for people with lost dogs
- a list of vets, pet food suppliers, kennels etc.
- a live gazetteer of countryside sites, potentially with opportunities for users to add comments about sites, recommend sites etc. The gazetteer should indicate (potentially with a colour scheme) sites where dogs are welcome and sites where dogs should be on a lead or are not welcome
- a register for professional dog walkers (allowing professional dog walkers to sign up to a particular code of conduct)
- a code of conduct for dog walkers in the countryside

5.8 Besides the website, there is the potential for the project to include events (guided walks, meet-the-ranger type events, events at particular sites where there are dog walking issues, indoors events with stands etc.). Promotion of the project could involve face-face contact on-sites, and also active work with local vets, suppliers etc.

5.9 By holding people's contact details (and potentially details of their dogs, where they live/walk etc.) there is the potential for users to be contacted directly if there are issues on local sites, for consultation etc.

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

- 5.10 ‘Dorset Dogs’⁷ provides a useful precedent – the project has won awards from the Kennel Club and has been developed over a number of years, using funding from developers to off-set impacts related to the Dorset Heaths SAC/Dorset Heathlands SPA.

Indicative Costs and Implementation

- 5.11 The website and the approach of the project will need to be designed with the involvement of local dog walkers and be tailored to the specific area of North Kent. This will ensure it will appeal to local dog walkers and be useful.
- 5.12 The project will need to have its own identity and initial costs will need to cover the design of the website, production of membership packs, display material, equipment for events etc. Staff time will be required to develop the project and organise any start-up events etc.
- 5.13 Costs are summarised in Table 2.

Table 2: Indicative costs for dog project

Recommendation	Set-up/Capital Cost	Annual Cost	Notes
Dog Project	£15,000	£2,000	Staff time not included in cost as assumed undertaken by warden/rangers. Set up cost to cover web design, production of membership packs, launch event. Running costs for web hosting, updates to website, further events.

⁷ <http://www.dorsetwildlifetrust.org.uk/dorset-dogs.html>

Wardening/Visitor Engagement

Overview

5.14 A small team of mobile warden/rangers is needed to patrol the SPA, engaging with visitors and providing the staffing needed to implement some of the other measures within the strategy.

Justification

5.15 There are lengths of coastline with currently little or no ranger presence and there are issues of disturbance from both legal and illegal activities. There are also a number of local settlements where there is little liaison with the communities and a lack of understanding of the importance of the SPA featured species and their sensitivity to human activities. Where mitigation measures are needed, there will be a need to liaise with local land managers and owners and to either carry out works or appoint and supervise contractors. A number of places are popular with tourists and enthusiasts at all times of year and engagement with these transient visitors is also important to inculcate an understanding of the importance of the SPA and the vulnerability of the featured species to human impacts. This all requires a presence on the ground of knowledgeable rangers. We therefore envisage a small mobile ranger team that would supplement and fit with existing warden/rangers. The team would have a dedicated role along the lines of a ‘bobby on the beat’, and the team would be flexible over time in that staffing levels and deployment would vary as required.

5.16 There are published studies that show that wardening is effective in reducing disturbance impacts (e.g. Medeiros *et al.* 2007).

Detailed Recommendations

5.17 The warden/ranger’s would function as a mobile team, covering multiple sites (under different ownership and management) and their duties would involve working with the existing site managers (where present) and include:

- Actively patrolling sensitive areas, engaging with visitors.
- Putting up seasonal signs, fences etc.
- Familiarisation with the area and identification of disturbance issues
- Putting in place mitigation measures to remove sources of disturbance (such as illegal motor biking) or reducing disturbance from legitimate users (education, signs, screening etc.
- Liaison with local communities, landowners and land managers and other organisations
- Education initiatives with local schools etc.
- Monitoring impacts from human activities and the effectiveness of mitigation measures

5.18 While we envisage that the main work of the warden/rangers would involve active engagement with visitors, we also envisage that the duties would include work on some of the other areas recommended in this report – the parking review and the dog project for example.

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

- 5.19 The wardens would need to have a strong presence and be clearly identifiable. There are a range of options for how the warden/rangers could be hosted or established. For example it may be possible to add to existing staff teams in the area (e.g. wildlife trust/RSPB/local authority) alternatively the warden/rangers could form their own team with a separate brand and identification.
- 5.20 It would be possible for the core team to work with volunteers, which could provide a means of increasing local support and face-face contact. ‘Walking Wardens’ have been employed by some wildlife trusts⁸ on their reserves to report anti-social behaviour and (for those who have dogs) ‘best practice’ dog walking.
- 5.21 Wardening effort and patrolling would involve all areas, and be flexible. Different locations and issues may become a focus at different times. Map 3 shows suggested locations for the wardening effort to be focused. These are also summarised in Table 3. The list is not exhaustive, but provides an overview of some of the locations where the wardening effort could be directed.

Table 3: Suggested areas for wardening effort to be focussed.

Map ID (See Map 3)	Details
11	Mobile warden/ranger focus: issues with local dog walkers/motor bikes
22	Roaming warden along Medway estuary shore - boost to existing warden staff
41	Mobile warden/ranger focus dog walkers
48	warden presence
51	Existing wardening presence at Oare Marshes, but necessary to ensure continuity and coverage
53	Mobile warden/ranger focus: issues with local dog walkers, roosts wardened at high tides
55	enforce speed limits - jet skis and catamarans in this area

- 5.22 In general the areas that should be a focus for wardening effort should be:
- Wader roost sites at high tides
 - Sites with particular issues, such as a focus for particular activities (off-roading; dogs off-leads etc.)
 - Areas where access is likely to change, for example close to areas where development takes place

Indicative Costs and Implementation

- 5.23 It is anticipated that two rangers will be required during the winter, and in addition one senior ranger throughout the year. Additional short-term posts could be created to supplement the core team as required (monitoring results will provide indication as to whether this is necessary). The senior ranger would supervise the seasonal rangers and would be funded in perpetuity. The senior ranger would cover the sites where wader

⁸ For example in Northamptonshire: [Irthlingborough Lakes and Meadows Walking Wardens leaflet](#)

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

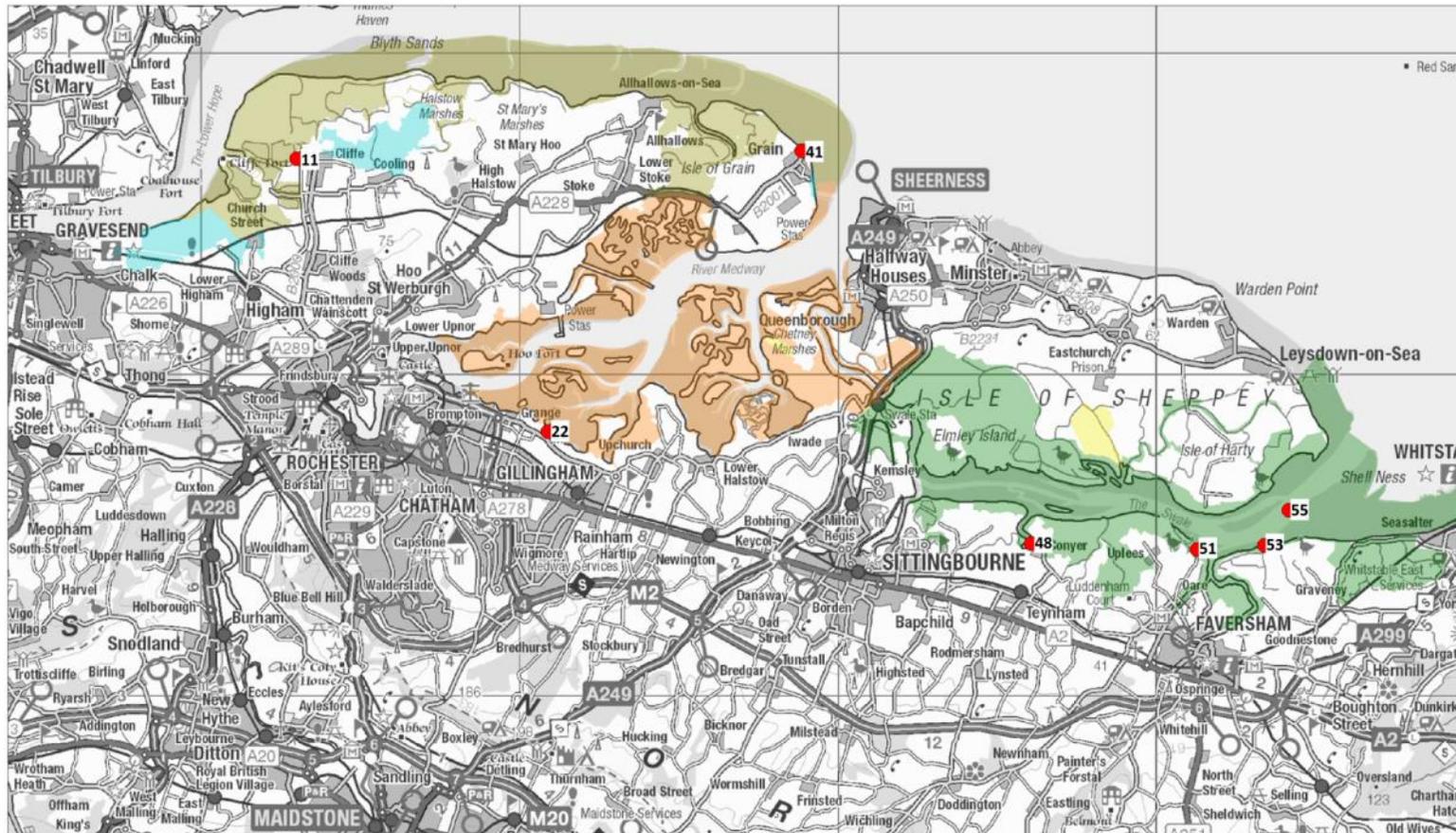
numbers start to build in July and in the quieter summer months (April – July) would be working on the other elements, such as data entry (monitoring data), the dog project, the parking review etc.). The two seasonal ranger posts would be employed for the autumn/winter only (August-March) and may not be required in perpetuity. This is because once access patterns have become established in particular ways that reduce disturbance (such as dogs on leads at particular sites) then there may no longer be a need for the staffing to continue at such a level. Volunteer wardens may prove effective support in the long term too. It may therefore be that – after eight to ten years and following careful review - it would be possible to reduce the staffing levels to two or one.

5.24 Costs would depend on how the team is set up and functioning. We recommend that the team does have its own identity, with an office base, vehicles, branding etc. With three staff in place, one staff member could have a focus on a particular estuary (Thames, Medway and Swale), with the potential for the three to also work together on particular aspects/projects/events.

5.25 Approximate costs are summarised in Table 4.

Table 4: Indicative costs for warden/ranger team

Recommendation	Set-up/Capital Cost	Annual Cost	Notes
Senior ranger post		£45,000	Long-term post. Includes office and vehicle costs.
Two seasonal rangers		£40,000	Potentially short-term. Includes office and vehicle costs.
Total		£85,000	



Map 3: Wardening/Rangers

(NB these would have a wide remit, points are examples and indicative)

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- Medway Estuary & Marshes SPA & Ramsar
- Thames Estuary & Marshes SPA & Ramsar
- Ramsar outside of SPA
- Compensation sites

New Access Infrastructure

Overview

5.26 This section is intended to cover small projects to reduce or modify visitor impacts on a site specific basis, for example changes to paths, gateways or other access infrastructure. Generic measures across sites and larger projects such as strategic signage or visitor centres are considered elsewhere.

Justification

5.27 Small, site specific measures may work well to resolve issues at a local scale. For example there are examples of where resurfacing paths has changed where people walk and as a consequence reduced disturbance (Pearce-Higgins & Yalden 1997). Vegetation structure appears to have the potential to affect how disturbance may affect birds (Murison *et al.* 2007), with thicker, scrubbier vegetation potentially screening visitors and reducing access off-paths.

5.28 The visitor survey results (Fearnley & Liley 2011) indicate that certain features draw users to particular locations and include better path surfacing/path network (7% respondents) and more dog-friendly (6%). For dog walkers in general evidence suggests that favourite sites are those where dogs are perceived as most happy; where they are permitted to run off lead, can socialise with other dogs, and where there is little danger of road traffic (Edwards & Knight 2006).

5.29 Re-routing paths, providing screening, providing fenced areas for dogs to be off lead and restricting access at certain (vulnerable) locations are commonly used approaches to simultaneously enhance access and reduce impacts. Many measures will be cost-effective to implement.

Detailed Recommendations

5.30 The following site specific measures have merit and could be focussed to particular locations:

- Allow vegetation to grow to set access back from sea-wall and screen users
- Provision of physical screening, such as reeds or fencing, to keep people away from particular areas and hide them. It may be possible to provide viewing facilities through the screen
- Enhancement of existing paths, for example through resurfacing, to draw users along particular routes
- Enhanced gateway/access furniture to prevent particular types of activity (such as off-road vehicles or motorbikes)
- Linking paths to provide choice of routes and potentially divert access away from seawall/shoreline
- Re-routing paths, for example below seawalls
- Fencing to direct people away from wader roosts

5.31 Opportunities for some of these measures may occur over time or be linked to other projects. It may be necessary to consider particular approaches as access levels change.

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

Through the workshop and site visits, we have identified a number of particular locations and projects. These are summarised in Table 5 and Map 4.

Table 5: Locations where there is potential for new access infrastructure which will reduce potential disturbance

Map ID (See Map 4)	Details
1	Linking of the shoreline path (Saxon Shore Way) with the Thames and Medway Canal towpath to give a choice of circular walks from housing and industrial area to east of Gravesend
3, 4 & 8	Infrastructure to inhibit motorbikes and other vehicles accessing marshes along the Saxon Shore Way, the Thames and Medway Canal towpath or existing or proposed new paths across Eastcourt or Shorne marshes.
19	Continue to manage existing shoreline vegetation of bramble etc. and reinforce with additional planting to provide partial screening - along seaward side of seawall in country park
23	Management of paths at Horrid Hill –making subtle changes including modification of path surfaces, provision of low vegetation screening and measures to discourage visitors straying onto foreshore instead staying on paths. Gated entrance to main access path onto Horrid Hill Peninsula with dogs on leads restriction on peninsula.
24	Continue to manage existing shoreline vegetation of bramble etc. and reinforce with additional planting to provide partial screening - along seaward side of seawall in country park
26	Promotion of fenced dogs run free areas away from shoreline, including particular dog training area
28	Fencing to restrict access from Saxon Shore Way on west side of Motney Hill onto adjoining beach.
46	Infrastructure to inhibit motorbikes and other vehicles accessing marshes on paths either side of Milton Creek
50	Screening enhanced at Oare Marshes with additional planting
58	Fencing around roost
59	Potential to restrict access at Shellness (privately owned area owned by hamlet) during tern breeding season (fencing and signs) and negotiate for access to very specific locations during winter to prevent disturbance to roosts.

5.32 Many of the recommendations in Table 5 relate to screening and allowing vegetation to develop further at particular locations. Low bramble exists in many locations, particularly around the Medway in the vicinity of the Riverside Country Park, and allowing the vegetation to build on the seaward side of the path to still provide views to people walking, but acting as a screen (particularly for dogs) would be relatively simple to achieve. Such approaches are particularly relevant in areas such as Horrid Hill where the spit allows people to be close to large areas of intertidal habitat important for birds. Provision and promotion of dog fenced areas in this area would also help divert use away from the shoreline, particularly if there is a stronger push for dogs to be kept on leads along the shoreline. Guidance on design and size of dog-fenced areas are provided by Jenkinson (2013). There is scope to provide agility areas (for both owners and their dogs: Jenkinson 2009).

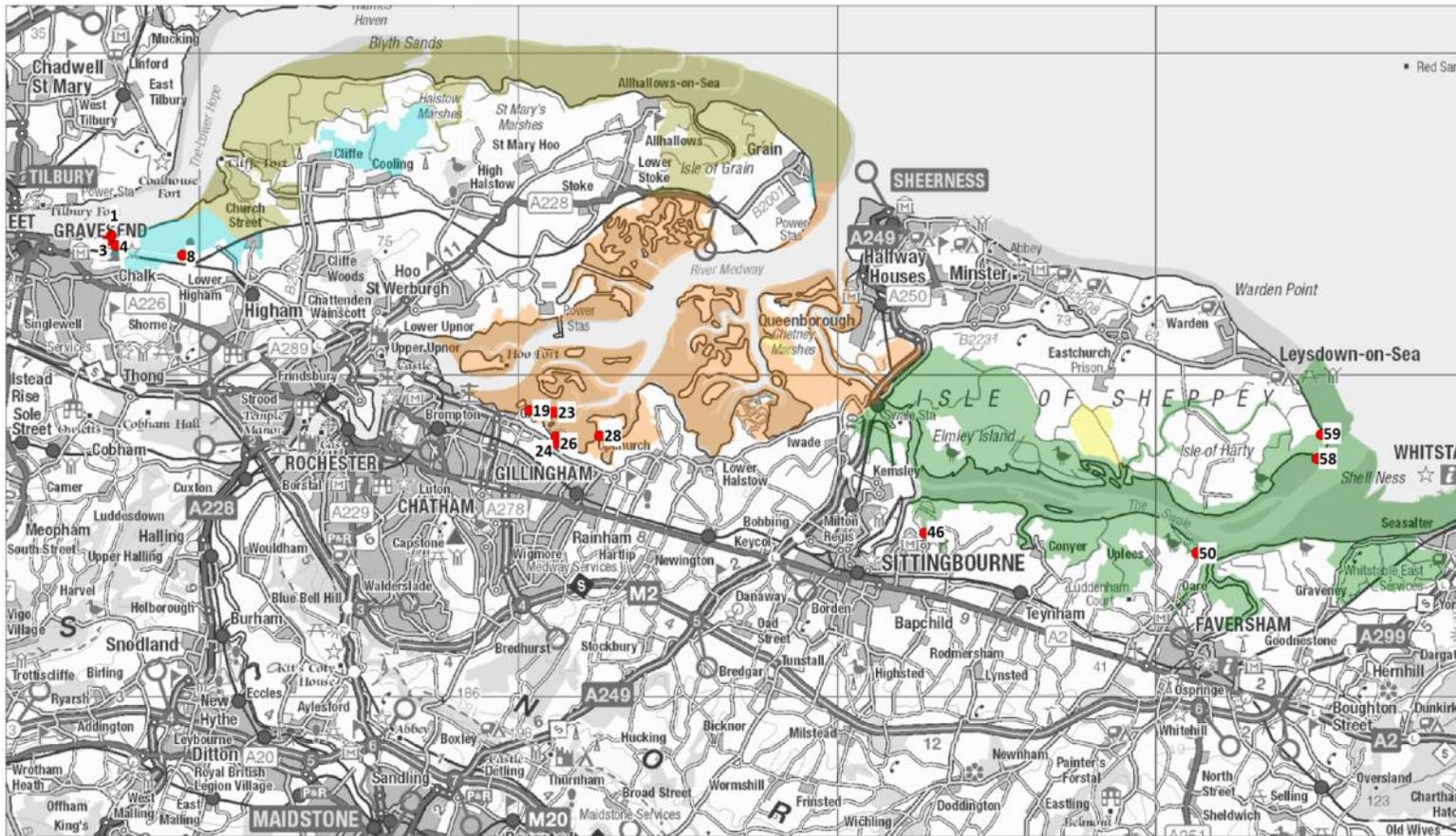
5.33 These relatively small infrastructure projects need to be considered on a case-by-case basis, and could be developed by the wardening team once in place. It may be that the best approach – at least initially – is for projects to come forward over time as funds allow. These projects could be phased with development.

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

5.34 Indicative costs for the measures above are summarised in Table 6.

Table 6: Indicative costs for site specific infrastructure

	Recommendation	Set-up/Capital Cost	Annual Cost	Notes
1	Path links	£5,000		Cost would depend on surfacing, route etc.
3, 4, 8 & 46	Structures to inhibit vehicles.	£3,500	£750	Range of different gate styles or designs possible. Costs need to cover installation. Annual cost covers maintenance/checking
19, 24 and 50	Additional planting at various locations	£1,800		Planting relatively low cost, but will need regular checks to ensure gaps are not developing and further planting may be required
23	Horrid Hill path management and screening	£5,000		Will need regular maintenance and checks to ensure new paths are not developing and further work (planting/screens) may be required
26	Dog training area	£3,000		Cost depends on area fenced.
28	Fencing at Motney Hill	£3,000	£500	Cost depends on type of fencing. Will need checking and maintenance
58&59	Fencing and signs around Shellness	£2,000	£500	Cost dependent on scale of fencing. New fencing may be required each year depending on flooding/changes in bird use etc.
	Total	£17,500		



Map 4: New Access Infrastructure

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■ Medway Estuary & Marshes SPA & Ramsar	■ Ramsar outside of SPA
■ Thames Estuary & Marshes SPA & Ramsar	■ Compensation sites

Parking: Strategic Review and Changes to Parking

Overview

5.35 We recommend a review of parking across the three estuaries and adjacent sites. The review should encompass lay-bys, formal car parks and roadside parking. It should consider the number of parking spaces available, any charges for parking and whether there are additional facilities (such as access to the water with a boat). While sites that have access to the SPAs should be the focus, sites that may also attract similar visitors and are away from the coast should be included. Following from the review a series of carefully considered changes should be possible.

Justification

5.36 Of the people interviewed in the visitor survey, 63% had arrived by car (Fearnley & Liley 2011). For locations well away from nearby housing the majority of people will travel by car. Modifying the distribution, cost and ease of parking is therefore a means of managing visitor flows. There are examples of sites where the careful review, assessment and management of parking provision has led to a marked change in how people use sites. For example at Burnham Beeches, an SAC near Slough, the Corporation of London have created a car-free zone in the northern part of the site and then closed part of Lord Mayor's Drive (which allowed vehicular access through the middle of the site). In total three car parks have been closed and roadside parking has been restricted on roads around the site through signage, ditches, banks and dragon's teeth. In parallel with these changes, the Corporation of London relocated the main visitor facilities to provide a central focus of activity slightly away from sensitive SAC features and adjacent to open grassland which was not particularly sensitive to recreation pressure. Car park charges have been introduced at weekends only, a system intended to encourage people not to visit at busier times.

5.37 The Burnham Beeches example illustrates how managing parking has the potential to influence access and redistribute visitor pressure. Closing car parks can however be contentious; for example proposals to close car-parks in the New Forest National Park have been strongly opposed by local dog walkers⁹. Closures should only be undertaken after careful consultation and survey work to ascertain people's reactions and where access might be deflected to. Evidence from Cannock Chase in Staffordshire suggests that results can be unpredictable (Burton & Muir 1974), for example people may still choose to visit favoured areas, but are prepared to park further away and walk further. In general, preventing parking in lay-bys, on verges and other informal parking locations may be easier to achieve than closing formal car-parks

Detailed Recommendations

5.38 A review of parking across the area would involve a short visit to each parking location and assessment of each in a standard fashion – recording charges, capacity, surfacing, signposting etc. Sites can initially be identified from aerial imagery. The review would

⁹ http://www.bournemouthcho.co.uk/news/districts/newforest/888601.Dog_owners_fury_over_car_park_closures/

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

identify changes that could be made to the car-parks, including enhancing some locations (by providing additional spaces, reducing parking fees etc.) and reducing parking and introducing charges/increasing charges at other locations. Suggestions for some locations that could be included in the review are set out in Table 7.

Table 7: Some locations to include in the parking review and where measures relating to parking could be adopted in the future

Map ID (See Map 5)	Details
2	Parking: creation of a small parking area linked to paths to provide circular walk on edge of SPA, i.e. focusing access where signs, visitor engagement etc. can take place.
10	Include in parking review. Track with parking
29	Could restrict roadside parking and close lay-by
34	Potential to close lay
37	Potential to formalise this layby, provide interpretation; low fence/dragons teeth to ensure parking and access contained
39	Potential to formalise this layby, provide interpretation; low fence/dragons teeth to ensure parking and access contained
42	Potential to enhance car-park to create more welcoming feel but also restricting overall number of spaces - potentially removing back half of car-park (already difficult to access and use anyway)
52	Oare Marshes. Include in review with consideration as to limit roadside parking in some locations and enhance car-park
57	Potential to move car-park entirely away from end of road, placing it part way down track and providing access to NNR well away from beach
61	Possibility for measures to restrict roadside parking around Sportsman Pub with aim of ensuring this location does not become too busy in future

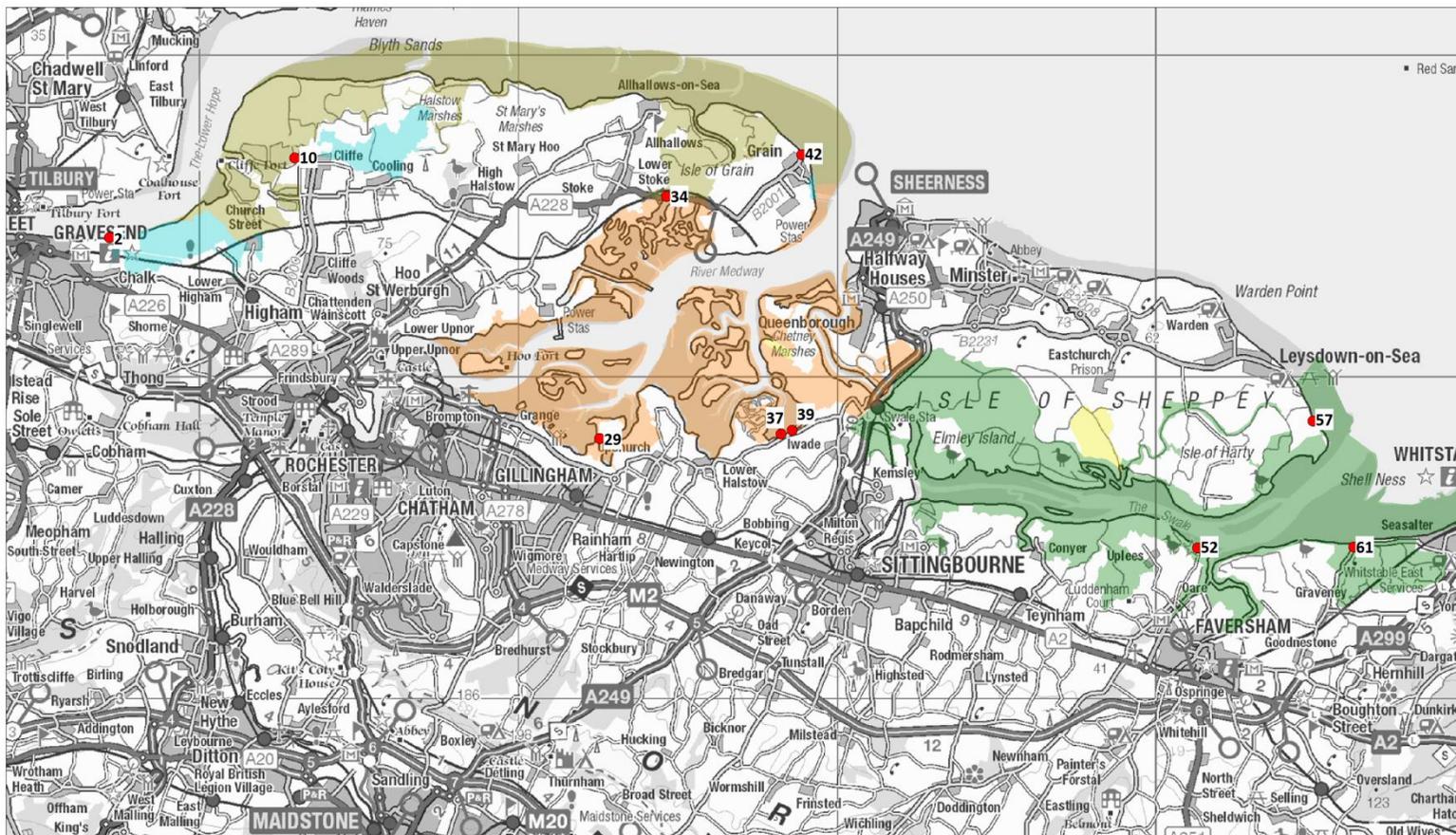
Indicative Costs and Implementation

5.39 It would be possible to include this as part of other projects – such as green infrastructure audits or checks. The review itself would not be a large or complicated piece of work, and could be achieved at little or no cost by wardening staff. Recommendations would need a set budget, but would depend on the outcomes of the review.

5.40 Costs are summarised in Table 8

Table 8: Indicative costs for parking: review and changes to parking

Recommendation	Set-up/Capital Cost	Annual Cost	Notes
Review of Parking	£0		No cost allocated as assumed review conducted by warden/ranger team
Changes to Parking	£20,000		Depends entirely on outcome of the review. £20000 would allow one or two small projects to probably be achieved.



Map 5: Some Locations to Include in Parking Review

- Medway Estuary & Marshes SPA & Ramsar
- Thames Estuary & Marshes SPA & Ramsar
- Ramsar outside of SPA
- Compensation sites

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Interpretation/signage

Overview

5.41 Interpretation will ensure visitors recognise that the sites they are visiting are important for nature conservation and will potentially increase awareness of nature conservation issues (and possibly behaviour in the long-term). Signage will convey particular messages, such as asking dogs to be on leads or asking people not to stray from the path. We recommend that interpretation with consistent styling and branding is installed at a range of carefully selected locations. Standard signs are also warranted at a range of locations.

Justification

5.42 Interpretation boards and signs are widely used around the UK at nature reserve sites. Tests of the effectiveness of education and interpretation in reducing visitor impacts are limited (Newsome, Moore & Dowling 2002), but studies would seem to indicate that they can be effective if targeted and well designed (Littlefair 2003). Interpretation has a role only in mitigation only as part of a package of measures – while it may help change people’s awareness, new interpretation boards on their own will certainly not be guaranteed to resolve any disturbance issues.

5.43 Signs are an important means of conveying information to visitors. Considerable guidance is available, for example describing design principles, wording, etc. for signs and interpretation (Mcleavy 1998; Kuo 2002; Hall, Roberts & Mitchell 2003; Littlefair 2003; Bell 2008; Kim, Airey & Szivas 2010). Provision of signage and wardening has been shown to result in enhanced breeding success for little terns in Portugal (Medeiros *et al.* 2007), and there is therefore some evidence of their merit.

5.44 Signs can ask visitors to behave in different ways. Interpretation provides information for visitors, enhancing their understanding of the site and its importance. Signs are also important to give the information to users that would be necessary to enable a conviction to be taken in relation to visitors knowingly causing harm to any of the features for which the site is notified.

Detailed Recommendations

5.45 We recommend a series of new interpretation boards should be designed and placed at strategic locations around the three sites. These signs should highlight the importance of the sites and the wildlife present in an inspiring way, and also provide information on what (in general) people can do to help protect the site, for example through keeping dogs on leads.

5.46 It would seem appropriate to establish up-dated signs at strategic points around the estuary, in line with the revised codes of conduct. The signs should clearly set out how users should behave, and a series of designs may be necessary – for example one for dogs on leads.

5.47 The locations for new signs and interpretation should be established by the warden/ranger team and new locations may become evident over time, as access

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

patterns change or as levels of access change at some places. Some suggestions for possible locations are given in Table 9 and Map 6.

Table 9: Potential locations for new interpretation and/or signage.

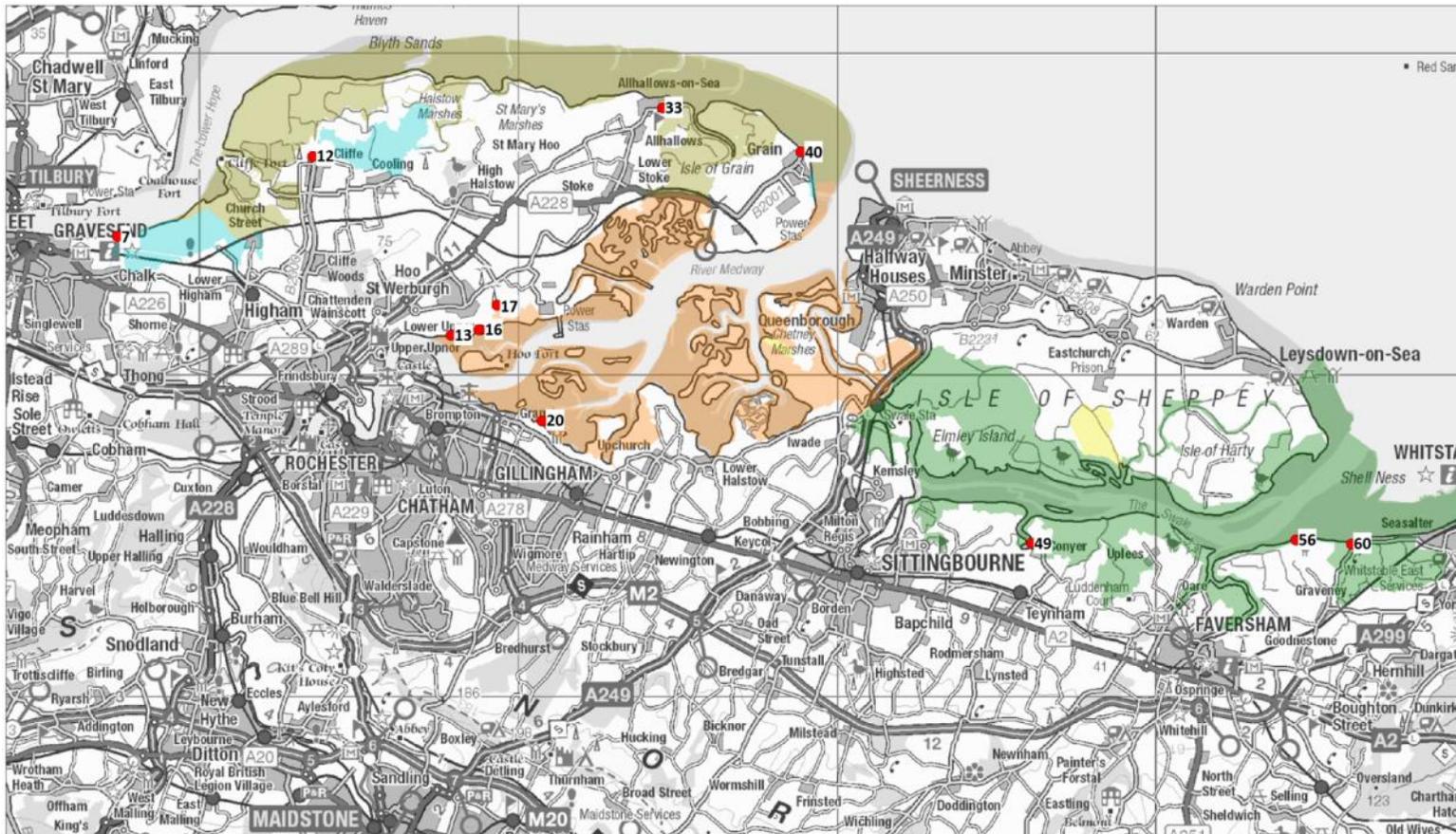
Map ID (See Map 6)	Details
60	Potential for interpretation: targeted to users at caravan park
56	Potential for signage re dogs on leads
49	Potential for interpretation aimed at dog walkers
20	Potential for signage re dogs on leads
13	Potential for interpretation at car-park
16	Potential location for interpretation, edge of marshes
17	Potential location for interpretation
7	Potential location for interpretation
40	Potential location for interpretation
12	Potential location for interpretation : at start of track.
33	Potential location for interpretation at start of footpath across marshes

Indicative Costs and Implementation

5.48 Costs are summarised in Table 10, we estimate that around ten interpretation panels and ten signs would be required. The exact locations would be chosen by the wardens/rangers.

Table 10: Indicative costs for new interpretation and or signage

Recommendation	Set-up/Capital Cost	Annual Cost	Notes
Interpretation boards	£25,000	£2,500	Estimate based on 10 outdoor panel interpretation boards (A0 size); £2500 per board. Annual fee allows for replacement of boards over 10 year period
Signs	£20,000	£1,000	10 signs. £2000 per sign, plus £1000 per year for replacement/maintenance



Map 6: Some Locations for Interpretation/Signage

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- Medway Estuary & Marshes SPA & Ramsar
- Thames Estuary & Marshes SPA & Ramsar
- Ramsar outside of SPA
- Compensation sites

Codes of Conduct

Overview

5.49 Codes of conduct set out how users should behave and provide guidance on a range of issues, including safety. A standard set of codes of conduct should be developed for the main activities and covering all three estuaries. Developing the codes provides a means to engage with local users and once established, a foundation is in place for enforcement if required. Codes of conduct should be widely promoted to users through paper copies, websites, user groups and local clubs. The warden/ranger team should be able to refer to them and give them out as required.

Justification

5.50 Codes of conduct set out clearly how users undertaking a particular activity should behave. Where there is plenty of space, relatively few users and few conflicts, there is unlikely to be a need for any agreed code of conduct. They are however relevant where there are a wide range of different users, potentially not linked to particular clubs, and a range of complicated issues, or where multiple activities overlap. Developing good, clear codes with user groups ensures that safety issues, insurance, consideration of other users and nature conservation issues can be accommodated, ensuring users can enjoy their chosen activities while minimising any impacts. The codes are also useful for casual visitors, who perhaps visit a location sporadically, and are unlikely to be fully informed of all local issues. A code of conduct provides the user with all the information they need to undertake their chosen activity safely, within the law and without creating conflict with others.

5.51 Codes of conduct can be established by directly working with local users, even by the users themselves. Codes developed in this way are likely to be the most effective. Involvement with users directly also makes sure that the codes of conduct reach the right audiences, as one of the key issues can be ensuring that they are read and circulated widely and that visitors are aware of them. Getting people to 'sign up' to voluntary codes of conduct is potentially tricky and may be difficult to achieve where many users are ad hoc, casual visitors and where there are multiple access points (i.e. no central location at which users can be intercepted).

5.52 A good example of voluntary codes of conduct is those for the Thanet area of Kent, where a series of codes of conduct have been brought together in a single document for a stretch of coast¹⁰. The document sets out the bird roosts and European Marine sites, and provides an easily accessible overview for users. The individual codes of conduct include dog walking, horse riding, bait collection, wind-powered activities and powercraft.

¹⁰ <http://www.thanetcoast.org.uk/pdf/ThanetCoastalCodes.pdf>

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

Detailed Recommendations

- 5.53 Using the Thanet example, we recommend that a similar set of Codes of Conduct are developed for the North Kent sites. These codes should be similar in design and wording, and should work as a pack.
- 5.54 We suggest codes are developed for the following activities (with a single code of conduct for each activity covering the three estuaries).
- Dog walking
 - Powercraft activities
 - Wind-powered craft
 - Bait digging and collecting
 - Wildlife Watching
 - Shore angling
 - Canoeing
 - A general shore code covering other activities
- 5.55 They should address safety issues, consideration for other users and conservation issues and be developed with users. Monitoring of behaviour should take place after the codes are established.

Indicative Costs and Implementation

- 5.56 The development of the codes could potentially be implemented by the wardening team. Consultancy support and graphic design would be required, and additional input may be required from local authorities/partners.
- 5.57 Costs are summarised in Table 11.

Table 11: Indicative costs for developing generic codes of conduct

Recommendation	Set-up/Capital Cost	Annual Cost	Notes
Codes of Conduct developed	£8,000	£200	8 codes produced as a pack for printing and as interactive document; cost estimated at £8,000. Annual cost allows for revision and further print runs

Work with local club/group

Overview

- 5.58 There is scope to resolve very specific local issues by directly talking to local users that have a local club/group and this contact has relevance for some of the other recommendations in this report (such as input into the codes of conduct).

Detailed Recommendations

- 5.59 An estuary users survey was undertaken in 2012 and this provides a useful overview of local clubs and groups. The survey identified 57 local clubs/groups and provides information on which have codes of conduct for members, how each group is set up and provides contact details. Direct contact with some of these groups to discuss

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

disturbance issues and resolve specific issues is recommended. These are listed below in Table 12 and shown in Map 7.

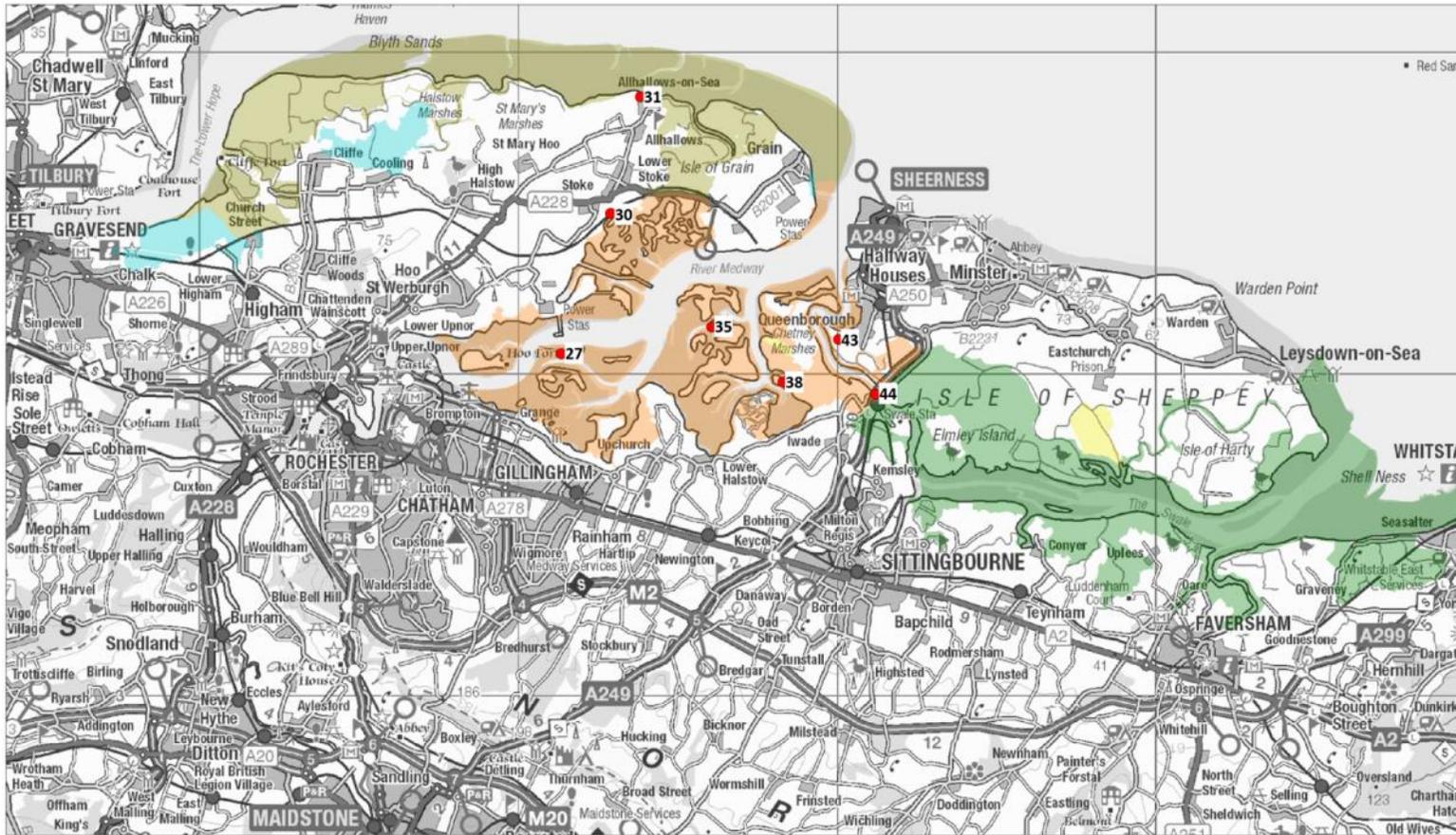
Table 12: Specific locations where there are specific issues relating to a club/group or where there is potential to reduce disturbance through direct contact and discussion

Map ID (See Map 7)	Details
27	Proactive work with canoe clubs, links to codes of conduct.
30	Liaison with the micro light Club (Medway Airsports Club) to attempt to resolve disturbance issues. Club website has no-fly zones but these do not seem to overlap with the SPA.
31	Work with caravan site
35	Work with canoe clubs to minimise disturbance from canoes here
38	Work with wildfowling to minimise disturbance
43	Work with local landowner to reduce disturbance from corporate shoot
44	Liaison with long reach jet ski club. Seems an awkward location given speed restrictions and alternative locations may be better.

5.60 Besides the specific examples given in Table 12 more general contact with local clubs and groups is recommended. The development of the codes of conduct may be a good way to facilitate contact and engage with local groups. Such contact should raise the profile of the nature conservation importance of the sites, ensure that users are aware that it may be illegal for them to disturb wildlife and discuss ways in which users could ensure they are not causing problems.

Indicative Costs and Implementation

5.61 Implementation of this element of the work could be done by the local warden/ranger team and no additional costs are likely to be incurred.



Map 7: Some Locations for Work with Local Clubs/Groups

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- Medway Estuary & Marshes SPA & Ramsar
- Thames Estuary & Marshes SPA & Ramsar
- Ramsar outside of SPA
- Compensation sites

Refuges

Overview

5.62 The Medway is the estuary with the most pressure from new development and the most marked declines in waterfowl. At the workshop it was suggested that creating one or more areas as refuges could be effective. These refuges would essentially be areas where human activity was minimised and users actively discouraged or prevented from undertaking activities in these areas.

Justification

5.63 There are some existing areas in the Medway that are relatively quiet and inaccessible and include a range of habitats. Establishing one or more of these as refuges would provide a means of ensuring a disturbance free area was always available to the birds. Such areas should provide roost and feeding areas.

Detailed Recommendations

5.64 Three potential areas could be established as ‘refuges’, these currently have relatively low levels of access and are relatively remote compared to some other parts of the estuary. The three areas are shown in Map 8 and Table 13. We recommend that at least one and potentially all three are promoted as areas for users to avoid. While access is fairly limited in these areas at present, they are used, for example Hoo Ness and Darnet are visited by canoeists who wild camp on the islands¹¹. Canoeists visiting these islands park at the Riverside Country Park and launch from Horrid Hill. Establishing these areas as voluntary no-go areas could be done through direct contact with the local groups, through maps in the codes of conduct and through other ways, such as restricting canoe launching from certain locations (for example by making it awkward to access the water). Creating these areas as refuges could also be extended to commercial activities and specific planning schemes. Mapping and promoting these areas as ‘quiet zones to protect bird interest’ (or similar) wherever possible would help ensure their effectiveness.

Table 13: Potential locations for ‘refuges’

Map ID (See Map 8)	Details
25	Potential for 'refuge' - area with minimal access and disturbance. Overlap with 36 and 32
36	Potential for 'refuge' - area with minimal access and disturbance. Overlap with 25 and 32
32	Potential for 'refuge' - area with minimal access and disturbance. Overlap with 25 and 36

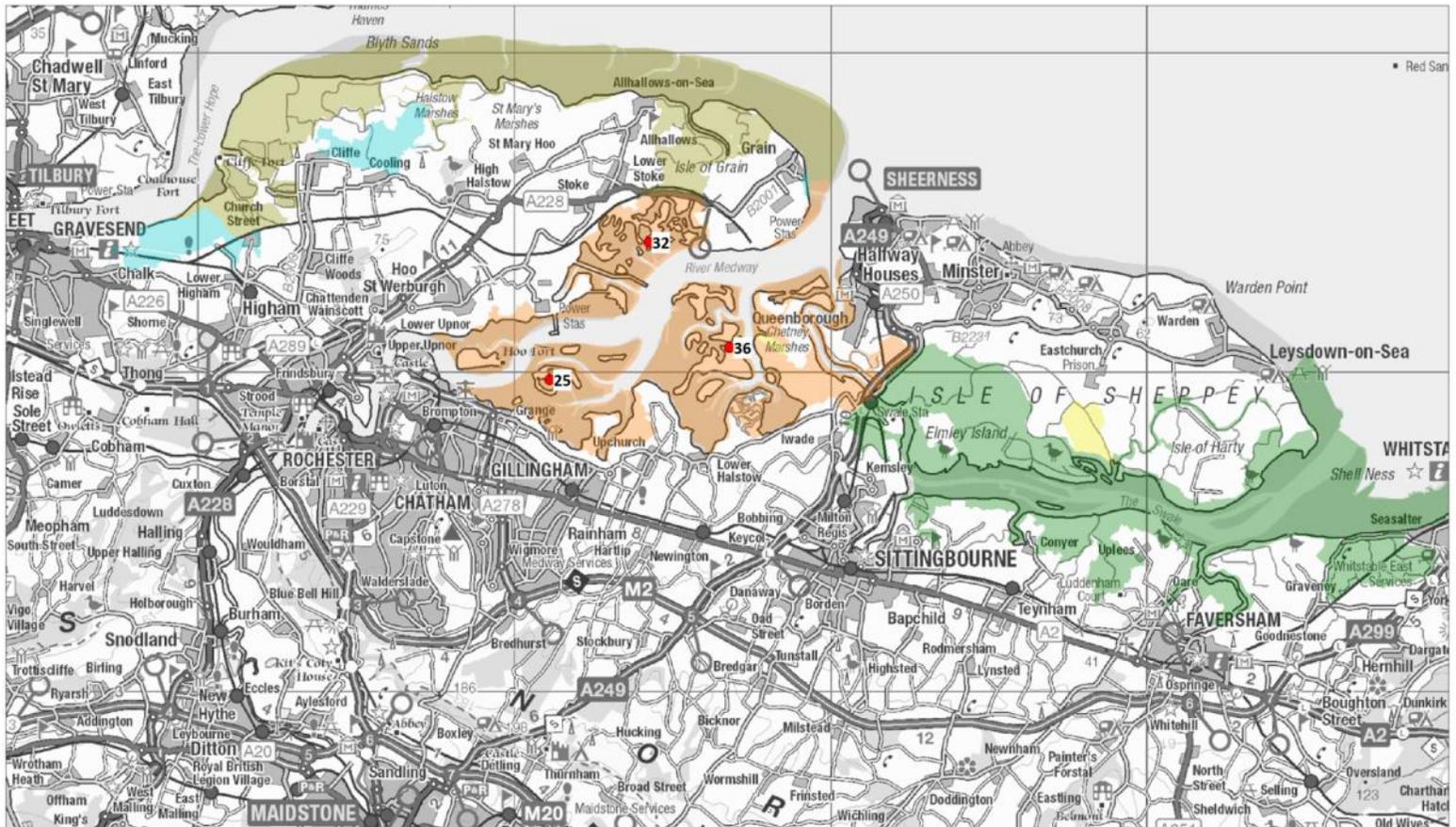
Indicative Costs and Implementation

5.65 Establishing the refuge areas would be a longer term goal than some of the other measures in this strategy, and would dovetail with many of the other recommendations such as the direct contact with clubs and the codes of conduct. We would envisage that

¹¹ For example: <http://www.trekandrunk.com/features/canoetrips/thetwoforts/trip.html>

Thames, Medway and Swale Estuaries – Strategic Access Management
and Monitoring Strategy

the refuges would be established and promoted through these means and therefore the cost of this work would be minimal.



Map 8: Potential Areas to Create Quiet Areas/Refuge

- Medway Estuary & Marshes SPA & Ramsar
- Thames Estuary & Marshes SPA & Ramsar
- Ramsar outside of SPA
- Compensation sites

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Enhancement of existing site to create hub

Overview

5.66 Directing users to particular locations where there is good access infrastructure and management in place should reduce disturbance. Where the users are deflected from visiting other more sensitive locations and instead spend their time at locations where disturbance is managed this approach is effective and the approach is positive as it enhances access for visitors.

Justification

5.67 At sites with high disturbance pressures it is usually best to aggregate visitors in as small an area as possible, whereas in areas with lower disturbance pressure, an even distribution of visitors may be better (Beale & Monaghan 2005; Beale 2007). A long term aim should therefore be to focus activity at particular locations, drawing users to areas where disturbance impacts can be effectively managed. Such an approach should reduce access in the wider area by drawing visitors who use other sites, rather than attracting new visitors to the area.

5.68 This approach is not a quick win, but would dovetail with the creation of the refuges in the Medway and be a long term goal of drawing access to particular locations.

Detailed Recommendations

5.69 We can identify three sites where existing visitor infrastructure is in place but where enhancements could be made to make more of a focus and draw for users. These three locations are:

- RSPB Cliffe Pools Reserve (Location 9 on Map 9)
- RSPB Northward Hill Reserve (Location 14 on Map 9)
- Riverside Country Park (Location 21 on Map 9)

5.70 At Cliffe Pools there is a secure car-park, nature trails and viewing platforms for seeing wildlife. There is potential in the long term to enhance the facilities here, for example with a dedicated visitor centre, toilets, education facilities and a wider range of walks.

5.71 At Northward Hill the RSPB Reserve has a car-park and toilets. This site could be promoted more for local access/users and access infrastructure enhanced to raise the profile of the site and its ability to absorb more visitors – for example through increasing the amount of parking provision. The existing public rights of way network, including the Saxon Shore Way and bridleways provide routes where dogs can be welcomed. These measures would be much more low-key than at Cliffe Pools. The aim would be to draw local visitors from nearby villages (Cooling, High Halstow, All Hallows) rather than these directly accessing the shoreline at other locations around the Thames/Medway.

5.72 Riverside Country Park covers a long stretch of the Medway shoreline and already draws a wide range of users, including many dog walkers. The site has a large car-park, visitor centre, café and children's playground. A number of measures could be

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

established here to reduce disturbance (see para 5.30) and the site could absorb further visitors. Additional infrastructure at the site could include fenced areas for dogs (again see para 5.30) and promotion of areas within the park away from the shoreline, for example creating more circular walks – drawing more access inland at the park.

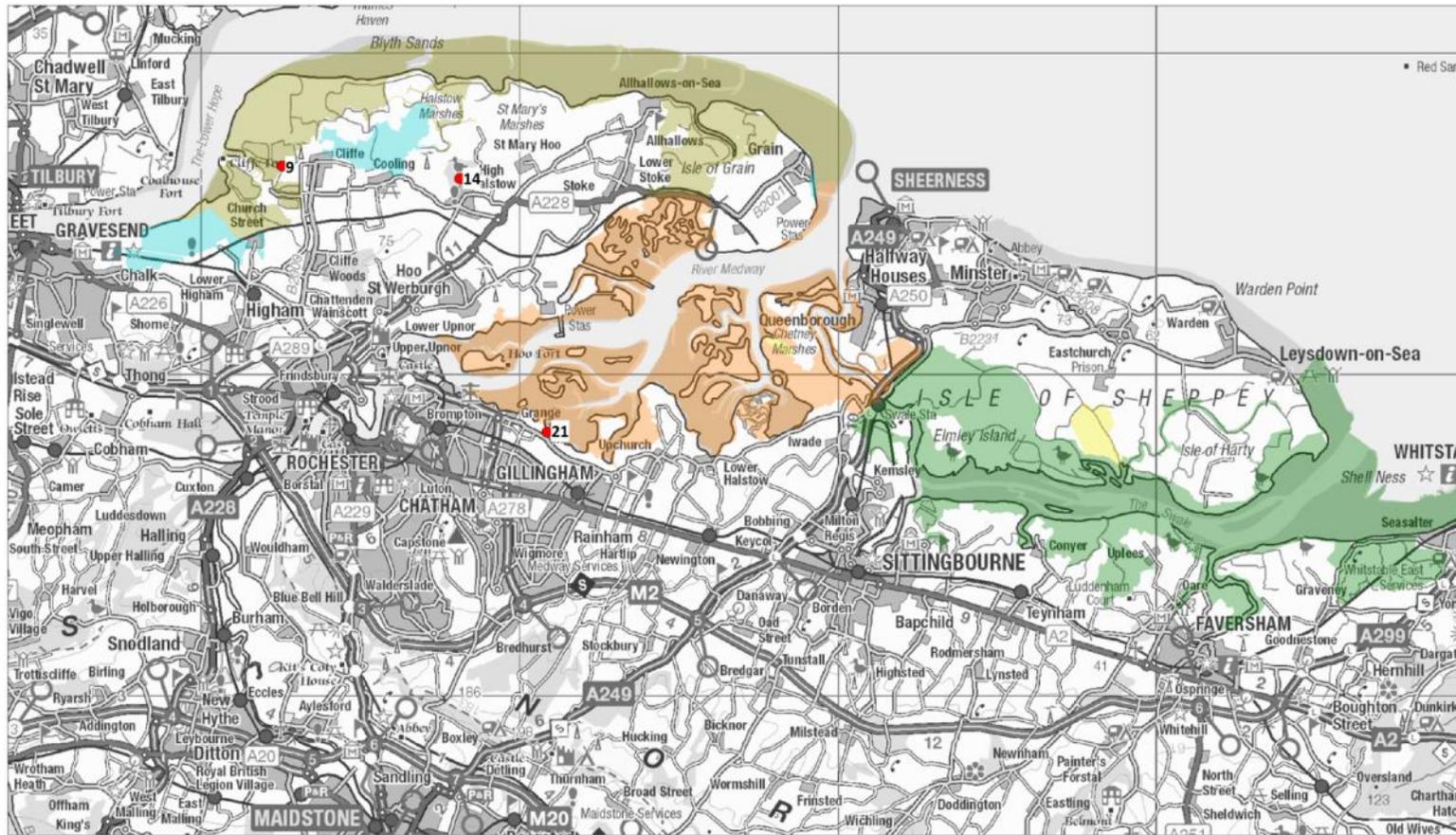
Indicative Costs and Implementation

- 5.73 The enhancement of visitor facilities at Cliffe would be expensive and long-term. Options at both Cliffe Pools and Northward Hill would depend on the RSPB, their assessment of the impact of existing visitor pressure and their long-term aspirations at the sites. At the Riverside Country Park the measures suggested are relatively low key and could be developed relatively easily, potentially incorporated into the site management plan. Any potential changes at the site would be dependent on Medway Council and their aspirations for the site.
- 5.74 Costs are summarised in Table 14. These costs are difficult to estimate and are approximate costs intended as a guide only. The potential to implement measures at these sites will depend on opportunities

Table 14: Indicative costs for enhancements to additional sites around the SPA

Map ID (See Map 9)	Recommendation	Set-up/Capital Cost	Annual Cost	Notes
9	New Visitor Centre and other facilities at Cliffe Pools RSPB	£4,000,000		Very approximate cost, roughly equivalent to cost of centre at Saltholme ¹² . Aspirational rather than an essential element of the strategy. Range of funding sources may be possible.
14	Enhancements at Northward Hill RSPB	£20,000		Improved parking and other infrastructure
21	Enhancements to Riverside Country Park	£25,000		Enhancements to areas away from shoreline such that access can increase here without further disturbance

¹² <http://www.eshbuild.co.uk/case-studies/leisure/rspb-saltholme/>



Map 9: Potential Locations for Enhancements to Create Visitor 'Hubs'

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- Medway Estuary & Marshes SPA & Ramsar
- Thames Estuary & Marshes SPA & Ramsar
- Ramsar outside of SPA
- Compensation sites

Enhancement to existing green infrastructure sites away from SPAs

Overview

5.75 There are some existing sites, well away from the SPAs, which could function as alternative destinations, drawing visitors away from the coast. Enhancements to these to draw visitors that otherwise would visit the SPA coast should help to reduce disturbance.

Justification

5.76 SANGs are a cornerstone of a number of European site mitigation strategies. We do not recommend creation of new sites for access, as whilst the evidence gathered for other strategic mitigation schemes and their particular circumstances indicate a clear need for alternative open space as a primary mechanism to protect the European sites, it is apparent that for North Kent there is a need for a more comprehensive mix of measures because alternative green infrastructure is unlikely to be as successful in drawing all types of visitors away in the absence of a wider suite of measures. It is important to appropriately apply mitigation to meet the individual circumstances of any strategic mitigation scheme, and where alternative greenspace will be successful it plays an important role. However, over reliance on new alternative greenspace that is expensive and potentially complex to achieve in circumstances where the benefits would be notably less will not benefit the European sites or those trying to achieve sustainable development. A strategic mitigation scheme should be evidence led, and it is however apparent that it should be possible to draw some of the very local and regular use of the European sites by improving the greenspace resource in the area. There are some existing nearby greenspace sites which would appear to have the potential to draw visitors and therefore we identify as potential alternative destinations.

5.77 In the on-site visitor work conducted on the North Kent Marshes (Fearnley & Liley 2011), one of the questions addressed whether changes could be made to alternative local sites in order to attract the interviewee to those sites. Of the responses given, 63% indicated that they thought no changes would work. This suggests enhancing alternative sites is likely to be effective for a relatively small proportion (37%) of visitors.

5.78 Modifications (to other local sites) that would appear from the visitor data to have the most merit are improvements to path surfacing and paths; making sites more dog friendly; measures to control other users and attractive scenery.

Detailed Recommendations

5.79 Five locations were mentioned in the workshop and are potentially good locations to draw visitors away from the SPAs. These sites are under existing management as recreational greenspace. It may be possible at each site to change the management slightly in such a way as to attract users that might otherwise visit the SPA. The sites are listed in Table 15 and shown in Map 10. In addition we would expect there to be other greenspace sites in the wider area which may suitable or may come forward over time.

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

- 5.80 We recommend that these sites are included in the review of parking (see para 5.35) and that consideration is given to measures at these sites that would attract those people who might otherwise visit the SPA. Measures would be changes to the path network, provision of dedicated areas for dogs, provision of attractive and relatively wild dog walking routes. Measures would need to be carefully considered and developed with the relevant organisations running the site.

Table 15: Existing green infrastructure sites away from the SPA

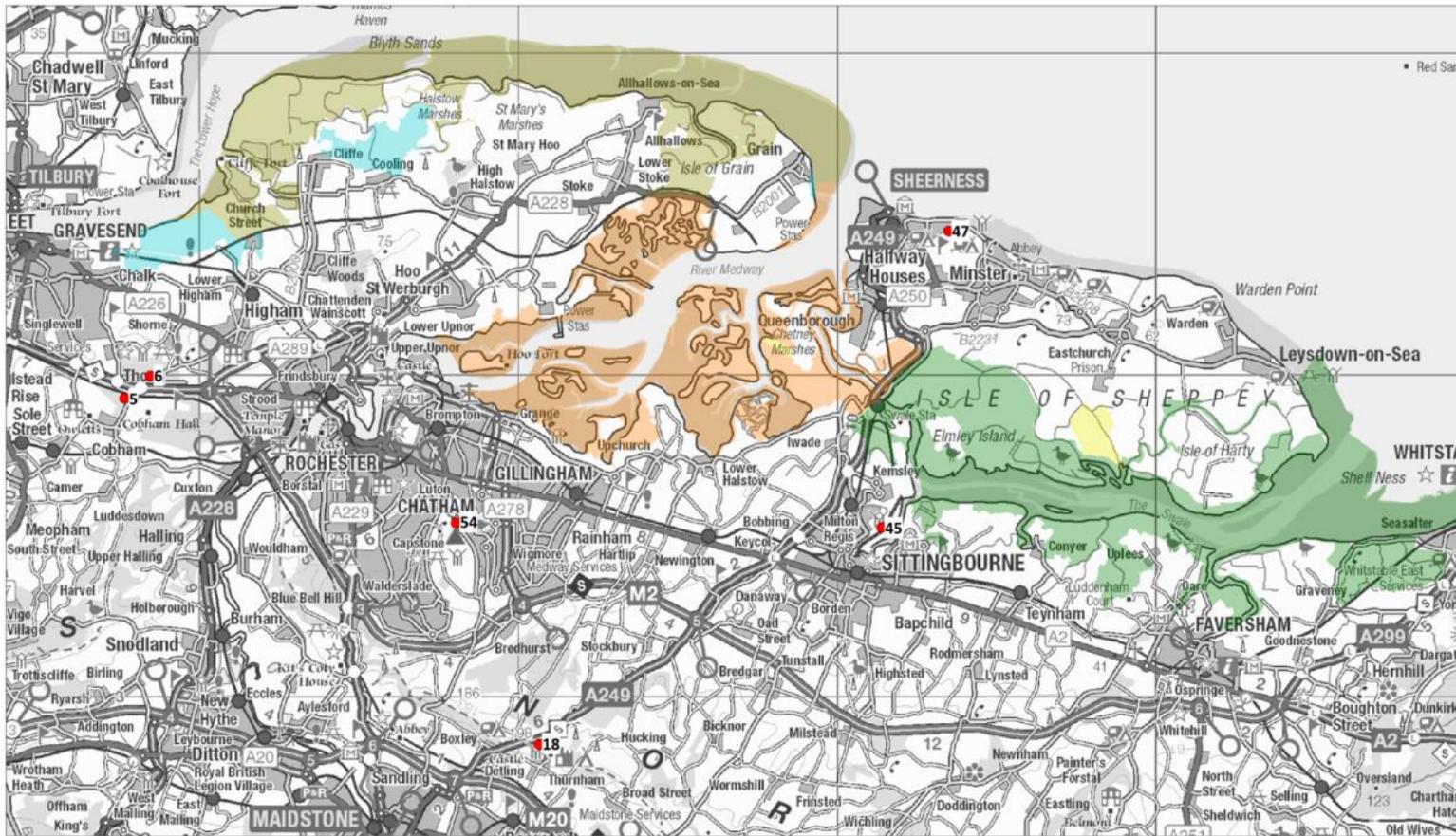
Map ID (See Map 10)	Details
18	White Horse Wood Country Park: potential to enhance and function as alternative destination for dog walking etc, though possibly too distant from main urban areas
45	Sittingbourne Church Marshes: potential to enhance and function as alternative destination for dog walking etc
5	Jeskyns Community Woodland: liaison with FC to ensure function as alternative greenspace and links to Shorne
6	Shorne Woods Country Park: liaison with KCC to ensure function as alternative greenspace and links to Jeskyns
47	Bartons Point Coastal Park: potential to enhance to draw canoeists and other users away from estuary
54	Capstone Country Park: potential to enhance and function as alternative destination for dog walking etc

Indicative Costs and Implementation

- 5.81 Implementation of management measures at the above sites would be undertaken by the organisations responsible for the sites. Costs are difficult to estimate as they are dependent on opportunities at the sites themselves.
- 5.82 As a means of calculating an indicative cost for a project to enhance access at an alternative site we have reviewed measures proposed in Dorset as mitigation (funded through developer contributions) to resolve access impacts on the Dorset Heaths. In the Dorset Heaths Planning Framework 2012-2014¹³ a series of projects are proposed which relate to enhancing existing greenspace sites¹⁴ – these range in cost (the cost sought from the fund) from £4,800 (for a dog gym/agility area) to £200,000 (for a new route and crossing to provide access to an existing open space) and the average cost is £84,000. A total budget of £420,000 would therefore be likely to fund around five projects.

¹³ See: www.boroughofpoole.com/EasySiteWeb/GatewayLink.aspx?allid=8409

¹⁴ Projects 1,4,6,8,10,11,14 and 15 in Appendix A of the above report



Map 10: Potential Locations for Off-site Enhancements to Green Infrastructure

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- Medway Estuary & Marshes SPA & Ramsar
- Thames Estuary & Marshes SPA & Ramsar
- Ramsar outside of SPA
- Compensation sites

Enforcement

Overview

5.83 Legal enforcement provides a means of ensuring some particularly disturbing activities do not take place. We suggest enforcement of speed limits on the water and the establishment of dog control orders as two mechanisms that would reduce disturbance. These should be targeted in response to monitoring data and phased such that they are utilised should other measures not be working.

Justification

5.84 A six knot speed limit operates west of Folly Point on the Medway and an eight knot limit is in place on the Swale. Active enforcement of these for small craft such as RIBs and Personal Watercraft would potentially curb speeding and could encourage users to seek alternative locations for their activity.

5.85 Dog control orders provide a mechanism through which dog walkers can be required to keep their dogs on a leads. Dog walkers whose dogs are not on leads can be fined. This would provide 'clout' to the on-site wardens.

5.86 The enforcement of speed limits and dog control orders would both require active policing and are likely to alienate users. Both are not without practical difficulties. They are therefore justified where other approaches have failed to work and applied to specific locations where disturbance issues are in place. As such their application will be linked to the monitoring results.

Detailed Recommendations

5.87 The enforcement of speed limits would primarily fall under the Medway Port authority. Some funding may be required to ensure effective targeting to the locations and times of year when birds are disturbed. Targeting would be informed by the monitoring. We feel that a dedicated patrol boat may be unnecessary, but additional equipment to record speed and capture images may need to be purchased.

5.88 Dog control orders need to be based on evidence, and will therefore need to be established in line with monitoring results. Costs will include legal fees and administration and in order to be effective active policing will be required. This will necessitate warden/ranger time. Dog control orders could therefore be carefully phased –as required – such that wardens can target their time efficiently.

Indicative Costs and Implementation

5.89 Indicative costs are set out in Table 16. The costs of these elements would depend on scale and may not even be required at all.

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

Table 16: Indicative costs for enforcement

Recommendation	Set-up/Capital Cost	Annual Cost	Notes
Speed monitoring equipment including digital camera and speed gun	£10,000		Approximate cost
Setting up dog control orders	£10,000		Estimate of costs required for legal advice, administration etc

Monitoring

- 5.90 Monitoring is essential to ensure the successful delivery of the mitigation work. Monitoring is necessary to ensure approaches are working as anticipated and to tell whether further refinements or adjustments are necessary. As the individual projects take off, monitoring will inform where resources can best be allocated, for example it may be that once codes of conduct are in place and working efficiently, wardening presence can be reduced or scaled back. In addition it is difficult to be confident of how access patterns may change over time, for example in response to new activities, changes in climate, and changes on the sites themselves. The monitoring is therefore aimed at ensuring mitigation effort is focused and responsive to changes in access, and that money is well-spent and correctly allocated. The monitoring is integral to the mitigation ‘package’.
- 5.91 Specific monitoring requirements are set out in Table 17. Many of these are already undertaken (at least in part) or there are existing protocols in place (for example the WeBS counts for birds).

Table 17: Monitoring elements required as part of the mitigation strategy

Monitoring	Justification	Approach
Visitor numbers at set locations	Repeat monitoring will inform how use is changing over time	Car-park counts, spot counts of people, mapping of people on the site (from vantage points); automated counters. Undertaken at a sample of locations and repeated annually
Visitor activities, motivation, profile and	Provides information on what people do, why they visit and how they behave	Questionnaires at a sample of access points repeated every 5 years. Questionnaires including home postcode, route on site, etc
Continued monitoring of wintering waterfowl	Ensures any changes in bird use of the site are picked up	WeBS
Disturbance monitoring	Checks to monitor response of birds and levels of disturbance	Repeat of approach in Disturbance Study, potentially at 10 year intervals.

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

5.92 Indicative costs for the monitoring (as set out in Table 17) are summarised in Table 18.

Table 18: Indicative costs of monitoring

Recommendation	Set-up/Capital Cost	Annual Cost	Notes
Visitor numbers at set locations	£10,000	£1500	Most annual, undertaken by warden staff. Budget for automated counters and casual staff/consultancy support as required and included as an annual figure
Visitor activities, motivation, profile and		£1000	Questionnaire work undertaken every 5 years (i.e. annual budget of £1000 equates to £5000 every 5 years).
Continued monitoring of wintering waterfowl		£500	Undertaken already as part of WeBS. Small annual fee to ensure data collated by local co-ordinators
Disturbance monitoring		£1000	Could be undertaken at set intervals - e.g. every 10 years or on an annual basis

6. Implementation

6.1 In this section we consider the implementation of the strategy, including delivery, phasing, governance, options for developer contributions and how to ensure the strategy can be flexible.

Delivery

6.2 The challenge with the strategy is that it needs to provide for the mitigation measures necessary to address the in-combination impacts of a range of development (including many small developments) spread over a wide area and coming forward over an extended time period. It also needs to ensure that the impacts are resolved in perpetuity, which could be 80-125 years into the future¹⁵.

6.3 A strategic approach that is plan led should enable impacts to be avoided where possible, and adequately mitigated for where the pressure cannot be diverted. A strategic approach for new growth should provide timely measures so that they are in place and functioning in line with growth coming forward, and therefore prevent harm from occurring. Such measures are often particularly difficult to secure where there are numerous, small developments likely to come forward. There therefore needs to be certainty that a package of measures to avoid and mitigate for the potential impact is planned, is fit for purpose, capable of implementation and fully committed to by those competent authorities taking forward the local plans and authorising the development projects.

6.4 However, within this there needs to be an inbuilt level of flexibility to adapt, particularly in light of monitoring findings, in recognition of the fact that further information and opportunities will emerge. Access patterns may change over time, and new recreational activities may become more prevalent. Whilst declines in SPA interest features are known, there are some aspects that are not fully understood, and as the way in which the sites are used changes over time, threats and potential impacts on the birds may also change.

6.5 A partnership of local planning authorities, Natural England and those best placed to contribute to mitigation through their land ownership or remit could be responsible for the continued evolution of the strategy over time. A partnership/board/panel would be responsible for overseeing the whole project and reacting to any changes necessary as monitoring or other new information emerges. Some mitigation measures (e.g. enhancement of alternative sites) will depend on the response of private landowners).

6.6 Within the strategy there is potential for measures to be interchanged, or developed in detail at a later stage, or modified in reaction to new information. Initially, there needs to be momentum behind the implementation of measures that are urgent and/or those that are easily implemented, in order to have confidence that initial development

¹⁵ The Perpetuities and Accumulations Act 1964 defined in-perpetuity as 80 years. The new Perpetuities and Accumulations Act 2009 extended the in-perpetuity definition to 125 years.

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

coming forward is being mitigated for by measures that are in progress, thus preventing any significant time lag between development and mitigation. It is suggested that measures to be implemented in the immediate term should include the dog project and the wardening (see phasing section above).

- 6.7 The concept of a flexible list of mitigation is already well established for the Dorset Heathlands strategic mitigation scheme, where for some time the approach has been based on an initial costed list of measures which is used to set a tariff that goes into a central funding pot. Proposals and bids are then put forward to use this money. For North Kent, a similar approach could be implemented, but it is also suggested that the additional element of maximising opportunities through external funding and combining the objective of European site protection with other initiatives should also be a focus, particularly given the twin objectives of this Plan and the need to rectify existing impacts. Changes in land management or ownership, wider green infrastructure or visitor management initiatives, remediation and regeneration projects, European funding, lottery funding, industry led funding schemes or changes in focus within partner organisations could provide additional opportunities.
- 6.8 An approach to implementing the strategy is therefore to develop a tariff based on the overall quantum cost of measures required for the level of new development coming forward, and this tariff calculated on a per house contribution. The partnership/board/panel would then collect and allocate funds according to proposals that come forward. Alongside the initial commencement of the scheme, there is continued work to improve the detail of the Plan, get the monitoring established and continually review opportunities for refined or additional measures. This approach would allow projects to be developed locally, collectively, and carefully planned to ensure success, encouraging proactive development of measures by all partners, and maintaining a best value approach, whilst continuing to ensure that the funding was being allocated to measures that were appropriate.

Phasing

- 6.9 The elements of the strategy, as set out in Section 6, are in an order that represents the order in which the main elements should be implemented and should facilitate phasing. Further notes on phasing are summarised in Table 19.
- 6.10 Establishing the wardening team will provide a core team and staff resources to get the other projects off the ground. Crucially the warden/ranger team could be deployed where most required, i.e. at locations where there is a direct link with new development or where particular issues are in place. The Dog Project could be started in tandem and could be set up very quickly. These two elements provide an immediate start to the strategy. As developer contributions and other funding allows, later discrete projects would include new access infrastructure, the review of parking and commencing work on the codes of conduct. Other elements of the strategy would develop later. This phasing allows mitigation measures to be phased alongside the development and as funding allows, ensuring that the response is proportionate to the impacts and targeted appropriately.

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

Table 19: Phasing of the different strategy elements

Elements of the strategy	Phasing
Dog Project	Quick win, website could be established quickly and project started quickly.
Wardening/Visitor Engagement	Establishing wardens at early stage would provide staff resources to oversee later elements. Quickly establishing a base and a team will allow many of the other projects to develop and take place.
New Access Infrastructure	Various small projects, could be phased over a number of years
Parking	Review of parking could be done quickly and easily; measures identified within review could be phased over a number of years
Codes of Conduct	Codes of conduct would need careful planning and consultation. Could start once other elements (above) have commenced.
Interpretation/signage	Would link to code of conduct so should happen in parallel
Work with local club/group	Some links to codes of conduct, so again happen in parallel. Some work could be done earlier (such as contact with micro light club).
Refuge	Long term aim with links to codes of conduct.
Enhancement of existing sites to create hub	More major projects, particularly Cliffe. These elements would be phased much later within the strategy.
Enhancement to existing GI away from SPA	Again, phased later in strategy, potential to be flexible with timing depending on opportunities.
Enforcement	Final elements of strategy, informed by monitoring results and only as required.
Monitoring	On-going through the strategy.

Implementing a cross boundary approach to protecting European sites

- 6.11 There is an increasing interest in developing strategic and cross boundary approaches to mitigating for the impacts of growth on European sites, in recognition of the potential benefits for both the environment and growth. Defra has produced guidance on the development of strategic approaches to Habitats Regulations Assessment, which is currently available in draft form on the Defra website.¹⁶
- 6.12 Any cross boundary approach to European site mitigation requires each planning authority to take full responsibility for the implementation of the strategic approach in their own administrative area. Each remains an individual competent authority and is therefore ultimately responsible for ensuring compliance with the Habitats Regulations for any plan or project taken forward under their authority. However, a strategic and cross boundary approach can provide notable benefits in terms of shared administration, consistency in implementation (proportionate to impacts), collaborative working to rectify existing impacts and fairness to developers across the neighbouring areas.
- 6.13 This SARMP sets out a comprehensive suite of measures to manage access and recreation that may otherwise affect the North Kent European sites. Fundamentally the implementation of the measures is reliant upon funding and resources sourced by each of the planning authorities, and the administration of the Plan, including the

¹⁶ Draft guidance on strategic approaches to HRA can be found at the following link: <http://guidanceanddata.defra.gov.uk/strategicapproacheshra/>

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

collection and allocation of funds, is a critical element of that implementation. Decisions therefore need to be made regarding the extent to which each planning authority works in partnership, via an elected lead authority, collaboratively or individually to achieve the objectives of the strategy and fund the implementation of measures on the ground.

- 6.14 Dividing or combining the administration and management of the Plan could potentially be achieved by a number of options: to either implement delivery individually, funded locally by developer contributions obtained within each administrative area and other funding sources pursued; to pool all contributions and implement the entire mitigation package jointly; or an approach that is partially individual and partially collective.
- 6.15 If the entirely individual approach was taken, the implementation of measures would become the responsibility of the administrative area in which they needed to be put in place. An entirely individual approach for a cross boundary scheme does present considerable difficulties in administration. Recognising that the reason for the joint approach is to mitigate for a collective potential impact that is not simply and easily defined by boundaries, an individual competent authority's duty to secure the necessary mitigation measures may not be met. There would potentially be some significant reliance on the implementation of measures in a different area by another competent authority, but in the absence of any joint commitment. It may therefore be difficult to secure adequate mitigation for the full impact of existing and new development across the administrative areas, and difficult to adequately monitor the effectiveness of measures.
- 6.16 A partial approach would be for the access and recreation management measures that relate to the individual authority and a specific geographical area to be taken forward by the individual authority, with funding sourced by the individual authority, and then for those measures relating to the area as a whole or are equally applicable across the administrative areas, to be implemented via a joint approach. A per-house contribution could still be made to a joint fund to implement those joint measures for new development, with the remaining elements of mitigation being the individual authority's responsibility to deliver. This approach would include some additional costs of administering a partial approach with funding moving between the planning authorities, and as with an entirely joint approach, the joint elements of a partial approach would be best administered by a lead authority, where funds are pooled.
- 6.17 An entirely joint approach may be the most appropriate way of delivering and monitoring the package of access and recreation management measures set out within this Plan. A fully joined up approach, working as a partnership, would maintain an overview of the entire project, thus ensuring consistent and timely implementation. The burden of mitigation delivery would be shared with each of the planning authorities, as competent authorities, committing to and assisting in the delivery of the Plan. This approach would be likely to be the most resource efficient method as it is the least administratively complicated.

- 6.18 An entirely joint approach would require one authority to administer the funding, with contributions paid into the fund on a per house basis via developer contributions. The fund would be used to pay for the full suite of access and recreation management measures, irrespective of which area they need to be implemented in. Whether the administration of the strategy is a full or partial approach, it is strongly advised that a partnership/board/panel needs to be established, to maintain transparency, make democratic decisions, and benefit from a range of expertise when reviews, monitoring and future options are being considered. Any staff funded by the project would be important members of the partnership/board/panel, and would be involved in key aspects of monitoring and review. Monitoring will need to cover three aspects of the overall project; the implementation of measures, the finance and administration, and continued monitoring of numbers of houses coming forward to ensure that the measures continue to be provided in a timely manner, and fully mitigate for potential impacts.

Developer contributions for the impact of new development

- 6.19 Competent authorities are responsible for securing any mitigation necessary to prevent adverse effects on European site interest features, but the mechanisms by which such measures are funded is a decision for the competent authorities, and there may be a range of options for funding some of the initiatives. Primarily however, developer contributions form the main source of funding when avoiding and mitigating for the effects of new development, and follow a principle of each development proportionately mitigating for its own potential impact.
- 6.20 Currently there are essentially two main mechanisms for obtaining funding for measures to avoid and mitigate for impacts on European sites: the Community Infrastructure Levy (CIL), or as an individual planning obligation, commonly referred to as a Section 106, or 'S106' as they are planning obligations as set out in Section 106 of the Town and Country Planning Act 1990. An alternative, third option, applies only to large developments, which may be able to provide mitigation measures as part of the development.

Community Infrastructure Levy (CIL)

- 6.21 The Community Infrastructure Levy was first introduced by the previous Government in the 2008 Planning Act. Section 205(2) of that Act states that the overall purpose of the levy is to ensure that costs incurred in providing infrastructure to support the development of an area can be funded wholly or partly by owners or developers of land. Specific legislation, the Community Infrastructure Levy Regulations 2010, brought the levy into force, with subsequent amendments made to those Regulations in 2011 and 2012. A further amendment is expected in 2014.
- 6.22 The Community Infrastructure Levy places a levy on new development that then provides funding to meet local infrastructure requirements, enabling growth to proceed with adequate and maintained infrastructure in place. As the charging schedule for the levy is a document produced in consultation with the public and taken through an Examination process, and given that the schedule takes into account all infrastructure

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

needs for the local area, the Community Infrastructure Levy is promoted as a fairer, more transparent and consistent way of seeking developer contributions for local infrastructure needs.

- 6.23 Importantly, the levy is agreed upfront, having regard for the growth proposed for an area and the consequent infrastructure needs, the needs of the local community, and the viability of the levy, i.e. not making it so onerous that it impedes development in the local area, is the most influential factor in the tariff set.

Section 106 agreements

- 6.24 Prior to the Community Infrastructure Levy, all contributions were obtained via Section 106 legal agreements, which can be bespoke and specific to an individual proposal, or could form part of a wider agreed strategy with numerous developments contributing. A planning obligation is used to fund requirements that are necessary to make the development acceptable in planning terms. With the introduction of the Community Infrastructure Levy to specifically fund infrastructure, the government expects the use of Section 106 agreements to be scaled back, and although there will still be a need for such obligations, they will now be primarily for non-infrastructure or site specific requirements.
- 6.25 Where developer contributions are necessary to fund requirements that do not specifically relate to the provision of infrastructure, or relate to development site specific measures that are necessary to make a development proposal acceptable, contributions can continue to be obtained on a development by development basis through Section 106 agreements. The difference between the application of the Community Infrastructure Levy and Section 106 obligations is that the Community Infrastructure Levy is a levy calculated on the basis of a pre-approved schedule that has taken into account the overall infrastructure needs of an area and its local community. Each new development coming forward will pay a proportionate contribution based on size and nature of the development, whereas Section 106 agreements can contain specific requirements that relate to the development and any particular requirements at that location that are necessary to make the planning application acceptable in planning terms.
- 6.26 There is potentially still provision for infrastructure to be funded through pooled Section 106 agreements, if firstly the infrastructure project requires less than five developments to contribute to its funding and if secondly the infrastructure project has not been listed as an infrastructure project for which the authority will be seeking contributions under the Community Infrastructure Levy. There are other exceptions where use of Section 106 may be the most appropriate means of securing infrastructure funding, particularly where the need is to mitigate for very site specific issues.
- 6.27 Although the Community Infrastructure Levy is relatively new and some local planning authorities are yet to put their charging schedule in place, it is understood that the Government has advised that the levy is appropriate for funding infrastructure required to mitigate for any development impacts on European sites, such as alternative green infrastructure that meets recreational needs of new residents to divert their use away

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

from European sites. The new amendments to the Community Infrastructure Levy Regulations, brought into force in November 2012, provide greater clarity regarding the use of the levy, identifying that the provision of infrastructure by the levy includes the provision, improvement, replacement, operation or maintenance of that infrastructure. Critically therefore, the operation and maintenance of alternative green infrastructure, as well as its provision, should be included in the levy.

- 6.28 It is considered that any non-infrastructure related avoidance and mitigation measure for potential impacts on European sites could continue to be funded by Section 106 agreements. Section 106 agreements can therefore cover a wide range of requirements and have successfully been used for European site mitigation for some time. The new restrictions on the use of S106 agreements do still allow non-infrastructure requirements that are directly related to the development to be funded through this mechanism. The restriction also still allows for development site specific infrastructure projects to be funded, if the total funding can be obtained from less than five developments and if the infrastructure project is not listed by the local planning authority as a project to be delivered by the Community Infrastructure Levy. This therefore provides opportunities for obtaining funding for European site mitigation from developments that may be specifically excluded from the Community Infrastructure Levy, but still have a potential impact.
- 6.29 To date, Government has indicated that provision of alternative greenspace does come under the umbrella of infrastructure to be funded by the Community Infrastructure Levy, but has not issued any specific guidance or statement regarding non-infrastructure elements of European site mitigation schemes. Therefore there remains the option of splitting the measures between the two mechanisms for obtaining the funds, with infrastructure paid for by the levy and non-infrastructure elements paid for by S106 obligations, or to fund the entire package through the levy. The planning authorities should give consideration to the two options, and determine which provides the most appropriate way forward in terms of cost, funding available, administration and flexibility.
- 6.30 It is advised that the contribution to be made into the fund for the implementation of the Plan needs to continually be calculated on a per house basis, as this is the measurement unit by which potential impacts are calculated and mitigated for. Particularly because of the way in which the Community Infrastructure Levy is generated (i.e. per sq m), contributions from the developer to the Levy will differ. However, whilst each house may generate differing levels of funding, via its Community Infrastructure Levy and/or S106 contributions, the overall quantity of the contribution for European site mitigation needs to be based on a consistent per house contribution. Expenditure out of the European site mitigation pot needs to equate to the number of houses that have come forward.

On-site provision on development sites

- 6.31 A third opportunity can also present itself when large developments are able to provide mitigation measures alone, as part of the proposed development, removing the

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

requirement to contribute to a central pot. The latter requires careful consideration to ensure fairness and adequate mitigation, and is most beneficial when considered upfront as part of large allocations within masterplans and green infrastructure strategies, for example.

- 6.32 The kind of mitigation measures that are applicable, with this third option, include on-site green infrastructure, such as dedicated areas for dog walking (see para 3.9 for more discussion).

Other funding sources

- 6.33 Other funding sources besides developer contributions will be necessary to deliver all the elements within the strategy. This is appropriate as elements such as the new facilities at Cliffe Pools and enhancements to green infrastructure away from the SPA will have a wider function and role than mitigating new development. For these elements (category B in Table 1) developer contributions may be appropriate for a small component, potentially providing match funding. We have also identified a measure that is perhaps more relevant to current impacts rather than impacts from new development (category B in Table 1), and again, this would be best funded through an alternative funding source. Other funding sources would be the best way of also securing habitat management within the SPA (which falls outside the role of mitigation).
- 6.34 Other funding sources could include local NGOs, Heritage Lottery Fund, the Nature Improvement Area (NIA) partnership and the Thames Estuary 2100 (TE2100). Other opportunities may arise over time, and partnership working and innovative approaches may be necessary.

Delivering measures relating to existing impacts

- 6.35 As demonstrated in Table 1 there is relatively little within the overall strategy that can be clearly identified as relating to existing impacts and excluded as mitigation. We have however suggested that structures to prevent access from vehicles – stopping off-road vehicles, motorbikes etc. from accessing key areas – relates primarily to existing impacts. Such measures need to be funded through some other means.
- 6.36 In para 3.6 we discussed habitat management and largely discounted habitat management options from the shortlist because some such management should be taking place anyway (management of the European sites to achieve favourable condition) and because they are not necessarily compliant with the Habitat Regulations if new habitat is being created outside the SPA to compensate for deterioration of the SPA. There may be opportunities that arise, however, linked to other plans and initiatives, in particular relating to shoreline management and managed retreat. We therefore suggest that there may be particular opportunities that arise and these should be considered carefully to check for potential to enhance the area for the SPA interest and help to reverse the bird declines.

Implementation next steps

- 6.37 Following from the discussion above, we set out the following as next steps in implementation:

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

- Establishment of a developer contributions tariff, based on calculations within this SARMP
- Continued review of spatial planning documents to ensure that the SARMP is planned
- Establishment of a partnership/board/panel with Terms of Reference and memorandums/commitments agreed
- Agreement on the level of individual/joint working to take the scheme forward.
- Agreement on a lead authority and administrative procedures.
- Consideration of dedicated staff/allocated resources for the SARMP within each organisation
- Planning for the implementation of immediate measures
- Progression on the detail of more aspirational measures to establish level of contribution to the two objectives of the SARMP

7. References

- Banks, A.N., Austin, G.E., Burton, N.H.K. & Mellan, H.J. (2005) Investigating Possible Movements of Waterbirds between the Medway Estuary and Marshes SPA and Neighbouring Areas of the Thames and Swale Estuaries. British Trust for Ornithology, Thetford.
- Beale, C.M. (2007) Managing visitor access to seabird colonies: a spatial simulation and empirical observations. *Ibis*, **149**, 102–111.
- Beale, C.M. & Monaghan, P. (2005) Modeling the Effects of Limiting the Number of Visitors on Failure Rates of Seabird Nests. *Conservation Biology*, **19**, 2015–2019.
- Bell, S. (2008) Design for Outdoor Recreation. Taylor & Francis.
- Burton, R.C.J. & Muir, K. (1974) The Recreational Carrying Capacity of the Countryside, a Research Report Presenting the Methodology & Results of Ecological and Psychological Surveys of Cannock Chase, Staffordshire. Keele University.
- Cruickshanks, K., Lake, S., Liley, D., Sharp, J., Stillman, R., Underhill-Day, J. & White, J. (2011) What Do We Know about the Birds and Habitats of the North Kent Marshes? Baseline Data Collation and Analysis. Footprint Ecology/Bournemouth University/Natural England.
- Edwards, V. & Knight, S. (2006) Understanding the Psychology of Walkers with Dogs: New Approaches to Better Management. University of Portsmouth, Portsmouth.
- Fearnley, H. & Liley, D. (2011) North Kent Visitor Survey Results. Footprint Ecology / Greening the Gateway.
- Fearnley, H. & Liley, D. (2012) North Kent Comparative Recreation Study. Footprint Ecology / Greening the Gateway.
- Hall, D.R., Roberts, L. & Mitchell, M. (2003) New Directions in Rural Tourism. Ashgate Publishing, Ltd.
- Jenkinson, S. (2009) Active Woods Design Guidance: Dog and Human Activity Trail. Forestry Commission/Kennel Club.
- Jenkinson, S. (2013) Planning for Dog Ownership in New Developments. Hampshire County Council.
- Kim, A.K., Airey, D. & Szivas, E. (2010) The Multiple Assessment of Interpretation Effectiveness: Promoting Visitors' Environmental Attitudes and Behavior. *Journal of Travel Research*.
- Kuo, I.-L. (2002) The effectiveness of environmental interpretation at resource-sensitive tourism destinations. *International Journal of Tourism Research*, **4**, 87–101.
- Liley, D., Cruickshanks, K., Lake, S., Sharp, J., Stillman, R.A., Underhill-Day, J. & White, J. (2011) What Do We Know about the Birds and Habitats of the North Kent Marshes?: Baseline Data Collation and Analysis. Natural England Commissioned Report, Footprint Ecology.
- Liley, D. & Fearnley, H. (2011) Bird Disturbance Study, North Kent 2010-2011. Footprint Ecology / Greening the Gateway.
- Liley, D., Lake, S. & Fearnley, H. (2012) North Kent Interim Overarching Report. Footprint Ecology.

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

Littlefair, C.J. (2003) The Effectiveness of Interpretation in Reducing the Impacts of Visitors in National Parks. PhD, Griffith University, Faculty of Environmental Sciences.

Mcleavy, A. (1998) An Evaluation of the Effectiveness of Interpretation as a Visitor Management Tool at Lathkill Dale. Sheffield Hallam University, Sheffield Hallam University. School of Leisure and Food Management, Sheffield.

Medeiros, R., Ramosa, J.A., Paivaa, V.H., Almeida, A., Pedroa, P. & Antunes, S. (2007) Signage reduces the impact of human disturbance on little tern nesting success in Portugal. *Biological Conservation*, **135**, 99–106.

Murison, G., Bullock, J.M., Underhill-Day, J., Langston, R., Brown, A.F. & Sutherland, W.J. (2007) Habitat type determines the effects of disturbance on the breeding productivity of the Dartford Warbler *Sylvia undata*. *Ibis*, **149**, 16–26.

Newsome, D., Moore, S.A. & Dowling, R.K. (2002) *Natural Area Tourism: Ecology, Impacts and Management*. Channel View Publications, Clevedon.

Pearce-Higgins, J.W. & Yalden, D.W. (1997) The effect of resurfacing the Pennine Way on recreational use of blanket bog in the Peak District national park, England. *Biological Conservation*, **82**, 337 – 343.

8. Appendix 1: Interest Features of the three SPAs

Table gives the interest features of the three SPAs and recent WeBS alerts (the national standard approach of assessing species populations on estuaries, alerts apply to certain wintering waterfowl, breeding birds are not assessed). Colours reflect alert status (red and amber) for the relevant species at the relevant site. Red shading indicates at least one high alert for a given species across all time periods, and amber at least one medium alert (if no high alerts) across all time periods. No shading indicates the species is not assessed or there is no alert triggered. Ramsar columns simply indicate bird species that are listed under Ramsar criterion 6 – species/populations at levels of international importance at time of designation.

	Thames Estuary & Marshes SPA					Swale SPA					Medway Estuary & Marshes SPA					Ramsar		
	4.1 Breeding	4.2 Passage	4.1 over winter	4.2 over winter	4.2 Assemblage	4.1 Breeding	4.2 Passage	4.1 over winter	4.2 over winter	4.2 Assemblage	4.1 Breeding	4.2 Passage	4.1 over winter	4.2 over winter	4.2 Assemblage	Thames	Swale	Medway
Avocet			✓		✓	✓		✓		✓	✓		✓		✓			
Bar-tailed Godwit								✓		✓								
Black-tailed Godwit					✓				✓	✓			✓	✓	✓			
Curlew										✓								✓
Dunlin					✓					✓						✓		✓
Golden Plover								✓		✓								
Grey Plover					✓				✓	✓						✓	✓	✓
Knot									✓	✓						✓		
Lapwing					✓					✓								
Oystercatcher										✓								
Redshank					✓				✓	✓						✓	✓	✓
Ringed Plover		✓		✓	✓		✓									✓		✓
Whimbrel					✓										✓			

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

	Thames Estuary & Marshes SPA					Swale SPA					Medway Estuary & Marshes SPA					Ramsar		
	4.1 Breeding	4.2 Passage	4.1 over winter	4.2 over winter	4.2 Assemblage	4.1 Breeding	4.2 Passage	4.1 over winter	4.2 over winter	4.2 Assemblage	4.1 Breeding	4.2 Passage	4.1 over winter	4.2 over winter	4.2 Assemblage	Thames	Swle	Medway
Dark-bellied Brent Goose										✓				✓	✓		✓	✓
Gadwall					✓					✓								
Pintail					✓				✓	✓			✓	✓				✓
Shelduck					✓				✓	✓			✓	✓				✓
Shoveler					✓				✓	✓								
Teal										✓					✓			
White-fronted Goose					✓					✓								
Wigeon										✓				✓				
Cormorant										✓				✓				
Great-crested Grebe														✓				
Hen Harrier			✓					✓										
Little Grebe					✓					✓					✓			
Little Tern											✓							
Marsh Harrier						✓												
Mediterranean Gull						✓												

9. Appendix 2: Previous Studies

9.1 There are a range of potential issues and pressures relating to the North Kent sites, these include industrial development, mineral extraction and water quality. Previous studies in North Kent underpin this strategy and provide context in terms of recreation and the other potential threats. Previous studies include:

- 1) What do we know about the birds and habitats of the North Kent Marshes? (Cruickshanks *et al.* 2011)
- 2) Bird Disturbance Study, North Kent 2010/11 (Liley & Fearnley 2011)
- 3) North Kent Visitor Survey Results (Fearnley & Liley 2011)
- 4) North Kent Comparative Recreation Study (Fearnley & Liley 2012)
- 5) Estuary Users Survey (Medway Swale Estuary Partnership, 2011)
- 6) GGKM Roost survey (mapped in Liley & Fearnley 2011)
- 7) Recent Wetland Bird Surveys results produced by the British Trust for Ornithology
- 8) Phase I Bird Disturbance Report (Liley, Lake & Fearnley 2012)
- 9) Detailed analysis of bird trends on individual parts of the Medway, conducted by the BTO (Banks *et al.* 2005)

9.2 The latest bird data (see Appendix 1) for the Medway Estuary and Marshes SPA (WeBS alerts¹⁷) indicate high alerts (declines above 50%) for nine species and medium alerts (declines between 25 and 50%) for a further three species, out of 17 assessed. In all cases comparison of the trends with broadscale trends suggests the declines are site-specific. Five of the high alerts on the Medway are triggered for the long term (i.e. 25 years). The latest WeBS alerts for the Swale SPA indicate alerts triggered for nine out of the 21 species assessed (site specific declines for two species) and for the Thames Estuary and Marshes SPA alerts have been triggered for seven out of the 14 species assessed (site specific declines for three).

9.3 A simple overview of the various reports listed above indicate that:

- There have been marked declines in some of the bird species, particularly around the Medway
- Within the Medway, the areas that have seen the most marked declines are the area north of Gillingham, including the area around Riverside Country Park. This is one of the busiest areas in terms of recreational pressure.
- There is no evidence to support the suggestion that bird declines on the Medway relate to increases on neighbouring sites (i.e. birds simply redistributing)

¹⁷ See <http://blx1.bto.org/webs-reporting/>

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

- The estuaries and coastline are widely used for recreation and a range of activities take place.
- Recreational activities do result in birds being flushed and displaced.
- Most behavioural responses that were observed from the birds were due to the presence of dogs, particularly those off the lead.
- There was some evidence that bird numbers at locations with high numbers of visitors were low.
- Visitors are mainly local, around a third of people interviewed in the visitor survey had walked from their home and of the two-thirds who had travelled by car, the median distance (home postcode to interview location) was 4.2km.
- Visitor rates decline with distance from the SPAs and indicate that development within a 6km radius of access points is particularly likely to result in increased access levels and activities that relate to day-to-day use of local greenspace.
- The levels of housing around the three European sites are currently relatively high compared to other estuary SPA sites in the UK
- The scale of new development in the general area – as set out in the relevant strategic plans – is considerable and may result in an increase in access levels of around 1700 person visits per day (an increase of 15%).

10. Appendix 3: Our Approach

- 10.1 In this appendix we summarise our approach.
- 10.2 Our approach has been initially to clarify a **framework** (section 3) for the strategy that sets out the aims, the limits (geographical and temporal), legal/planning requirements and guiding principles that underpin the plan. This framework was agreed with the steering group for the project in the early stages of developing the plan.
- 10.3 The next step was to identify a **long list** of all possible measures that could be used to address disturbance issues; this is set out in section 4. This list was then reviewed to consider which approaches have the most merit and the relative advantages and disadvantages of each. From this a **short-list** of measures was compiled that we believe could form the basis of a plan.
- 10.4 In order to identify the **locations** (section 5) that are a focus for the plan, we used GIS data from the previous studies (summarised in paragraph 1.7) to identify areas:
- Important for particular bird species
 - Potentially vulnerable to disturbance/sensitive to disturbance (e.g. high tide roost)
 - That fall within the designated sites or support relevant interest features
 - Where access levels are predicted to increase markedly
 - Where access levels are low
 - Where access levels are high
 - Where there is no or limited public access
 - Where access onto intertidal is limited
 - Where there are particularly high levels of particular activities
- 10.5 These maps provided the information required to identify the locations and geographical focus for the elements within the plan.
- 10.6 The short-list was presented to a workshop¹⁸ comprising local landowners, site managers, countryside staff, rangers, wardens and other stakeholders, whose opinion was sought on how to deliver the different elements. Drawing on their local knowledge we were able to produce a list of detailed, target projects and check the short list. The **detailed strategy** was then finalised after this workshop.

¹⁸ Workshop held at Medway Council offices on 9th September 2013

11. Appendix 4: A ‘long list’

This table provides a broad overview of ways to reduce disturbance to birds at coastal sites. Note that some of these may not necessarily be compliant with the Habitat Regulations, for example habitat management within European sites to enhance the habitat for the interest features would not count as ‘mitigation’.

	Management option	Description
1. Habitat Management		
1a	New habitat creation	Creation of new habitat in areas away from parts of the site with recreation pressure (see also zoning). Examples may include creation of islands for roosts or lagoon areas for additional feeding.
1b	Habitat management	Habitat enhancement may create new breeding/roosting/feeding sites, potentially in areas away from sources disturbance.
2. Planning & Off-site Measures		
2a	Locate development away from sensitive sites	Much recreational use of sites is local, for example from people living within a short drive or walk of sites. Focussing development away from nature conservation sites is a way to reduce the long term future pressures of increased recreation from development.
2b	Management of visitor flows and access on adjacent land (outside European site)	Planting, screening, careful routing, provision of access infrastructure (boardwalks, marked paths, steps etc.) around the periphery and outside European sites can influence how people access sites.
2c	Provision of suitable alternative greenspace sites ('SANGs')	SANGs, sited away from designated sites, have the potential to draw users away from designated sites. Alternative sites need to be tailored to provide a viable and attractive alternative destination, matching the draw of the relevant designated site or providing a near equivalent recreational experience in a more convenient location.
2d	Provision of designated access points for water sports	Provision of public slipways, trailer & vehicle access to shore etc. in predetermined locations where boat access is likely to be away from nature conservation interest.
2e	Enhance access in areas away from designated sites	At a reasonably strategic level it should be possible to encourage people to change access patterns by enhancing access provision at less sensitive sites and not enhancing provision at sensitive locations. Users can be encouraged to locations through the provision of attractions/facilities such as toilets, food, improved walking surfaces, hides etc. Demand can be managed through modification of parking fees and parking capacities, restriction of on-road parking, wardening etc. As such there are parallels with 3e and also the approach is similar to 2d.
3. On-site Access Management		
3a	Restrict/ prevent access to some areas within the site	Potential to restrict access at particular times, e.g. high tide and particular locations (roost sites). Temporary fencing, barriers, diversions etc. all possible.
3b	Provide dedicated fenced dog exercise areas	Allowing dogs off leads etc. in particular locations that are not sensitive for nature conservation or other reasons may increase their attractiveness to dog walkers. Links to 2e.
3c	Zoning	Designated areas for particular activities. Often zones are set out in a code of conduct and prevention of use for the

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

		areas outside the zones is enforced through byelaws. We refer to zoning therefore as positive spaces where users are welcomed, as opposed to the exclusion zones described in 3a.
3d	Infrastructure to screen, hide or protect the nature conservation interest	Screens, hides, embankments etc. are commonly used to direct visitors along particular routes and screen people from birds or other features vulnerable to disturbance. Such infrastructure can also provide enhanced viewing facilities and opportunities for people to get close to wildlife without causing disturbance. Path design can enhance the extent to which people stray or roam from the path. Boardwalks etc. can protect vulnerable habitats.
3e	Management of car-parking	Car-park spaces can be redistributed around a site, parking closed in some areas, parking fees modified (e.g. encouraging people not to stay too long) or a permit system be instigated to limit use of car-parks.
3f	Path design and management	Surfacing, path clearance and other relatively subtle measures may influence how people move around a site and which routes they select.
4. Education and Communication to Public/Users		
4a	Signs and interpretation and leaflets	Provision of informative and restrictive signs, and interpretive boards. Directions to alternative less sensitive sites. General information on the conservation interest to highlight nature conservation interest/importance.
4b	Codes of Conduct	Guidance on how to behave to minimise impacts is promoted at a range of sites, through websites, leaflets, interpretation etc. These are sometimes enforced by byelaws and other control measures (see section 5).
4c	Wardening	In addition to an enforcement role (see 5d below) wardens can provide a valuable educational role, showing visitors wildlife etc.
4d	Provision of information off-site to local residents and users.	Local media, newspapers etc. can provide means to highlight conservation importance of sites and encourage responsible access. Educational events, provision of items for local TV/other media. Information can be made available in local shops, tourist centres etc. Potential to promote non-designated sites, for example through web / leaflets listing, for example, dog friendly sites. Can include school visits and working with children.
4e	Contact with relevant local clubs	Agreed codes of conduct (see 4b) and self-policing can be set up with individual groups and provide a means of ensuring users are aware of how to act responsibly (e.g. water-sports club revoking membership for anyone caught speeding).
5. Enforcement		
5a	Covenants regarding keeping of pets in new developments	Covenants prohibiting the keeping of cats and / or dogs.
5b	Legal enforcement	Byelaws can be established by a range of bodies including local authorities, the MOD, National Trust, Parish Councils etc. Other options include special nature conservation orders, dog control orders or prosecution under SSSI legislation. Enforcement can apply to speed limits (e.g. on water), where people go and how they behave. Dog control orders involve a range of options such as dogs on leads only, on leads when asked, no fouling and no dogs at

Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy

		all.
5c	Wardening	<p>Wardens have both educational (see 4c above) and enforcement roles. With respect to the later, wardens can provide direct contact and intervene when they observe particular activities (such as dogs off the lead on mudflats).</p> <p>The ability of a warden to control disturbing activities is clearly related to whether control measures are in place, and their nature. The more specific and statutory in nature the control, the greater the potential for enforcement by a warden.</p>
5d	Limiting visitor numbers	Visitor numbers capped, for example through tickets, permits or a similar system.

12. Appendix 5: Main Matrix

This appendix sets out the 'main matrix', assessing measures against various assessment criteria. The shading reflects how measures are scored. For all shaded cells, the colours go from green (through pink and orange) to dark red. Rows with lots of green cells are therefore those where measures are most likely to be easy, cheap, effective and will work over a wide area. Green cells therefore lend support for a measure while orange or dark red indicates difficulties or issues with a particular measure. Where there is some uncertainty regarding how to categorise a measure (for example the cost), we have coloured the cell orange.

The categories used are broad and we have categorised measures based on our judgement.

Thames, Medway and Swale Estuaries – Strategic Access and Recreation Management Plan (SARMP)

		Activity specific?	Activities relevant	Likely Effectiveness	Practicality of delivery	Scale of measure	Mechanisms for delivery	Time to implement	Potential for phased delivery	Capital Costs	Maintenance Costs (annual/phased)	Notes
1a	New Habitat Creation	No		Likely to work but limited evidence	Some difficulties	Very local /site specific	Local landowner/stakeholder/Developer	Single one-off event	No	£10k - £100k	<£50k	Unlikely to be an option within European site boundaries as already designated. Creating habitat outside the sites a positive measure, but not acceptable if proposed as mitigation to offset harm to the designated site. Dependent on suitable locations with no disturbance; likely to be a very limited range of locations where could be implemented
1b	Habitat management	No		Effectiveness dependent on location and specific circumstances	Some difficulties	Very local /site specific	Local landowner	Requires continuous input	No	negligible	£?	Habitat management within the European sites is necessary to achieve favourable condition and taking place anyway. Habitat management outside the designated sites may provide some opportunities, but dependent on circumstances.
2a	Locate development away from sensitive sites	No		Good evidence that can work	Highly complex to deliver	Sub-regional	Local authority	Single one-off event	No	negligible	negligible	Distance at which development would have to be limited would be considerable and may be unworkable for many local authorities
2b	Management of visitor flows on adjacent land	Yes	General Shorebased	Likely to work but limited evidence	Straight forward & easy to implement	Very local /site specific	Directly linked to developer/local authority	Single one-off event	Yes - but over 5 years or less	£10k - £100k	<£50k	Depends very much on site specific details and opportunities available.
2c	Provision of alternative sites for recreation "SANGs"	Yes	General Shorebased	Effectiveness dependent on location and specific circumstances	Highly complex to deliver	Sub-regional /local	Strategic/partnership working	Single one-off event	No	>£1m	<£50k	large, carefully positioned sites only likelihood of success; 20ha site - land value could be around £1m; capital costs would also need to include landscaping, planting etc.; maintenance costs around £1500 per ha p.a. Very much dependent on opportunities. Inland SANGs may not attract shore users
2d	Provision of designated facilities for watersports outside SPA	Yes	Watersports	Effectiveness dependent on location and specific circumstances	Some difficulties	Sub-regional	Strategic/partnership working	Single one-off event	Yes - but over 5 years or less	£100k - £1m	<£50k	Many activities such as kite surfing rely on specific conditions - wind, tide etc. that mean limited options. Most applicable for jet skis and small craft from trailers.
2e	Enhance access facilities in general area	No		Effectiveness dependent on location and specific	Some difficulties	Sub-regional /local	Strategic/partnership working	Single one-off event	Yes - over many years	£10k - £1	<£50k	Costs, ease and details depend on the enhancement, location etc.

Thames, Medway and Swale Estuaries – Strategic Access and Recreation Management Plan (SARMP)

		Activity specific?	Activities relevant	Likely Effectiveness	Practicality of delivery	Scale of measure	Mechanisms for delivery	Time to implement	Potential for phased delivery	Capital Costs	Maintenance Costs (annual/phased)	Notes
	(away from SPA)			circumstances		I				00k		
3a	Restricted access to parts of site	No		Likely to work but limited evidence	Some difficulties	Very local /site specific	Local landowner/stakeholder/Developer	Single one-off event	No	£10k - £100k	<£50k	Difficult on sites with rights of access
3b	Provide dedicated fenced dog exercise areas	Yes	Dogs/dog walking	Unsure/limited effectiveness	Straight forward & easy to implement	Very local /site specific	Local landowner/stakeholder/Developer	Single one-off event	No	£10k - £100k	<£50k	May draw dog walkers from wide area, therefore probably not effective if on edge of SPA. Likely to be effective only if off site or combined with other measures - i.e. Dogs then subsequently required to be on leads
3c	Zoning	Yes	Most applicable to watersports	Likely to work but limited evidence	Some difficulties	Local	Local authority/Strategic/partnership working	Single one-off event	No	£10k - £100k	<£50k	Single zones could be very local and site specific. Zoning for some watersports could alternatively be established at a broad scale. Would need to be combined with codes of conduct/enforcement etc
3d	Infrastructure to screen, hide or protect the nature conservation interest	Yes	Most applicable to General Shorebased	Effectiveness dependent on location and specific circumstances	Straight forward & easy to implement	Very local /site specific	Local landowner/stakeholder/Developer	Single one-off event	Yes - but over 5 years or less	£10k - £100k	<£50k	Different types of screening likely to work better in different locations.
3e	Management of car-parking	No		Likely to work but limited evidence	Some difficulties	Sub-regional /local	Local landowner/stakeholder/Developer	Single one-off event	Yes - but over 5 years or less	£10k - £100k	<£50k	May be unpalatable/unpopular. Reduction in spaces likely to work better than full closure. Parking charges may even help to cover costs. Dependent on organisations involved working together and agreeing charges
3f	Path design and management	No	Most applicable to General	Effectiveness dependent on location and specific	Straight forward & easy to	Local	Local landowner/stakeholder/Developer	Single one-off event	Yes	£10k - £1	<£50k	Marked routes can provide means to funnel access away from particular areas. Depends on opportunities at site/general area. Resurfacing and modifying particular routes or part of routes may provide opportunities at very local level

Thames, Medway and Swale Estuaries – Strategic Access and Recreation Management Plan (SARMP)

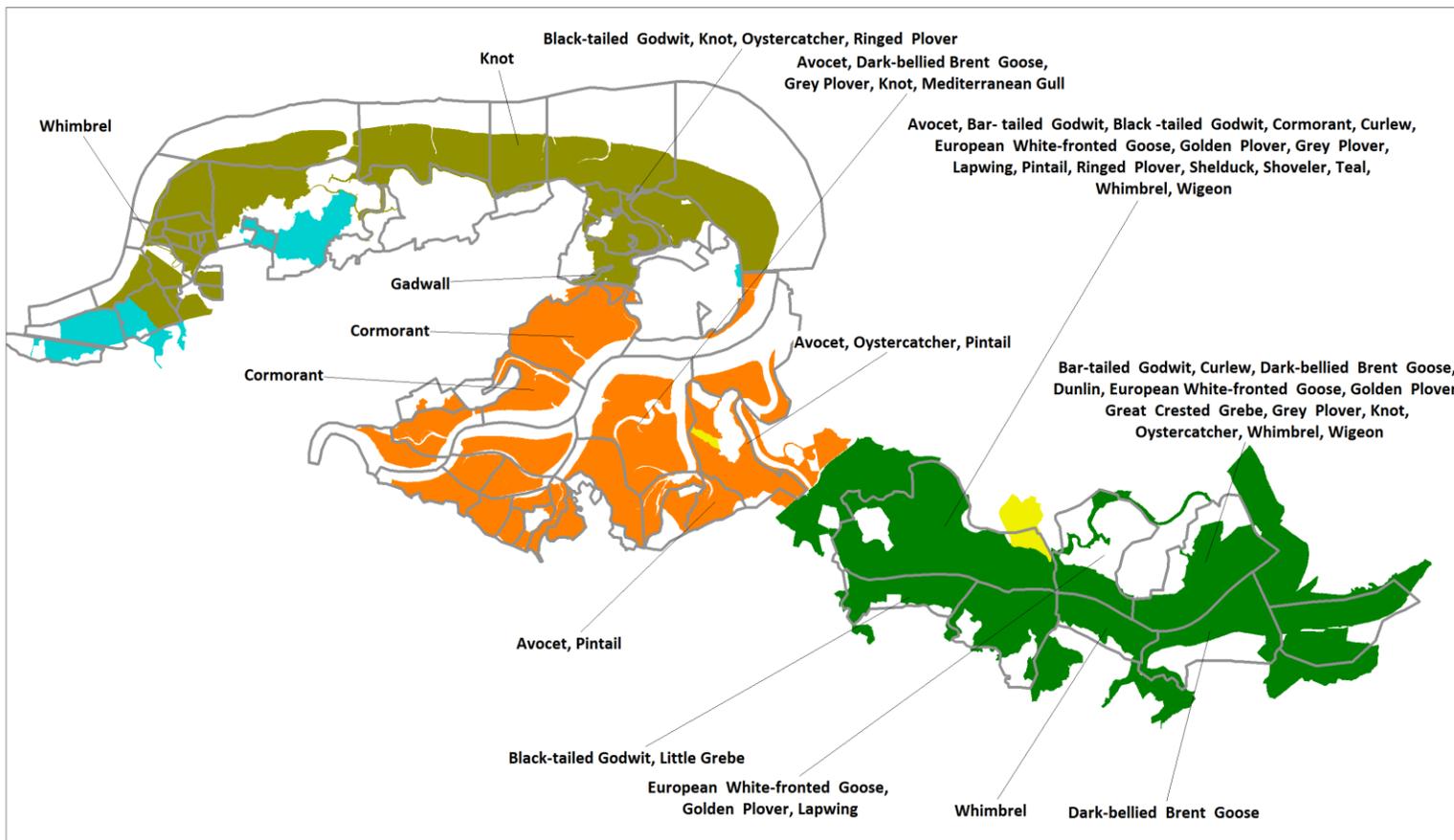
		Activity specific?	Activities relevant	Likely Effectiveness	Practicality of delivery	Scale of measure	Mechanisms for delivery	Time to implement	Potential for phased delivery	Capital Costs	Maintenance Costs (annual/phased)	Notes
			Shorebased	circumstances	implement					00k		
4a	Signs, interpretation and leaflets	No		Unsure/limited effectiveness	Straight forward & easy to implement	Sub-regional/local	Strategic/partnership working	Single one-off event	No	<£10k	<£50k	Difficult to have much confidence of success. May raise awareness of disturbance.
4b	Voluntary codes of conduct developed with local user groups/users	Yes	Watersports/bait digging and others	Likely to work but limited evidence	Straight forward & easy to implement	Sub-regional	Strategic/partnership working	Single one-off event	No	negligible	<£50k	Intensive work to establish, set up and only likely to be effective where good link with users can be established and where scope to develop codes of conduct that resolve issues and do not inhibit users
4c	Wardening (with an education/communication role)	No		Unsure/limited effectiveness	Straight forward & easy to implement	Sub-regional/local	Strategic/partnership working	Requires continuous input	No	negligible	£50k - £500k	Wardens showing people wildlife but not actually asking people to behave differently. May have some success but unlikely to be effective with many user groups. Most likely to work if wardens in an engagement role, talking directly to users about activities and use of site etc.
4d	Provision of information off-site to local residents and users	No		Unsure/limited effectiveness	Straight forward & easy to implement	Sub-regional/local	Strategic/partnership working	Requires continuous input	Yes - over many years	<£10k	£50k - £500k	Labour intensive. Potentially beneficial in terms of local support/awareness for nature conservation, but may have little or no success in reducing disturbance.
4e	Contact with relevant local clubs	Yes	Watersports	Unsure/limited effectiveness	Straight forward & easy to implement	Sub-regional/local	Strategic/partnership working/ Local landowner/stakeholder/Developer	Requires continuous input	Yes - over many years	£10k - £100k	<£50k	Requires staff input to maintain dialogue and connection with clubs. Most likely to work where there is an active local group and potential to enforce further restrictions if self-policing doesn't work.
5a	Covenants regarding keeping of pets in new developments	Yes	Dog walking	Unsure/limited effectiveness	Some difficulties	Very local/site specific	Directly linked to developer	Single one-off event	Yes - over many years	<£10k	negligible	Impossible to be confident of effectiveness in perpetuity. Maintenance costs may need to be high to check and enforce

Thames, Medway and Swale Estuaries – Strategic Access and Recreation Management Plan (SARMP)

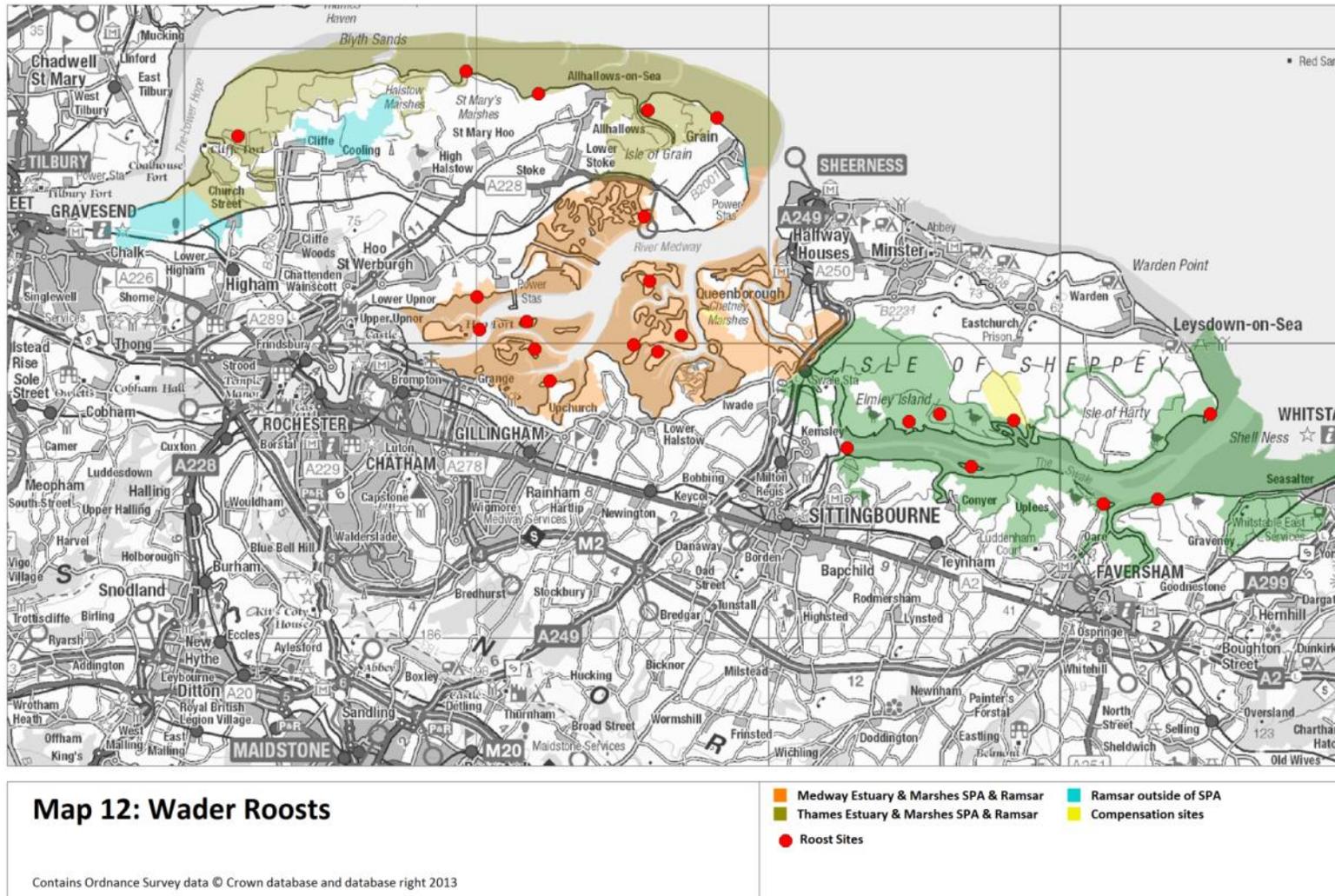
		Activity specific?	Activities relevant	Likely Effectiveness	Practicality of delivery	Scale of measure	Mechanisms for delivery	Time to implement	Potential for phased delivery	Capital Costs	Maintenance Costs (annual/phased)	Notes
5b	Legal enforcement	No		Likely to work but limited evidence	Some difficulties	Local	Legal framework needs to be established by local authority or other body with appropriate powers	Requires continuous input	No	£10k - £100k	<£50k	Byelaws may take some time to establish and potentially evidence base necessary to establish need
5c	Wardens on site to ask people to behave differently	No		Good evidence that can work	Straight forward & easy to implement	Sub-regional/local	Strategic/partnership working	Requires continuous input	No	<£10k	£50k - £500k	Presence of wardens costly but wardening is possible over wide area/multiple sites. Possibly more effective if wardens are able to enforce.
5d	Limiting visitor numbers	No		Likely to work but limited evidence	Some difficulties	Very local/site specific	Local landowner/stakeholder/Developer		No	<£10k	<£50k	Possible at nature reserves or sites where management of access formalised and in place, can only work where no legal right of access

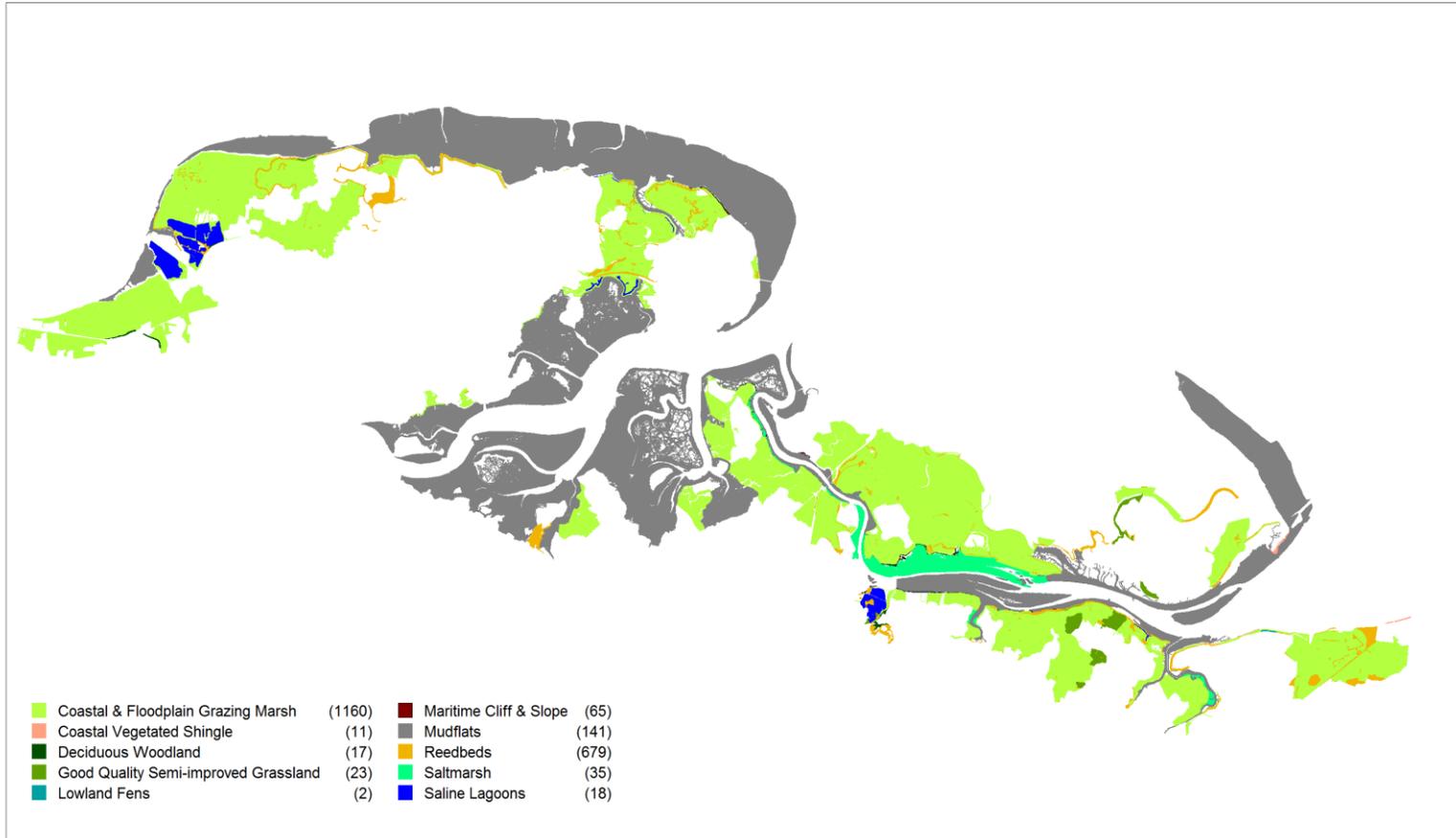
13. Appendix 6: Spatial Context: Identifying areas that should be a focus for the strategy

- 13.1 Map 11 shows WeBS sectors and those with at least 10% of the mean peak count for the period 1988-2010 for each species across all three SPAs. This allows us to highlight WeBS sectors that are particularly important for given species. A problem with this approach is that the WeBS sectors vary in size and the WeBS counts are high tide counts and therefore do not necessarily reflect the distribution of the birds at other tide states. The map will also not necessarily indicate areas where bird declines have already taken place. The map is however useful in summarising where birds can be concentrated, but other information is important too.
- 13.2 We therefore show roost sites in Map 12. The wader roost locations are extracted from the bird disturbance study. In Map 13 we show the priority habitats within the SPAs. The mudflats (grey) provide the main feeding areas for many species at low tide. The coastal grassland also will provide some important feeding areas for some species (such as golden plover and lapwing). The saline lagoons are used by some breeding species – such as avocets and terns – and also provide important roost and loafing areas for the wintering bird interest. While the intertidal habitat and wet grassland habitats are widely distributed, saline lagoons are more limited in distribution, with Cliffe and Oare Marshes being the main locations.
- 13.3 Visitor data indicates that most visitors live within 6km of the locations where interviewed. Identifying areas that have high levels of new housing within 6km provides a simple way of identifying areas that are most likely to see a change in access. In Map 14 we show these data, and it highlights that the most change will be around the Medway Estuary. The western part of the study area – towards Gravesend – and the Isle of Sheppey are also areas that appear likely to change in access levels.
- 13.4 In considering changes in access it is also important to consider which locations already have high levels of access and which have relatively low levels of access. In Map 15 we show comparative scores (scoring by local experts) that show relative levels of access. It can be seen that the Medway and the area towards Whitstable are the busiest areas currently. Some of the areas with the low scores for access have limited access to the shore. Access infrastructure – such as parking, jetties, slipways etc. are largely focused in the Medway and towards Whitstable (Map 16).



Thames, Medway and Swale Estuaries – Strategic Access and Recreation Management Plan (SARMP)

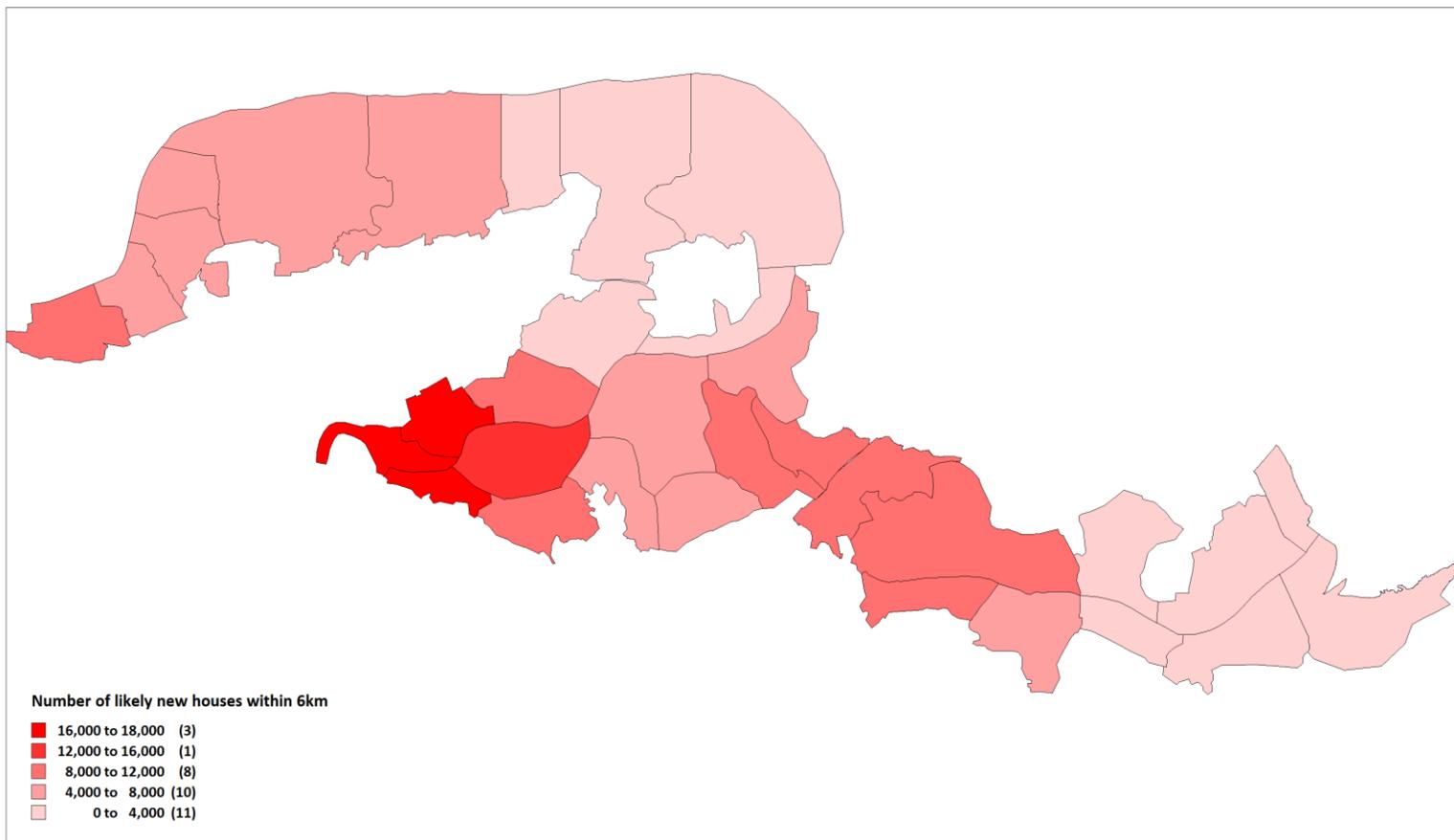




Map 13: Main Priority Habitats Within the SPA and Ramsar Sites

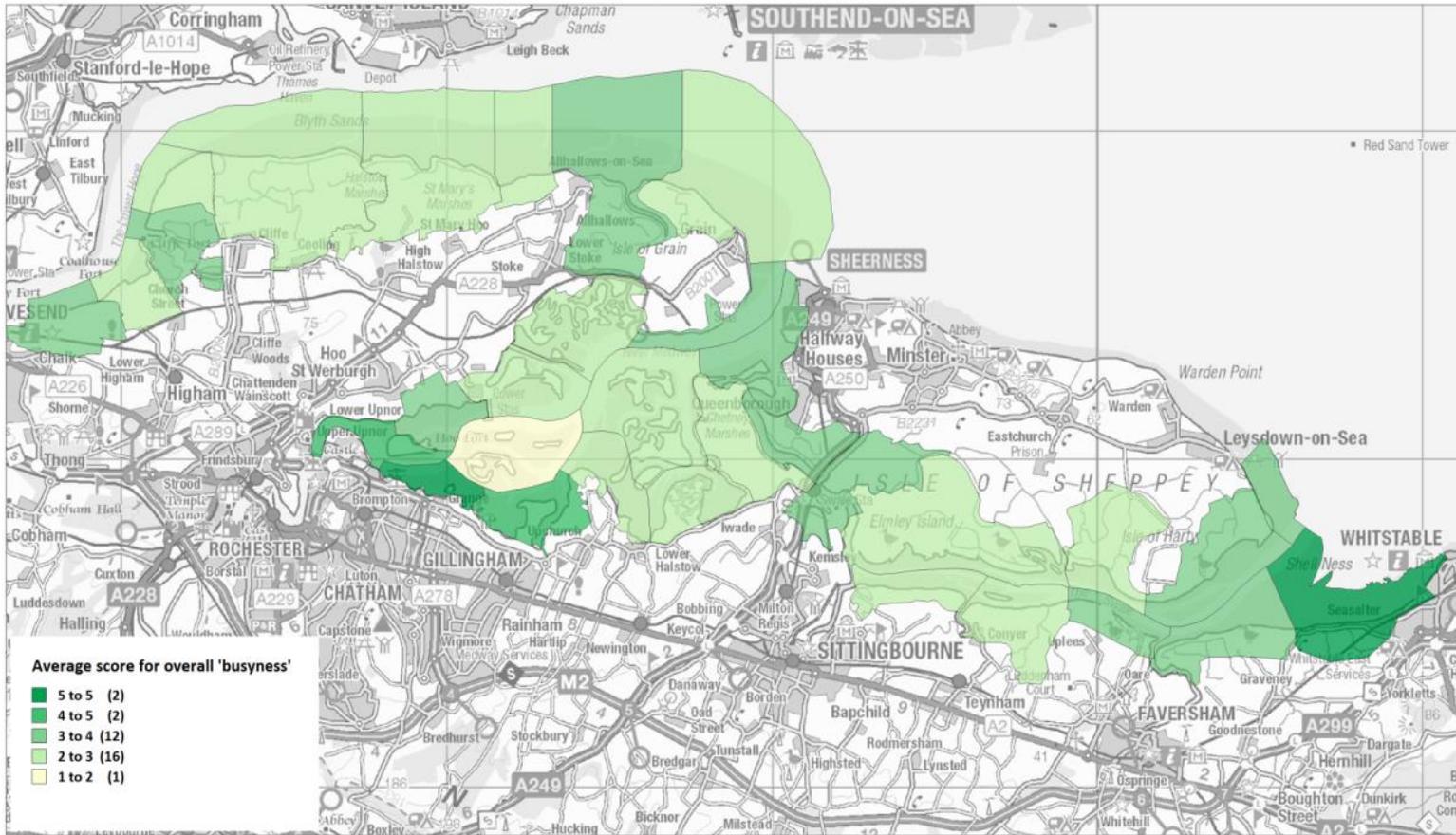
Derived from priority habitats GIS data, provided by Natural England

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Map 14: Coast sections shaded to reflect indicative levels of new housing within 6km radius
See Liley, Lake and Feanley 2012 for further details

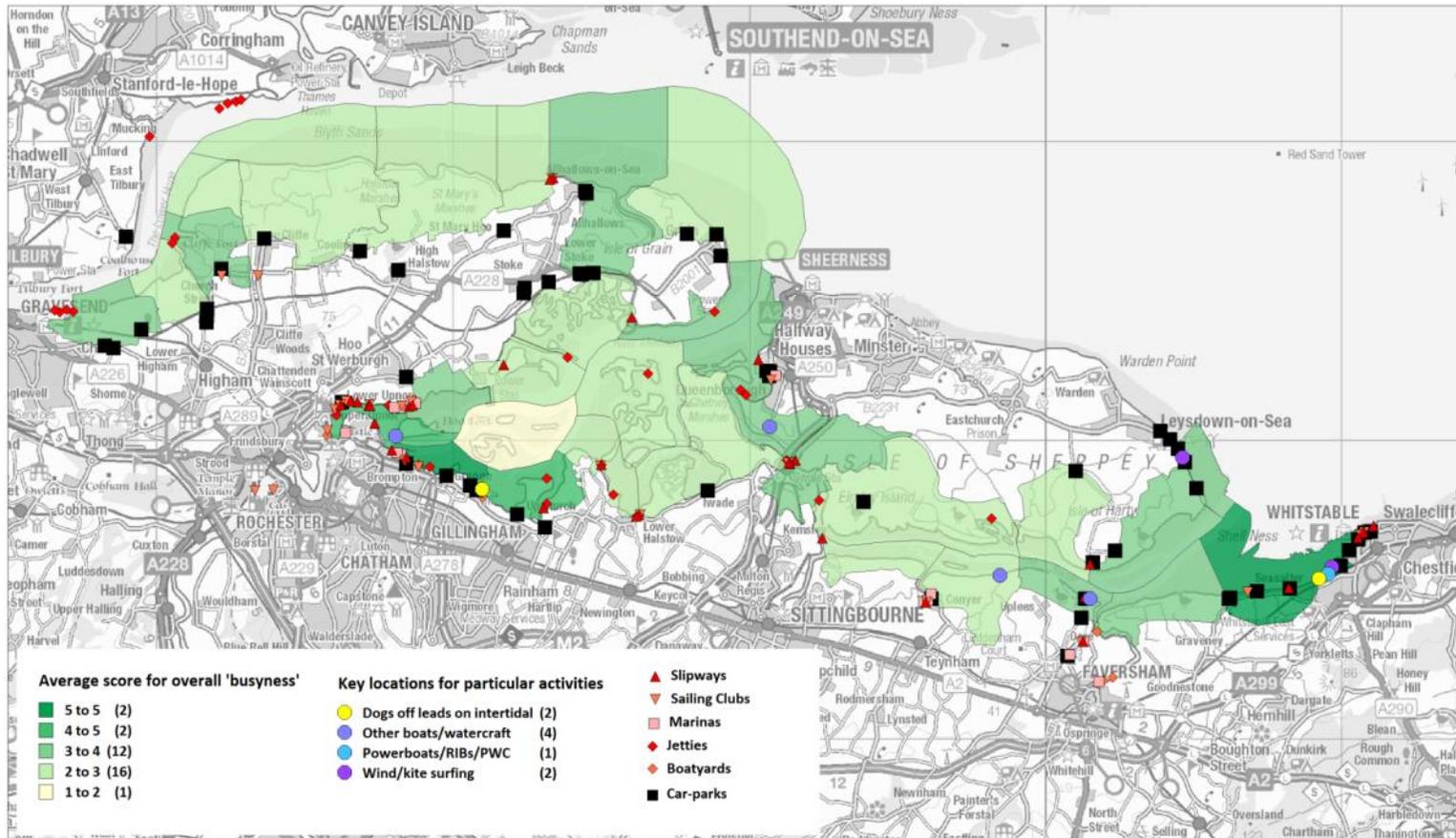
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Map 15: Levels of Current Access (from Fearnley & Liley 2012)

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Map 16: Levels of Current Access (see Map 14), Access Infrastructure and Key Locations for Particular Activities

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14. Appendix 7: Summary Map and Tables for Elements of the Plan

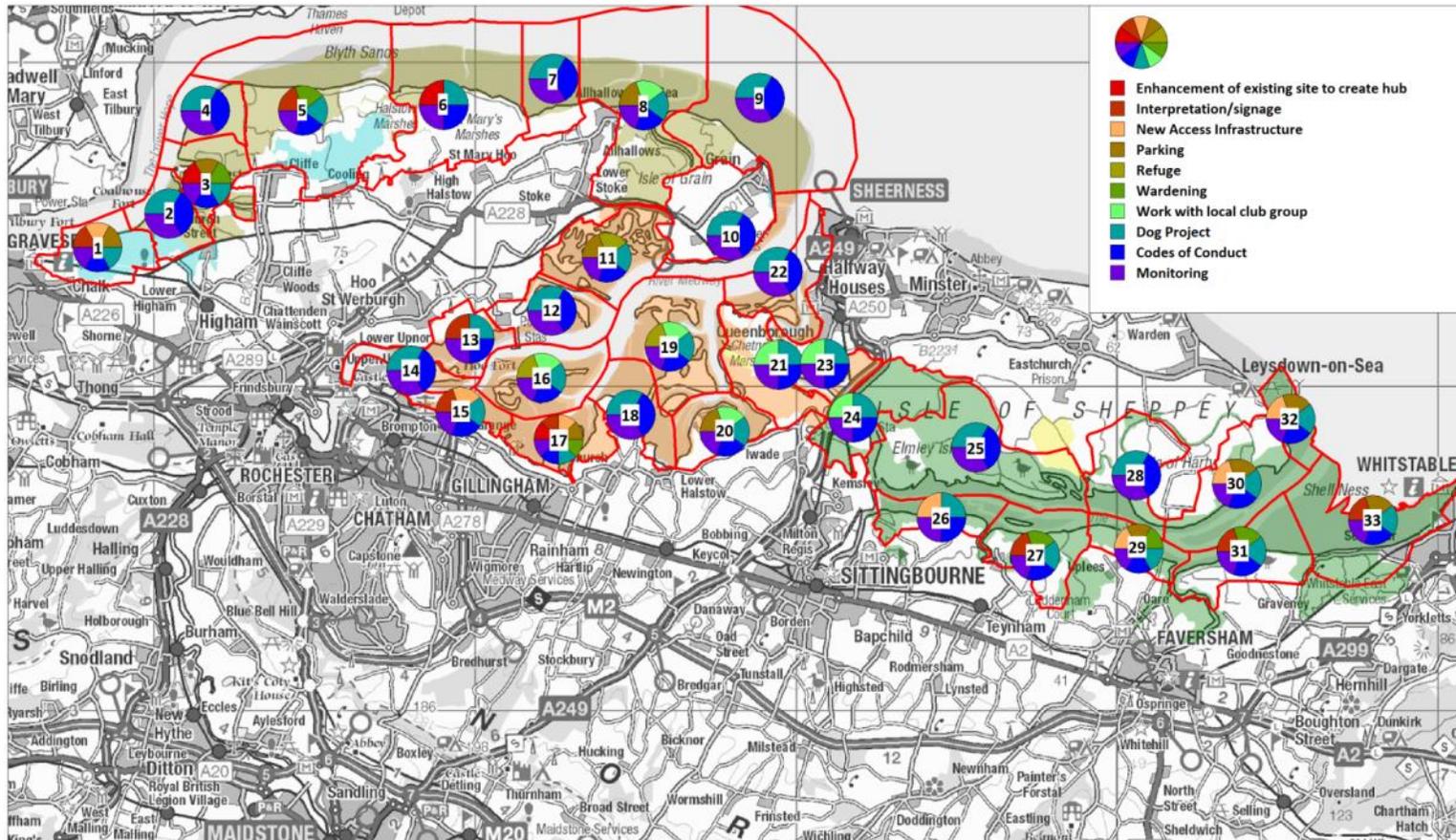
Summary of strategy elements by section. Sections are those used in Maps 14-16. See also Map 17 which shows each section and pie charts coloured to reflect measures within each. Within the table the number of new houses within 6km are the data in Map 14 (see Liley, Lake & Fearnley 2012 for details) and the score for 'busyness' is from Map 15 and reflects a score of 1 (quiet) to 5 (high general levels of access) (see Fearnley & Liley 2012). In all cases the ticks are indicative, additional areas or changes to locations are likely. The dog project, codes of conduct and monitoring are all elements that are generic and therefore difficult to map. Enforcement is an option that can be phased and used when other options fail, hence the brackets.

Map Ref (See Map 17)	LPA	No. of New Houses Within 6km	Score reflecting Current 'Busyness'	Enhancement of existing site to create hub	Interpretation/signage	New Access Infrastructure	Parking	Refuge	Wardening	Work with local club/group	Dog Project	Codes of Conduct	Monitoring	Enforcement
1	Gravesham	9349	3		✓	✓	✓				✓	✓	✓	(✓)
2	Gravesham	7320	2								✓	✓	✓	(✓)
3	Gravesham & Medway	6752	3	✓			✓		✓		✓	✓	✓	(✓)
4	Medway	5018	2								✓	✓	✓	(✓)
5	Medway	6534	2		✓				✓		✓	✓	✓	(✓)
6	Medway	6504	2	✓							✓	✓	✓	(✓)
7	Medway	183	2								✓	✓	✓	(✓)
8	Medway	166	3				✓			✓	✓	✓	✓	(✓)
9	Medway	3834	2								✓	✓	✓	(✓)
10	Medway	3874	3								✓	✓	✓	(✓)
11	Medway	3375	2				✓	✓			✓	✓	✓	(✓)
12	Medway	8951	2								✓	✓	✓	(✓)
13	Medway	16582	3		✓						✓	✓	✓	(✓)
14	Medway	17181	4								✓	✓	✓	(✓)
15	Medway	17155	5		✓	✓					✓	✓	✓	(✓)

Thames, Medway and Swale Estuaries – Strategic Access and Recreation Management Plan (SARMP)

Map Ref (See Map 17)	LPA	No. of New Houses Within 6km	Score reflecting Current 'Busyness'	Enhancement of existing site to create hub	Interpretation/signage	New Access Infrastructure	Parking	Refuge	Wardening	Work with local club/group	Dog Project	Codes of Conduct	Monitoring	Enforcement
16	Medway	15029	1					✓		✓	✓	✓	✓	(✓)
17	Medway	8461	4	✓	✓	✓	✓		✓		✓	✓	✓	(✓)
18	Swale	6282	2								✓	✓	✓	(✓)
19	Swale	5256	2					✓		✓	✓	✓	✓	(✓)
20	Swale	6899	2				✓			✓	✓	✓	✓	(✓)
21	Swale	8426	2							✓	✓	✓	✓	(✓)
22	Swale	5173	3								✓	✓	✓	(✓)
23	Swale	8393	3							✓	✓	✓	✓	(✓)
24	Swale	9044	3							✓	✓	✓	✓	(✓)
25	Swale	9503	2								✓	✓	✓	(✓)
26	Swale	8985	2			✓					✓	✓	✓	(✓)
27	Swale	5225	2		✓				✓		✓	✓	✓	(✓)
28	Swale	2133	2								✓	✓	✓	(✓)
29	Swale	1006	3			✓	✓		✓		✓	✓	✓	(✓)
30	Swale	1414	3			✓	✓				✓	✓	✓	(✓)
31	Swale	2009	3		✓				✓		✓	✓	✓	(✓)
32	Swale	1282	3			✓	✓				✓	✓	✓	(✓)
33	Canterbury	3610	5		✓		✓				✓	✓	✓	(✓)

Thames, Medway and Swale Estuaries – Strategic Access and Recreation Management Plan (SARMP)



Map 17: Spatial Summary

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Phase I - Bird Disturbance Report



Durwyn Liley, Sophie Lake & Helen Fearnley



Date: 9th July 2012

Version: Final

Recommended Citation: Liley, D., Lake, S. & Fearnley, H. (2012). Phase I – Bird Disturbance Report. Footprint Ecology/GGKM/NE

Summary

Designated European Wildlife Sites in North Kent include three Special Protection Areas (SPAs) and Ramsar sites: the Thames Estuary and Marshes SPA and Ramsar site, the Medway Estuary and Marshes SPA and Ramsar Site, and the Swale SPA and Ramsar Site.

The North Kent Environmental Planning Group has completed Phase 1 of a bird disturbance study. This report draws on Phase 1 to provide summary information for Habitat Regulations Assessments (HRAs) of the relevant Local Development Frameworks, land allocation for development and the creation of mitigation and access management strategies. This report is limited to the administrative areas of Canterbury, Dartford, Gravesham, Medway and Swale local authorities. We focus on the impacts of recreational activities on the three SPA and Ramsar sites, and consider these impacts (individually and in-combination) in relation to new housing development.

From the evidence base we draw the following broad conclusions relating to development and the need for mitigation:

- There have been marked declines in the numbers of birds using the three SPAs. Declines are particularly apparent on the Medway and have occurred at the locations with the highest levels of access.
- Disturbance is a potential cause of the declines. The disturbance study shows birds are responding to the presence of people, and there is evidence that the busiest locations (which have seen the most marked bird declines) support particularly low numbers of birds. Detailed and costly fieldwork (involving assessment of invertebrate food supplies) and complex modelling would be necessary to explore in detail the impacts of disturbance on bird population size.
- Access levels are linked to local housing, with much of the access involving frequent use by local residents. Indicative data on future housing development,, when used with the visitor data to estimate change in access levels between now and c.2026, would suggest that the SPA/Ramsar sites would see a future increase of approximately 15%. Given the results of the disturbance work to date and the likely scale of change in the future, it is clearly not possible to rule out any likely significant effects on the integrity of the European sites as a result of increased housing. A suite of mitigation measures are therefore necessary to avoid potential adverse effects caused by future development.
- All activities (i.e. the volume of people) are potentially likely to contribute to additional pressure on the SPA sites and should be addressed within mitigation plans. Dog walking, and in particular dog walking with dogs off leads, is currently the main cause of disturbance (by far) and therefore should be a focus for mitigation. Other particular activities are those that involve people on the mudflats or the water.
- Development within 6km of access points to the SPAs is particularly likely to lead to increase in recreational use of the SPAs. Local greenspace use such as dog walking, cycling, jogging, walking and to some extent family outings will originate from people living within this radius.
- Beyond 6km from access points onto the SPA, large developments or large scale changes to housing levels will also result in increased recreational use. It would appear that visitors to

the North Kent coast mostly originate from a zone north of the M2/A2 between Gravesend and Herne. People living within this broad coastal strip (i.e. beyond 6km from SPA access points and north of the M2/A2) are likely to visit for more coastal specific activities. Assuming users will be drawn to make a dedicated trip to particular features/areas, then we can highlight:

- the mouth of the Swale (for kite/windsurfing, dog walking with dogs off leads on the intertidal, bait digging);
 - the upper parts of the Swale (boating activities);
 - the upper parts of the Medway around Gillingham, Upnor and Rochester (where considerable infrastructure is present and lots of boating activity including powerboats, RIBs etc)
 - nature reserves at Sheppey, Oare Marshes, Cliffe and Northward Hill.
- Development beyond 6km (excluding large sites) can be potentially screened out of assessments and assumed to have no likely significant effect on European sites. For development that does fall within 6km (or large sites beyond 6km) it will not be possible to demonstrate no adverse effect on integrity of the European sites and mitigation measures will need to be considered.
 - Mitigation measures are discussed within the report include awareness raising, on-site wardening, provision of signage and access infrastructure, provision/enhancement of green space away from the SPAs and direct contact with users.
 - Areas currently undisturbed, and in particular the main roost sites should, in particular, be protected from additional recreational pressure.

Contents

Summary	4
Contents	6
Acknowledgements	7
1. Introduction	8
Context	8
Overview of legislation and its implications	8
Aims of this Report	11
2. Drawing from the available information	13
Bird Disturbance Study	17
Recreational use	21
Data gaps and limitations	24
Mitigation and Disturbance Studies at other Locations	24
3. Predicting changes in visitor numbers and recreational pressure	26
Housing numbers.....	26
Predicting visitor numbers from housing data	30
Scale of development and particular locations likely to result in changes in access.....	33
4. Visitor pressure	34
Current levels of access	34
Likely changes in recreational activities and locations where use may be concentrated	35
Special interests.....	40
Spare capacity.....	40
5. Mitigation and Avoidance	44
Assessment of Individual Development Sites	54
6. References	56
Appendix 1	59
Appendix 2	61

Acknowledgements

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We are grateful also to various local authority staff that have provided the GIS data used in this report, particular thanks to Brian McCutcheon (Medway Council).

Cover photograph Neil Gartshore (© Footprint Ecology).

1. Introduction

Context

- 1.1 The continuous swathe of coastal habitat between Gravesend and Whitstable on the North Kent shore comprises three Special Protection Areas (SPAs) and Ramsar sites. The status of the Thames Estuary and Marshes, the Medway Estuary and Marshes and the Swale as European designated sites reflects their importance for wintering waterfowl, breeding waterfowl, breeding and wintering raptors and also a range of rare plant and invertebrate species. Lying close to London and to major ports, north Kent is of considerable strategic economic importance, and much of the area lies within the Thames Gateway Growth Area, a Government priority for regeneration and economic development.
- 1.2 There is a strong body of evidence showing how increasing levels of development, even when well outside the boundary of protected sites, can have negative impacts on those sites (Liley & Clarke 2003; Liley *et al.* 2006; Sharp *et al.* 2008; Stillman *et al.* 2012). The North Kent Environmental Planning Group has undertaken a bird disturbance study of the North Kent shore to examine the possible impact of human disturbance on the protected bird species present. Phase 1 of the project gathered evidence on bird on the causes and extent of bird disturbance within the three designated European Sites, and is now complete (see Liley & Fearnley 2011, Fearnley & Liley 2011 and Fearnley & Liley 2012). A second phase of the project has been proposed to look at the distribution of invertebrate prey within the designated sites. This would provide evidence on whether disturbance may be contributing to bird population declines through the displacement of birds from good quality feeding areas and would provide some indication of how much food there is in relation to the number of birds using the sites.
- 1.3 The evidence from the bird disturbance study and visitor studies will be used to inform and review the Habitat Regulations Assessments (HRA) of the Local Development Frameworks (LDF), Appropriate Assessments of planning applications, and in future the the development of mitigation and access management strategies. This report collates and puts into context all existing data to enable the findings to be used in assessments of development.

Overview of legislation and its implications

- 1.4 The three sites are classified as SPAs in accordance with the European Birds Directive (Council Directive 79/409/EEC on the conservation of wild birds, updated by Council Directive 2009/147/EC in 2009). This European legislation requires Member States to classify sites that are important for bird species listed on Annex 1 of the European Directive, which are rare and/or vulnerable in a European context, and also sites that form a critically important network for birds on migration.
- 1.5 All three of the north Kent sites are classified for their waders and waterfowl, both Annex 1 and migratory species. The bird interest features for which each site has been classified varies slightly, but the three sites provide passage, overwinter, and breeding habitat to an array of species of European Importance. The three European sites

together provide a vast and linked expanse of critically important habitat to the SPA network around the British coast. In this report we focus on the wintering bird interest, and the area of coast between Gravesend and Whitstable. It should be noted that there are additional parts of the Thames Estuary and Marshes SPA that lie outside our area of focus.

1.6 The additional Ramsar site listing for all three sites arises from recognition of the international wetland importance of each, under the Ramsar Convention¹. It is common for SPAs to also be listed as Ramsar sites. The Ramsar site boundary does not quite match the SPA boundary, notably near Gravesend where the Ramsar boundary extends beyond the western boundary of the SPA.

1.7 The conservation objectives for three SPAs are defined by Natural England². They are similar for each SPA and, with regard to the individual species and/or assemblage of species for which the site has been classified (which is slightly different for each SPA), are:

Avoid the deterioration of the habitats of the qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds Directive.

Subject to natural change, to maintain or restore:

- *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 populations of the qualifying features;*
- *The distribution of the qualifying features within the site.*

1.8 Strict protection requirements apply to European sites. The Member States' duties for European sites, both SPAs and Special Areas of Conservation (SACs being designated for non-avian wildlife of European interest), are set out in Article 6 of the European Habitats Directive (Council Directive 92/43/EEC on the conservation of natural habitats and of wild flora and fauna). Relevant duties have been transposed into UK legislation via the Conservation of Habitats and Species Regulations 2010 (SI No. 2010/490), commonly referred to as the Habitats Regulations.

¹ Convention on wetlands of international importance especially as waterfowl habitat, Ramsar, Iran, 2/2/71 as amended by the Paris protocol of 3/12/92 and the Regina amendments adopted at the extraordinary conference of contracting parties at Regina, Saskatchewan, Canada 28/5 – 3/6/87, most commonly referred to as the 'Ramsar Convention.'

² See:

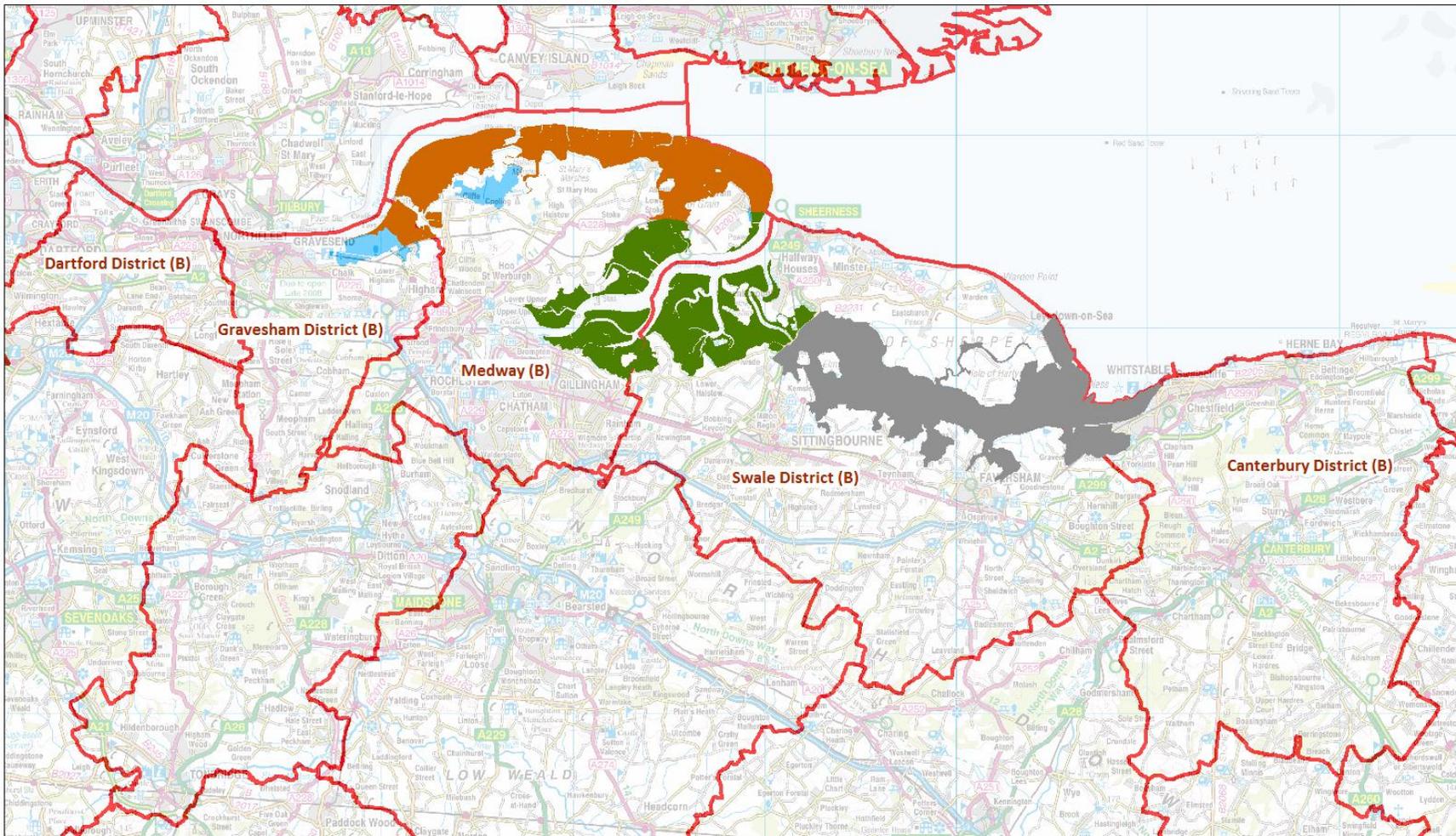
<http://www.naturalengland.org.uk/ourwork/conservation/designatedareas/sac/londonandsoutheast.aspx>

- 1.9 It is important to note that the European legislation requires two key elements of protection. Firstly there is the overall duty to avoid the deterioration of European sites (Article 6(2) of the Habitats Directive), and secondly there is the duty to properly assess plans or projects that are likely to have a significant effect upon European sites, and only allow their implementation if the European site will not be adversely affected, unless further stringent tests apply (Article 6(3) and 6(4) of the Habitats Directive). There is therefore a duty to both prevent or rectify effects from existing impacts, and to ensure that further effects do not occur as a result of new potential impacts.
- 1.10 In complying with the Ramsar Convention, the UK Government treats listed Ramsar sites as if they are European sites, as a matter of national planning policy, as set out at Section 118 of the National Planning Policy Framework 2012, and the legislation to protect European sites is therefore equally applied to the Ramsar listing. In the case of the north Kent marshes it is important to note that the Ramsar boundaries, while mostly coinciding with the SPA boundaries, do also extend in parts well outside the SPAs (Map 1). While we mostly use and refer to the SPA boundaries within this report (because these designations reflect the key areas of wintering birds), areas just outside the SPA may also be important for the wintering birds and the Ramsar interest features.
- 1.11 In addition to its European wildlife importance, the context for this assessment work is the North Kent coast as an area of significant economic importance, both in terms of development and regeneration, industry and international trade. The North Kent coast is the subject of a concentration of strategies and initiatives for economic regeneration and growth, with a clear central government priority, and this is further reflected in the county and district level spatial planning documents.
- 1.12 Proposals for transport improvements, green energy development, increased tourism, regenerated towns and the scale and location of new housing all need to take into account the European wildlife site backdrop to this prioritised area for growth. In accordance with the new National Planning Policy Framework 2012, economic, social and environmental gains should be sought jointly through the planning system.
- 1.13 It is imperative that Local Development Frameworks/Local Plans provide a clear policy steer for a suitable type, amount and location of development that can meet the aspirations of the growth agenda for the area, supported by HRA work to demonstrate that the suite of European sites will not be adversely affected. In the absence of comprehensive HRA work at the plan stage, conflicts are likely to occur when development proposals that accord with the growth agenda are presented, yet they are unable to proceed if they cannot accord with the requirements of the Habitats Regulations.
- 1.14 The clear policy steer may need to take the form of an interim strategy to inform the determination of development proposals until agreed and consistent approaches across the North Kent coast can be embedded in plans. Consistency across LPAs in both HRA and the application of mitigation measures should be sought, so that the application of mitigation throughout the area is strengthened by a coordinated approach.

- 1.15 HRA assessment work will require an evidence base that includes scientific assessment of how European site bird interest features may be being affected by existing development, i.e. the current condition and sensitivities of interest features, and also how European site bird interest features may be further affected by potential impacts.
- 1.16 Deficiencies in information require application of the precautionary principle, and it is therefore in the interest of all parties to obtain as much information as possible to inform the HRA work. Where required, the precautionary principle will be informed by current interest feature condition and sensitivities, and any wider relevant information that may indicate that impacts should not be ruled out (for example relating to different species and habitats, or different scenarios, but indicating a response that may also be applicable in this case).

Aims of this Report

- 1.17 This report focuses on the administrative areas of Canterbury, Dartford, Gravesham, Medway and Swale local authorities. These authorities lie closest to the European sites and will therefore be most relevant to the issues considered. We focus on the impacts of recreational activities on the three SPA and Ramsar sites, and consider these impacts (individually and in-combination) in relation to new housing development.
- 1.18 The aim of the report is to bring together information from a range of sources and provide support for plan-making and site specific Habitat Regulations Assessments. The report has been commissioned to provide an overview of the issues, the scale of impacts and the consequences with respect to legislation. Given the complexities of the ecological issues and strict requirements of the Habitat Regulations, a clear view of the the implications and necessary next steps is required.



**Map 1: SPA and Ramsar boundaries
(South side of Thames only)**

Contains Ordnance Survey data © Crown database and database right 2011

Relevant SPAs (also Ramsar)

- Medway Estuary & Marshes
- Thames Estuary & Marshes
- The Swale

■ Ramsar (but not SPA)

District Boundaries

2. Drawing from the available information

2.1 The findings of the bird disturbance and recreational use work carried out to date are summarised from the following reports:

- 1) *What do we know about the birds and habitats of the North Kent Marshes?* (Cruickshanks *et al.* 2011)
- 2) *Bird Disturbance Study, North Kent 2010/11* (Liley & Fearnley 2011)
- 3) *North Kent Visitor Survey Results* (Fearnley & Liley 2011)
- 4) *North Kent Comparative Recreation Study* (Fearnley & Liley 2012)

2.2 Other work considered includes:

- 5) Estuary Users Survey (Medway Swale Estuary Partnership, 2011)
- 6) GGKM Roost survey (mapped in Liley & Fearnley 2011)
- 7) Recent Wetland Bird Surveys produced by the British Trust for Ornithology
- 8) Other relevant studies/work taking place in other areas.

Bird species of particular concern

2.3 Thirty two species of wader and wildfowl for which WeBs data are available are listed in the SPA designations for the three sites. These data are summarised in Appendix 1, which gives the recent peak counts for each site and each species.

2.4 WeBS alerts provide the most robust and standardised means of highlighting which species have undergone major declines on particular protected sites. WeBS alerts are based on trends, assessed over the short-, medium-, and long-term (5, 10 and up to 25 years respectively). Declines exceeding 50% are classified as “High Alerts” and those exceeding 25% as a “Medium Alert” is issued. The most recent WeBS alerts (using data up to 2007/08) are summarised in Table 1. The Medway Estuary and Marshes SPA has a large number of current alerts, with 12 species listed as high alert and an additional two species with medium alerts only, i.e. 14 species for which the site is designated have undergone recent declines of 25% or more.

2.5 Declines in individual species on particular sites may be caused by a range of factors, for example changes in the distributions of a number of waders and wildfowl within the UK have been well documented and illustrate a trend for distributions to shift north-east (Austin & Rehfish 2005; Maclean *et al.* 2008). Declines that occur simultaneously across multiple sites may indicate broad issues, such as effects of climate change (note that increased access/disturbance could occur across multiple sites and be a ‘broad’ issue, as population levels in the UK and access are increasing generally). Site specific declines will potentially indicate particular pressures on individual sites or particular changes to individual sites. WeBS alerts therefore need to be considered in context with the species’ ecology, the distribution of the birds within the sites and the likely factors that might be involved in any decline. It is useful to understand site declines in relation to other sites, and the WeBS alert accounts do provide this information, and a

comparison with other sites designated for each species in the south-east region is also provided by Cruickshanks *et al.* (2011).

- 2.6 In Table 1 we have highlighted in orange which species have seen site specific declines on each SPA, drawing from the species accounts in the WeBS alert report (Thaxter *et al.* 2010). It can be seen that there are site-specific issues for particular species on each of the three estuary SPAs. Species that are highlighted include wildfowl (pintail, shoveler, wigeon, teal) and waders (curlew, knot), and also other species such as great-crested grebe and cormorant. Table 1 provides some indication of the time periods over which declines have occurred. Drawing on the WeBS alerts reports it can be seen that the declines for many species started in the 1990s. The decline in wigeon numbers on the Swale (which appears to be site specific), appear to be more recent, and probably first came to bear around winter 2003/2004.
- 2.7 Additional information on the declines in bird numbers can be drawn from some earlier work by the BTO (Banks *et al.* 2005). Banks *et al.* compared the declines on the Medway with trends for the Swale and Thames in order to determine whether the declines on the Medway could be linked to increase in numbers on adjacent sites / count sectors, in other words the extent that birds were redistributing within the Medway/ Swale/Thames complex as a whole. The Banks study did find some evidence that birds were redistributing away from the Medway but staying within the wider north Kent area (in particular this was shown for ringed plover, oystercatcher, grey plover and dunlin). Banks *et al.* highlighted the south and west sections of the Medway as being the ones where the decline in birds had been most marked. In addition, the majority of species identified to be in decline using Core Count data, also showed declines in their Low Tide Count trends, indicating that the factors leading to declines have similarly affected both roosting and feeding usage of the site. Banks *et al.* highlight urban and recreational development around the south and eastern part of the Medway as a potential cause of the observed declines.

Table 1: Bird species of particular concern (from Cruickshanks et al. 2011). Table show percentage changes over the period winter 1981/82 and 2006/07 unless specified. ¹ % change – 1985/86 - 2006/07, ² % change 1990/1991, ³ % change 1986/1987 – 2006/07, ⁴% change 1990/1991 – 2006/07, ⁵% change 1988/1989 – 2006/07, ⁶% change 1987/1988 – 2006/07. Species highlighted in orange are those where the BTO alerts report suggests the decline is site specific³

	Species	Short-term % change	Medium-term % change	Long-term % change
THAMES	European White-fronted Goose	-86	-92	-99
	Shelduck	-9	-30	-41
	Gadwall	-37	9	188
	Pintail	-68	-61	-33
	Shoveler	-48	-15	-48
	Little Grebe	15	26	193
	Avocet	9	70	7200
	Ringed Plover	27	12	51
	Grey Plover	-49	-20	8
	Lapwing	-46	-39	74
	Knot	-77	-58	-37
	Dunlin	-16	-1	-5
	Black-tailed Godwit ¹	593	352	5100
	Redshank	-4	-18	-12
MEDWAY	Dark-bellied Brent Goose	-30	-52	21
	Shelduck	-3	-58	-20
	Wigeon	18	-59	95
	Teal	-22	-44	93
	Pintail	58	-54	211
	Little Grebe ²	-2	6	6
	Great Crested Grebe	45	-16	-66
	Cormorant	-55	-60	-73
	Oystercatcher	-35	-56	295
	Avocet ³	38	156	15500
	Ringed Plover	-48	-75	-65
	Grey Plover	-39	-62	60
	Lapwing	40	-26	727
	Dunlin	25	-67	-43
	Black-tailed Godwit	56	13	3133
	Curlew	-41	-48	53
Redshank	-27	-62	-36	
SWALE	European White-fronted Goose	-23	-76	-81
	Dark-bellied Brent Goose	20	-3	49
	Shelduck	0	-15	61
	Wigeon	-26	-34	46
	Gadwall	-47	3	25
	Teal	6	80	80
	Pintail	-3	62	194
	Shoveler	-37	-39	-20
	Little Grebe ⁴	-16	-57	-26
	Cormorant ⁵	-32	-56	-79
Oystercatcher	-34	-1	26	

³ See species accounts for respective sites in Thaxter *et al.* (2010)

	Species	Short-term % change	Medium-term % change	Long-term % change
	Avocet ⁶	54	255	5050
	Golden Plover	60	230	1457
	Grey Plover	-44	-54	-13
	Lapwing	3	41	115
	Knot	33	-9	35
	Dunlin	-27	-51	-34
	Black-tailed Godwit	30	88	1480
	Bar-tailed Godwit	-24	-15	59
	Curlew	8	7	-9
	Redshank	-33	-32	-13

2.8 Figure 1 shows the changes in total waterbird numbers at the three sites between winter 2005-6 and 2009-10. During this period, total numbers at the Swale have stayed relatively stable, whereas the Medway has seen a recent decline, and the Thames a longer-term and more substantial decline.

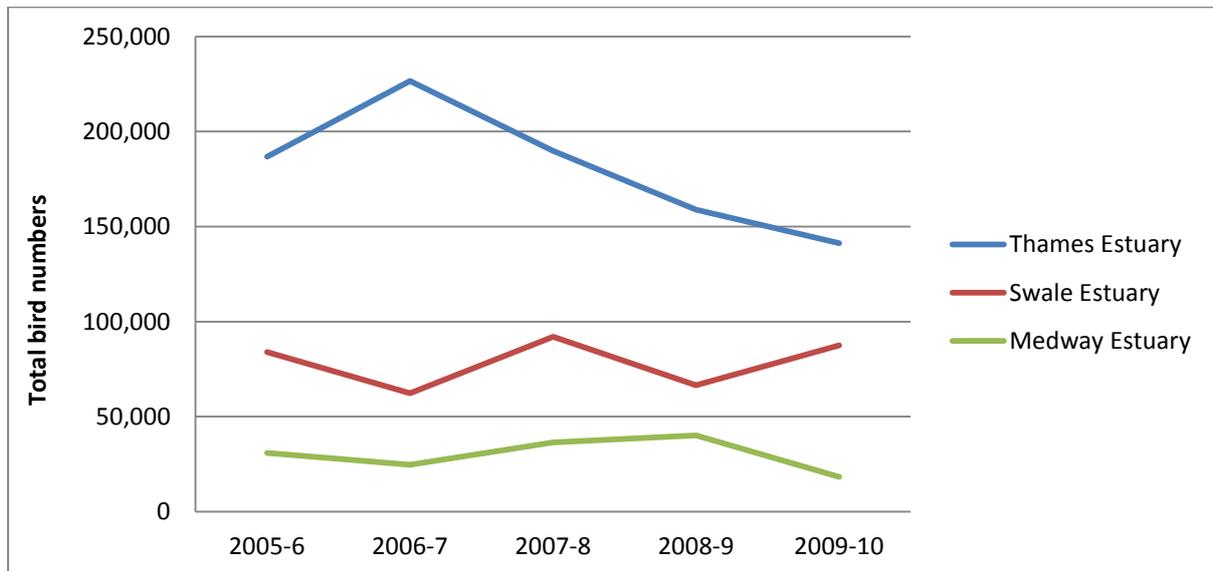


Figure 1: Total number of waterbirds on the Thames, Swale and Medway 2005/2006 to 2009/10 (Holt *et al.* 2011 p. 10)

Bird Disturbance Study

- 2.9 The results of the bird disturbance study are summarised in Box 1 (see Liley & Fearnley 2011 for further information). Bird and visitor distributions were such that people and birds overlapped, and birds were being flushed as a result. Visitor presence resulted in behavioural changes in the bird species present in about 25% of cases. In 13% of cases this involved the birds taking flight and being displaced more than 50m (defined as a major flight). Most behavioural changes were due to the presence of dogs, particularly those off the lead. Variation was observed between sites in the proportion of disturbance events resulting in major flight – this appeared greatest at the sites with fewer visitors, and lowest at the busiest sites.
- 2.10 In Table 2 we summarise the activities observed to cause major flights and the frequency with which the activities were recorded. Nearly half (47%) of all the major flights observed and that were attributed to people/craft etc. were caused by dog walkers with dogs off the lead. This group accounted for 37% of the activity observed, indicating that the disturbance caused was disproportionate to the level of occurrence. Including dog walkers whose dogs were on leads, dog walkers in total accounted for 56% of the major flight events observed. Other activities causing major flight included walkers, bait diggers, birdwatchers, motor vehicles, RIBs/power boats and wildfowling.

Table 2: Activities and major flight responses, from the disturbance study (data drawn from Table 6 in the disturbance report)

	% of major flight	% of total observations
Bait digger	5.4	1.4
Birdwatcher	4.7	3.7
Cycling	1.5	6.1
Dog off lead	0.0	0.1
Dog walker, all dogs on lead	9.4	12.2
Dog walker, one or more dogs off lead	46.8	37.2
Fishing (from shore)	0.7	0.2
Jogger	0.7	4.0
Motor vehicle	5.2	8.2
Other	1.2	0.7
Person accessing boat or water	1.7	1.1
Person working on boat	1.0	0.2
Kids playing	0.0	0.0
Other	1.0	0.3
Walking / rambling (without dog)	17.6	22.5
Wildfowling	1.5	0.5
Large boat on outboard motor	0.0	0.6
Rib or similar fast small boat	1.2	0.5
Rowing boat	0.0	0.0

Small sailing boat	0.0	0.1
Swimming	0.0	0.1
Air-borne	0.2	0.4

- 2.11 Various factors were shown to influence whether or not birds showed behavioural changes as a consequence of visitor presence. Distance was a highly significant factor, with birds more likely to take flight when the source of disturbance was closer. Birds were found to respond when disturbance took place within 50m. The number of birds in the flock was also a factor, with the probability of major flight occurring being less for larger groups of birds. The number of people in a group did not appear to be relevant, but the presence of a dog increased the likelihood of birds taking flight, further increasing with the number of dogs and if they were off the lead. The probability of individual potential disturbance events leading to behavioural change was greatest on the intertidal zone, but because of the much larger number of visitors using the shore by far the largest number of disturbance events occurred on the shore. Major flight was more likely to take place at high tide, when birds were more likely to take flight at closer distances.
- 2.12 The disturbance study highlighted the behavioural changes seen in waders and wildfowl as a consequence of visitor presence on the shore, intertidal zone and water, and identified which factors were most likely to lead to changes. The behavioural response of birds is not necessarily always a good indication of the impact of disturbance (Gill, Norris, & Sutherland 2001; Beale & Monaghan 2004). While other studies have shown that repeated flushing can have population impacts (West et al, 2002), we cannot ascertain from this work whether the level of flushing is such that population size may be affected. This would require highly complex modelling of the energetic costs of the increased flight time. Without this modelling, and given the level of flushing recorded, it is certainly not possible to suggest that disturbance is not having an impact on the European sites.
- 2.13 While lower numbers of birds tended to be found at the busier sites, no statistically significant overall correlation was found between bird and visitor numbers. However, there were no visits where high numbers of people were counted and high numbers of birds also occurred. Low numbers of birds were recorded within the survey areas at the busiest sites, in the south-eastern part of the Medway. This is also the area that has seen the most marked declines in bird numbers (2.7).
- 2.14 This suggests that birds may be avoiding the busiest sites, but at the other sites other factors may be influencing distribution. It is therefore not possible to conclude that there are no impacts from disturbance. In fact, negative correlations were shown between visitor density and density of curlew, greenshank, oystercatcher and sanderling, and between visitor and overall bird density at one site, Grain Beach (Location 17). There was therefore some (albeit weak) evidence to suggest that the distribution of birds was related to levels of access, at least at the surveyed sites. It is clear that other factors may also be determining the distribution and abundance of

birds at the sites with lower levels of access, and without a full understanding of these other factors it is not possible to fully determine the scale of impact of disturbance on bird numbers and distribution. Ideally detailed analysis of bird numbers in relation to prey availability would be available and included in this document, but such data are difficult and costly to collect. In the absence of this more detailed (and highly complex work), it is certainly not possible, with the available data, to rule out likely significant effects (from future changes in access levels) on the integrity of the European sites.

Box 1: Bird Disturbance Study: Summary

- Within the 22 areas surveyed, 1400 records of visitors within 200m of the birds (considered as potential disturbance events) were made.
- During these 1400 events, 3248 species-specific observations were made of behavioural responses to visitor presence. Of these:
 - 74% resulted in no response
 - 13% resulted in a major flight
 - 5% resulted in a short flight
 - 5% resulted in a short walk
 - 3% resulted in the birds becoming alert
- Dog walking accounted for 55% of all major flight observations, with a further 15% attributed to walkers without dogs along the shore.
- 37% of potential disturbance events recorded on the intertidal zone resulted in a major flight, while 9% of potential disturbance events recorded on the shore resulted in a major flight. However, of all the major flight observations noted, 73% were caused by shore based visitors and 22% by visitors on the intertidal/area of mudflats.
- The distance between the potential disturbance event and the birds was a significant predictor of major flight, with birds more likely to fly when the source of disturbance was nearby.
- After controlling for distance, major flights were more likely to occur when activities took place on the intertidal zone compared to events on the water or events on the shore, and the probability of major flight increased with the number of dogs present with a group.
- There were significant differences between species with curlew showing the highest probability of major flight and teal and black-tailed godwit the lowest. Brent goose showed the most frequent behavioural changes as a result of visitor presence: birds became alert, walked or flew in 53% of observations of this species. Knot was the species with the highest percentage (36%) of major flights.
- High numbers of major flights were recorded at South Oaze (location 2), Oare Marshes (location 3) and Grain Power Station (location 18).
- Tide state was also significant with major flights more likely at high tide, after controlling for distance. There was also a significant interaction between distance and tide, indicating that the way in which birds responded varied according to tide.

Recreational use

- 2.16 Three separate but linked studies have been carried out on the North Kent shore to explore how the designated sites are used for recreation:
- Detailed information on visitor behaviour, patterns and attitudes was obtained through the North Kent Visitor survey (Fearnley & Liley 2011).
 - The North Kent comparative recreation study (Fearnley & Liley 2012) was commissioned to provide a strategic overview of access across the shoreline.
 - The Estuary Users Survey provides information from clubs and other recreation groups.
- 2.17 The results of the North Kent Visitor survey, in which visitors were interviewed across 22 survey locations in the winter of 2010-2011 are summarised in Box 2. Visitor numbers to locations varied, with a far higher number of people recorded and interviewed at 'honey pot sites' with large car parks and dedicated visitor infrastructure than at relatively remote coastal locations with layby parking.
- 2.18 The visitor survey revealed the importance of the North Kent marshes as a place for visitors to exercise themselves and their dogs. Dogs were recorded at every location. The average route length of a dog walker was 2.6km and 3.0km for a walker.
- 2.19 The time visitors spent at a location was typically short (under an hour) but this varied substantially between locations, suggesting the character and nature of area may play a part in determining visit durations. Locations which had the largest catchment (i.e. where interviewees travelled the furthest to visit) were the places where visitors spent the longest time. Duration of visit and travel distance to a location also varied with the activity undertaken. Only a small number of interviewed visitors came from south of the M2/A2.

Box 2: Visitor survey results

- A total of 1398 visitors were recorded at the 21 surveyed access points and 542 visitor groups were interviewed. The majority of these (96%) were local residents who had made their trip from home.
- The majority of those interviewed (61%) stated they visited the area equally all year indicating the sites are well used during the winter. Visitor use of the area was higher at weekends than on weekdays.
- The area is well used by dog walkers with over two thirds (65%) of interviewed groups accompanied by at least one dog.
- Visitors made their trip to the coast to undertake a broad range of land and water based activities. Two type of activity were dominant: dog walking and walking.
- Two main types of transport were used to access visit location with 63% of visitors arriving by car and 34% by foot.
- Of the visitors who arrived by foot 50% lived within 0.9km of the area they visited while 50% of visitors who arrived by car lived within 4.2km. Those who arrived by foot made more annual visits to the area they visited than those who arrived by car.
- The route a visitor took varied dependent on the activity they were undertaking and location they visited. Visits were typically short with 57% lasting less than an hour and 23% of routes strayed from the paths and crossed onto the intertidal areas or open beach.
- The main reason for 28% of interviewees visiting the location they did was because it was close to home and an additional 26% mentioned it was good for their dog. Visitors indicated that more time would be spent at their visit location if there was better path surfacing and marked trails or routes.
- Visitors had a mixed reaction as to whether they would spend more time on site if they had to keep their dog on lead, where 44% would use the area less and 15% would use the area more. Just over a third (35%) of visitors would spend less time at an area if car parking charges were introduced.
- Of those visitors interviewed 52% came from Medway, 24% from Swale, 12% from Canterbury. In terms of settlements themselves 29% of interviewees came from Gillingham and 10% from Whitstable.

2.20 The North Kent comparative recreation study (Fearnley & Liley 2012) involved the comparative scoring of the frequency of activities (5 shore, 3 intertidal, 8 water and 1 air based) across 33 sections of the coast. Scoring was carried out by local experts. The results are summarised in Box 3

2.21 The busiest sections of the shoreline were those nearest to Gillingham and at the mouth of the Swale. The sections nearer the mouth of the Swale had higher intensity of

bait diggers, kitesurfers, windsurfers, canoes, ribs/small powerboats and jet skis than any other coastal sections. Scoring was carried out by local experts.

Box 3: North Kent comparative recreation study results

- Recreational use of the shoreline is not uniform. Some activities were concentrated across specific coastal areas while others were widespread.
- Bird watching was present across all sections of the shoreline while walking and dog walking were present at all but one.
- Five sections were identified with no car parking provision and restricted access was noted over 10 sections. There were slipways/ launching facilities at 10 sections.
- The coastal sections of the north and south (especially) at the mouth of the Swale scored highest for dogs off lead and on the intertidal, bait digging and shell fishing.
- Kitesurfing and windsurfing were concentrated at a handful of sections
- Overall business scores identified the coastal sections closest to Gillingham and at the mouth of the Swale as the busiest.

- 2.22 The face-to-face interviews carried out for the North Kent visitor survey provide a robust overview of access patterns. It should be noted that the data do not necessarily provide good representation for all user groups. The particularly cold winter, plus the fact that water-based activities tend to be focussed around launch points (which were not necessarily the focus of surveys) meant that users such as kite surfers and wind surfers may have been under-recorded (or at least in the case of the cold weather, not out as often as they might be during a mild winter). The comparative scoring and the Estuary Users Survey therefore provide additional important information. .
- 2.23 The Estuary Users Survey was undertaken in 2011 survey, and included direct contact with 57 user groups and clubs. The results indicate that over the past five years, eight yacht clubs saw an increase in their membership while two clubs reported a downturn and two stated that membership had remained constant. Kayak and rowing clubs both confirmed that the level of membership had increased over the past five years. The jet ski club noted a recent decrease in membership. Overall it seems that club boating, rowing, kayaking and canoeing activity is likely to continue to rise in the foreseeable future, while jet ski club activity levels may fall. An increase in club membership is likely to reflect an increase in the interest in and awareness of the sports, suggesting that increases in individual activity levels (i.e. individuals who are not members of clubs) are also likely. Appendix 2 provides information concerning clubs with increasing membership.
- 2.24 Of the interviewed clubs, only one is open all year (its membership is decreasing). It is difficult to establish whether watercraft activity associated with clubs in the spring is

likely to overlap with the period of time when wintering birds are present. For most clubs, spring and summer are the busiest times when the most boats are on the water and using the moorings. There were eight clubs which stated they are also open over the autumn and activity levels at this time of year would coincide with the arrival of some bird species.

- 2.25 Overall it seems that boating, rowing, kayak and canoeing activity is likely to continue to rise over the foreseeable future, and jet ski activity levels may fall. It is not possible to establish whether this predicted increase would result in increased activity when wintering birds are present. It seems likely that notable increases in activity levels would be observed in the warmer, milder months of the year when wintering birds are absent.

Data gaps and limitations

- 2.26 The lack of information on prey abundance has been previously discussed (see 2.14), and this does form a gap in our understanding. With a knowledge of prey distribution and abundance it would be possible to determine the key areas for feeding, where bird numbers are lower than might be expected (given the level of food) and to what extent bird distribution may be being affected by disturbance. The prey data would also provide the opportunity to undertake more detailed modelling of bird populations (see Stillman *et al.* 2007), as has been undertaken on the Solent (Stillman *et al.* 2012).
- 2.27 Such modelling, and indeed the focus of the bird disturbance work to date, has been on the intertidal parts of the SPAs. The SPAs, and indeed the Ramsar designations, do also include non-intertidal habitats, including large areas of coastal grazing marsh which are integral to the sites and support many of the key species, both during the breeding season and the winter. The Ramsar designations also encompass non-avian interest features

Mitigation and Disturbance Studies at other Locations

- 2.28 Maintaining integrity of a European site is not simply a case of allowing deterioration to the point at which Natural England advise it will cross the threshold into failing its conservation objectives, but rather that competent authorities seek to ensure that the ecological robustness of a site and its ability to function as a thriving ecosystem into the long term, alongside fluctuating natural cycles and processes, is not compromised.
- 2.29 There are numerous precedents for strategic approaches to mitigation and an evidence base of disturbance studies being used to inform HRA work. Two of the most widely cited, and most tested are the Thames Basin Heaths and the Dorset Heaths, where the issues of increased recreation on the heaths and ground nesting birds have led to the development exclusion zones being identified with core strategies and local authorities joining forces to deliver mitigation. While heathlands are clearly different to coastal areas (in terms of access patterns, ecology, interest features and impacts), the heathlands examples demonstrate that strategic solutions are possible to resolving impacts of increased recreation.

2.30 Useful visitor studies and disturbance work that provides context includes work on the Exe Estuary and Dawlish Warren (Lake 2010; Liley & Cruickshanks 2010; Liley *et al.* 2011) and on the Humber (Cruickshanks *et al.* 2010a). The series of studies on the Solent is also particularly relevant. The Solent Forum has commissioned a series of studies which have formed the evidence base to consider disturbance impacts and the need for mitigation. Some of the studies have been similar to those in North Kent and have included a disturbance study (Liley, Stillman, & Fearnley 2010) and on-site visitor work (Fearnley, Clarke, & Liley 2010). The evidence-base relating to the Solent also includes a postal survey of residents (Fearnley, Clarke, & Liley 2011) and detailed models of bird survival over the winter in relation to access changes (Stillman *et al.* 2012). The Solent evidence base has only recently been completed, and the most recent Natural England advice⁴ to the Solent Local Authorities has recommended “.....partners to begin discussion of a strategy for impact avoidance or mitigation measures”.

⁴ Letter from Wanda Fojt to Solent Forum, dated 17th April 2012.

3. Predicting changes in visitor numbers and recreational pressure

Housing numbers

- 3.1 Housing levels around the three north Kent SPAs are summarised in Cruickshanks *et al.* (2011). We have updated the data given in that report, using housing data from 2012⁵ within the GIS to extract the number of current residential properties at different distance bands from the SPA. The SPAs were merged to allow us to summarise the data as though the three SPAs were a single designated site, and we extracted housing figures based on the SPA rather than Ramsar boundaries. We also excluded the area north of the Thames (and east of the Dartford Crossing), as these areas are a considerable travel distance and despite being relatively close ‘as the crow flies’.
- 3.2 There are nearly 35,000 residential properties currently within 1km of the three SPAs/Ramsar boundaries. This rises to nearly 200,000 within 5km; 287,000 within 10km; 396,000 within 15km and nearly 600,000 within 20km. Comparing the SPAs in North Kent individually with other sites it can be seen that the level of current housing is high compared to many other SPA sites (Table 3), however taking into account the relatively large size of the sites, the number of properties is comparable, and in some cases (such as small estuaries, for example Pagham Harbour or the Deben), lower. Such a comparison is relatively simplistic as many factors besides simply the number of houses in relation to the area of the SPA will determine the relative impacts of housing. It does however provide some wider context and indicates which sites may be expected to have impacts from development and increased recreation.

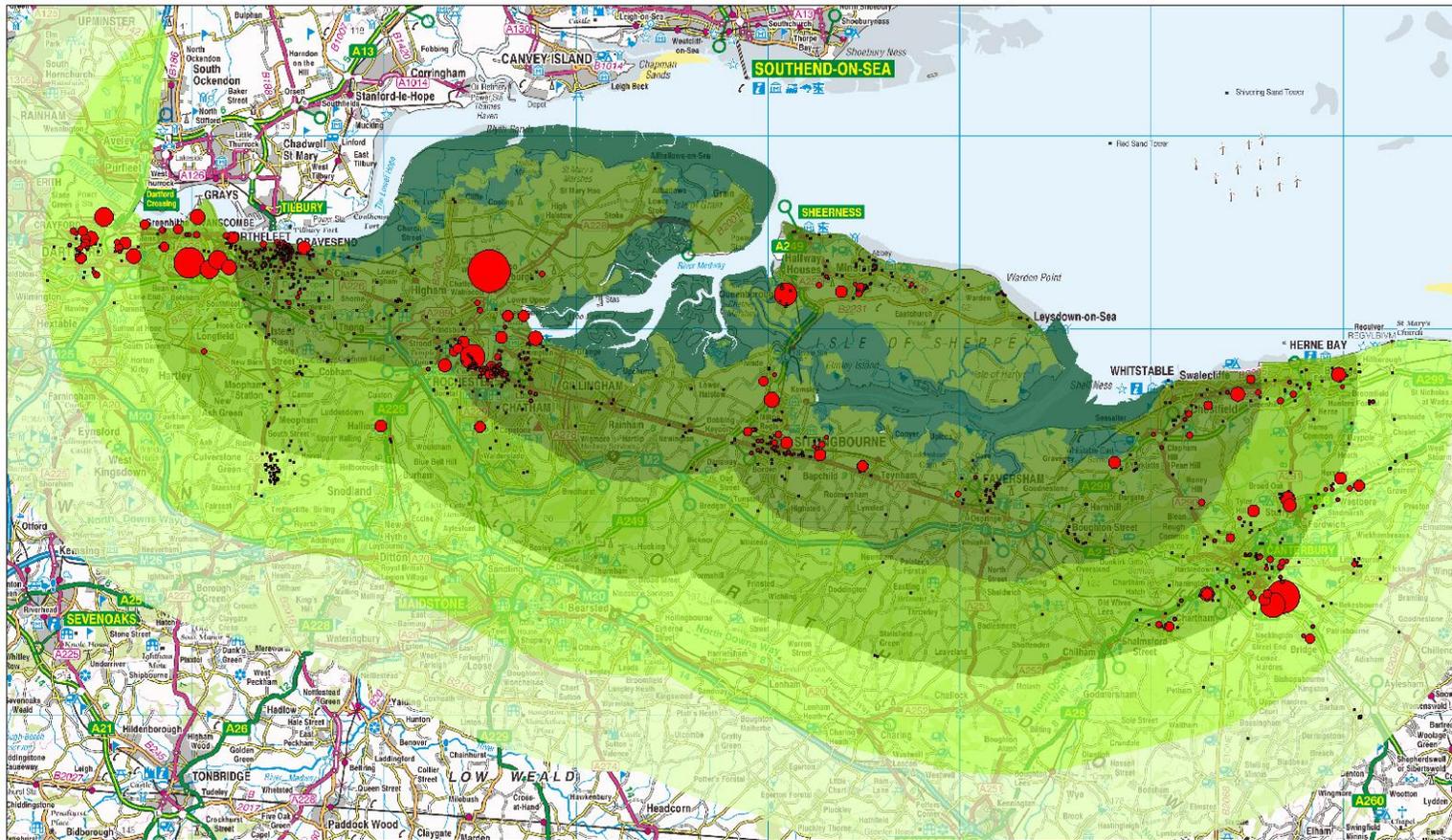
Table 3: Number of residential properties surrounding a selection of SPA sites. Selected SPAs are estuaries, coastal or wetland sites and predominantly in the south. We have included the Thames Estuary & Marshes, The Swale and the Medway Estuary & Marshes SPAs as separate sites within the table and make no adjustments to the 20km buffers to take into account geographic separation (such as estuaries).

SPA	SPA area (ha)	Total residential properties 20km	Residential Properties per ha SPA
South West London Waterbodies	827	1,888,140	2283
Portsmouth Harbour	1,246	467,999	376
Pagham Harbour	627	177,400	283
Mersey Estuary	5,007	1,268,187	253
Crouch and Roach Estuaries (Mid-Essex Coast Phase 3)	1,739	405,757	233
Thames Estuary and Marshes	4,492	745,895	166
Deben Estuary	977	154,959	159
Solent and Southampton Water	5,387	681,061	126
Medway Estuary and Marshes	4,670	570,490	122
Nene Washes	1,505	172,392	115
Poole Harbour	2,308	258,933	112
Tamar Estuaries Complex	1,939	178,436	92

⁵ Royal Mail Postzon data purchased Feb 2012

SPA	SPA area (ha)	Total residential properties 20km	Residential Properties per ha SPA
Chesil Beach & the Fleet	745	65,606	88
Exe Estuary	2,360	203,141	86
Dungeness to Pett Level	1,473	126,588	86
Ouse Washes	2,485	204,248	82
Stour and Orwell Estuaries	3,658	271,553	74
The Swale	6,486	407,331	63
Severn Estuary	17,550	912,183	52
Humber Estuary	3,7494	443,415	12
N Norfolk Coast	7,830	52,685	7
The Wash	61,817	160,817	3

- 3.3 Potential locations for future development were provided by relevant local authorities surrounding the three SPAs. The data were provided for testing purposes only and simply provide an indication of possible change. Different local authorities are at different stages in the development of relevant strategies and the data provided were therefore not necessarily strictly comparable between authorities. The data were provided in separate GIS files, drawn largely from SHLAA (strategic housing land availability assessment) data and in most cases filtered to reflect contents of relevant strategic planning documents. We used this data to consider how housing patterns may change in the future, in relation to current housing and the access patterns of residents.
- 3.4 The data from the local authorities contained residential units only and data from each local authority was in a slightly different format. We converted all data to point data, with any sites mapped as polygons converted to a point (centroid of polygon) and all different data merged into a single file. For Canterbury the data occasionally was a range, for which we took the mid point. Where there was no information on the number of units (some Canterbury sites only), we included the locations in our mapping but treated the data as no housing in the summary totals.
- 3.5 The merged data file contained details of 655 sites and potentially some 62,290 new dwellings (20,094 within Canterbury District, 4,703 from Gravesham, 14,726 from Dartford, 9,656 from Swale and 17,814 from Medway). These locations are mostly strategic and large sites, and we have made no effort to try and map or predict windfall locations. The locations included and used are shown in Map 2, where the green shading reflects the distance from the SPA boundary.



Map 2: SHLAA data in relation to SPA/Ramsar boundaries

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Potential new development

- 5,000 houses
- 2,500 houses
- 500 houses



3.6 We summarise the number of current houses at different bands from the three SPAs (merged) in Figure 2 and also show the volume of new housing in the GIS layers provided by the relevant local authorities. In relation to the SPA boundaries, it can be seen that the pattern for current housing is one where there are high levels of housing within 5km, and then over the distance bands between 6km and 12km the amounts of current housing are relatively low. Numbers of dwellings rise beyond 12km, coinciding with the M25 and outskirts of London. At the Dartford Crossing our bands also extend north of the Thames (we deliberately excluded the area east of here and north of the Thames as the Dartford Crossing is the first crossing point). The new housing, as mapped, doesn't show too much variation with distance. There are peaks within the 3km distance band and the 11km distance band.

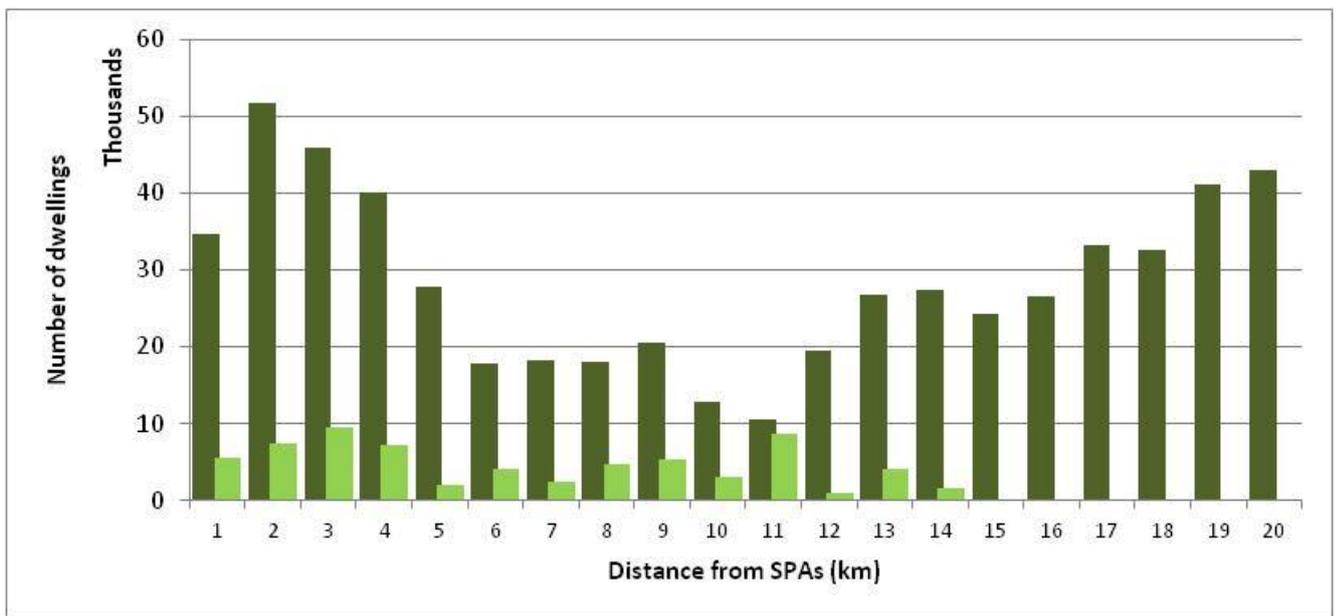


Figure 2: Current (dark green) and possible new housing (pale green) in relation to distance from the three SPAs. Data grouped in 1km distance bands.

3.7 We repeat Figure 2 in Figure 3, this time we show the cumulative levels of development in relation to distance too. The peaks in new development are visible within the 3km and 11km distance bands. The two green lines, showing cumulative development (current housing being dark green and new housing in light green) suggest that levels of development are particularly focused within around 6km currently and that new housing will closely match that distribution.

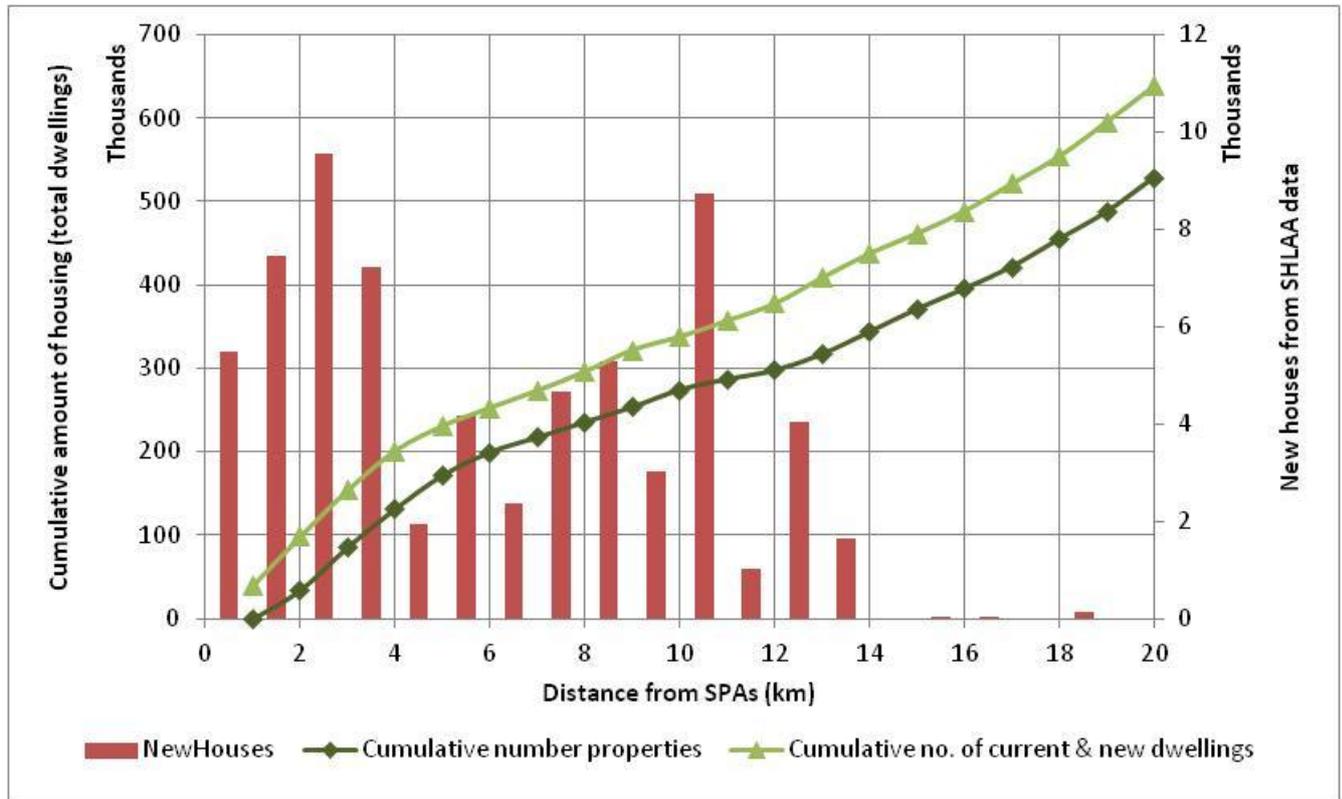


Figure 3: Cumulative amounts of current and new housing (relevant districts only; green lines), and amount of new housing (red bars) in relation to distance from SPAs. All three SPAs merged.

Predicting visitor numbers from housing data

- 3.8 From the original visitor survey we have data relating to the home postcodes of interviewees. Within the GIS we plotted concentric rings (500m bands, out to 20km) around each of the survey points and for each band we used postcode data to work out the current number of houses and also the number of people who had visited from that band. By combining these two data we can show visit rate in relation to distance from the survey point.
- 3.9 In order to calculate the visit rate we used the data on the number of people interviewed (i.e. the sum of the number of people in each interviewed group), and we adjusted this to represent a single day (i.e. people per day). As 16 hours of survey work were conducted at each survey location (and assuming a single day is roughly 12 hours of daylight), then the adjustment factor is 1.33. Only a sample of visitors were interviewed at each survey point. The tally data indicated that 772 groups were counted, while interviews were conducted with 542 and 513 gave valid postcodes. If we assume the visitors that gave postcodes were a random sample of all groups visiting, then to calculate total people per day we need to scale the postcode data up by a factor of 1.5 (calculated from $772/513$).
- 3.10 In order to relate visitors to housing, we used an average occupancy rate per house of 2.36, the national average occupancy rate given by the Office of National Statistics.
- 3.11 We therefore calculated visit rate for each distance band as:

$$\text{Visitrate} = \Sigma((V/1.3)*1.5)/(H*2.36)$$

Where: V=number of people in each group interviewed

H=no houses in band

3.12 In Figure 4 we show the visit rate in relation to distance from the survey location. The plot shows the mean (from 22 survey locations) and the fitted trend line (exponential curve, fitted manually based on r^2 and visual checks). The plot is important as it shows how visit rate declines with distance and provides a means of estimating future visits as a result of new housing.

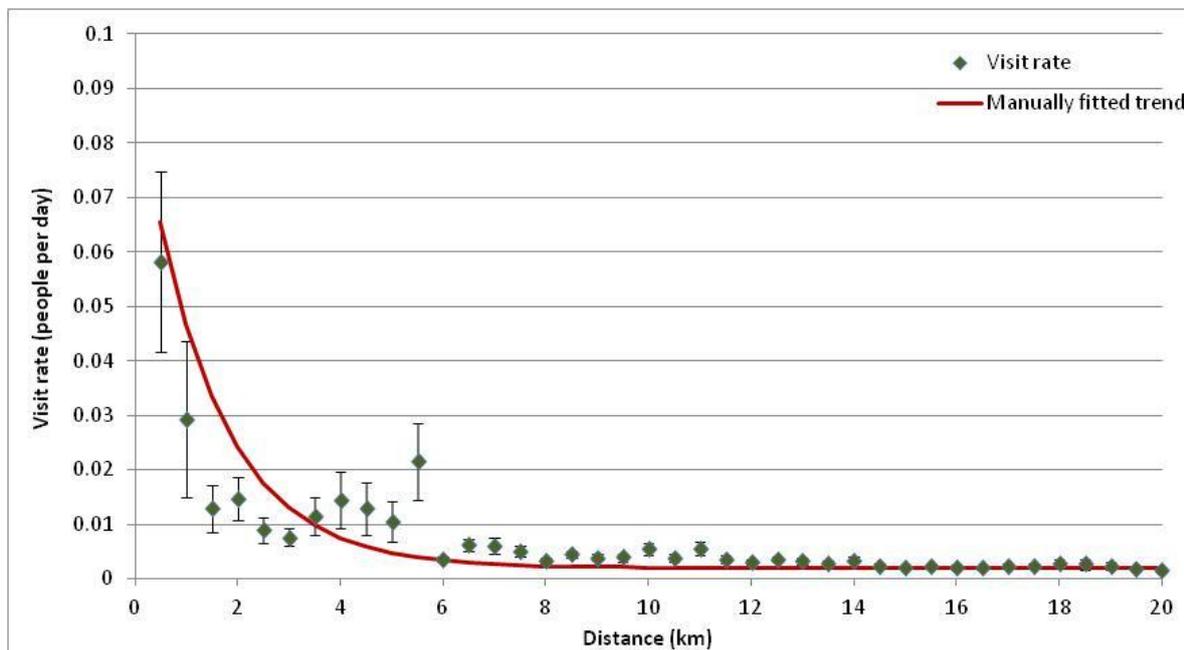


Figure 4: Mean (error bars give standard error) visitor rate for the 22 survey locations in relation to distance from the survey point. Trend line fitted by eye and from r^2 value. $Y=0.09e^{-0.7x}+0.002$. $r^2=0.78$.

3.13 It can be seen from Figure 4 that the number of visits per house drops with distance such that at around 6km the visit rate has dropped to a relatively low level which changes little with distance at greater distance bands. Within 6km of the access points, there is a strong decrease in visitor rates. We summarise this information within Table 4. The final row in the table compares the number of visits originating at the given distance with the number at 0.5km. In other words this figure is the number of houses at the given distance that will be equivalent to a single house at 0.5km. This shows that the number of visits from a house at 0.5km is the same as the number of visits from 14 houses at 5km – i.e. a development of 14 new units at 5km might be expected to have a similar impact to a single dwelling at 0.5km. At 10km from the SPA 31 dwellings would have the same impact as a single dwelling at 0.5km.

Table 4: Summary of estimated number of visits per house to a single access point. Estimates derived using the fitted line in Figure 4. Last row compares the number of visits from a given distance with the number at 0.5km.

Distance (km)	0.5	1	2.5	5	6	7.5	10
Number of visits (per day per person) to a single access point	0.0654	0.0467	0.0176	0.0047	0.0025	0.0033	0.0021
Ratio to visits at 0.5km	1	1.4	3.7	13.9	19.5	26.5	31.4

- 3.14 Applying the rate curve in Figure 4 we can predict the future increase in visitor ‘pressure’ from all the new development (i.e. all that shown in Map 2) and we can compare future levels with current. This is the in-combination effect of development. Ideally this approach would be done by individual access point (i.e. for each access point around the SPA, calculating the housing at different distance bands). In order to provide a simple overview we have assumed it reasonable to apply the curve using the SPA boundary.
- 3.15 Using new housing data for all distance bands up to 20km, the number of person visits that we would estimate to occur currently would be in the region of 11,000 per day. The level of new development (as mapped in Map 2) would result in an estimated additional visits of around 1700 people per day, an overall percentage increase of around 15%. Looking at the closer distance bands only, current housing within 5km of the SPA/Ramsar is estimated to generate around 9200 person visits per day, and this is estimated to rise by around 16% (just under 1500 new person visits per day) with the new housing. Looking at distance bands from 0-10km, current housing is estimated to generate around 9700 person visits per day, and this is estimated to rise by 16% (just under 1600 new person visits per day) with the new housing. We can therefore suggest that access levels in the future, if development as shown in Map 2 occurs, would rise by around 15%.
- 3.16 There are a range of different approaches that we could have used to assess how housing and access are linked. The above approach (based on Figure 4) is relatively simple, intuitive and makes sense from the data in the visitor survey. There are a number of considerations that should be recognised in the application and use of the plot and fitted trend:
- The figures describing the number of visits per person appear relatively low – e.g. 0.065 at 0.5km. This figure of 0.065 is the number of visits, per person per day, to a single access point. If the average occupancy of a property is 2.36 and we assume 200 days in a winter, then this would equate to 31 visits per winter – i.e. a single dwelling at 0.5km from a single access point might be expected to typically ‘generate’ 31 visits to that access point over a winter.

- The plot is derived using a standard household occupancy rate based on national average and assuming a standard visit rate with distance for different dwellings, different SPAs and for urban and rural areas. The distance measurement is the linear ('euclidean' distance) between housing and access point, and therefore does not take into account the transport network. As such it provides a general pattern and general broad trend.
- The data relate to each access point, i.e. we have used distance from postcodes to access points, rather than the SPA boundary. In order to use this approach to estimate changes in visit rates to the SPA from a single development site, the approach has to be applied to all access points in the vicinity of the development. Access points may not necessarily relate to the SPA boundary, some might be outside the SPA and some might be inside the SPA.
- We have fitted the line using the average visit rate for each distance band. Access points will of course vary in their attractiveness and relative 'draw', and this is clear from the visitor survey report (see Figure 4 in that report). Survey locations such as Harty, Shellness and Grain Beach had people travelling relatively far compared to other sites. We would expect (besides distance from home) a number of other factors to influence the draw of sites, these factors might include attractiveness (sea views, sandy beaches etc), features (ability to do different walks; access to the water, sediment type etc), facilities (such as cafe), parking availability, publicity, proximity to other locations, and the range of alternative destinations.
- The data are derived from the visitor survey work, conducted during February and March 2011. The rate we have derived therefore equates to visit rates at this time of year. We believe this is likely to be equivalent to typical winter use, albeit with the survey data collected during a particularly cold winter. Visit rates during holiday periods and over the summer are likely to be different.

Scale of development and particular locations likely to result in changes in access

- 3.17 Table 4 provides a comparison of the implications of development at different distances from the SPAs. One house within 0.5km of an access point is likely to generate as many visits as 20 dwellings at 6km. Within c.6km it is therefore likely that, in combination, even single dwellings will result in increased access to the SPAs. Beyond 6km it is likely that large developments will require particular consideration, and in particular any development north of the M2/A2. Visual inspection of the postcode data in the visitor survey report (e.g. Maps 6 and 7 in that report) would seem to indicate that the majority of current visitors originate from the coastal strip north of that route.
- 3.18 Referring back to the original visitor survey report to also check on people who walked to the site where interviewed, 75% gave a home postcode within 1.5km of the survey point and half gave a postcode with 0.8km. This would suggest that people are likely to access the SPA on foot where they live within approximately 2km.

4. Visitor pressure

Current levels of access

4.1 The disturbance study involved observations from a sample of locations. It is possible to check the number of people recorded during the disturbance study against the comparative scores derived for the whole section as coast. In Figure 5 we compare the mean number of diary events for a particular activity, for survey points within each scoring section, with the scores for that same section. The categories are not always directly comparable, but it would appear the data match well. For example, the plot of walkers indicates a good correlation (Correlation coefficient=0.627, n=22, p=0.005). Similarly the number of dog walkers with dogs off leads counted in the disturbance study correlates with the score for dog walking along the shore (Correlation coefficient=0.568, n=22, p=0.014).

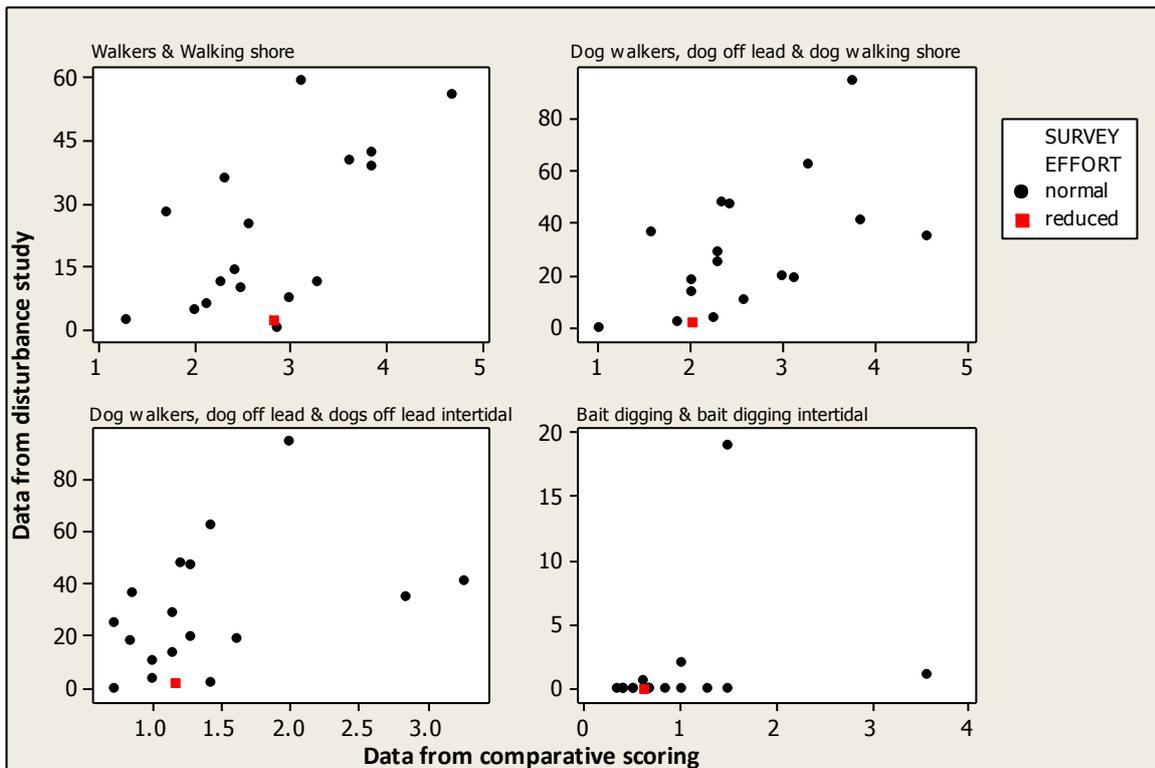


Figure 5: Access data from the disturbance study compared with the data from the comparative scoring work. The captions refer to the category used in the disturbance study & the category used for the comparative scoring. Red symbols indicate survey point 22, where the survey effort was reduced.

4.2 We can therefore have confidence in the access scoring and also some confidence in relating the results from the access scoring work with the bird disturbance study. Using the scores we can gain a strategic perspective on the relative levels of access and intensity of different activities within each SPA. This is useful as if a site has high levels of access over much of its area then disturbance is likely to be much more of an issue than sites where access is focused in only a limited part of the site. By assigning the average scores into bands (0-1,1-2 etc) we can estimate the percentage of the area of

each SPA that falls within each band (Table 5). Of the three SPAs that we are considering, the Swale SPA forms the largest area (note that we consider only a part of the Thames Estuary & Marshes SPA). For overall ‘busyness’ the Swale has the largest proportion of it’s area with high scores, with around 16% of the SPA being scored 4.5 or more (averaged across all scores). The Swale also has the highest scores for dogs off leads on the intertidal, with a fifth of the SPA being scored in the 2.5-3.5 band. This would suggest that disturbance is potentially more of an issue on the Swale than the other sites.

Table 5: Area (%) of each SPA falling within a given scoring band for different activity types.

Activity type scored	SPA	Average Score						Total
		0-0.5	0.5-1.5	1.5-2.5	2.5-3.5	3.5-4.5	>4.5	
Overall busyness	Medway	0	475 (10)	2701 (59)	731 (16)	540 (12)	155 (3)	4603 (100)
Dogs off lead on the intertidal	Medway	668 (15)	3240 (70)	540 (12)	155 (3)	0 (0)	0 (0)	4603 (100)
Parking Score	Medway	1805 (39)	1376 (30)	728 (16)	419 (9)	122 (3)	155 (3)	4603 (100)
Overall busyness	Thames	0	0 (0)	3019 (68)	1410 (32)	0 (0)	0 (0)	4429 (100)
Dogs off lead on the intertidal	Thames	798 (18)	3631 (82)	0 (0)	0 (0)	0 (0)	0 (0)	4429 (100)
Parking Score	Thames	210 (5)	2813 (64)	1007 (23)	0 (0)	0 (0)	399 (9)	4429 (100)
Overall busyness	Swale	0	0 (0)	2518 (44)	2332 (40)	0 (0)	931 (16)	5781 (100)
Dogs off lead on the intertidal	Swale	1381 (24)	3194 (55)	0 (0)	1207 (21)	0 (0)	0 (0)	5781 (100)
Parking Score	Swale	0 (0)	1767 (31)	472 (8)	3249 (56)	294 (5)	0 (0)	5781 (100)

4.4 The disturbance study did not show a clear pattern with the levels of human activity and the response of birds to disturbance: neither the number of birds recorded flushed nor the number of flight events showed a significant correlation with the number of people recorded. Instead a more complex pattern is present. Rather than simply levels of disturbance relating to access levels per se, other factors, such as the distance people were from the birds (which in turn relates to the site features, location of paths etc), species present; flock size; whether or not (and how many) dogs were present; where the people were (i.e. mudflats, shore or on the water) and the tide state were all important. Given this complexity it is not possible to relate the percentages in Table 5 to actual disturbance. If visitor numbers per se were directly linked to disturbance and if we were able to identify threshold visitor levels at which disturbance were to occur, then it would be simple to use the percentages to gain a strategic perspective of the areas where disturbance is taking place and where it might occur in the future.

Likely changes in recreational activities and locations where use may be concentrated

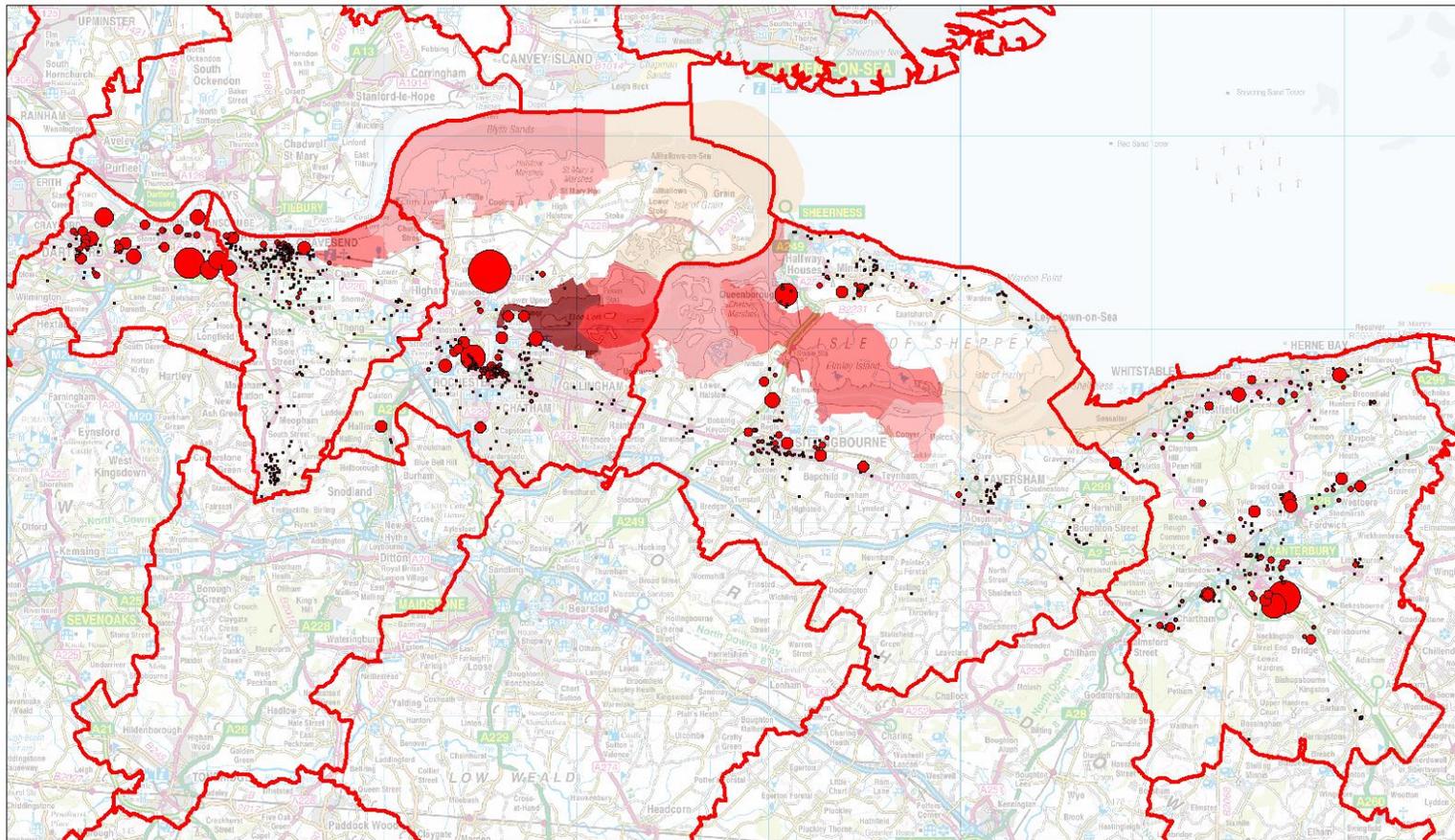
4.5 From consideration of visitor rates in relation to distance, we can assume that development within a 6km radius of access points is likely to particularly result in increased access levels. This of course does not mean that development at distances beyond 6km will have no impact. Development within c.6km radius of access points is likely to result in increased use for activities such as dog walking, jogging, cycling and to some extent outings with friends (see figure 5 in the visitor survey report), activities that relate to day-to-day use of local greenspace. Development beyond 6km is likely to

result in fewer visits per property, and will involve more sporadic trips, where people potentially make a conscious choice to visit the coast and activities might include some dog walks, walking, family outings, wildlife watching and potentially more specific activities such as watersports, wildfowling or fishing.

- 4.6 We can use the 6km radius to identify which sections will see a change in access. In Map 3 we have used the sections from the access scoring work, and for each section calculated the number of units from the SHLAA data and other housing data provided by the local authorities. It can be seen that the most ‘pressure’ is likely to be on the Medway (particularly the area adjacent to Gillingham, Rochester and Werburgh) and on the Thames to the east of Gravesend. These areas are likely to see an increase in ‘local use’, i.e. activities such as dog walking, cycling, walking.
- 4.7 Development at locations such as Canterbury lie outside our 6km radius, and therefore, for example, the outer Swale is a pale colour within Map 3. However there are large volumes of development at distances beyond the 6km. We might therefore expect to see increased recreational use, with more occasional visits (per household) for more specific activities, for example activities that are water-based or for which the coast has a specific draw, such as wildfowling. At these kind of distances, people are not likely to be drawn to their nearest part of the coast, but particular locations will then draw visitors according to the features – i.e. the nature reserves are likely to draw people for the wildlife interest. Watersports users will be drawn to the locations where they can launch their craft, access the water or where the conditions are right for the activity.
- 4.8 In Map 4 we highlight locations where particular relevant activities are focused. These features are:
- Marinas/boat yards/sailing clubs (data from Cruickshanks 2011); indicating areas where boat use may be focused.
 - Slipways and jetties (data from Cruickshanks 2011); indicating where access to the water is possible, e.g. for casual users
 - Car-parks (see Cruickshanks 2011 for details)
 - Areas scored highly for kitesurfing, windsurfing, dogs off-leads on the intertidal, powerboats/RIBs/Personal Water Craft (“PWC”), with the dots indicating sections with high scores in the comparative scoring.
 - Nature Reserves (NNRs, RSPB reserves and Kent Wildlife Trust Reserves: data from Cruickshanks 2011). These will draw wildlife watchers and birdwatchers.
- 4.9 Map 4 therefore shows some of the features which may draw people from larger distances, beyond the 6km, and some of the activities shown are ones particularly linked to disturbance. Using Map 4, and cross referencing to potential development locations, we can highlight:

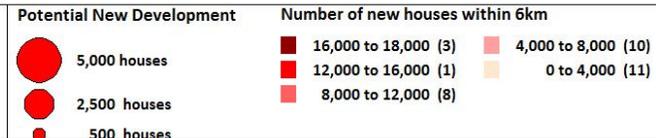
- The mouth of the Swale (kite/windsurfing, dog walking with dogs off leads on the intertidal),
- The upper parts of the Swale and boating activities
- The upper parts of the Medway (around Gillingham, Upnor and the Riverside Country Park) where considerable infrastructure is present and lots of boating activity including powerboats, RIBs etc.
- Birdwatchers and wildlife watchers are likely to be drawn to Sheppey, Oare Marshes, Cliffe and Northward Hill.

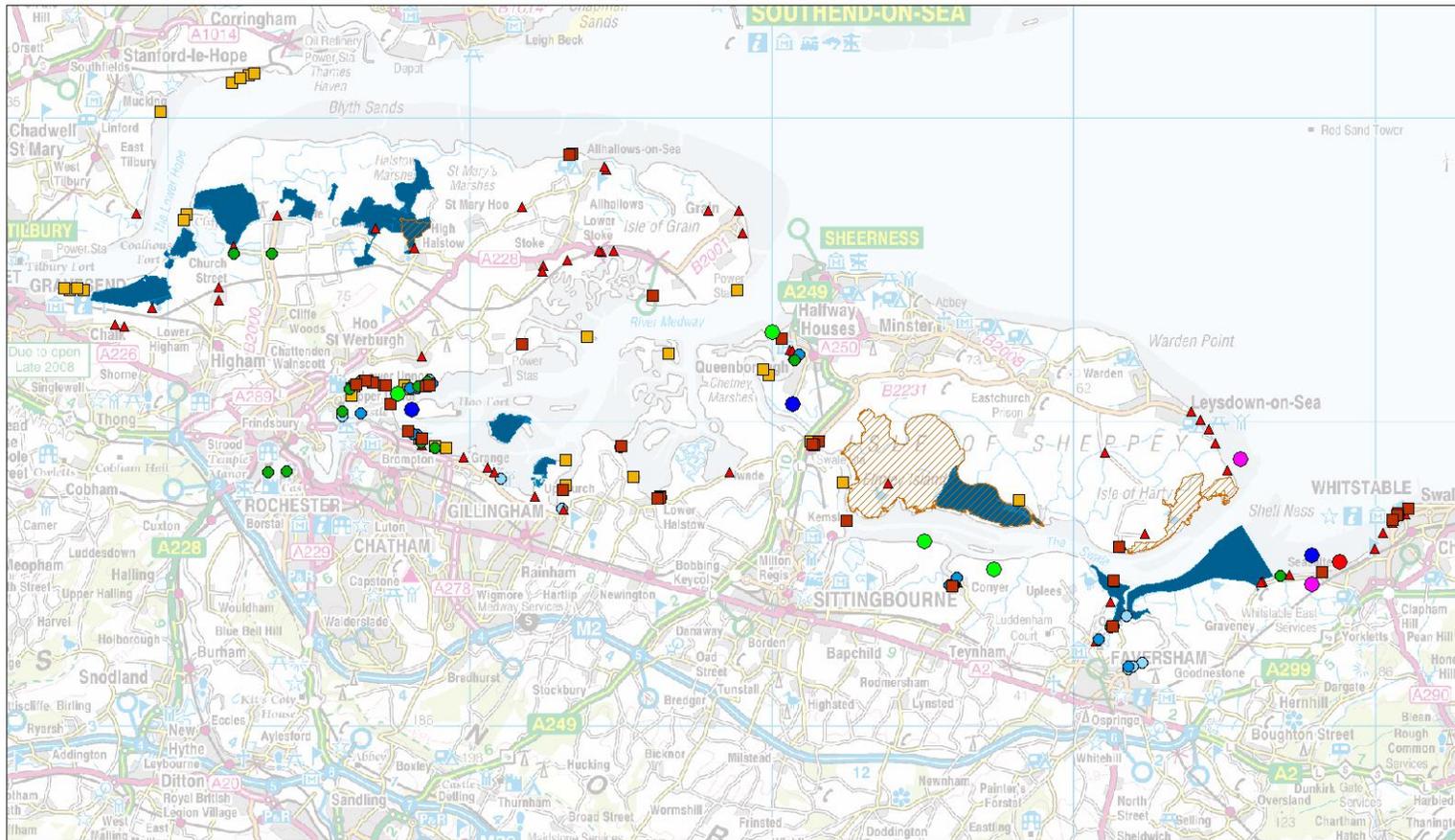
4.10 One activity that it is difficult to predict the level of change is wildfowling. Wildfowling caused around 2% of the major flight events observed during the bird disturbance study, and were recorded at Harty, Oare Marshes and Conyer. This low level of recording may be due to the approach used in the disturbance study (wildfowling is particularly concentrated around dawn and dusk, whereas the disturbance study fieldwork was distributed through the day, and also included times outside of the wildfowling season). It is therefore difficult to be confident about the level of impact of this activity. Only one wildfowler was interviewed within the visitor survey. While a number of sections were scored for wildfowling taking place we have limited information on the likely changes in wildfowling as a result of new development. Natural England issues consents for wildfowling to take place, and these consents are based on specific levels of activity in specific areas. As such wildfowling is not likely to increase in a similar fashion to other activities.



Map 3: Sections (from scoring report) and no. of potential new houses within 6km

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Map 4: Locations where particular activities focused

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Selected Activities (from comparative scoring report)

- Dogs off lead on intertidal
- other boats/watercraft
- powerboats/RIB/PWC
- wind/kite surfing
- Slipways
- Jetties
- Sailing Clubs
- Marinas
- Boatyards
- ▲ Carpark
- NNR
- KWT/RSPB

Special interests

- 4.11 In Map 5 we show the relevant SPAs and highlight particular areas that are particularly important to wintering birds. The intertidal mudflats are all potentially used by birds, and without understanding the distribution of prey within the mudflats all intertidal areas are shown. We also highlight:
- Wader roost sites (from the GGKM roost survey, as shown in Liley & Fearnley 2011).
 - Key reserves (NNRs, RSPB reserves and Kent Wildlife Trust Reserves: data from Cruickshanks 2011 and also in Map 4 of this report). These are sites where high numbers of birds can sometimes be present.
- 4.12 It can be seen that a number of the roost sites are islands, which potentially provide secure roost sites, many of which will be largely free of disturbance, at least from most shore-based activities. However, many are low-lying and therefore vulnerable to flooding and sea-level rise. Disturbance from wildfowling, boating and other water-based activities may also occur.

Spare capacity

- 4.13 A further important consideration is the extent to which any areas might be able to absorb additional numbers of people without adding to the pressure on the birds and the SPA. This is difficult to determine without detailed site assessments. In particular it would be useful to know the prey availability within different areas.
- 4.14 There are a number of areas with access restrictions, i.e. where public access is limited. These are clearly shown in Map 21 of the comparative scoring report (which shows 10 out of the 33 sections having some restrictions, most notably those towards the outer part of the Medway and near Sheerness). While it might seem intuitive that these areas could perhaps support some access, this is probably not appropriate. Many of the sections identified as having access restrictions include islands and offshore areas, and one has no shoreline at all. Diffuse access over wide areas is difficult to manage, control and influence and, more importantly, it is necessary to ensure there are areas with no disturbance. It is probably no coincidence that many of the sections with access restrictions are also the ones supporting wader roosts (see Map 5 in this report).
- 4.15 Where access levels are already very high, then it is likely that increased use of these areas will involve the least impact for the birds. The particular issues with these locations is more likely to be their ability to ‘take’ more visitors, in terms of parking capacity and whether people will use them if they become busier.⁶
- 4.16 Looking in detail at the busier sites, there was little evidence to suggest that the distribution of birds was related to levels of access, at least at the sites surveyed in the bird disturbance study. Across all sites there was no significant correlation with bird

⁶ Note that around one third of respondents in the visitor survey indicated that if the site (where interviewed) became busier they would visit for less time or less often (see Table 9 of visitor survey report).

numbers (or densities) and the mean level at sites of access or the actual count of people made during a count. However, there were no visits where high numbers of people were counted and high numbers of birds also occurred. The sites with the high levels of access, in the south-eastern part of the Medway, are those where bird declines have been most marked (see paragraph 2.7). This would suggest that birds are perhaps avoiding the busiest sites – and the lack of significant correlation is due to the fact that there are a few locations with high levels of access.

- 4.17 There was also some indication from the disturbance study that the response of birds was different at the busier sites (see Figure 7 of the disturbance study report). The proportion of events resulting in major flights was less at the busier sites, potentially indicating that people behaved differently at these locations; that the birds were at lower densities; that the birds were distributing themselves to as to avoid the disturbance, or possibly even becoming habituated.
- 4.18 We produce a different plot using the data from the disturbance study in Figure 6. We show the rate at which birds were flushed (major flights) at each survey point and the level of access (x axis), and three data points stand out and are labelled. At these locations the level of access was high and the rate at which birds were flushed was low. These locations are Riverside Country Park (location 11), The Strand, Gillingham (location 12) and Lower Upnor (location 13). A check of the responses at these locations (see Figure 6 of the bird report) indicates that the majority of observations at these sites involved 'no response' from the birds. Birds were therefore apparently not being disturbed and not undertaking major flights; it appears they are responding differently. It might be therefore argued that these sites could be ones where additional access levels could be accommodated.
- 4.19 We are highly cautious about such an approach. The three sites fall in the part of the Medway that has seen the particular declines in bird numbers and the counts of birds here during the disturbance study were comparatively low. This may explain the low flush rate - where numbers are low birds may be able to distribute themselves so as to avoid areas where they are flushed. These are potentially the locations where access is currently having an impact, and increases in access may have further impacts or reduce the potential to resolve the existing problems.

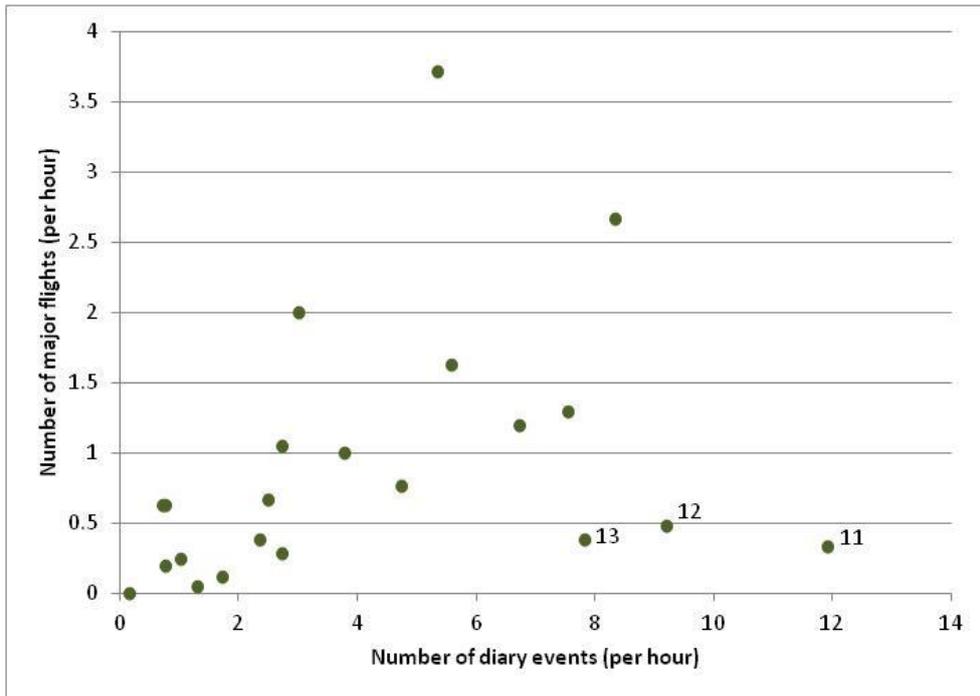
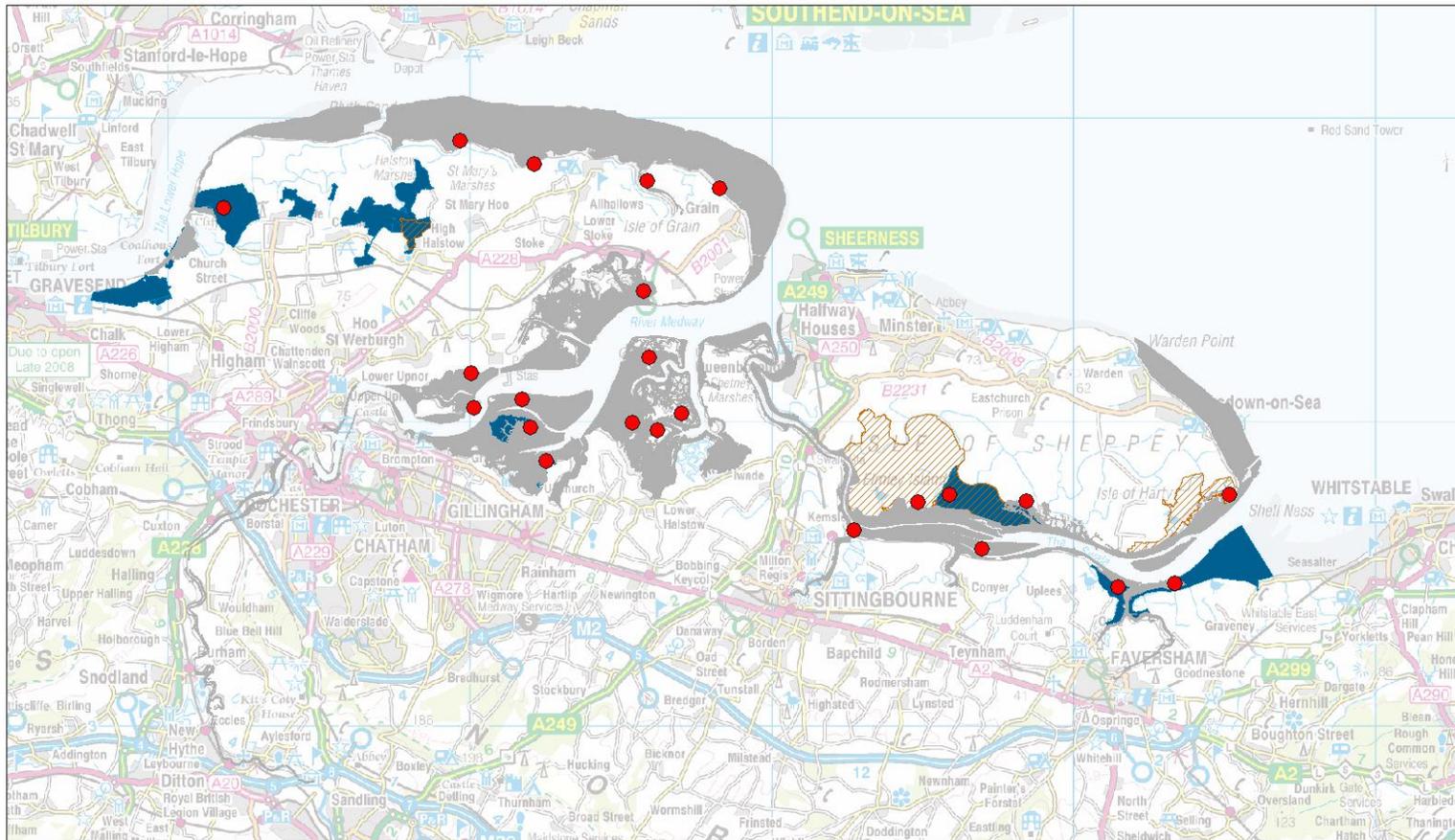


Figure 6: Number of major flights (per hour) and number of diary events (per hour) from the bird disturbance study data. Diary events equate to the total number of groups of visitors, craft etc recorded at each survey point. The three data labels refer to survey locations (see main text).



Map 5: Key locations/features

Contains Ordnance Survey data © Crown database and database right 2011

- | | | | |
|---|----------|---|--------------------------------------|
|  | NNR |  | Bird Roost Sites |
|  | KWT/RSPB |  | Mudflats (data from Natural England) |

5. Mitigation and Avoidance

Introduction: Need for Mitigation and Avoidance

5.1 Following the previous sections of this report, and the evidence already collated for North Kent, we are in a position to identify where access might change, which locations are potentially vulnerable and what activities might be expected to occur as a result of new development. Disturbance results in behavioural responses from the birds, and it is not possible, with the available data, to rule out likely significant effects (from future changes in access levels) on the integrity of the European sites. We can identify the following key points relevant to mitigation:

- Dog walking, and in particular dog walking with dogs off leads, is currently the main cause of disturbance (by far). Besides dog walking, all activities (i.e. the volume of people) are potentially likely to contribute to additional pressure on the SPA sites, but activities on the mudflats or the water should be of particular focus for mitigation.
- Development within 6km of access points to the SPA is particularly likely to lead to increase in recreational activities on the SPA. Local greenspace use such as dog walking, cycling, jogging, walking and to some extent family outings will originate from people living within this radius.
- Beyond 6km from access points onto the SPA, large developments or large scale changes to housing levels will also result in increased recreational use. It would appear that visitors to the North Kent coast mostly originate from a zone north of the M2/A2 between Gravesend and Herne. People living within this broad coastal strip (i.e. beyond 6km from SPA access points and north of the M2/A2) are likely to visit for more coastal specific activities. Assuming users will be drawn to particular features/areas, then we can highlight the mouth of the Swale (kite/windsurfing, dog walking with dogs off leads on the intertidal, bait digging); the upper parts of the Swale (boating activities); the upper parts of the Medway around Gillingham, Upnor and Rochester (where considerable infrastructure is present and lots of boating activity including powerboats, RIBs etc) and nature reserves at Sheppey, Oare Marshes, Cliffe and Northward Hill.
- It is difficult to be confident in identifying areas that can absorb additional recreational pressure. It may be that existing areas with high levels of access (such as Riverside Country Park and the Strand, Gillingham) may warrant consideration.
- Areas currently undisturbed, and in particular the main roost sites should be protected from additional recreational pressure

5.2 Within 6km of access points to the SPA (and beyond 6km for large developments) new development will result in increased levels of access to the SPAs. Small development, beyond 6km from access points onto the SPA, and any development south of the

M2/A2 can be assumed not to have a likely significant effect on the European sites (in terms of recreational disturbance). Development within 6km, or large development between 6km and the M2/A2 will need to provide mitigation to provide confidence that there will be no adverse effects on integrity as a result of disturbance. A suite of management measures should therefore be considered to avoid potential adverse effects caused by future development.

Overview of Possible Measures

- 5.3 A range of measures are possible to minimise disturbance, for example careful siting of development, influencing which sites people visit, where people go within sites and how they visit. We set out a summary list of possible options in Table 6. These options range from soft measures and proactive work with local residents, to enforcement. Conclusive evidence that the different measures work is limited, but within the table we summarise examples and, where available, reference studies showing the effectiveness of the different options.
- 5.4 It is important to recognise that access to the countryside is important, bringing widespread benefits including health, education, inspiration, spiritual and general well-being (English Nature 2002; Bird 2004; Pretty *et al.* 2005, 2007; CABE Space 2010; Moss 2012). While mitigation measures might seek to control or limit access in some areas, the overall aim should be to enhance existing recreation experience and provide recreation opportunities such that access and nature conservation interests are not in conflict.

Table 6: Options to Reduce Disturbance Impacts

Management option	Description	Examples and Notes
1. HABITAT MANAGEMENT		
New habitat creation	Creation of new habitat for the interest feature in areas away from human disturbance. Potential to be carried out in combination with managed realignment schemes and/or disposal of dredgings.	Effectiveness of ‘refuges’ shown by Madsen, in Denmark (Madsen 1993, 1998). Artificial roost sites have been created, for example at Hartlepool (Burton, Evans, & Robinson 1996)
2. PLANNING & OFF-SITE MANAGEMENT MEASURES		
Site development away from sensitive sites	Much recreational use to sites is local, for example from people living within a short drive or walk of sites. Planning development at a strategic level is a way to reduce the long term future pressures of increased recreation from development. Needs to be taken into account during formulation of Local Development Frameworks.	Relevant core strategies for authorities adjacent to The Thames Basin Heaths SPA, the Dorset Heathlands SPA and the Breckland SPA all have development exclusion zones.
Planning conditions on adjacent development (land)	Urban design and planning conditions (such as Section 106 agreements) can ensure that planting, screening, careful routing, provision of access infrastructure (boardwalks, marked paths, steps etc) are incorporated into new developments to influence visitor flows within sites and minimise the potential of people to cause disturbance.	Design for development adjacent to Poole Harbour at the site of the old power station included a ditch to deter access (Hoskin <i>et al.</i> 2007).
Provide alternative recreational facilities	Provision may need to be combined with other measures such as education and management on the designated site. Likely to need to be carefully designed and targeted to provide a viable alternative. Targeting for dog walkers would need to ensure dog friendliness (Edwards and Knight, 2006) and suitable routes (e.g. Liley <i>et al.</i> , 2006c, Liley <i>et al.</i> , 2006d). For water-based activities, gravel pits or similar may need careful landscaping and particular types of infrastructure.	‘SANGS’ (suitable alternative natural greenspace) have been promoted around the Thames Basin Heaths and the Dorset Heathlands SPAs. Currently little evidence has been collated to demonstrate effectiveness (Clarke, Sharp, & Liley 2008; Liley, Underhill-Day, & Sharp 2009; Sharp 2010). In coastal environments likely only to work in circumstances where use is not coastal specific, e.g. local daily dog walk.
Provision of designated access points for water sports	Provision of public slipways, trailer & vehicle access to shore etc in predetermined locations where boat access is likely to be away from nature conservation interest.	
Attract visitors to less sensitive areas; discourage access to sensitive areas	Provision of attractions/facilities such as toilets, food, improved walking surfaces, hides etc. Manage demand through car-park costs and capacities, restriction of on-road parking by wardening. Establish coast paths where there are gaps to minimise access to beach, realign footpaths where necessary.	Few examples exist where such infrastructure has been reviewed and designed across a wide area to focus visitor pressure away from sensitive areas.
3. ON-SITE ACCESS MANAGEMENT		
Restrict/prevent access to some areas within the site	Potential to restrict access at particular times, e.g. high tide and particular locations (roost sites). Temporary fencing, barriers, diversions etc all possible.	Enclosures to provide safe nesting areas for terns and breeding waders exist at numerous sites such as Holme NNR, Scolt Head NNR, Dawlish

Management option	Description	Examples and Notes
		Warren, Pagham Harbour LNR and Walberswick NNR. There are few examples of successful exclusion of people in the winter from roost sites etc. At Dawlish Warren a warden is present through the winter at high tide and visitors are redirected according to where the birds are.
Provide dedicated fenced dog exercise areas	Allowing dogs off leads etc in particular locations that are not sensitive for nature conservation or other reasons may increase their attractiveness to dog walkers.	Dedicated dog exercise facilities exist at Sutton Heath in the Suffolk Sandlings SPA. The enclosure is outside the SPA and draws visitors from a wide area (Cruickshanks, Liley, & Hoskin 2010b).
Zoning	Designated areas for particular activities. Often zones are set out in a code of conduct and prevention of use for the areas outside the zones is enforced through byelaws.	Dedicated ‘zones’ for particular activities exist on various estuary sites around the UK.
Infrastructure to screen, hide or protect the nature conservation interest	Screens, hides, embankments etc are commonly used to direct visitors along particular routes and screen people from birds or other features vulnerable to disturbance. Such infrastructure can also provide enhanced viewing facilities and opportunities for people to get close to wildlife without causing disturbance. Path design can enhance the extent to which people stray or roam from the path. Boardwalks etc. can protect vulnerable habitats.	Wide range of techniques and infrastructure. Many nature reserves commonly use such infrastructure to allow access and good viewing of wildlife. Less potentially relevant on greenspace sites where people are not necessarily visiting to view/experience wildlife.
Management of car-parking	Car-park spaces can be redistributed around a site, parking closed in some areas, parking fees modified (e.g. encouraging people not to stay too long) or a permit system be instigated to limit use of car-parks	Car parks have been temporarily closed as part of CRoW access restrictions on some sites (e.g. sites in Breckland with breeding stone curlews) and have been permanently reduced in size or closed at a number of sites such as the New Forest (to considerable public opposition) and Burnham Beeches (very successful). Evidence from Cannock suggests that results can be unpredictable (Burton & Muir 1974).
Path design and management	Surfacing, path clearance and other relatively subtle measures may influence how people move around a site and which routes they select.	Work in the Pennines demonstrated that path resurfacing resulted in a change in people’s behaviour and a resulting reduction in disturbance (Pearce-Higgins & Yalden 1997).
4. EDUCATION, COMMUNICATION TO PUBLIC AND SITE USERS		
Signs and interpretation and leaflets	Provision of informative and restrictive signs, and interpretive boards. Directions to alternative less sensitive sites. General information on the conservation interest to highlight nature conservation interest/importance.	Interpretation boards, signs and leaflets are widely used around the UK. Provision of signage and wardening have been shown to result in enhanced breeding success for little terns in Portugal (Medeiros <i>et al.</i> 2007).
Codes of Conduct	Guidance on how to behave to minimise impacts is promoted at a range of	On the Humber a generic code of conduct includes different sections for

Management option	Description	Examples and Notes
	sites, through websites, leaflets, interpretation etc. These are sometimes enforced by byelaws and other control measures (see section 5).	each type of activity and the code is available as a leaflet or a download from the Humber Management Scheme website ⁷ . Scottish Natural Heritage have produced comprehensive guidance titled the Marine Wildlife Watching code, covering cetacean boats, otters, seabirds etc ⁸ .
Wardening	In addition to an enforcement role (see 4e above) wardens can provide a valuable educational role, showing visitors wildlife etc.	Many sites have wardens who fulfil a range of roles, including interacting with the public and education. Can be both on-site and off-site (e.g. school visits).
Provision of information off-site to local residents and users.	Local media, newspapers etc can provide means to highlight conservation importance of sites and encourage responsible access. Educational events, provision of items for local TV/other media. Information can be made available in local shops, tourist centres etc. Potential to promote non-designated sites, for example through web / leaflets listing, for example, dog friendly sites.	In Dorset, Natural England provide a dog-users website which gives information to dog walkers, it includes codes of conduct and highlights places to walk, indicating which sites requires dogs to be on a lead and when ⁹ . Many estuaries have management partnerships that host regular forum meetings, estuary festivals and other events that bring local users together and can provide a means of conveying information.
Contact with relevant local clubs	Agreed codes of conduct and self-policing can be set up with individual groups and provide a means of ensuring users are aware of how to act responsibly (e.g. water-sports club revoking membership for anyone caught speeding (Defra, 2004)).	A range of examples exist, for example the Jersey Canoe Club has a code of conduct for wildlife encounters ¹⁰ ; In Pembrokeshire a marine code exists in addition to legislation as a voluntary agreement to which all major local wildlife tour boat operators, sub aqua diving organisations, jet ski organisations, sailors and sea kayakers etc. have signed up to ¹¹
Establishment of Voluntary Marine Reserves (VMRs)	By agreement of interested parties.	There are a number of sites around England, such as Purbeck, Looe St. Abbs and Seven Sisters.
Off-site education initiatives, such as school visits etc	Proactive education work with local communities, raising awareness and highlighting local issues.	

⁷ <http://humberems.co.uk/downloads/Codes%20of%20Conduct%20PDF.pdf>

⁸ <http://www.marinecode.org/documents/Scottish-Marine-Code-web.pdf>

⁹ <http://www.dorsetdogs.org.uk/>

¹⁰ http://www.jerseycanoeclub.co.uk/docs4dl/wildlife_coc.pdf

¹¹ <http://www.pembrokeshiremarinecode.org.uk/code%20conduct.htm>

5 ENFORCEMENT		
Dog control orders	Orders to keep dogs on leads, restrict specific access at certain times etc ¹² .	Difficulties in getting measures agreed, particularly when people have been using an area for a long period. Difficulties in policing. Peer pressure could be effective. Examples include Stanpit Marsh (Christchurch Harbour), the Hayle Estuary (RSPB Reserve) and Chichester Harbour.
Covenants regarding keeping of pets in new developments	Covenants prohibiting the keeping of cats and / or dogs for example in flats where a management company could enforce the restriction.	In a review of planning appeal decisions in the Thames Basin Heaths SPA (Hoskin and Tyldesley, 2006), a number of cases rejected the use covenants as ineffective and / or unenforceable and in ten appeals, such covenants were found to be insufficient to avoid harm to the SPA because they would not deter other recreational visits not related to dog walking.
Legal enforcement	Byelaws can be established by a range of bodies including local authorities, the MOD, National Trust, Parish Councils etc. Other options include special nature conservation orders or prosecution under SSSI legislation.	Policing of watercraft zoning, speed limits etc, with fines or other penalties for infringement ¹³ . Enforcement facilitated when a system of permits and vessel registrations is in place. Byelaws also often used for activities such as kite surfing (e.g. the Hayle Estuary and at Seaforth). Byelaws exist at a range of sites to control bait digging, e.g. The NNR part of Teesmouth and Cleveland Coast SPA/EMS
Wardening	Wardens have both educational (see 5b below) and enforcement roles. With respect to the later, wardens can provide direct contact and intervene when they observe particular activities (such as dogs off the lead on mudflats). The ability of a warden to control disturbing activities is clearly related to whether control measures are in place, and their nature. The more specific and statutory in nature the control, the greater the potential for enforcement by a warden.	Many sites have wardens who fulfil a range of roles, including interacting with the public dealing with disturbance issues. At Teesmouth and Cleveland Coast SPA/EMS, one targeted patrol per week allows NE on-ground presence to be demonstrated, but is very resource intensive.
Limiting visitor numbers	Visitor numbers capped, for example through tickets, permits or a similar system.	Commonly used in the past at various nature reserves around the UK such as Minsmere. Widely used in American National Parks.

12 See defra guidance at: <http://www.defra.gov.uk/environment/quality/local/legislation/cnea/documents/dogcontrol-orders.pdf>

13 Model byelaws provided at: http://www.mcga.gov.uk/c4mca/cons_mca_guidance_pleasure_boat_model_byelaws_amenda.pdf

Specific Recommendations for North Kent

- 5.6 In Table 7 we provide an overview of potential options that could be considered as mitigation. Specific details and fully worked up costs and plans for a package of measures are beyond the scope of this report. Drawing from Table 6 we have selected a series of measures which we feel are appropriate and relevant, and we have suggested where they might be targeted and illustrative costs. They are largely strategic options, that are likely to be beyond the scope that single developments can provide. We hope these will form a foundation that can be further built on; we recognise that local input, local stakeholder involvement and further consideration is essential to the successful design and implementation of any mitigation measures. We have not indicated likely timescales for implementation, however we have highlighted measures that are relatively easy to implement and also measures that we believe are particularly important, in that they are likely to bring the most benefit. Mitigation measures can be phased so that not all measures will be necessary immediately, and therefore those that are the most important and easiest to implement would be the ones to consider first.
- 5.7 Within the table we have included monitoring. Monitoring is important as there is relatively little evidence for the effectiveness of the different measures (see limited references in Table 6). Monitoring will provide the ability to test the effectiveness of measures and where measures are not successful, may be able to identify modifications. It will also provide an early warning of where impacts may occur within the European sites and allow additional measures to be targeted accordingly.

Table 7: Examples of Targeted Mitigation Options. Initial ideas requiring further detailed consideration. Costs are very approximate and indicative, they are estimated approximately drawing from existing costed mitigation plans relating to the Dorset Heaths (http://www.rspb.org.uk/Images/Dorsetheathlands_tcm9-256254.pdf)

Mitigation Measure	Areas to Target	User Group	Indicative cost	Likely to be easy to implement	Importance (star indicates important)	Notes/rationale
Set back development at distances greater than 6km from SPA access points	All				*	Would resolve much of the issues relating the SPAs
Secure roost site	Off-shore islands	all	?		*	Providing refuges for roosting birds, for example securing off-shore islands or similar could be an effective long term strategy.
Additional green infrastructure	Gravesend, Upper Medway (Gillingham, Rochester etc), Sittingbourne, Whitstable	Dog walkers	£2,000,000		*	“SANGs” designed to absorb local recreational use, and draw users who might otherwise use SPA. Dog gym or similar features potentially cost £3-5000 within a site. Land purchase costs difficult to estimate, also potential need to secure management in perpetuity.
Additional green infrastructure	Gravesend, Upnor, Rochester, Sittingbourne	Joggers, cyclists, walkers?	£200,000			Provision of promoted routes and enhanced infrastructure set back from coast and providing attractive options for a range of different route lengths. High costs reflect possible need to upgrade pavements, provide road crossings etc.
Awareness raising of issues relating to disturbance and dogs: leaflet and	All. Focus on SPA sites near Gravesend, the Upper Medway, Sittingbourne and	Dog walkers	£15,000	✓	*	Promoting simple messages - the need to keep dogs under close control, why disturbance is an issue, birds present. Leaflets and website that site-based staff can promote. Website potentially promoting dog

website	Whitstable.					friendly locations.
Enhanced wardening presence/site based staff	All	All	£150,000 p.a.;			Potential for dedicated team of mobile wardens or site based staff at existing sites (RSPB, KWT, local authority staff?). Costs assume 5 posts each for 9 months p.a. at c.£30,000 per person (including support costs, transport etc). Would not necessarily be required in perpetuity. Could be linked to existing voluntary wardening scheme. Wardens would provide face-face contact with visitors. May be merit in increasing cost and having year-round wardening.
Direct contact with bait diggers and promotion of a code of conduct	Swale, to west of Whitstable	Bait Diggers	£2,000?	✓		Could be undertaken by site-based staff. Existing code of conduct not currently available on the internet.
Signage, access infrastructure	Potentially all	All shore based users	£50,000			Interpretation boards and other on-site infrastructure such as screening, redesigning paths etc to influence how people move through sensitive areas and how they behave. Requires site based assessments to identify locations where potential to improve existing infrastructure or where there are gaps.
Contact with watersport users, liason, data collection and development of codes of conduct	Whitstable/outer Swale/ Sheerness	Kitesurfers, windsurfers, PWC.	£5000?	✓		Face-face meetings with local users, identifying where and when users go into the SPA. Potentially developing voluntary code of conduct ¹⁴ and considering options to back up with legal enforcement
Project focused on Canoeists	Medway and Swale	Canoes	£15,000			Direct contact with local clubs, development of code of conduct, assessment of sites where launching

¹⁴ There is already a good code of conduct for PWC that covers the whole of Kent: <http://www.msep.org.uk/downloads.php>

						undertaken, potential for signage etc
Map and assess parking and all access points onto SPA	All	Range of users	£3000	✓		Small dedicated piece of work mapping and assessing all parking options around the SPA. Useful to inform development of mitigation with respect to parking etc. Would need to assess quality of parking, current charging, nearby options etc
Modifications to parking at selected locations	? Needs initial work (see above)	Range of users	£500,000?			Potential to use banks, ditches, dragon's teeth etc to reduce informal parking in some areas, enhance parking at other locations through additional parking bays etc. Would require initial review (see above) to identify options.
Monitoring of access levels	All	All	£10,000 p.a.	✓	*	Different options. Standardised counts of parked cars at multiple locations and standardised recording of foot access (potentially through automated counters and face-face interviews/counts) to determine changes over time.

Assessment of Individual Development Sites

- 5.8 In addition to the strategic measures outlined above, various measures can be tailored to individual developments and the area around development locations. Ideally any large development would be able to provide such tailored mitigation measures, considered on a site-by-site basis alongside the wider measures set out in Table 7.
- 5.9 In this section we provide guidance on how individual development sites might be considered within a Habitat Regulations Assessment. This is intended to help inform how those involved with masterplans and large development sites may draw on the available information and data to consider the impacts and mitigation measures. It is important that there is clear understanding of where such assessments might be necessary and how development will need to ensure that costs for off-site mitigation can be met.
- 5.10 Let us consider a hypothetical development site at around 2km from the SPA of 200 dwellings. Such a development might be expected to generate around 27 person visits per winter day to each access point at 2km. This could roughly be around 15 groups of people and 25 dogs¹⁵. Access points that are closer, for example 1km, would be expected to have around 52 additional person visits per winter day. These figures are derived using the equation in Figure 4. These figures are based on averages from the visitor survey and should be considered ‘typical’ based on the kind of survey points used in the visitor survey. The in-combination effects of these changes can be considered by cross-referencing to the overall figures for change in access as a result of development (the 16%) and by cross-referencing to the maps within this report and the overarching scoring report.
- 5.11 Visitors would be expected to use the SPA for normal greenspace activities, dog walking, cycling, jogging etc. In addition residents would be expected to drive – particularly within 6km – to nearby parts of the SPA, potentially drawn to access points that offer good parking, attractive walks etc and are easily accessible.
- 5.12 Some access points further afield with a specific ‘offer’ such as birdwatching, fishing, particular scenery, facilities etc., may also draw residents.
- 5.13 It is necessary therefore to map all access points around the development and assess them. Visit rates will be lower for some access points (for example ones that are muddy, difficult to reach, where there are other access points very close etc). Some may be particularly busy. Each access point should be assessed and mapped in relation to footpaths, road network etc. If one of the access points was included in the visitor and bird fieldwork this will provide additional information on activities, routes of visitors and home postcodes.
- 5.14 Consideration of the nearest parts of the SPA should include the scale of parking, existing use by visitors, whether people access the intertidal and levels of existing

¹⁵ 542 interviews were conducted in the visitor survey, involving 930 people and 502 dogs. Average group size is therefore 1.7 people and 0.9 dogs.

access. The greatest impacts are likely to be where levels of access are currently low, where the number of new units is high; where the development is close to the SPA; where there are no (or few) options for access apart from the SPA; where there are good parking options nearby to access the SPA; where access is directly onto the intertidal/shore, or where there are launching facilities.

- 5.15 It may be possible to position houses within the development site so that they are away from SPA access points and link to local footpaths in such a way that direct access to shore is avoided. New foot access that does not provide direct access onto shoreline is potentially necessary and areas for dogs to be exercised away from the SPA should be provided. New visitor survey work may help identify where people tend to walk and existing popular local circuits (note this depends on people currently visiting and using the area). This will help inform where there are options to provide additional facilities and direct users away from the SPAs.

- 5.16 Typical dog walking routes (from the visitor survey) were 3.3km. This provides an indication of the path lengths and scale of provision necessary. Simply ensuring 3.3km of existing footpath routes are available within the local area will not be adequate mitigation. Dog walkers will be drawn to the coast for the attractive scenery and perception that there is space and interesting terrain for the dog. Alternatives in or close to the development will need to recreate this.

- 5.17 If there are no options to redirect new residents or provide enhanced local green infrastructure away from the SPA, then additional green infrastructure within a wider radius may work as mitigation, if it reduces the overall level of access onto the nearby SPA, such that there is no net increase in access.

- 5.18 Table 2 within this report will help provide information on types of activity currently causing disturbance. Further cross reference with information in this report (e.g. Map 5) will inform where on-site mitigation measures may be beneficial within the SPA. These may be difficult for local developers to secure.

- 5.19 Additional measures as appropriate should be selected from Table 6 to minimise disturbance impacts.

- 5.20 Interpretation material and welcome packs for residents in the new development should link to the assessment of local access points and information gathered in the steps above.

- 5.21 Other checks (not relevant to disturbance issues to the wintering waterfowl interest, but nonetheless potentially material to any HRA) should include: proximity to Ramsar boundary and presence of Ramsar Interest; access onto grazing marsh, lagoons and other areas potentially part of, or used by the SPA bird interest; checks on breeding bird interest; check of building design (potential to influence flight lines, predator perches, light pollution); run-off and water-quality implications from waste water treatment.

6. References

- Austin, G.E. & Rehfisch, M.M. (2005) Shifting Nonbreeding Distributions of Migratory Fauna in Relation to Climatic Change. *Global Change Biology*, **11**, 31–38.
- Banks, A.N., Austin, G.E., Burton, N.H.K. & Mellan, H.J. (2005) *Investigating Possible Movements of Waterbirds Between the Medway Estuary and Marshes SPA and Neighbouring Areas of the Thames and Swale Estuaries*. British Trust for Ornithology, Thetford.
- Beale, C.M. & Monaghan, P. (2004) Behavioural Responses to Human Disturbance: a Matter of Choice? *Anim. Behav.*, **68**, 1065–1069.
- Bird, D.M. (2004) *Natural Fit, Can Green Space and Biodiversity Increase Levels of Physical Activity*. RSPB, Sandy, Bedfordshire.
- Burton, N.H.K., Evans, P.R. & Robinson, M.A. (1996) Effects on Shorebird Numbers of Disturbance, the Loss of a Roost Site and Its Replacement by an Artificial Island at Hartlepool, Cleveland. *Biological Conservation*, **77**, 193–201.
- Burton, R.C.J. & Muir, K. (1974) *The Recreational Carrying Capacity of the Countryside, a Research Report Presenting the Methodology & Results of Ecological and Psychological Surveys of Cannock Chase, Staffordshire*. Keele University.
- CABE Space. (2010) *Community Green: Using Local Spaces to Tackle Inequality and Improve Health*.
- Clarke, R.T., Sharp, J. & Liley, D. (2008) *Access Patterns in South-east Dorset. The Dorset Household Survey: Consequences for Future Housing and Greenspace Provision*. Footprint Ecology / Poole Borough Council.
- Cruickshanks, K., Lake, S., Liley, D., Sharp, J., Stillman, R., Underhill-Day, J. & White, J. (2011) *What Do We Know About the Birds and Habitats of the North Kent Marshes? Baseline Data Collation and Analysis*. Footprint Ecology/Bournemouth University/Natural England.
- Cruickshanks, K., Liley, D., Fearnley, H., Stillman, R., Harvell, P., Hoskin, R. & Underhill-Day, J. (2010a) *Desk Based Study on Recreational Disturbance to Birds on the Humber Estuary*. Footprint Ecology / Humber Management Scheme.
- Cruickshanks, K., Liley, D. & Hoskin, R. (2010b) *Suffolk Sandlings Visitor Survey Report*. Footprint Ecology / Suffolk Wildlife Trust.
- English Nature. (2002) *Revealing the Value of Nature*. English Nature, Peterborough.
- Fearnley, H., Clarke, R.T. & Liley, D. (2010) *The Solent Disturbance and Mitigation Project. Phase II. On-site Visitor Survey Results from the Solent Region*. Footprint Ecology/Solent Forum.
- Fearnley, H., Clarke, R. & Liley, D. (2011) *The Solent Disturbance & Mitigation Project. Phase II – Results of the Solent Household Survey*. Footprint Ecology Unpublished Report.
- Fearnley, H. & Liley, D. (2011) *North Kent Visitor Survey Results*. Footprint Ecology / Greening the Gateway.
- Fearnley, H. & Liley, D. (2012) *North Kent Comparative Recreation Study*. Footprint Ecology / Greening the Gateway.

- Gill, J.A., Norris, K. & Sutherland, W.J. (2001) Why Behavioural Responses May Not Reflect the Population Consequences of Human Disturbance. *Biological Conservation*, **97**, 265 – 268.
- Holt, C.A., Austin, G., Calbrade, N., Mellan, H., Mitchell, C., Stroud, D., Wotton, S. & Musgrove, A. (2011) *Waterbirds in the UK in 2009/10*. BTO, RSPB, JNCC.
- Hoskin, R., Liley, D., Underhill-Day, J. & Tyldesley, D. (2007) *Lower Hamworthy Former Power Station Site Development Project, Habitats Regulations Assessment*. Footprint Ecology / David Tyldesley Associates / Poole Borough Council.
- Lake, S. (2010) *Assessment of Recreational Impacts on Dawlish Warren Special Area of Conservation*. Footprint Ecology / Teignbridge District Council.
- Liley, D. & Clarke, R.T. (2003) The Impact of Urban Development and Human Disturbance on the Numbers of Nightjar *Caprimulgus Europaeus* on Heathlands in Dorset, England. *Biological Conservation*, **114**, 219 – 230.
- Liley, D., Clarke, R.T., Mallord, J.W. & Bullock, J.M. (2006) *The Effect of Urban Development and Human Disturbance on the Distribution and Abundance of Nightjars on the Thames Basin and Dorset Heaths*. Natural England / Footprint Ecology.
- Liley, D. & Cruickshanks, K. (2010) *Exe Visitor Survey, 2010*. Footprint Ecology / Teignbridge District Council.
- Liley, D., Cruickshanks, K., Waldon, J. & Fearnley, H. (2011) *Exe Disturbance Study*. Footprint Ecology / Exe Estuary Management Partnership.
- Liley, D. & Fearnley, H. (2011) *Bird Disturbance Study, North Kent 2010-2011*. Footprint Ecology / Greening the Gateway.
- Liley, D., Stillman, R.A. & Fearnley, H. (2010) *The Solent Disturbance and Mitigation Project Phase II. Results of Bird Disturbance Fieldwork, 2009/10*. Footprint Ecology / Solent Forum.
- Liley, D., Underhill-Day, J. & Sharp, J. (2009) *Green Space Quality: Guidelines for SANGS Surrounding the Thames Basin Heaths SPA*. Footprint Ecology / Natural England.
- Macleán, I.M.D., Austin, G.E., Rehfisch, M.M., Blew, J., Crowe, O., Delany, S., Devos, K., Deceuninck, B., Günther, K., Laursen, K., Van Roomen, M. & Wahl, J. (2008) Climate Change Causes Rapid Changes in the Distribution and Site Abundance of Birds in Winter. *Global Change Biology*, **14**, 2489–2500.
- Madsen, J. (1993) Experimental Wildlife Reserves in Denmark: a Summary of Results. *Wader Study Group Bulletin*, **68**, 23–28.
- Madsen, J. (1998) Experimental Refuges for Migratory Waterfowl in Danish Wetlands. I. Baseline Assessment of the Disturbance Effects of Recreational Activities. *Journal of Applied Ecology*, **35**, 386–397.
- Medeiros, R., Ramosa, J.A., Paivaa, V.H., Almeida, A., Pedroa, P. & Antunes, S. (2007) Signage Reduces the Impact of Human Disturbance on Little Tern Nesting Success in Portugal. *Biological Conservation*, **135**, 99–106.
- Moss, S. (2012) *Natural Childhood*. National Trust.

Pearce-Higgins, J.W. & Yalden, D.W. (1997) The Effect of Resurfacing the Pennine Way on Recreational Use of Blanket Bog in the Peak District National Park, England. *Biological Conservation*, **82**, 337 – 343.

Pretty, J., Griffin, M., Peacock, J., Hine, R., Selens, M. & South, N. (2005) A Countryside for Health and Well-being: The Physical and Mental Health Benefits of Green Exercise. *Countryside Recreation*, **13**, 2–7.

Pretty, J., Peacock, J., Hine, R., Sellens, M., South, N. & Griffin, M. (2007) Green Exercise in the UK - Countryside: Effects on Health and Psychological Well-being, and Implications for Policy and Planning. *Journal of Environmental Planning and Management*, **50**, 211.

Sharp, J. (2010) *Evaluating the Public Use and Effectiveness of Sunnyside Farm*. Footprint Ecology / Natural England.

Sharp, J., Clarke, R.T., Liley, D. & Green, R.E. (2008) *The Effect of Housing Development and Roads on the Distribution of Stone Curlews in the Brecks*. Footprint Ecology / Breckland District Council.

Stillman, R., West, A.D., Caldow, R. & Durell, S.E.A. le V. dit. (2007) Predicting the Effect of Disturbance on Coastal Birds. *Ibis*, **149**, 73–81.

Stillman, R.A., West, A.D., Clarke, R.T. & Liley, D. (2012) *Solent Disturbance and Mitigation Project Phase II: Predicting the Impact of Human Disturbance on Overwintering Birds in the Solent*. Solent Forum / Bourneouth University / Footprint Ecology.

Thaxter, C.B., Sansom, A., Thewlis, R.M., Calbrade, N.A., Ross-Smith, V.H., Bailey, S., Mellan, H. & Austin, G.E. (2010) *Changes in Numbers of Wintering Waterbirds in the Constituent Countries of the United Kingdom, Special Protection Areas (SPAs) and Sites of Special Scientific Interest (SSSIs)*. BTO Research Report, BTO, Thetford, Norfolk.

Appendix 1

Species totals (taken from Cruickshanks 2011) for species included in the SPA designations. Thresholds indicate the count where a site is deemed to be internationally or nationally important for a given species (see Holt *et al.* 2011). Brackets indicate counts that are incomplete (i.e. not all WeBS sectors were counted)

Species	International Threshold	GB Threshold	Thames		Medway		Swale	
			Peak Count 04/05 - 08/09	Mean 04/05 - 08/09	Peak Count 04/05 - 08/09	Mean 04/05 - 08/09	Peak Count 04/05 - 08/09	Mean 04/05 - 08/09
White-fronted Goose	10,000	58					430	332
Dark-bellied Brent Goose	2,000	981	22,047	12,771	1,834	1,436	2,310	2,051
Shelduck	3,000	782	2,318	2,064	2,360	2,155	2,207	1,936
Wigeon	15,000	4,060	9,293	5,374			16,651	12,244
Gadwall	600	171	471	438			(198)	127
Teal	5,000	1,920	5,433	4,911			(5,783)	4,981
Mallard	20,000	3,520					2,972	2,410
Pintail	600	279			812	761	731	642
Shoveler	400	148	524	428	(509)	269	331	274
Little Grebe	4,000	78	499	403			(191)	102
Great-crested Grebe	3,600	159						
Cormorant	1,200	230	654	538				
Mediterranean Gull	6,600		71	40	(18)	12		
Moorhen	20,000	7,500	383	374				
Coot	17,500	1,730						
Oystercatcher	10,200	3,200	33,659	26,350	(4,160)	2,937	5,225	4,279
Avocet	730	35	1,663	1,395	(1,027)	1027	1,290	686
Ringed Plover	730	330	1,998	1,186	332	332	(605)	(605)
Golden Plover	9,300	4,000	7,401	5,004			17,327	14,671

Phase I - Bird Disturbance Report

Species	International Threshold	GB Threshold	Thames		Medway		Swale	
			Peak Count 04/05 - 08/09	Mean 04/05 - 08/09	Peak Count 04/05 - 08/09	Mean 04/05 - 08/09	Peak Count 04/05 - 08/09	Mean 04/05 - 08/09
Grey Plover	2,500	530	13,028	5,673	(1,586)	1,302	1,631	1,631
Lapwing	20,000	206	18,662	16,863			23,479	16,129
Knot	4,800	2,500	83,716	42,871	4,304	3,461	5,002	3,927
Dunlin	13,300	5,600	40,838	37,251	(10,633)	9,126	9,181	7,366
Black-tailed Godwit	470	150	8,081	5,311	(1,120)	(1,120)	1,782	1,589
Bar-tailed Godwit	1,200	620	8,629	5,870			922	716
Whimbrel	6,800	6,800						
Curlew	8,500	1,500	6,993	4,549				
Greenshank	2,300	6	259	183	(35)	(35)	(55)	26
Redshank	2,800	1,200	5,081	4,313	1,068	1,237	1,715	1,527
Turnstone	1,500	500	1,090	844			(515)	(515)
Little Tern	490		154	84				
Common Tern	1,900		(553)	373				

Appendix 2

Results of Medway Swale Estuary Partnership survey of recreation groups: Groups that indicated that their membership was increasing.

Name	What activity does your organisation participate in?	How many members do you have?	% of members who travel more than 10 miles to take part in activities?	How is contact maintained amongst members?	What is the busiest time of year for your organisation?	Key locations on the estuary where your activities take place
2nd Whitstable Sea Scouts	sailing, PWC, rowing, motor boating, fishing, training, diving, swimming, windsurfing, kitesurfing, water skiing	60	20%	newsletter, email, internet forum	summer	Whitstable, Long Beach. East of the harbour & Swale Estuary
Arethusa Venture centre	almost no sailing on the river (use Basin 2 at Chatham Maritime), paddle sports - kayaking & canoe	n/a	65%	newsletters etc.	spring & summer	mainly upriver from buoy 30A, up as far as Thunderbold Pier, sometimes as far as Rochester Bridge
Chatham Maritime Marina	sailing, motor boating	n/a - but 300 berth holders	75%	email	summer	River Medway
Cruising Association - Kent Section	sailing, motor boating	4500 (400 in Kent, 100-150 in Medway & Swale estuaries)	80%	newsletter (via email), email, internet forum, website	spring, summer, autumn & Winter	Medway & Swale Estuaries, Thames & Essex
Cuxton Marina Limited	sailing, motor boating, marina operators	250	75%	face to face interaction	summer	all over the estuary
Gravesend Rowing Club	rowing	approx. 70	10%	email	spring & summer	from New Bridge, Gravesend Promenade up as far as Cliffe Creek
Highway Marine Limited	sailing, motor boating, fishing, training, yacht brokerage, boatyard	n/a	80%	newsletter, email, telephone, texts	spring	Kentish Stour in Sandwich Town, Kingsferry Lakes and Foreshore (old ferry road i.o.s)
Hollowshore Cruising Club	sailing, motor boating	137 memberships(230 individuals)	50%	newsletter, email	summer & autumn	The Swale, the Medway, North Kent Coast to Ramsgate, Thames to London, estuary NEwards as far as the Deben
Kingsferry Boat Club	sailing, motor boating, fishing	c.50	10%	newsletter, email	summer	East & West Swale, Medway, Thames Estuary
Medway Towns Rowing Club	rowing, training	124	5%	email	spring & summer	M2 to Rochester Bridge

Phase I – Bird Disturbance Report

Medway Towns Sea Cadet Unit	sailing, rowing, motor boating, rowing, training, diving & swimming. Also seamanship, marine engineering, BTEC, Duke of Edinburgh's award scheme, cooking, stewarding, first aid, communications, adventurous training, field gun competition, watersports (as above plus kayaking & canoeing) & others	45	2%	email, verbally & printed at twice weekly parades, facebook	summer	Chatham Dockyard to Otterham Quay
Medway Water Sports Trust	sailing, motor boating, fishing, training	there is not actually a membership	15%	email	spring, summer & autumn	Gillingham Reach, general area Rochester Bridge to Kingsnorth power station
SEGAS Sailing Club	sailing, motor boating, canoeing	100	0%	newsletter, email, website & clubhouse notice board	spring, summer & autumn	Gillingham Reach (Strand down stream to Kingsnorth Power Station), from Rochester Bridge to Queenborough, Swale, Thames and East Coast rivers
Strood Yacht Club	sailing, motor boating	193	n/a	newsletter, email	spring, summer & autumn	Queenborough, Canvey Island, Red Sands Tower
Upnor Sailing Club	sailing, fishing, training	130	75%	newsletter, email, internet forum	spring, summer & autumn	Medway River (Stangate, Queenborough, The Swale and parts of the east coast)
Whitstable Cruising Club	sailing	28	30%	newsletter, email, post, telephone	spring, summer & autumn	The Swale, Thames & Medway Estuary's
Whitton Marine Limited	commercial & leisure moorings, dry dock engineers etc.	60	15%	newsletter	spring & summer	Hoo Creek, Cookham Reach to estuary, Folly Point
Wilsonian Sailing Club	sailing, motor boating, training, dinghy sailing club and RYA, recognised training centre	224	60%	newsletter, email, internet forum	summer	River Medway from Cockham Reach to Saltpan Reach

Local Development Framework Panel Meeting		Agenda Item: 5
Meeting Date	2 March 2015	
Report Title	Queenborough and Rushenden - Indicative Revised Land Use Plan: Addendum to 2010 Adopted Masterplan - Consultation Results	
Cabinet Member	Cllr Lewin, Cabinet Member for Planning; and Cllr Cosgrove, Cabinet Member for Regeneration	
SMT Lead	Pete Raine - Director of Regeneration	
Head of Service	James Freeman - Head of Planning Services	
Lead Officer	Gill Harris - Spatial Planning Policy Manager	
Key Decision	No	
Classification	Open	
Forward Plan	Reference number: N/A	
Recommendations	<ol style="list-style-type: none"> 1. To note the results of the recent consultation; 2. To agree the suggested change to the Masterplan Addendum: and 3. To agree the adoption of the Addendum to the original Masterplan SPD for Development Management purposes. 	

1 Purpose of Report and Executive Summary

- 1.1 This report is to inform Members of the responses received as part of the recent consultation on the Queenborough and Rushenden Masterplan Addendum and to recommend that Members agree its use for Development Management purposes.
- 1.2 The main points highlighted in the report are:
- the majority of respondents wanted the adoption of the Alternative Marina Creek Plan by Messers Orpin, MacDonald and Bell; and
 - in the light of this, it is proposed that the Masterplan Addendum is altered to show the area to the south of the Creek as safeguarded for future Creekside leisure, commercial and open space uses. This leaves open the possibility of the Alternative Marina Creek Plan being implemented once the promoters gain funding for their scheme

2 Background

- 2.1 Members will recall that at the LDF Panel meeting on 25 September 2014 they agreed the contents of the Masterplan addendum (See Appendix I) for the purpose of a six-week public consultation. This consultation ran from 3 November to 15 December 2014.
- 2.2 The Masterplan Addendum was produced to provide a refresh of the adopted Masterplan to reflect changing economic conditions and progress in the current and planned delivery of the Queenborough and Rushenden regeneration proposals, as well as other material changes such as changes in land ownership.
- 2.3 Much of the adopted Masterplan will remain in place for Development Management purposes, especially the overall vision and design concepts. The main changes proposed to the Masterplan included:
- the reduction of dwelling numbers from 2,000 to 1,180;
 - the removal of the proposed marina;
 - the inclusion of the former ISTIL Mill and Thomsett Way sites for potential residential development; and
 - a new location for the proposed primary school.

Results of Public Consultation on the Masterplan Addendum

- 2.3 Almost 70 responses were received to the consultation (See Appendix II) covering a mixture of issues. There was support for the more central location of the school with some arguing it should be built in tandem with the Phase I houses to avoid local overcrowding of the primary school. Another respondent believed that the plan offers no future or aspiration for Sheppey's young people. Others stated that Queenborough's maritime heritage must be retained.
- 2.4 Queenborough Town Council objected to the reduction in dwelling numbers and the removal of the marina. They stated that they: "have sympathy for the current business users on the Klondyke Industrial Estate who have been told to vacate the land rented without the provision of adequate alternative accommodation." However, the Economic Development team at SBC has previously offered help to tenants to try to assist them with their relocation. The HCA are also in talks with the primary leaseholder, Charles Stevens, about extending the lease for one year.
- 2.5 There was one issue which the majority of respondents focussed on; the Alternative Marina Creek Plan by Messers Orpin, MacDonald and Bell (See Appendix III). This document has been prepared by three local residents in response to the proposed removal of the marina from the Masterplan.

2.6 The Alternative Marina Creek Plan proposes an impounded Queenborough Creek Marina bounded to the north by the existing quayside, and to the south to include Klondyke Wharf and Cutters Dock. A sector gate would be added to impound the water in the Creek with a pedestrian crossing on the lock gate. The Swale mooring arrangements by the Queenborough Harbour Trust would be continued and expanded and enhanced by the introduction of a dedicated visitor berthing area within the impounded Creek fronting the Town Quay adjacent to South Street. The marina would provide 150 to 200 berths or more varying in size. The Plan includes a technical and practical feasibility study which can be viewed in Appendix III.

2.7 A large number of respondents requested that this alternative plan be 'adopted' by the Borough Council instead of the proposed Masterplan Addendum. Respondents supported the alternative plan for a number of reasons, notably that:

- the waterside location is unique and should not be used for housing when alternative brownfields available for this;
- the alternative marina plan is cheaper and more deliverable;
- a marina would add to local amenity and recreation value and provide a focus for the area;
- a marina would generate local employment and will support the economic prosperity of the town and island as a whole;
- it would attract a lot of visitors to the area, especially if the expected level of tidal access could be achieved, and could be a significant boost to the tourism offer of Queenborough and Sheppey generally, as an important focal point. It would diversify Sheppey's traditional 'bucket and spade' holiday offer and cater for a more sophisticated market;
- Queenborough is a better location for a marina than the Sheerness Port proposal. Economic upturn means that deliverability of a marina now possible and should be reinstated in plans;
- a marina would make the housing in the area more viable and enable a higher density to be achieved; and
- increased yacht visits will encourage related industry and jobs.

3 Proposals

3.1 As a result of, and in response to, the consultation responses received, it is proposed to strengthen the Masterplan Addendum to highlight that the area to the south of the Creek is to be safeguarded for future Creekside leisure, commercial and open space uses. This can be seen in Appendix I. This leaves open the possibility of the Alternative Marina Creek Plan being implemented once the promoters gain funding for their scheme.

3.2 The HCA have been kept informed of the consultation responses and they proposed the suggested amendment in consultation with SBC Officers. They are content that it fits in with their plans for the area as a whole.

4 Alternative Options

4.1 An alternative option is not to make the suggested change to the Addendum and agree it as it was prior to the consultation. However, this would ignore the results of the public consultation.

4.2 Another option is to not agree this addendum and rely on the provisions of the adopted Masterplan for development management purposes. However, this would not reflect the changed economic circumstances and land ownership changes at Queenborough and Rushenden, and the HCA's future plans.

5 Consultation Undertaken or Proposed

5.1 A period of public consultation ran from 3 November 2014 to 15 December 2014. Every residential and business address within the Masterplan area received a letter notifying them of the consultation, alongside statutory consultees and local interest groups. Copies of the Masterplan Addendum were made available at the Rushenden Community House, Castle Connections in Queenborough, Queenborough Library, and at the Sheppey Gateway in Sheerness.

5.2 Details of the consultation and the Masterplan Addendum were placed on the Borough Council's website. A press release was also issued.

6 Implications

Issue	Implications
Corporate Plan	Open for business; and Healthy environment
Financial, Resource and Property	The costs can be met from existing budgets.
Legal and Statutory	The process will follow the statutory planning regulations where necessary.
Crime and Disorder	None identified at this stage.
Sustainability	The draft addendum pursues sustainable development across all elements of the plan.
Health and Wellbeing	None identified at this stage.

Risk Management and Health and Safety	None identified at this stage.
Equality and Diversity	None identified at this stage.

7 Appendices

7.1 The following documents are to be published with this report and form part of the report:

- Appendix I: Indicative Revised Land Use Plan: Addendum to 2010 Adopted Masterplan
- Appendix II: Table of Representations Received to the Consultation.
- Appendix III: The Alternative Creek Marina Plan by Messers Orpin, MacDonald and Bell.

8 Background Papers

8.1 None.

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QUEENBOROUGH AND RUSHENDEN REGENERATION

Indicative Revised Land Use Plan: addendum to 2010 Adopted Masterplan, 29.01.2015

The Vision

A 'multifaceted' regeneration, using the highest standards of design; an urban scheme which is respectful of the history and character of Queenborough, where new houses complementing the old will revitalise the area, bringing money into the local economy, improving education and services, and putting a 'value' on the visual, historical and ecological qualities that the Isle of Sheppey enjoys. The new regenerated Queenborough and Rushenden will be a very attractive place to live and work.

Introduction/purpose of the exercise

The Revised Indicative Land-Use Plan proposals have been prepared for a number of reasons. These include:

- Changing market circumstances and realisation that the original masterplan proposals may have been overly ambitious, and proven "challenging" to deliver on a financially viable basis, in the current market circumstances. In particular, the removal of the proposed marina is likely to have a major benefit to the financial viability of the overall masterplan proposals; and
- The need to reflect actual progress in the current and planned delivery of the Queenborough and Rushenden regeneration proposals, and other material changes such as changes in land ownership.

The revised land use plan represents a response to this changing context.

These changes have the potential to bring significant benefits and arguably represent an improvement, in urban design terms, upon the original masterplan. Chief amongst these are the creation of a more "integrated" development, which now includes residential uses on both sides of Rushenden Road and the removal of some of the employment uses which could potentially deter new investment and residential development. Similarly, the introduction of residential uses along the Rushenden Relief Road will help to create a more attractive environment in this location, creating enhanced linkages to the Neatscourt development which is now being implemented, and a more inviting "gateway" to the area.

The purpose of this Indicative Revised Land Use Plan is to act as an addendum the original Masterplan providing updated land use proposals to reflect changing market circumstances. The assumption is that much of the earlier document (which was adopted as SPD), will remain in place for Development Management purposes – this sets out Swale BC's expectations and gives design guidance on a range of matters:

Design concepts –

Creation of Place, Waterspace, Sustainability, Housing, Employment, Greenspace/public realm, Integrating Rushenden

Design principles –

- Principle 1: Linking Queenborough & Rushenden
- Principle 2: Creating Legibility - Views & Landmarks, permeability
- Principle 3: Grain - Height & Massing, density
- Principle 4: Spatial Street Strategy
- Principle 5: Activity and Movement
- Principle 6: Greenspace & Landscape Strategy
- Principle 7: Art, Culture & Community
- Principle 8: Sustainable Development
- Principle 9: Waterspace
- Principle 10: Creating place and distinctiveness

Development proposals should demonstrate a commitment to urban design quality, and will be subject to scrutiny by the Council's Design Panel.

Key changes to the Land Use Plan

- The Marina proposals have been removed, and replaced by a new Primary School. This places the school in the heart of the new community;
- In light of the removal of the marina, the densities applied to development have been revised, and are arguably more in keeping with the local context. Potential exists, however, for greater densities adjacent to the creek and this is also reflective to the generally more "tight" urban grain of Queenborough;
- The safeguarding of the creekside area for future development of a "Waterside Hub" to the South of Queenborough Creek – this could take the form of a visitor centre and/or leisure facilities; and
- Former Istil and Thompsett Way site now included for potential residential development.

Revised housing numbers

- The original masterplan indicated circa 2,000 residential units.
- The indicative revised proposals would deliver up to 1,180 dwellings within the sites labelled 'higher medium density' and 'lower medium density' in the key, with the approximate number of homes for each area indicated in the adjacent annotations.
- While delivery of this quantum of new housing is likely to occur over a protracted timescale, reduced densities (relative to those originally suggested in the vicinity of the proposed marina) and a lower proportion of flats/apartments may be more in line with likely market expectations and perceived as less risky by potential developers.
- Affordable Housing will be required in accordance with the original Masterplan targets.

Key benefits of the changes to the Land Use Plan

- There is now much greater certainty regarding the delivery of the school, which represents a key element of new social/community infrastructure, given its new location on land owned by the HCA. The school also now sits in the heart of the new residential community, and on a key new pedestrian axis, linking Queenborough and Rushenden;
- The revisions eliminate the potentially high risk/high cost marina;
- Given the loss of the employment/leisure elements potentially associated with the marina, the area adjacent to the existing creek will be safeguarded to provide options for the delivery of a "Waterside Hub", which would benefit from an attractive location adjacent to the Creek. While viability/marketing testing is required, potential uses might include a mixture of some or all of the following:
 - Enhancement of existing moorings or repovision as part of comprehensive redevelopment of creekside activities
 - Public access must be provided both along the seafront and the south side of the Creek.
 - Visitor Centre (potentially covering environment, local history etc)
 - A waterside pub, restaurant or café
 - Limited water-related uses (possibly as part of the visitor centre) eg canoeing
 - Other active uses possibly in the form of youth provision eg bmx, skate park etc
 - Limited employment uses eg managed workspace, workshops, chandlery etc; and
 - Attractive public realm
- The inclusion of residential development on the Istil Mill and Thompsett site has significant urban design benefits. The removal of industrial uses from part of Rushenden Road helps to create more integrated development and improve the quality of the environment. Similarly, the introduction of residential uses along the new Rushenden Link Road will improve the character of this key gateway into Queenborough and Rushenden, and improve pedestrian linkages to the new retail and employment uses at Neatscourt.

Area safeguarded for future waterside hub

Area safeguarded for future development of creekside leisure, commercial, open space use. Leisure and community uses would benefit from the attractive waterside Creek location, integrating with existing marine activities and moorings which could be expanded.



Welney Visitor Centre in Norfolk could form a precedent for the waterside hub

Other development sites

Other development sites, potential for residential and mixed use development.

Community

Potential permanent location for new community facilities in close proximity to the new school to be confirmed following appropriate needs viability assessment.

New housing site

The revised proposal shows housing here instead of a marina as in the original masterplan. A lower density of housing is proposed as the waterside apartments facing the marina in the original masterplan would no longer be possible. Additional leisure and waterside investment could be focused on The Creek and the Waterside Hub. Up to **220 units**.

Health facilities

A health centre is proposed here as part of phase one. The health centre could be at ground floor with housing above.

Phase one

A development brief for phase one is currently being drafted. This suggests a density of c.70 units/ha achieving up to **250 units** overall.



Higher medium density housing

Waterside housing environments such as Whitstable are viewed as a precedent of how housing can be built at higher-medium densities through smaller plots and narrower lanes whilst maintaining a predominantly low rise character. Up to **380 units**.



An example of higher-medium density housing - p.89 of the Queenborough & Rushenden Masterplan (2010)

Mill and Thompsett sites

The Mill and Thompsett sites have the potential to deliver new housing at a similar density and scale to phase one across Rushenden Road. The introduction of residential uses in this location will help to make Thompsett Way a more attractive environment and create linkages to the Neatscourt development. The sites could deliver up to **240 units**.



An example of higher-medium density housing - p.83 of the Queenborough & Rushenden Masterplan (2010)

Primary school site

In this location the school would be easily accessible from Rushenden Road and waterfront space would be preserved for residential development. This location may also help to integrate the two communities of Queenborough & Rushenden, and the school could potentially utilise the community facilities of the Phase 1 site. (c.2ha* site). Following discussions with Kent County Council the likely trigger for the school would be around 2018, after the completion of approximately 350 - 400 dwellings.



A new primary school forms a key part of the masterplan and is important for raising educational achievement in the area

* All measurements are approximations based on aerial photography and should be treated as rough estimates

- Health
 - Community
 - Waterside hub
 - Education
 - Public open space - parks and gardens
 - Other open space - recreation areas
- Map is not to scale
- Higher medium density (80 to 100 units/ha)
 - Lower medium density (60 to 80 units/ha)
 - Other development sites, potential for residential and mixed use development
 - Area safeguarded for future creekside leisure, commercial, open space uses

APPENDIX II

Queenborough and Rushenden Indicative Revised Land Use Plan: Addendum to 2010 Adopted Masterplan : Summary of Consultation Responses December 2014

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
QR/001	Tony Lavelle	Object	<p>I am writing personally to express my support for the alternative plan for Queenborough Creek proposed by Messrs Orpin, MacDonald and Bell.</p> <p>Queenborough is a unique location of historic significance due to its particular maritime location and natural harbour (the Creek). The SBC+HCA amended plan abandons provision for maritime use of the south side of the creek for what seems to be a short-sighted valuation based only on the locally depressed price of housing. I strongly feel that the alternative marina plan is more practical and cheaper than that originally proposed. The marina would also add significant amenity value and focus to the local area.</p> <p>There is plenty of other brownfield land locally for house building but such a waterside location suitable for a marina is rare and precious. Apart from the recreational benefits it would bring much needed employment.</p>	<ol style="list-style-type: none"> 1. Objects to proposed amendments to SPD - prefers the alternative Orpin, MacDonald and Bell proposal which retains a marina plan. 2. Waterside location is unique - and should not be used for housing when alternative brownfields available for this. 3. Alternative marina plan is cheaper and more deliverable. HCA plan based on short term evaluation of local depressed housing prices. 4. Marine would to local amenity and recreation value and provide a focus for the area. 5. Marina would generate local employment. 	<p>1,3,4,5. The single most expensive piece of infrastructure in the adopted Masterplan was the proposed marina at an estimated £8m. The original studies showed that although this could be operated on a commercial basis, significant gap funding would be required to support its development. Originally it was proposed that this be cross-subsidised, through SEEDA at the time, either reinvesting capital funds or perhaps foregoing land receipts in order to bring forward this element of the scheme. Clearly all recent work on viability by both HCA's consultants and SBC's own work has demonstrated that viability is a real issue in this location and that sites will struggle to be developed, even without any additional requirements. Build costs and sales values are very close, leaving little room for any developers margins (essential to attract a developer partner).</p> <p>The other significant issue that has changed since the original Masterplan, and one that also affects viability, is as</p>

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Page 176					<p>a result of more recent developments in flood defence requirements. Since the Masterplan was adopted, Government Policy on flood defence protection has been tightened and estimates of future sea levels have been updated requiring further work to render the Q&R sites developable. The sites now require substantial investment to raise levels, which adds some £100,000 per acre to development costs. With an already fragile position on viability taking a standard set of assumptions, this additional abnormal cost would rule out any other land owner other than HCA bringing these sites forward for development, as the cost of development would exceed any future revenues. Therefore any potential to cross-subsidise the development of the marina is lost with any additional funding available to the HCA allocated to site preparation works.</p> <p>It is therefore proposed to strengthen the Masterplan Addendum to highlight that the area to the south of the creek is to be safeguarded for future Creekside leisure, commercial and open space uses. This can be seen in Appendix I to the LDF panel report.</p>

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Page 577					<p>This leaves open the possibility of the Alternative Marina Creek Plan being implemented once the promoters gain funding for their scheme. Change Proposed.</p> <p>2. It is agreed that the waterside location is unique; however, all of the proposed housing is on brownfield sites. There are very few brownfield sites available in Swale which are not already allocated for development. Many of these contained previous employment uses and the Council's policy is to not lose employment sites for housing.</p>
	QR/002	Simon Pamment	Object	<p>Given the position of Queenborough it should be a focal point for sailing in the area, yet remains little used. I for one have sailed in and out of the Medway for over 30 years and on most occasions pass Queenborough by, as do most of my sailing colleagues. The reason being the lack of facilities and the disproportionately high fees charged. I can get almost the exact level of service in Stangate creek for free, so that is where I and my colleagues go. When I sail the east coast most summers, where do I go, Bradwell / Bightlingsea / Tollesbury / Havingore basin / Maldon / Titchmarsh / Burnham / Shotly/ Ipswich / Wolverston / Levington / Pin Mill / Conyer Creek / Ramsgate to name a few. I go there because I can</p>	<p>1. Objects to exclusion of a marina, as believes a reasonably priced marina at Queenborough with decent facilities would be very popular with the sailing community, as there is no suitable port of call in the Medway / Thames area.</p> <p>2. Would be likely to attract a lot of visitors to the area especially if the expected level of tidal access could be achieved.</p>

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Page 178			<p>moor up, fill with water/fuel, walk ashore, plug into the mains electric and can eat at a local pub or yacht club; all often for only £5/£6 more than I pay on a Buoy at Queenborough.</p> <p>I sail an elderly westerley centaur, but the availability of an electric kettle, electric toaster, a fan, a laptop/dvd player and walk in toilet and shower just make the sailing infinitely more pleasurable. A reasonably priced marina at Queenborough, would make sense. Chatting to sailors around the east coast, most do not sail the Medway or Thames as there is no suitable port of call. Queen borough makes a good jump off point, where do most of my trips start, Standgate creek of course, no sense going to Queenborough.</p> <p>The Idea of a marina in Queenborough Creek, would have my support and would likely attract visitors, especially if the expected level of tide access was achieved.</p>		
QR/003	Will Pretty	Object	<p>I understand that it is proposed to change the proposal for the development of Queenborough creek so that marina facilities are no longer included.</p> <p>I am the race captain at Hoo Ness Yacht Club. We organise cruises for our members to Queenborough. Currently these are of short duration as there are no facilities other than for a temporary stay. Were Queenborough Creek to be made more suitable it is likely we would visit more.</p>	<p>1. Objects to exclusion of marina as believes this would be very popular with local sailing community. Currently not possible to organise anything other than very short trips to Queenborough, as there are no suitable facilities. Improvements would bring more visitors.</p>	<p>1. See response to respondent QR/001. Change Proposed.</p> <p>2. Noted. This is part of longer term aspirations by Peel Ports and is not part of the emerging Swale Borough Local Plan Part 1: December 2014.</p>

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			I know there are plans by Peel Ports to consider a marina at Sheerness in the long term future. These are at an early stage and it looks to be more suitable for continental visitors on their way to and from London than for those that would see Queenborough as their destination.	2. The longer term potential for a marina at Peel (Sheerness) would be more likely to cater for international visitors heading for London, than local sailing.	
QR/004	Queenborough Town Council	Object and comment	<p>Queenborough Town Council objects to the Addendum to the adopted Queenborough & Rushenden Regeneration Masterplan and the inaugural Masterplan as presented.</p> <p>We object strongly to the changes proposed, particularly the reduction in the number of dwellings and in the removal of the proposed marina.</p> <p>We also have sympathy for the current business users on the Klondyke Industrial Estate who have been told to vacate the land rented without the provision of adequate alternative accommodation.</p> <p>There are also queries regarding ownership of the land and the Town Council is in the process of contacting HM Land Registry to ascertain the legal ownership of all relevant parcels of land.</p>	<p>1. Object to the reduction in dwelling numbers.</p> <p>2. Object to the removal of the marina from the regeneration plans.</p> <p>3. Klondyke Industrial Estate businesses have been given notice to vacate without provision of suitable alternative.</p> <p>4. Unclear land ownership of some land parcels which the Town Council is investigating via the Land Registry.</p>	<p>1. The dwelling numbers have been reduced as Government guidance now promotes a lower density of dwellings than was the case when the Masterplan was adopted.</p> <p>2. See response to respondent QR/001. Change Proposed.</p> <p>3. The Economic Development team at SBC has previously offered help to tenants to try and assist them with their relocation and the HCA are also in talks with the primary leaseholder, Charles Stevens, about extending the lease for 1 year.</p> <p>4. Noted.</p>
QR/005	Patricia Roberts	Object	<p>I have spoken to Tim Hill this morning and he has persuaded me to vote in favour of the Marina at Queenborough, which was proposed and then dropped in favour of nothing useful.</p> <p>Please reconsider and approve Queenborough Marina for boats because the foreign business</p>	<p>1. Objects to loss of marina from the plan as believes this will attract foreign boats and the business they bring will be good for the local economy.</p>	<p>1. See response to respondent QR/001. Change Proposed.</p>

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			they attract can only be good for the Borough.		
QR/006	David Thurman-Newell		<p>I write to add my support for the above plan. For a long time now Sheppey as a whole has been treated as a poor relation regarding developments benefiting the residents of the island.</p> <p>I strongly believe that the current plans for an inbound marina on the creek are a massive step forward for the creek the surrounding area and economy.</p> <p>I am of the opinion that with the right backing from yourselves and the continued support of the area population this plan can and must be implemented.</p>	<p>1. Objects the Swale / HCA plan to delete the marina and support the Alternative Creek Marina Plan (Orpin, MacDonald & Bell).</p> <p>2. Believes that this marina would be a great step forward for the Creek and surrounding area and the local economy.</p> <p>3. Believes this version of marina is deliverable with plan and local backing.</p>	1-3. See response to respondent QR/001. Change Proposed.
QR/007	Giacomo De Stefano,	Object	<p>My name is Giacomo De Stefano, I work and sail to promote a sustainable way of living and travelling. In 2010 along my project called Man on the river, on a open, engineless 18 foot long wooden boat from London to Istanbul I was trying to sail and enter the Queenborough harbour but, being engineless, I could cope with tide and wind against me so I headed to Sheerness beach were I saw a Yachting Club and some boats.</p> <p>I received a wonderful hospitality and Tim Bell helped me and my friend so much (he capsized on a little dinghy in the meanwhile).</p> <p>I see that a very important project is going to be undertaken and I really hope you will listen to the wisdom of those who would like to bring more</p>	<p>1. Believes the sailing community would make good use of a marina at Queenborough.</p> <p>2. Marina would be better for the long term environment of the area than more housing.</p>	1-3. See response to respondent QR/001. Change Proposed.

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Page 81 QR/008			<p>boats to Q.</p> <p>The housing project is simply a nonsense in that area. I was an architect before and it seems that in a medium term only an activity full of clean energy and less impactful than other concrete on the Sheppey Island would be acceptable. Please do not listen to the money greed of the investors. You would be remembered like thieves and corrupted persons. All the reasons already written by the Q. harbour trust are so true and simple than would be simply not reasonable to ignore them.</p> <p>If behind your wallet there is a human being please do something to protect and help the future of Queenborough</p>		
	Marine Management Organisation	Comment	<p>Thank you for inviting the Marine Management Organisation (MMO) to comment on the above consultation. The MMO has reviewed the document and whilst we have no specific comments to make we would like to draw your attention to the remit of our organisation as you may wish to be aware of this in relation to the consultation.</p> <p>As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high</p>	<p>1. No specific comment on the proposed revision to the SPD Masterplan, but draw attention to the role of the MMO and the forthcoming South Plan which will cover coastal areas and the tidal extent of rivers. In the interim, they draw attention to the national Marine Policy Statement; and the potential need for licences for construction, dredging, alteration or improvement works in such locations.</p>	<p>1. Noted.</p>

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Page 182			<p>water spring tides mark there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. In our duty to take all reasonable steps to ensure compatibility with existing development plans, which apply down to the low water mark, we are seeking to identify the 'marine relevance' of applicable plan policies.</p> <p>On 2 April 2014 the East Inshore and East Offshore marine plans were published, becoming a material consideration for the Marine Management Organisation (MMO) and other public authorities with decision making functions. The East Inshore and East Offshore Marine Plans provide guidance for sustainable development in English waters, and cover the coast and seas from Flamborough Head to Felixstowe. Marine plans will inform and guide decision makers on development in marine and coastal areas. More information including the East Inshore and East Offshore marine plans document can be found at https://www.gov.uk/government/collections/marine-planning-in-england</p> <p>The next round of planning began in 2013 in the south plan area. Until such time as a marine plan is in place for the South East plan area we advise local authorities to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with</p>		

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Page 183			<p>the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. The Marine Policy Statement will also guide the development of Marine Plans across the UK. More information can be found at http://www.defra.gov.uk/news/2011/03/18/marine-policy-statement/.</p> <p>The MMO is responsible for issuing marine licences under the Marine and Coastal Access Act 2009 in England. Amongst other things, a marine licence may be needed for activities involving the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence.</p> <p>Alongside marine licences, we also issue consents under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. We are also the authority responsible for processing and determining harbour orders in England and for some ports in Wales and for granting consent under various local Acts and orders regarding harbours.</p> <p>The applications we receive may be subject to various forms of assessment. This includes environmental impact assessment, Habitats Regulations assessment, marine conservation</p>		

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Page 184			<p>zone assessment and assessment for compliance with the Water Framework Directive. Early consultation with the MMO is always advised and we would encourage applicants to engage early with the MMO alongside any application for planning consent to ensure that the consenting process is as efficient as possible. We will look to follow the principles set out in the Coastal Concordat in considering any application which is linked to an application for planning consent.</p> <p>We are also an advisor to the Planning Inspectorate, Secretary of State and other consenting bodies for various consents affecting the marine area. This includes Nationally Significant Infrastructure Projects under the Planning Act 2008.</p> <p>We would suggest that reference to the MMO's role in consenting projects be made within planning documents to ensure that necessary regulatory requirements are covered.</p> <p>If you have any questions or need any further information please just let me know. More information on the role of the MMO can be found on our website www.gov.uk/mmo</p>		
QR/009	Minster-on-Sea Parish Council	Object	Please consider this to be Minster-on-Sea Parish Council's formal response to the consultation on the Queenborough and Rushenden - Indicative Revised Land Use Plan. Its comments are as follows:-	<ol style="list-style-type: none"> 1. Support the position of Queenborough Town Council. 2. Felt the Planning for Real exercise undertaken for the original SPD did a better job of 	<ol style="list-style-type: none"> 1. Noted. 2. Much of the adopted Masterplan is still relevant and will be used in planning decisions. The Masterplan Addendum was out for

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			<p>Noting that MPC will support the position of Queenborough Town Council who is better placed to understand the impact the proposals will have on that community, MPC would like to add the following comments:-</p> <p>MPC feels that the 'Planning for Real' consultation work undertaken in the communities of Queenborough and Rushenden ensured that the local communities had their say in the future regeneration of their area. Having engaged a large percentage of the population and gained the support and full confidence of a complex partnership including councillors, master planners, the Regional Development Agency and other organisations, it provided a better understanding of the community situation and helped to identify the issues, wants and needs that might arise as a result of the major developments proposed. It also supported the creation of a sustainable community. In view of its importance, Members would want to see some of the aspects of that work resurrected rather than lost forever particularly related to the environment.</p> <p>MPC also believes that Queenborough offers a better location for a marina than the Sheerness Port Proposal on the North coast. Regarding the reduction of dwelling numbers from 2,000 to 1,180, MPC queries whether the difference of 820 dwellings will go to the ISTIL Mill /Thomsett Way sites.</p>	<p>understanding the wants and needs of all partners and supported the creation of a sustainable community. Lack of proper survey for this consultation not conducive to getting the right feedback.</p> <p>3. Elements of the Planning for Real Work, especially in relation to the environment should be carried forwards and not lost.</p> <p>4. Believes that Queenborough is a better location for a marina than the Sheerness Port proposal on the north coast.</p> <p>5. In regards of reducing the dwelling numbers from 2000 to 1180 – will the 800 now go to the ISTIL Mill/ Thomsett Way site?</p>	<p>consultation for 6 weeks and the Council received a good number of responses on a variety of issues. It would not have been appropriate to use a 'Planning for Real' exercise again as that was used to plan the whole development from scratch whereas this is proposing changes only to the marina, the location of the school and a reduction in dwelling numbers.</p> <p>3. As previously stated, much of the adopted Masterplan will remain in place for Development Management purposes, especially the overall vision, design concepts and environmental policies.</p> <p>4. Noted. This is part of longer term aspirations by Peel Ports and is not part of the emerging Swale Borough Local Plan Part 1: December 2014.</p> <p>5. The 1,180 figure includes the proposed housing at the ISTIL Mill and Thomsett Way site.</p>

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			In concluding, MPC feels the lack of a proper survey in the current consultation is not contusive to obtaining important feedback.		
QR/010	Matty Spokes	Comment	Please tell me you are having a laugh?? After all this time saying there was no more houses being built!!!	1. Comment unclear	1. Noted.
QR/011	Highways Agency	No comment	Having reviewed the document, the Agency has no comments on the proposed revised plan. Rather it will be content to consider any and all impacts on the Strategic Road Network as pre-app consultations and subsequent applications for development come forward; and then to agree mitigation as appropriate.	1. No comment at this stage.	1. Noted.
QR/012	Environment Agency	Comment	<p>Overall we have no major concerns with the indicative revised land use plan. We do have the following comments to make which we hope you will find useful.</p> <p>All development at this location will need to be supported with a detailed flood risk assessment, which should be based on modelled tidal flood levels within the site.</p> <p>Surface water drainage will also need to be considered in detail, and we would expect sustainable drainage techniques to be incorporated across the proposed developments.</p> <p>Flood defences around the site boundary may need to be improved and raised in places. This should be fully addressed within a detailed FRA</p>	<p>1. No major concerns over the proposed revisions to the plan.</p> <p>2. All development proposals to be supported by a detailed flood risk assessment based on modelled tidal flood levels within the site.</p> <p>3. Sustainable surface water drainage techniques expected across the proposed developments.</p> <p>4. Flood defences around the site boundary may need to be raised and improved in places and should be fully addressed</p>	<p>1. Noted.</p> <p>2, 3 +4. These are all issues that would be dealt with at the outline planning application stage.</p>

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			and any works would need to be completed prior to development of the site. Works to the flood defences, and any other work within 15m of the existing defences will require flood defences consent from the Environment Agency.	within the FRA. Any works to defences or within 15 m of defences require EA consent.	
QR/013	Eddie Johnson	Object and comment	<p>When the harbour was under threat of closure following Swale Borough Council's decision to terminate their involvement in the mooring facilities Queenborough Harbour Trust was created by a small number of people who not only wanted to save the harbour, but improve it.</p> <p>Just two years later the achievements of Queenborough Harbour Trust cannot be disputed. With increased mooring holders and visitors the harbour is helping the town's economy, and although a lot of work is still needed the harbour is heading in the right direction.</p> <p>The proposal for a marina in the creek shouldn't even need to be discussed. It is a natural progression for the prosperity of the town and island as a whole. With the creation of a marina will come the industries which rely on yachts, and with these industries will come much needed employment.</p> <p>As a resident of Queenborough I am looking at this plan with enthusiasm and sincerely hope this plan goes ahead as soon as possible.</p> <p>Now it's up to the local people, mooring holders and visitors to Queenborough to support this</p>	<ol style="list-style-type: none"> 1. Supports the Alternative Creek Marina Plan (Orpin, MacDonald & Bell). 2. A marina at Queenborough is essential - will support economic prosperity of the town and island as a whole. Increased moorings showing results after just two years. Increased yacht visits will encourage related industry and jobs. 3. Could work in tandem with the Sheerness Peel Ports proposals for a marina to make island a place of excellence for sailing. 	<p>1 + 2. See response to respondent QR/001. Change Proposed.</p> <p>3. The Sheerness Port proposals are part of longer term aspirations by Peel Ports and are not part of the emerging Swale Borough Local Plan Part 1: December 2014.</p>

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			<p>incredible plan, and make Queenborough a yachting paradise to match Cowes.</p> <p>With Peel Ports Master Plan for a marina north of Sheerness, it cannot be overstated what these developments will do for the island. I would like to thank Tim and the other people who are responsible for putting this plan together.</p>		
QR/014	Dawn Benson	Support	<p>I am writing to you in support of the proposed Queenborough creek marina, i feel that this would be valuable asset not only to the local area of Queenborough but also the whole of the island, not only would it encourage visitors but it would also give locals a wonderful place to visit & spend the day as a family.</p> <p>As a still working & often used harbour (all be it small) it would be of asset to boatsmen looking for somewhere nice to moor & visit historic Queenborough/Sheppey.</p> <p>Also the economic reasons for dropping the marina earlier this year are no longer relevant, not only has the country as a whole seen an economic upturn, but in particular Kent. I would like to also point out the wonderful job that has been done to Faversham creek, wouldn't it be fantastic not only for the islanders but for the present planners to be a part of something such as a marina at Queenborough.</p>	<ol style="list-style-type: none"> 1. Supports the Alternative Creek Marina Plan (Orpin, MacDonald & Bell). 2. Will encourage visitors and be a local recreational asset. 3. Will be popular with the sailing community and benefit Queenborough and the whole of the island. 4. Economic upturn means that deliverability of a marina now possible and should be reinstated in plans. 	1-4. See response to respondent QR/001. Change Proposed.
QR/015	David Brown	Comment/	I wish to add my support for a Marina in	1. Supports the Alternative	1-4. See response to respondent

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		Object	<p>Queenborough Creek. Queenborough is the first and last stopping off point for Yachts sailing around the Coast, across the estuary or to the continent. I keep my yacht in Queenborough and have been offered mooring further up river but much prefer the Queenborough harbour and creek. The work carried out by the Harbour Trust will attract many more craft to the harbour and if Peel Ports can put a Marina in to their plan they must think they will attract sufficient business.</p> <p>To just build flats or houses on to the back of a muddy creek will be a missed opportunity for the town and the borough.</p> <p>I whole heartily support the idea of a Marina in the creek and I would certainly move my yacht to it and in addition it would make an ideal base for disabled persons yachting and dinghy sailing, youth sailing and the Sea Cadet Corps which includes the Sittingbourne Unit who no longer have a boating base.</p>	<p>Creek Marina Plan (Orpin, MacDonald & Bell).</p> <p>2. Support from the boating community as Queenborough is the first and last stopping of point for sailing around the coast, across the estuary or to the continent. Must be a viable proposition for Peel Port to include similar in their plan.</p> <p>3. Valuable sailing and recreational facility for disabled and also Sea Cadet Corps (including Sittingbourne who no longer have a boating base).</p> <p>4. Building houses onto the back of a muddy creek is a missed opportunity for Queenborough and the whole island.</p>	QR/001. Change Proposed.
QR/016	David Price	Object	As Commodore of Queenborough Yacht club I would like to support all proposals for Queenborough Creek as submitted by Tim Bell	1. Support from boating community for the Alternative Creek Marina Plan (Orpin, MacDonald & Bell).	1. See response to respondent QR/001. Change Proposed.
QR/017	David Marshall	Object	I have recently heard about the possibility of a marina at Queenborough and I would give this my full support.	1. Support from boating community for the Alternative Creek Marina Plan (Orpin,	1-4. See response to respondent QR/001. Change Proposed.

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Page 190			<p>As a sailor belonging to one of the sailing clubs up the river Medway I am very conscious that the Swale surrounding the Isle of Sheppey is the first all tide mooring facility travelling up the Thames after leaving Ramsgate and as such is a valuable refuge from adverse weather. The west side of the Swale at Queenborough thus provides the first all tide mooring with immediate access to shops, as close shops is not readily available at the East of the Swale.</p> <p>I have visited Queenborough many times over the past 30 years of sailing and recently I have been ashamed of the lack of facilities for sailors, particularly the fact that for the last 2 years there has not even been a lock on the inside of the men's toilet thus necessitating us using the toilet in an unlockable WC!!!! I have therefore been ashamed of the facilities provided for visiting sailors and I shudder to think what visiting sailors from abroad must think!! They come not only from the near continent but this year I saw those who had sailed here from as far away as Canada.</p> <p>I therefore fully support the plans to build a marina in the creek in Queenborough, not only because of the improved facilities it will mean for sailors but also because of the increased trade it will bring the town; something that I expect all those who live in Queenborough would appreciate.</p>	<p>MacDonald & Bell) plan for a marina at Queenborough. Queenborough is the first all tide mooring facility between Ramsgate and the Thames and a valuable refuge from bad weather.</p> <p>2. Facilities at Queenborough currently very poor and present a bad impression to visitors, including international visitors.</p> <p>3. Improved marina facilities would bring in extra trade and prosperity for the town.</p>	
QR/018	Craig Butler	Object	I am writing this email to add my comments to those of others about the Q&R Regeneration	1. Marina would make the housing in the area more	1. The dwelling numbers have been reduced as Government guidance now

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			<p>amendment. I have looked at the amendments and I have the following points to make:</p> <p>1) Removal of Marina: This has been removed and replaced with the waterside hub, as it is deemed as a "risk" to the developers of the scheme. In the grand scheme of things a marina will potentially make the housing around the area more valuable and you will also be able to create a higher density of housing within the area. This means there will be more homes, worth more money. Where is this risk exactly?? I believe the Marina is and always has been a ploy to get the residents on side so you can push through with yet more housing on the island. If these developers really want to build homes then maybe you should state to them that they HAVE to build on this site first before they can go tearing up the green fields of Sheppey. All you are doing is allowing them is to make maximum profit while destroying our quality of life. Being a business if they were told they couldn't build anymore unless they built here, the odds are they will build here first. If the marina is not possible then I suggest that SBC or whomever owns the still natural areas of the creek turn this area over to the not for profit Queenborough harbour trust who are keen to create a successful marina within the current boundaries of the creek. This will create much needed revenue to Queenborough and in turn SBC. It will also start to get other businesses thriving such as cafes, restaurants, etc. with the</p>	<p>viable and enable a higher density to be achieved.</p> <p>2. Brownfield here should be built on before any greenfield is used on the island. Quality of life should come before profit.</p> <p>3. Site should be turned over to the not-for-profit Queenborough Harbour Trust to create a successful marina.</p> <p>4. Marina will boost other related local businesses as a result of increased footfall from visiting boats.</p> <p>5. Supports the more central location of the school and believes it should be built in tandem with the Phase I houses to avoid local overcrowding.</p> <p>6. Queries why the Klondyke estate businesses have been given notice to quit years before anything will be built in this phase – displacing a large number of self-employed people and questions whether/ where new provision being</p>	<p>promotes a lower density of dwellings than was the case when the Masterplan was adopted.</p> <p>2. All of the proposed housing is on brownfield sites. There are very few brownfield sites available in Swale which are not already allocated for development. Many of these contained previous employment uses and the Council's policy is to not lose employment sites for housing if possible.</p> <p>3. It is proposed to strengthen the Masterplan Addendum to highlight that the area to the south of the creek is to be safeguarded for future Creekside leisure, commercial and open space uses. This leaves open the possibility of Queenborough Harbour Trust increasing their facilities at this location. Change Proposed.</p> <p>4. See response to respondent QR/001. Change Proposed.</p> <p>5. Noted. Both the HCA and SBC have been working closely with the education provider, KCC, to ensure that the primary school is built at the appropriate time to meet the needs of the increasing population.</p>

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
			<p>much increased footfall of docking boats.</p> <p>2) School: although I agree the school is situated more centrally now, I do believe that the trigger for building the school should take place as the Phase 1 is commencing as by the time the homes are built all those extra children will be crammed into the existing local schools, namely Queenborough primary for a few more years while the new school is built, if it is ever built. A contribution towards the school should come from the developer before any homes are built.</p> <p>3) Eviction of Klondyke estate businesses: I am unsure why you are evicting the businesses on the estate years before anything is even built in that phase. These are companies although not large, do support a large number of self-employed people and you are kicking them off the land with no plan as to where they can go straight away. Why are you evicting them so soon? What is your plan with these people businesses once you have? Will you be building new workshops for them locally such as Cullet drive?</p> <p>4) Creation of jobs: Apart from Neat's Court where are the plans for the creation of jobs, bearing in mind not even 20 years ago Rushenden Road itself employed 1000s of people. Now you want to just build homes, but you haven't stated exactly how you are going to create jobs for all these lovely new residents, and after evicting people from the Klondyke you are actually</p>	<p>made for them.</p> <p>7. Apart from Neatscourt - where are new jobs to be created on the island?</p> <p>8. This is about Queenborough and Rushenden Regeneration, and to regenerate doesn't just mean build lots of new homes, it means to regenerate all aspects, homes, jobs, quality of life, community and doesn't believe plan fulfils this.</p>	<p>6. Businesses were given notice to allow them time to find alternative premises. The process of preparing that area of the site for development (flood alleviation work, decontamination, etc.) is time consuming and therefore HCA felt that it we the right time to 'give notice.' The Economic Development team at SBC has offered help to tenants to try and assist them with their relocation. As progress has been slower than hoped for, the HCA are currently in talks with the primary leaseholder about extending the lease for 1 year.</p> <p>7. There are other employment allocations on the island at West Minster, Sheerness and at Cowstead Corner, Queenborough.</p> <p>8. Agreed. Much of the adopted Masterplan will remain in place for Development Management purposes, especially the overall vision, design concepts, environmental policies, community facilities, etc.</p>

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
			<p>eliminating jobs.</p> <p>5) My final point is please remember that this is called the Queenborough and Rushenden Regeneration, and to regenerate doesn't just mean build lots of new homes, it means to regenerate all aspects, homes, jobs, quality of life, community and I am afraid I don't think your plan fulfils this.</p>		
QR/019	Colin and Elaine	Support	What a good revised plan. I would like to see project start as soon as possible, the site looks like a bombed out waste land and anyone visiting the area must think what a rundown place this is.	1. Supports revised proposals.	1. Noted.
QR/020	Clive Hancock at A Glaze Marine Products	Object	<p>As a resident of the Isle of Sheppey I note from your latest plans for the regeneration of Queenborough and Rushenden, the planned marina has been completely dropped.</p> <p>Whilst new homes are obviously very much needed for areas of the South East I would question the sort of development planned for this area.</p> <p>Queenborough and Rushenden are not well off areas and I assume the type of housing will reflect this, which in my view will not improve the area, but attract more social housing and landlords looking to rent out cheaper accommodation to those unable to afford their own homes.</p> <p>Surely this is just providing a "dumping ground" for the type of housing that councillors do not wish to</p>	<p>1. Notes need for new homes in South East, but queries whether this is right for Queenborough and Rushenden. The area is not prosperous and the type of housing likely to be built is likely to reflect this and not contribute to regeneration. Could become a dumping ground for social housing and lead to a downward social spiral.</p> <p>2. Leisure boating on Medway and Swale now huge business and a marina here could take advantage of demand for</p>	<p>1. The Housing Team at SBC will advise at the time of a planning application what type housing is required for this area. It is envisaged that 25% of all of the new dwellings will be 'affordable housing.'</p> <p>2.+3. See response to respondent QR/001. Change Proposed.</p> <p>4. Noted. The vision still remains for "a 'multifaceted' regeneration, using the highest standards of design; an urban scheme which is respectful of the history and character of Queenborough, where new houses complementing the old will revitalise the area, bringing money into the local</p>

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
			<p>see in more affluent areas of the Borough and Kent as a whole.</p> <p>By building a marina in this area surely it will be easier to attract the type of development and developer that can envisage an area built around the marina to take advantage of the demand for this type of living around our coasts. Leisure boating on the River Medway and the Swale is now huge business and a new marina will only attract visitors and householders to this area, improving the area no end, not adding to its downward social spiral.</p> <p>I do not live in Queenborough or Rushenden, but I am a user of the river and facilities in Queenborough and for anyone like myself it is easy to see the potential of Queenborough to the leisure marine industry in not only in South/ South East/ Eastern England, but also for visitors from France, Benelux, Germany and beyond, being the perfect staging point to visit our capital and other fantastic harbours in Eastern England.</p> <p>I am sure you are trying to achieve what is socially correct at this time, but please look into the future and see how these plans can improve the whole of Sheppey and the Borough for the long term and generations to come by including the Marina plans and areas/trades associated with this.</p>	<p>waterside homes and attract new visitors and households and benefit the whole area.</p> <p>3. As a river user it's easy to see the potential of Queenborough to the leisure marine industry in not only in South/ South East/ Eastern England, but also for visitors from France, Benelux, Germany and beyond, being the perfect staging point to visit our capital and other fantastic harbours in Eastern England.</p> <p>4. Balance needed between what is socially correct and amending plans which will improve the whole of Sheppey and the Borough for the longer term.</p>	<p>economy, improving education and services, and putting a 'value' on the visual, historical and ecological qualities that the Isle of Sheppey enjoys. The new regenerated Queenborough and Rushenden will be a very attractive place to live and work."</p>
QR/021	Chris Foulds	Object	I object to the deletion of the Marina at Queenborough, there is no justification for doing	1. Objects to deletion of marina as this could vastly	1+2. See response to respondent QR/001. Change Proposed.

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
			<p>so, the people of Queenborough and Sheppey have been promised one after years of consultation. What a wonderful place Queenborough could become with badly needed maritime facilities. Details of a more realistic and deliverable project are to be found in the alternative Creek Marina Plan by Orpin, MacDonald, and Bell.</p> <p>Please reconsider this plan and reinstate the Marina as described in the Queenborough Creek Marina Plan.</p>	<p>improve Queenborough for the longer term.</p> <p>2. Believes the more realistic marina proposals in the Orpin, MacDonald and Bell scheme are deliverable and should be considered.</p>	
QR/022	Ashley Shiel: Chairman, Rushenden Community Association	Comment	I think the idea is amazing if only it would happen.	1. It is unclear whether the respondent is supporting the Masterplan Addendum or the Alternative Creek Marina Plan (Orpin, MacDonald & Bell).	1. Noted.
QR/023	Adam Hanson	Object	<p>My wife and I have lived in Alsager Avenue in Queenborough for just under a year and we loved our time there. It showed and still does so much potential. We were looking forward to the birth of our first son and we thought long and hard where we wanted to bring him up.</p> <p>It saddened us that we just felt there was nothing ever going to happen to improve the area. Plans for regeneration were always stalling to come to fruition. The neglect of this unique and quite beautiful area continued. Why can't this area get the same attention and investment as parts of Medway has had in the past? Look at the work</p>	<p>1. Believe the Queenborough area has huge potential, given the right investment such as Chatham Maritime (can SEEDA assist?).</p> <p>2. Plan as proposed offers no future or aspiration for Sheppey young people. As ever I feel totally let down by Swale Council.</p>	<p>1. SEEDA was merged into the HCA in 2012 and no longer has the same role as before. They are unable to assist in funding a marina. See response to respondent QR/001. Change Proposed.</p> <p>2. The plan offers young people places to work, live and spend their leisure time in an improved natural environment.</p>

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
			done to regenerate the Chatham Dockyard area focussing on the Marina? Can't this be a template for all other post Industrial sites such as Queenborough? Isn't SEEDA based in the Dockyard area? They should know the important part the Marina has played in that area. Where is the aspiration from the council and what does this show to the Swale community? You don't deserve this better future for your children? Hopefully your children will get out of Sheppey as soon as they can! As ever I feel totally let down by Swale council.		
QR/024	Tim Harris Commodore Sheppey Sailing Club	Object	Speaking as Commodore on behalf of the Isle of Sheppey Sailing Club, I wish to register my objection to the amendments to the Queenborough and Rushenden plan, because of lack of marine use of the creek in the amended plan, but I fully support the alternative creek marina idea as attached.	<ol style="list-style-type: none"> 1. Objects to deletion of the marina use for Queenborough Creek. 2. Support from boating community for the Alternative Creek Marina Plan (Orpin, MacDonald & Bell) plan for a marina at Queenborough). 	1+2. See response to respondent QR/001. Change Proposed.
QR/025	Southern Water	Comment	<p>Southern Water is the statutory water supply and sewerage undertaker for the area covered by Queenborough and Rushenden regeneration.</p> <p>We note that there are four sites (with numbers of dwellings) identified for residential development in the document, described as:</p> <p>New housing site (up to 220 units)</p> <p>Phase one (up to 250 units)</p>	<ol style="list-style-type: none"> 1. Existing sewerage capacity in the immediate vicinity of all four sites is insufficient to serve them. This is not a constraint provided each site connects to the system at the nearest point of suitable capacity (precise point to be identified when development 	<p>1+2. Both of these issues can be dealt with at the planning application stage.</p> <p>3. This is too detailed for the Masterplan Addendum and as previously stated it can be dealt with at the planning application stage.</p>

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
Page 197			<p>Higher medium density housing (380 units) Mill and Thomsett sites (up to 240 units)</p> <p>We have carried out capacity and infrastructure checks on these sites. Unfortunately, we are unable to assess the 'Other development sites' to the north of the area because we require both the number of dwellings as well as the precise location to do so.</p> <p>The checks show that there is insufficient sewerage capacity for all four sites listed above and multiple sewerage/water supply pipes running underneath each of these sites.</p> <p>Neither of these issues are showstoppers, however, the following should be taken into account:</p> <p>Insufficient capacity to serve a site</p> <p>Existing sewerage capacity, in the immediate vicinity of each of the sites, is insufficient to serve them. This is not a constraint to development provided each site connects to the local sewerage system at the nearest point of adequate capacity. The precise location of the nearest point of capacity will need to be investigated when the development comes forward.</p> <p>Local infrastructure required to service individual development sites, such as local sewers, should be funded by the development. The mechanism by which the development can provide the infrastructure required to serve it is to connect to</p>	<p>comes forward), but may involve off-site works. Must be coordinated with new development through planning policies and conditions.</p> <p>2. Southern Water sewage infrastructure crosses all four sites. Development layout should avoid building over this and observe appropriate easements around them, or allow for diversion of the infrastructure. Latter would be at developers' expense and subject to a suitable alternative route being available.</p> <p>3. New text suggested to ensure plan takes account of these matters.</p>	

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
Page 198			<p>the sewerage systems at the nearest points of adequate capacity. This may require off-site infrastructure if the nearest point is not located within the immediate vicinity of the site.</p> <p>We look to the planning authority to ensure, through planning policies and planning conditions, that development is co-ordinated with provision of infrastructure and not permitted to proceed unless it connects to the sewerage system at the nearest points of adequate capacity, to ensure levels of service are maintained to both new and existing customers.</p> <p>Underground infrastructure crossing a site</p> <p>Southern Water sewerage infrastructure crosses all of these sites. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available.</p> <p>Proposed amendments</p> <p>As described above, the need for additional</p>		

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
Page 199			<p>sewerage capacity and infrastructure crossing the Masterplan area are not 'showstopper' issues, however, it would be helpful if the Addendum recognised these issues.</p> <p>We suggest the following amendment (new text underlined):</p> <p>Infrastructure</p> <p><u>Each development should connect to the sewerage system at the nearest point of adequate capacity</u></p> <p><u>Development will avoid building over the underground infrastructure crossing the sites and either allow adequate easement or divert the infrastructure subject to feasibility.</u></p>		
	QR/026	Heather Thomas-Pugh; Chair of Sheppey Tourism Alliance	<p>Comment and object</p> <p>With regard to the refreshed proposals to the Queenborough and Rushenden Masterplan I should like to make the following comment:</p> <p>I fully support the alternative Marina Creek Marina Plan and that it be considered an amendment to the Queenborough & Rushenden Masterplan</p> <p>The British seaside tourist industry is deserving of policy attention – and probably support – in its own right. The industry is an important national asset. These days, most large towns can boast at least one 'tourist attraction' that draws in visitors from elsewhere - this could be Queenborough Harbour/Creek by visiting leisure craft. Some of the visitors support jobs in hotels, and more</p>	<p>1. Support for the Alternative Creek Marina Plan (Orpin, MacDonald & Bell) plan for a marina at Queenborough) and asks that is considered as an amendment to the Masterplan.</p> <p>2. Could be a significant boost to the tourism offer of Queenborough and Sheppey generally, as an important focal point. Important to diversify Sheppey's traditional 'bucket and spade' holiday offer and cater for a more</p>	1-4. See response to respondent QR/001. Change Proposed.

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response	
Page 200			<p>generally visitors add to consumer spending and thereby support jobs in shops, restaurants and so on.</p> <p>The Isle of Sheppey is still steeped in the traditional family holiday, however though there is a place for this the bucket and spade holidays of the 1950s and 60s, often the same week every year to the same place, is limited to the few. The market has become more sophisticated, more fragmented, and more diverse - hence we must think "outside the box" and not lose this opportunity to put "the Island on the Map".</p> <p>Further research and perhaps a feasibility study would be a sound method for ensuring we take a balanced view on the Queenborough Creeks potential.</p>	<p>sophisticated market.</p> <p>3. Marina could also create local jobs in support of facilities to service visiting leisure craft.</p> <p>4. Suggest further feasibility work on the alternatives, to ensure that a balanced decision is made on the potential of Queenborough Creek.</p>		
	QR/027	Wendy Bell	Object	<p>I would like to register my support for the attached plan. I think there will be huge social and economic benefits from developing a Marina in Queenborough and would urge you to consider this plan.</p>	<p>1. Support for the Alternative Creek Marina Plan (Orpin, MacDonald & Bell) for a marina at Queenborough in respect of the huge social and economic benefits it would confer.</p>	<p>1. See response to respondent QR/001. Change Proposed.</p>
	QR/028	David Orpin	Object	<p>I object to the deletion of the Marina at Queenborough, there is no justification for doing so, the people of Queenborough and Sheppey have been promised one after years of consultation.</p>	<p>1. Support for the Alternative Creek Marina Plan (Orpin, MacDonald & Bell) for a marina at Queenborough and objects to the deletion of a marina in the Masterplan SPD,</p>	<p>1+2. See response to respondent QR/001. Change Proposed.</p>

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
			<p>What a wonderful place Queenborough would become.</p> <p>Details of a more realistic and deliverable project are attached.</p> <p>The HCA are instrumental in providing a new Marina in East Cowes with only 180 dwellings being created, so there is no justification for not providing one at Queenborough with 1180 dwellings proposed.</p>	<p>as this would be a key focal point of regeneration for the town.</p> <p>2. Believes this offers a more realistic and deliverable plan and compares this to the HCA project at East Cowes, where a marina is being provided with only 180 enabling dwellings.</p> <p>Alternative plan attached.</p>	
QR/029	Medway City Council	No comment	<p>Thank you for your letter dated 31st October 2014 notifying Medway Council of the consultation on the Queenborough and Rushenden Land Use Plan: Addendum to 2010 Adopted Masterplan.</p> <p>After a review of the addendum, Medway Council has no comments to make on the consultation.</p> <p>Thank you for your consultation letter.</p>	1. No comment.	1. Noted.
QR/030	Alan Friday	Object	I am supporting the Queenborough creek marina (Tim Bell). I think this will be a great project that will help the island bring business- people and financial benefits to Sheppey. We need the council to get behind project like this to build Sheppey for the future	1. Support for the Alternative Creek Marina Plan (Orpin, MacDonald & Bell) for a marina at Queenborough in respect of the huge social and economic benefits it would confer to Sheppey for the longer term future.	1. See response to respondent QR/001. Change Proposed.
QR/031	KCC	Support	KCC supports the principle of regeneration in Queenborough and Rushenden, especially given	1. Support principle of	1. Noted.

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
		and comment	<p>the significant public sector investment by a range of partners that has taken place in order to bring forward development including transport improvements, land acquisition and remediation. The County Council appreciates that the Masterplan forms part of a wider regeneration initiative including the new retail led development at Neatscourt.</p> <p>KCC recognises the substantial investment to date by the Homes and Communities Agency (HCA) which enabled the delivery of Neatscourt and site acquisition and preparatory works at Queenborough and Rushenden. The ongoing involvement of the HCA will be critical to ensure that all of the original regeneration objectives are met including bringing forward the residential elements in tandem with associated community infrastructure.</p> <p>The County Council welcomes the changes to the original Masterplan which reflect current market conditions and should improve the overall deliverability of the scheme.</p> <p>The Masterplan addendum will play an important role in setting out the vision for the development and its component parts. It should also give the local community and proposed investors clarity in how supporting infrastructure will be brought forward. This will help to de-risk delivery by giving all partners confidence in the overall</p>	<p>regeneration in Queenborough and Rushenden. Note that ongoing involvement of the HCA will be critical. Welcome changes to the original Masterplan which reflect current market conditions and should improve the overall deliverability of the scheme.</p> <p>2. Addendum should be underpinned by an update to 'Volume 2: Project Delivery' of the original Masterplan to give clarity on infrastructure requirements, delivery mechanisms and phasing. This should take into account the latest housing trajectory and proposed mix of dwellings.</p> <p>3. Welcome the provision of a primary school as a key element of the Masterplan. Note the reference to the primary school being required around 2018. As there is a three year lead in time clarity will be needed on funding and site transfer early in 2015. Only a modest amount of housing can be</p>	<p>2. It is proposed that this will take place once the first planning application is imminent.</p> <p>3. Noted. As you will be aware the HCA and SBC have been working with yourselves to plan for the school, including its funding and delivery timescales.</p> <p>4. This will be dealt with through the Queenborough and Rushenden Steering Group and is too detailed to add to the Masterplan Addendum.</p> <p>5. Noted.</p> <p>6. Noted. The suggested inclusion is too detailed to add to the Masterplan Addendum.</p> <p>7. The design of this open space at the planning application stage will take careful account of any BAP habitats or species. This can be dealt with at the planning application stage.</p> <p>8. An HRA has not been produced as the Addendum is updating the Masterplan in terms of the reduction in dwelling numbers, the removal of the marina proposals and the moving of the location of the school. It is likely that recreational activity will be less than previously envisaged due to the</p>

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			<p>implementation strategy.</p> <p><u>Infrastructure requirements</u> The addendum should be underpinned by an update to 'Volume 2: Project Delivery' of the original Masterplan to give clarity on infrastructure requirements, delivery mechanisms and phasing. This should take into account the latest housing trajectory and proposed mix of dwellings. KCC welcomes the provision of a primary school as a key element of the Masterplan. A new school will help to create a sense of place and improve the marketability of the development. The County Council notes the reference to the primary school being required around 2018. There is usually a three year lead in time to deliver a school which suggests that there needs to be clarity on both funding and site transfer proposals early in 2015. The precise timing for the release of the school site will be subject to detailed discussions with KCC Education, taking into account up to date capacity information and the impact of other planned developments on primary school provision.</p> <p>As there are significant capacity issues in respect of primary education within the locality, only a modest amount of new housing is capable of being accommodated ahead of additional capacity being provided. The County Council therefore request the delivery of the new school is linked not only to occupations but also a specific date, whichever is the earlier. The County Council is</p>	<p>accommodated ahead of additional educational capacity being provided. Delivery of the school should be linked to occupations and a specific date, whichever is the earlier.</p> <p>4. Masterplan should refer to the need to establish an Infrastructure Delivery Group to bring forward essential infrastructure including design, planning and implementation.</p> <p>5. A summary of KCC's likely requirements is provided, to inform the Draft Infrastructure Delivery Plan. There has been a significant reduction in the cost of KCC requirements since 2009 due to more cost effective models of service delivery.</p> <p>6. The addendum should refer to the undertaking by SBC that KCC would have first call on developer contributions to recover the construction costs of completing the Rushenden Relief Road. KCC will prioritise contributions received towards the delivery the new primary</p>	<p>reduction in dwelling numbers and the removal of the marina. The proposed growth strategy for Sheerness Port is part of longer term aspirations by Peel Ports and is not part of the emerging Swale Borough Local Plan Part 1: December 2014.</p> <p>9. Noted. The importance of cycle routes was highlighted in the adopted Masterplan, stating that "connectivity via footpaths and cycle routes are a key component to the Masterplan." This would be dealt with at the detailed planning application stage.</p>

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
Page 204			<p>keen to work in partnership to assist the delivery of the school and is keen to receive clarification from the HCA about when a site will be available. The Masterplan should refer to the need to establish an Infrastructure Delivery Group in order to bring forward essential infrastructure including design, planning and implementation. The group should help to refine requirements taking into account existing and planned provision and identify appropriate funding (especially developer contributions) and delivery mechanisms. KCC will be keen to play its role in planning for the delivery of key infrastructure but will need confidence in how that infrastructure will be funded in order to include the delivery of any specific projects within its capital programme. A summary of KCC's likely requirements is attached. It should be noted that these are draft figures subject to confirmation and formal agreement by appropriate cabinet members and the S151 Officer but they will hopefully help to inform the Draft Infrastructure Delivery Plan. If the quantum of development changes, KCC will need to reassess its requirements. There has been a significant reduction in the cost of KCC requirements since 2009 due to more cost effective models of service delivery.³</p> <p>Rushenden Relief Road</p> <p>The Masterplan addendum should refer to the undertaking by SBC that the County Council would have first call on developer contributions to recover the construction costs of completing the</p>	<p>school.</p> <p>7. Note that Masterplan no longer has a nature conservation area at the north of the site (shown as public open space). The northern section of the site adjacent to the creek is of high ecological value with Biodiversity Action Plan (BAP)/ Natural Environment and Rural Communities Act 2006 s.41 habitats present. KCC would welcome further discussion on the extent to which these habitats might be retained/ protected.</p> <p>8. Doesn't appear to have been an updated Habitats Regulations Assessment (HRA). Updated HRA may be necessary to ensure that the potential for increased recreational activity has been adequately addressed, and consider cumulative effects and proposed mitigation strategy of the proposed growth strategy for Sheerness Port.</p>	

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			<p>Rushenden Relief Road. This is set out in the letters dated 3 February 2014 from the Leader of SBC to Mark Dance, KCC Cabinet Member for Economic Development, and 26 March 2012 from the SBC Director of Regeneration to Mike Austerberry, former KCC Corporate Director for Growth, Environment and Transport. The County Council would aim to prioritise any contributions received towards the delivery the new primary school.</p> <p>Biodiversity KCC notes the Masterplan no longer has a nature conservation area at the north of the site – this is now shown as public open space. The northern section of the site adjacent to the creek is of high ecological value with Biodiversity Action Plan (BAP)/ Natural Environment and Rural Communities Act 2006 s.41 habitats present. The County Council would welcome further discussion on the extent to which these habitats might be retained/ protected.</p> <p>There does not appear to have been an updated Habitats Regulations Assessment (HRA) undertaken in response to this addendum. Given the research that has recently been carried out on behalf of the North Kent Environmental Planning Group in relation to the decline of birds within the north Kent Special Protection Areas, the County Council advises that an updated HRA may be necessary to ensure that the potential for increased recreational activity as a result of the implementation of the plan has been adequately</p>	<p>9. Public Footpaths ZB48 and ZB49 will be directly affected by the proposed development. Inclusion of continuous waterside access is welcomed. An opportunity has been missed to connect the green infrastructure of the “Swale” to the sea wall. Recommend that traffic free, cycling routes are provided.</p>	

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
Page 206			<p>addressed, particularly given the stated intention to promote public access along the seafront and creek. There may also be a need to consider the cumulative effects and proposed mitigation strategy of the proposed growth strategy for Sheerness Port.</p> <p>Public Rights of Way (PROW) and Access Public Footpaths ZB48 and ZB49 are within the site and would be directly affected by the proposed development. The location of these paths is indicated on the enclosed extract of the Network Map. The Network Map is a working copy of the Definitive Map. The existence of the Right of Way is a material consideration.</p> <p><i>Public Access and Rights of Way</i></p> <p>The inclusion of continuous waterside access around the south side of the creek is an excellent improvement to the existing situation. This will create an attractive and valuable recreational amenity for new residents.</p> <p>As proposed, both Public Footpaths ZB48 and ZB49 would be obstructed by building blocks. As such, proposals for their diversion or part extinguishment must be submitted and agreed by the County Council.</p> <p>Public footpath ZB48 currently follows an alignment along the sea wall, diverting inland along an access track to connect with Rushenden Road. KCC would recommend that this path be diverted to continue around the creek to re-join Rushenden Road, as demonstrated on the enclosed plan. Due to the proximity to water, KCC</p>		

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Page 207			<p>would request that sensitive lighting is installed along the creek side path.</p> <p>Public Footpath ZB49 is within the proposed "Phase 1" and would be obstructed by housing blocks at its western end and would appear to be lost to highway following the old railway line. KCC would therefore recommend that this path be extinguished for all that length east of "First Avenue". To mitigate for the loss of the Public Footpath, it is recommended a slight change to the green space design within "Phase 1". An opportunity has been missed to connect the green infrastructure of the "Swale" area to that of the sea wall. As this could be achieved with a relatively small design change, KCC would recommend that this be re-connected for the benefit of continuity of Green Infrastructure.</p> <p><i>Cycling access</i></p> <p>On the documents provided it is difficult to comment on the provision of cycle access being proposed. As a general statement KCC would recommend that, at a minimum, traffic free, cycling routes are provided alongside the Rushenden Road from the southern extremity of the site to Railway Terrace. Sufficient public realm space and crossing facilities must be provided at the school frontage for safe access.</p> <p>KCC recognises that this remains a challenging scheme to bring forward and would be keen to work with SBC and the HCA to address any obstacles to delivery. This may include making the</p>		

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			<p>case to government for gap or forward funding if viability issues are demonstrated, to ensure the delivery of a high quality development alongside an appropriate package of infrastructure requirements to deliver a sustainable community.</p>		
<p>QR/032</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 208</p>	<p>Mark Kennedy</p>	<p>Support and comment</p>	<p>Our home is located at 65 High Street Queenborough, and backs onto South Street with attractive Southerly views across the Creek onto the Klondyke Area. My family has roots in Queenborough back to 1860, and we are passionate about Queenborough retaining its unique historical and maritime atmosphere, which could be developed into an attractive tourist destination with a little sensitivity and investment.</p> <p>We have carefully reviewed the Indicative Revised Land Use Plan: addendum to 2010 Adopted Masterplan, 2014, and are generally pleasantly surprised by the proposal, and support the scheme presented.</p> <p>Pros:</p> <ul style="list-style-type: none"> • Apparent large public open spaces and recreation areas; • Attention given to school, medical and community facilities, well placed within the centre of the development to break-up the expanse of housing; • Retention of green space at the Saltings on the South Bank of the Creek to maintain 	<p>1. Generally support the scheme, subject to confirmation of use of waterside areas, cycle path provision, visual impact of development and confirmation as to whether the marina uses will remain – Queenborough's maritime heritage must be retained.</p>	<p>1. Noted. It is proposed that the area to the south of the creek is to be safeguarded for future Creekside leisure, commercial and open space uses. There are no plans to remove the existing marina uses from the creek. Cycle paths will be provided throughout the development. The visual impact of the development has been considered whilst drawing up the plans and will be assessed at the planning application stage.</p>

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
			<p>separation between old Queenborough and new;</p> <ul style="list-style-type: none"> • Deletion of unrealistic marina scheme which would have been out of keeping with Queenborough' s traditional marine facilities; • Use of the old Mill site rather than overly dense development towards the Chalk Wharf. <p>Cons:</p> <ul style="list-style-type: none"> • The scheme says little about what is planned for the water side areas. Are you planning on refurbishing the Chalk Wharf to allow larger vessels (Sailing Barges) to moor? • Will the area be grass/ parkland with cycle paths? • A key issue is how the new development will be viewed from old Queenborough at the North Bank. How will the High/ Medium density housing on the South Bank be landscaped? Will housing back onto the Creek (with unsightly back fencing) or will there be an even more unsightly access road? • Will the marina area (currently leased by Geoff Fray) be retained for marine use? • Will there be waterfront facilities to attract visitors and give locals a pleasant place to walk? Is this area to be actively marketed to waterfront developers? <p>The final point is very critical for many local</p>		

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Page 210			<p>residents and the many visitors to Queenborough. We must retain Queenborough's maritime heritage. With many hundred overseas sailing visitors coming to Queenborough every year and using the mooring facilities in the Swale, we need to ensure Queenborough has something worthwhile to visit. There is ample space to build upgraded mooring pontoons, workshops, Chandlery shops and visitor facilities with comparatively little work on the existing docks and quay without encroaching onto the development plots. We urge you to take this into account and to provide something to attract people to Queenborough to encourage investment and regenerate not only housing but leisure for the people of Sheppey and surrounds. Regeneration means. "restored to a better, higher or more worthy state", and not just houses. You have a real opportunity here to do this with minimal expense. Please view this regeneration as more than just housing; we only have one chance to do this.</p>		
QR/033	Michael Trimmer	Object	<p>Is Swale willing to look at the option of a Queenborough Creek Marina? Now the Marina has been dropped from the Masterplan. This will bring employment and much needed tourism to our island. I hope it will be considered.</p>	<p>1. Support for the Alternative Creek Marina Plan (Orpin, MacDonald & Bell) for a marina at Queenborough in respect of the huge social and economic benefits it would confer.</p>	<p>1. See response to respondent QR/001. Change Proposed.</p>
QR/034	Crown Commercial	Comment	<p>The guidance which previously advised that we require sight of such documentation is no longer</p>	<p>1. Consultation not required.</p>	<p>1. Noted.</p>

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
	Service		extant so there is now no need to submit these to us.		
QR/035	Helen Wakeling	Object	<p>Why on earth did you drop the marina? They make a fortune just look at the success of Chatham! We have just as much maritime history here which we should be celebrating! Why do you have ZERO VISION for Sheppey? We need to improve the island and restore it to the central and important strategic hub it once was, loved by royalty for years not least Queen Elizabeth the First; not to be left to rot as a car park for more darned houses!! We get visitors from many different countries coming to Queenborough who have written to express their support for a proper marina.</p> <p>Please don't be near - sighted, Sheppey has been ignored for too long. Even the SEEDA plans which included a marina were wiped out.</p>	1. Objects to the deletion of the marina at Queenborough as it could bring social and economic benefits to Queenborough and Sheppey.	1. See response to respondent QR/001. Change Proposed.
QR/036	James Bell	Object	<p>Queenborough should be capitalising on its unique strategic location and maritime heritage. Queenborough is the closest location to London offering the best and most direct sheltered access to the Thames Estuary and north sea for yachts. This is why it has such a long and distinguished maritime heritage.</p> <p>Various highly-paid independent strategic consultants as employed by Swale Borough Council to draft local plans, and other government agencies such as SEEDA (also employing</p>	<p>1. Objects to the deletion of the marina at Queenborough as it could bring social and economic benefits to Queenborough.</p> <p>2. Providing houses with no additional infrastructure requires no vision and will only serve to increase the problems that Swale Borough Council will face in the future due to</p>	<p>1. See response to respondent QR/001. Change Proposed.</p> <p>2. Both the adopted Masterplan and the Addendum propose development with the adequate infrastructure. Much of the employment has already been provided at Neatscourt and the link road from Neatscourt to Rushenden is open. The Addendum proposes a new primary school, a health facility and open spaces.</p>

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Page 212			<p>independent consultants) have clearly recognised this over numerous years. Proposals for a marina in the Queenborough area go back to at least the 1980s. Queenborough exists because of its excellent waterside location and creek – it now needs new infrastructure to be put in place to make the most of this unique and strategic location.</p> <p>Therefore, I CANNOT understand why the proposed marina has been dropped from the regeneration plans and wish to STRONGLY object to the marina being removed from the plans, and request that it is re-instated.</p> <ol style="list-style-type: none"> 1. It's well known that yachting and sailing activity provides huge economic benefits to an area, including employment (both directly, and indirectly through associated services), tourism (marine and general), as well as being a focal point/draw for activity. The costs associated with building a marina would quickly be re-paid tenfold, bringing considerable income and trade to Swale and the council. Developing a marina is an investment that will pay back year after year. 2. Vision is about looking far into the future to improve the prospects for everyone in an area. SBC will be shooting themselves in the foot (as well as everyone else) by not including a marina as part of this regeneration plan. 	social discord, lack of employment and lack of trade.	

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Page 213			<p>3. Providing houses with no additional infrastructure requires NO vision and will only serve to increase the problems that Swale Borough Council will face in the future due to social discord, lack of employment and lack of trade. If however, a marina is reinstated Swale Borough Council will benefit in the future from greater income, greater prosperity, happier residents, a better reputation, and a more cohesive social environment (with less problems for the council to deal with); Queenborough will go on to develop into a strong and vibrant community attracting investment.</p> <p>4. If Swale Borough Council wishes to prosper, the choice is clear: a marina needs to be reinstated in the plans.</p>			
	QR/037	John Beasty	Object	I want to add my voice in support of the plans for Queenborough Marina. This is a long overdue development that would benefit the whole of the Island - not only for those who sail but also the work and tourism that such a development would bring.	1. Support for the Alternative Creek Marina Plan (Orpin, MacDonald & Bell) for a marina at Queenborough in respect of the huge social and economic benefits it would bring.	1. See response to respondent QR/001. Change Proposed.
	QR/038	Julia McDougall	Object	I write to object to the deletion of the Marina at Queenborough as part of the Queenborough and Rushenden Regeneration. There is no justification for doing so; in fact the removal of this part of the plan is detrimental to the people of Queenborough	1. Support for the Alternative Creek Marina Plan (Orpin, MacDonald & Bell) for a marina at Queenborough in respect of the huge social and	1. See response to respondent QR/001. Change Proposed.

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Page 214			<p>and the Isle of Sheppey becoming a world class player in marine development. If it is allowed to become just residential such an opportunity would be lost.</p> <p>We had been promised a Marina Development one after years of consultation. What a wonderful place Queenborough could become with badly needed maritime facilities.</p> <p>Details of a more realistic and deliverable project are to be found in the alternative Creek Marina Plan by Orpin, MacDonald and Bell.</p> <p>Please reconsider this aspect of planning for the area and reinstate the Marina as described in the Queenborough Creek Marina Plan, utilising the revised plan submitted by the above consortium to develop the Marina at a realistic cost which would be more than recouped within a year of the Marina being functional</p>	economic benefits it would bring.		
	QR/039	Anonymous	Object	Please include marina in plans for Queenborough regeneration. It's not just about housing.	1. Support for a marina at Queenborough.	1. See response to respondent QR/001. Change Proposed.
	QR/040	Martin Kuhn	Object	I have been sailing up and down the Medway for many years in my yacht which is based on the river at Gillingham. I am very enthusiastic about the plan to establish a marina at Queenborough. Queenborough is a wonderful location on and off the water however the facilities have been very poor. It would give the area such	1. Support for the Alternative Creek Marina Plan (Orpin, MacDonald & Bell) for a marina at Queenborough.	1. See response to respondent QR/001. Change Proposed.

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			<p>a boost and I am sure it would attract many visitors, boat owners and people coming just to enjoy the area. Building more houses only would be just sad. There need to be other attractions making the area vibrant and interesting and in particular jobs!</p> <p>I fully support the proposals to build a marina at Queenborough!</p>		
QR/041	Matt Brown	Object	I would like to show my support for the "Queenborough Creek Marina" proposal which I feel offers far more than the presently considered scheme for the area. This plan provides a far greater useful space and would enhance the existing facilities in Queenborough.	1. Support for the Alternative Creek Marina Plan (Orpin, MacDonald & Bell) for a marina at Queenborough in respect of the huge social and economic benefits it would bring.	1. See response to respondent QR/001. Change Proposed.
QR/042	Mike Greenland	Object	<p>Being involved with the sailing community on Sheppey for the last 33 years and still an active member of IOSSC plus ex commodore I feel the planning and regeneration of Queenborough' will just be wiped off (or is) the map or chart as some yachtie pipe dream however, what you need is a little more thought planners? you may say what thought, Peel Ports management bothered to spend a considerable sum on presenting a need for a Marina off Garrison point to the extent of having their own consultation and presentation, do they think it just a lost leader?</p> <p>So myself; I'm 66 next week and thinking of 'reducing' my dinghy racing and fancy a 32' yacht,</p>	1. Support for the Alternative Creek Marina Plan (Orpin, MacDonald & Bell) for a marina at Queenborough in respect of the huge social and economic benefits it would bring.	1. See response to respondent QR/001. Change Proposed.

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Page 216			<p>yes I can afford a 40k to spend but my main criteria is where to keep it? if on the moorings in the Swale at Queenborough' I need a tender and outboard to get on and off, where do I keep that, Join QYC no problem but that involves at least 30-40 minutes each way of getting on and off my yacht and not without dangers! Many a story there. The next alternative is Chatham Maritime half hour + drive and step straight-on your yacht, but there is a waiting list and a price of £3000 a year cost without moving one nautical mile! if I do exit that Marina where do I head off via first 'Queenborough'</p> <p>So, SBC; wipe it off the chart as some pipe dream or look at it as an investment for the Sheppey community and those yachties coming up and down the Thames estuary from the whole of Europe! get in first before Peel Ports do with their 20-25 year project, I may not be around then to see the benefit!</p> <p>Please reconsider this plan and reinstate the Marina as described in the Alternative Queenborough Creek Marina Plan.</p>		
QR/043	Stephen Ford & Sheila Mitchell	Object and comment	We contacted you with regards to our concerns over the Rushenden development and our inclusion in the process, when we called you; we were told only the residents in the immediate area were consulted, so we have no idea of the proposal and the changes that have been made to the master plan!	<ol style="list-style-type: none"> 1. Raise concerns about extent of public consultation. 2. What changes are being proposed with regard to housing numbers, highway network and the proposed 	<ol style="list-style-type: none"> 1. All residential and business addresses within the Masterplan area received a letter notifying them of the consultation, along with a large number of statutory consultees and local amenity groups. There was also a press release and all of the

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			<p>Although we are the owners of Highfield and Leo Bay the Campsite on Rushenden Hill, it would be nice to be kept in the loop so to speak, as we have a vested interest in the area.</p> <p>We would like to know how the plan has changed towards the number of dwellings proposed, as well as the changes if any to the road network; we also understand the school positioning has changed, so where will that now be? As a tourist business, what has been decided with regards to the creek, we understand the Marina concept has been withdrawn, but is there any chance the Creek can be taken into consideration, as Queenborough and Rushenden needs a focal point! We know this has been discussed locally but what does the Council feel about the subject?</p> <p>Personally developing the creek, with some sort of widening, offering well planned rentable moorings, will bring in people and revenue to the town, add in eating facilities at the quay side, restaurants, coffee bars and shops will lift the tourist trade, creating that special place by the sea, just a few miles from London. Now add in a nice walkway along the shore with seating areas and good parking Queenborough and Rushenden becomes a place to go and not just a dot on the map!</p> <p>After running Leo Bay Campsite for the last few short years, we have listened to the tourist we help bring to the area, just read our reviews to see what</p>	<p>school?</p> <p>3. Marina should be provided at Queenborough due to the social and economic benefits it could bring to Queenborough and Sheppey.</p>	<p>information was placed on SBC's website.</p> <p>2. The number of dwellings has been reduced from 2,000 to 1,180 due to a decrease in the density. There are no major plans for the highway network but the need for some may arise as planning applications are assessed. The location of the school has been moved from land owned by a third party to land owned by the HCA in order to ensure its delivery. It is now in a more central location within the scheme.</p> <p>3. See response to respondent QR/001. Change Proposed.</p>

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
			sort of job we have accomplished with just an acre of land, see how many people love the place, now let's build on this with the right decisions and our little corner of England could well be the place to go!		
QR/044	Michael Judson	Object	<p>I do not support the proposal to omit the inclusion of the marina from the original 2010 Masterplan.</p> <p>The MacDonald/Bell/Orpin alternative proposal is not only more financially viable, but delivers a development which is in keeping with the spirit of the Masterplan.</p> <p>The marina is vital to the regeneration of Queenborough which as a town is of such historical importance to the island.</p> <p>Queenborough with a marina would generate income, which with time would attract more and more tourists, thereby reflecting the changing economic conditions outlined in your Addendum.</p>	1. Support for the Alternative Creek Marina Plan (Orpin, MacDonald & Bell) for a marina at Queenborough in respect of the huge social and economic benefits it would bring to Sheppey.	1. See response to respondent QR/001. Change Proposed.
QR/045	Joy Woolley	Object	My family of 4 all support the amended creek marina plan for Queenborough please, please do not let them just build lots of high density houses along the creek-side! Please listen to local people's views as we love our island. Thank you.	1. Support for the Alternative Creek Marina Plan (Orpin, MacDonald & Bell) for a marina at Queenborough in respect of the huge social and economic benefits it would bring to Sheppey.	1. See response to respondent QR/001. Change Proposed.
QR/046	Royce Watchorn	Object	Queenborough is in a unique position as the gateway to London for both British and foreign cruising boat users (i.e. waterborne tourists!), it is	1. Support for the Alternative Creek Marina Plan (Orpin, MacDonald & Bell) for a	1. See response to respondent QR/001. Change Proposed.

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
			<p>the natural place to pause before taking a new tide up to London. It is also very well placed for other routes used by cruising boat owners transiting the S.E. Coast and a logical place for local boat owners to cruise to for overnight and longer stays.</p> <p>A marina at Queenborough couldn't fail to be popular and therefore successful, bringing both trade and associated activities to the area. Boats and boat owners need services of all descriptions, from replenishing supplies to major purchases and works being carried out.</p> <p>For some strange reason the UK, unlike other European countries, does not seem to want to encourage boating facilities. Most European coastal countries welcome with open arms maritime activities, realizing they bring prosperity to the areas around them.</p> <p>Please do not let any opportunity to put Queenborough and Swale back on both the National and International map languish due to lack of foresight.</p> <p>A Marina at Queenborough would be good for both Queenborough and Swale.</p>	<p>marina at Queenborough in respect of the huge social and economic benefits it would bring to Sheppey.</p>	
QR/047	Peter Hawkins	Object	<p>As a river user the Marina Plan is just what the Medway/Swale needs, as it would be a long term asset to both Queenborough and the surrounding area. Many yachtsmen travelling from overseas and other east coast ports use this stop off point</p>	<p>1. Support for the Alternative Creek Marina Plan (Orpin, MacDonald & Bell) for a marina at Queenborough in respect of the social and</p>	<p>1. See response to respondent QR/001. Change Proposed.</p>

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			for London and for some it is their first experience of England and Kent! Make it a good one! Queenborough would then become a gateway to be proud of. This I feel sure will create jobs and revenue and provide a suitable environment for sailors.	economic benefits it would bring to Sheppey.	
QR/048	Peter MacDonald	Object	<p>Having seen the regeneration of Faversham since the electrification of the Railway in the late 1950's the various Councillors, Officers, & planners deserve to be congratulated. Yes there have been mistakes, but overall the Historic Town is a credit. An increasing number of visitors now enjoy its attractions, and its population has been boosted by a number of families who commute to work by rail to Medway, Gravesham, & London finding more reasonable housing costs & a better quality of life than in the Metropolis, thus yielding a local economy with a greater disposable income.</p> <p>The Historic Town of Queenborough deserves something a lot better than the current regeneration plans to which I OBJECT most strongly.</p> <p>Local people are now coming up with sensible and economic proposals and plans which could quickly get off the ground and truly regenerate the area leaving something to be proud of for future generations. The current Swale Councillors & Officers have started on the mammoth task of regenerating parts of Sheerness by encouraging & facilitating the restoration of the historic Dockyard</p>	<p>1. Object to plans. Queenborough deserves something better.</p> <p>2. Support for the Alternative Creek Marina Plan (Orpin, MacDonald & Bell) for a marina at Queenborough in respect of the social and economic benefits it would bring to Sheppey.</p>	1+2. See response to respondent QR/001. Change Proposed.

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
Page 221			<p>Houses & Church. These are a credit to those involved as is the restoration of the windmill just off the High Street. I call on Swale Borough Council to facilitate and give the same opportunities to Queenborough.</p> <p>I and many others believe a quality well researched maritime plan with water retained in Queenborough Creek, of necessity being of sufficient size to be economically viable, sensibly, it would utilize some of the unattractive wasteland currently being part of the Klondike Estate, this would kick start the whole regeneration of the Queenborough / Rushenden brown field site to the benefit of all. The added bonus is a direct commuter train service to London starting in January should open the area to greater employment opportunities helping the local economy.</p>		
QR/049	Peter Norris; Clarke & Carter Interyacht (Kent) Ltd	Object	<p>I am writing to register my formal disapproval of the proposed amendments to the Queenborough & Rushenden Regeneration Plan both as a local business and a resident of the Isle of Sheppey.</p> <p>It would appear that the main driver for the proposed change is to merely increase the density of the proposed housing to generate additional revenue for the financial stakeholders at the time of selling off the land to proposed developers, in particular the development of additional housing overlooking the Queenborough Creek and the re-</p>	<p>1. Object to amendments to increase housing density, but don't take into account the need to develop and attract small and medium businesses to the area. There, is no point in having additional high density houses with no local employment.</p> <p>2. Note that Peel Ports has been overwhelmed by support for a new marina at Garrison</p>	<p>1. The number of dwellings has been significantly reduced from 2,000 to 1,180 due to a decrease in the density of housing proposed.</p> <p>2. The proposed plans for Sheerness Port are part of longer term aspirations by Peel Ports and are not part of the emerging Swale Borough Local Plan Part 1: December 2014.</p> <p>3. All residential and business addresses within the Masterplan area,</p>

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			<p>location of the primary school.</p> <p>The amendments do not take into account the need to develop and attract small and medium businesses to the area, who can offer urgently needed apprenticeships for the community, and to attract overseas visitors to the area through visiting yachtsman/boat owners to boost the incomes of current small businesses. There, is no point in having all of these additional high density houses with no local employment.</p> <p>I believe from information provided by local residents that Peel Ports have been overwhelmed by the support for the development of a new marina at Garrison Point and the impact that everyone believes it will have on Sheerness and the River Medway in general with additional overseas and UK visitors, the development of local marine related businesses and the local skill base, and the development of further tourism attractions via the release of the old buildings in Blue Town. The River Medway and its surrounding towns have a great opportunity to develop a sailing/boating centre of excellence with its open safe waters, good climate and prevailing winds.</p> <p>Swale Borough Council I understand missed a golden opportunity a number of years ago to invest approximately £60,000 to secure a proper lock gate into the Queenborough Creek which would have made the creek even more attractive and easier to develop as a vibrant and profitable</p>	<p>Point. The River Medway and its surrounding towns have a great opportunity to develop a sailing/boating centre of excellence with its open safe waters, good climate and prevailing winds.</p> <p>3. Trust that what appears to be a clear a current lack of understanding of the asset it has within the creek will not prevent the Council consulting with local interested parties in order to work together to develop the Creek into a vibrant and attractive Marina</p>	<p>along with a large number of statutory consultees and local amenity groups were consulted on this Masterplan Addendum. See response to respondent QR/001. Change Proposed.</p>

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
			<p>marina. I hope that what appears to be a clear a current lack of understanding of the asset it has within the creek will not prevent the Councils Officers consulting further with local interested parties in order to work together to development the Creek into a vibrant and attractive Marina with small business/restaurants etc. for both the local and oversea boating community.</p>		
QR/050	R. Telford	Object	<p>What drives Swale to ignore local assets and heritage, and waste potential amenity and Industry; Milton Creek wasted, Faversham Creek's only hope resting on an active local resistance to a corrupted 'Neighbourhood Plan', and now Queenborough Creek to be sacrificed on the alter to more crammed housing.... ignoring the success of the Queenborough Harbour Trust.</p> <p>Such lack of vision would not be tolerated in many parts of this country, never mind on the Continent.</p> <p>Are you aware of what the leisure marine industry is worth, and its potential for growth. Estimates vary but the annual total economic contribution for the coastal Marina sector alone, in England is estimated to be around £571million., around £19,000 per marina boat per annum. Given that the majority of the marina berths are in the south, and especially the central south coast, it should be no surprise to you to know that there is a shortage of marina berths in the Thames estuary, and especially on the south Thames.</p>	1. Support the Alternative Creek Marina Plan (Orpin, MacDonald & Bell)	1. See response to respondent QR/001. Change Proposed.

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
Page 224			<p>It gets better; the total economic contribution for the leisure and small commercial marine industry [excluding exports and superyachts] in 2012 in the whole UK was £2.31billion; in England £2.15billion, the bulk of which is in the southeast and southwest.</p> <p>Waste this opportunity at your peril; future generations will curse you for throwing away this opportunity to develop industry alongside leisure.</p> <p>The state of the economy at any point is not a valid basis for developing a long term plan; vision is vision, not just the expedient response to current conditions.</p> <p>Please reconsider this plan and reinstate the Marina as described in the Queenborough Creek Marina Plan.</p>		
QR/051	Richard Blake	Object	<p>I object to the deletion of the Marina at Queenborough, there is no justification for doing so, the people of Queenborough and Sheppey have been promised one after years of consultation. What a wonderful place Queenborough could become with badly needed maritime facilities. Details of a more realistic and deliverable project are to be found in the alternative Creek Marina Plan by Orpin, MacDonald, and Bell.</p> <p>Please reconsider this plan and reinstate the Marina as described in the Queenborough Creek Marina Plan.</p>	<p>1. Supports the Alternative Creek Marina Plan (Orpin, MacDonald & Bell) due to the social and economic benefits it would bring.</p>	<p>1. See response to respondent QR/001. Change Proposed.</p>

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
QR/052	Roger Taylor	Object	<p>Having sailed from Queenborough/Sheerness for many years as well as a host of other South Coast ports it has always seemed odd that Queenborough Creek has been what can only be called the worst advert for a community being such a dreadful visual mess when the tide is out, and a wasted asset when the tide covers the mud. Who in their right mind would want to be associated with Sheppey who had an alternative? The Borough Council has neglected its duty of care to the community in regard of enhancing the area to the benefit of the community at large and employment in particular. Housing development alongside an eyesore will only attract those with no other choice.</p> <p>The alternative plan proposed seems the only one with real vision of all those current within the Borough what with Faversham's creek's alternative vision now being all but dismissed in favour of a dormitory future for what is a Cinque Port.</p> <p>SBC's lack of vision is all too obvious but unsurprising in view of the unimaginative efforts which has allowed Sittingbourne to loose what could have been a quite spectacular redevelopment of the Paper Mill in favour of yet another supermarket of little real benefit to either employment or the public at large. And as to the Northern Relief Road – it beggars belief to any outsider the road should go to the motorway i.e.</p>	<p>1. Supports the Alternative Creek Marina Plan (Orpin, MacDonald & Bell) due to the social and economic benefits it would bring.</p>	<p>1. See response to respondent QR/001. Change Proposed.</p>

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
			<p>the South, not Sheppey.</p> <p>So while I have little hope that the alternative for Queenborough will be given any real consideration by the Council, I would like it to be noted that I support the alternative plan outlined wholeheartedly.</p>		
<p>QR/053</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 226</p>	<p>Tim Bell</p>	<p>Support and object</p>	<p>The first two phases of the amended Masterplan development are good. I like the open space fronting the harbour, like at Maldon, a promenade waterside park, and a primary school, However the third phase around the creek end plans, I object to, by not utilising the creek to its full potential and local marine asset as it should, and in fact potentially impeding the present maritime use, by doing so could well be the start of a decline of the creek where it could wither and die!</p> <p>I would propose that the last phase area around the creek be given more time to be carefully considered, and the addendum for this last phase be postponed as this will not affect or delay the development of the first two phases.</p> <p>STATEMENTS ON CORE OBJECTIVES FOR THE LOCAL PLAN (Bearing Fruits)</p> <p>The Master Plan Amendments around the creek, with the loss of a marina within the development, will lose many of these core objectives:-</p> <p>Use our coastal assets to support a strong economy and a sustainable managed environment</p>	<p>1. Welcome the first two phases of the amended Masterplan - the open space fronting the harbour, a promenade waterside park, and a primary school.</p> <p>2. Object to the creek end plans, which will start the decline of the creek. This element should be more carefully considered. Loss of the marina will have an adverse impact on the core objectives set out in the Local Plan. The amended plan also will lose many of the design concepts and principles of the Masterplan. The plan will damage the potential of marine related businesses alongside the creek and affect the work of the Queenborough Harbour Trust. The land earmarked in the Masterplan for a</p>	<p>1. Noted.</p> <p>2. See response to respondent QR/001. Change Proposed.</p> <p>3. All residential and business addresses within the Masterplan area received a letter notifying them of the consultation, along with a large number of statutory consultees and local amenity groups. There was also a press release and all of the information was placed on SBC's website.</p>

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			<p>Support economic success and improve community well-being with a network of maintained, protected and improved natural assets in town and country</p> <p>Conserve and enhance our historic and natural assets as the means to drive regeneration, tourism, and environmental quality and to reverse declines in their condition.</p> <p>Be flexible, provide choice and support sectors that can build on our strengths, diversify our economy, promote investment in skills, and develop our distinct opportunities in pursuit of greener and pioneering technologies.</p> <p>Bring economic growth, regeneration and community development, especially to our most deprived communities.</p> <p>Develop tourism and culture to support regeneration, employment growth, communities and environmental management.</p> <p>Improve prosperity and environmental quality with efficient and sustainable transport networks.</p> <p>The amended plan also will lose many of the design concepts and principles of the Masterplan:-</p> <p>Linking Queenborough & Rushenden, the creek isolates and divides both communities.</p> <p>Views and land marks, the higher medium density housing close to the creek side will spoil</p>	<p>marina is now being planned for residential/housing, therefore land adjacent to the creek should be used for marine use, to replace the land that will be lost for marine use by residential /housing on the dropped marina site within the development. There are enough heritage centres (without the waterside hub) including the Guildhall. The Hub will be of little use, being isolated across the creek, without direct access. A waterside hub for water activities would be impractical when a lot of the time there is no water in the creek. A bridge would limit or stop the movement of boats in the creek and would not be allowed by the creek users. A public house without direct access across the creek will be useless too, many public houses have been closed in the area and it would be in competition to the ones that remain. Loss of a marina would be a very serious setback for Queenborough</p>	

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			<p>the view from the old town, these houses (like in any urban areas) will not create uniqueness and legibility and destroy the marine use of the creek, and its character, how will boats have security, moored alongside as at the present, it will be lost by this planned development.</p> <p>Activity and movement limited with no direct access between the two communities across the creek, loss of water space.</p> <p>Sustainable Development Houses on their own do not create businesses jobs, tourism. Green energy opportunities lost.</p> <p>Waterspace for the community, the amended plan will lose water-space for the community, facility for disabled persons, youth and Cadets.</p> <p>Creating place and distinctiveness lost, without a focal point of a marina.</p> <p>The amended plan will damage the potential of marine related businesses alongside the creek and affect the work the Queenborough Harbour Trust are doing.</p> <p>Creeks are a precious resource, and this one in Queenborough has been used for maritime use, for hundreds of years and should not be treated as an urban street ripe for housing development; they are a waterway to the sea and beyond, there are many streets and areas suitable for housing development, but very few creek and waterways that are suitable.</p>	<p>and the Island, very few areas like this are suitable for marina related activities, it seems the Council doesn't understand the assets on its doorstep - an international port for leisure and tourism? The viability and reasons given seemed to be flawed. A marina would add to the value of any new housing. Query what research was done on the marina project as a separate project (Interreg). Queenborough is a better location for a marina than Sheerness, because its more sheltered</p> <p>3. Insufficient consultation has been undertaken.</p> <p>The Alternative Creek Marina Plan (Orpin, MacDonald & Bell) is attached.</p>	

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			<p>The land ear-marked in the Masterplan for a marina is now being planned for residential /housing, therefore land adjacent to the creek should be used for marine use, to replace the land that will be lost for marine use by residential /housing on the dropped marina site within the development.</p> <p>Chalk wharf</p> <p>No mention of regeneration to the top of this wharf, (lost heritage) which could attract Thames Sailing Barges and other marine use alongside facing the outer harbour!</p> <p>The Waterside hub, for a possible use of a heritage centre, there are enough heritage centres including the wonderful Guildhall on the island and the Hub would be of little use when it would be isolated across the creek, without direct access, a waterside hub for water activities would be impractical when a lot of the time there is no water in the creek. It would be a waterless hub. A bridge across would limit or stop the movement of boats in the creek and would be not be allowed by the creek users. A public house without direct access across the creek will be useless too, many public houses have been closed in the area and it would be in competition to the ones that remain.</p> <p>The loss of a marina would be a very serious setback for Queenborough and the Island, very few areas like this are suitable for marina related activities, it seems SBC don't understand the</p>		

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Page 230			<p>assets on its doorstep, where else does SBC have an international port for leisure and tourism?</p> <p>The viability and reasons given seemed to be flawed, and judged on house values, it appears to be a chicken and egg situation, a marina would add to the value of any new housing stock, what research was done on the marina project as a separate project and supply & demand? What marine experts have been used? Has the EU Inter-regional (Interreg) initiative, investing in the future by working together for a sustainable and competitive region, been considered? (Interreg is financed through the European Regional Development Fund (ERDF)). Has a partnership been sort like at Brightlingsea which is run by a trust like QHT, Colchester and even Peel Ports with their marina plan are partners for their plan, for the Intererreg North Sea Region?</p> <p>What alternatives have been explored? The Island is a holiday haven with the most Caravans/chalets in the South East; this amended plan does nothing to exploit the Tourist and Leisure opportunities.</p> <p>The Minster Parish Council think Queenborough is a better location for a marina than Sheerness, because Queenborough is much more sheltered, The Sea at Garrison Point can get very rough with a difficult tidal back eddy and flow being immediately on the confluence of the Medway and Thames, making it difficult to enter a potential marina. The whirlpools and tidal rip are at its most</p>		

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
			<p>dangerous here!</p> <p>Nick Ardley editor of the “Thames estuary ditch-crawler, river, creek and coastal sailor” thinks that Queenborough is a better place for a marina too, as well as QYC, IOSSC, and MSBA.</p> <p>Notification to members of the public</p> <p>Many of the island population do not know about these addendum/amendments to the Master plan, because this is so important for Sheppey, all residents should have been notified, as was done by Peel Ports with their plans and exhibitions. The Gateway Centre in Sheerness did not seem to know about this consultation period, they first thought I was talking about Peel Ports that was displayed on their desk for all to see, after much to do and some phone calls they eventually found a scrap of paper in the bottom of a drawing cabinet, even then they didn't know what they were looking for. It wasn't advertising to the public, and yet the scale of such a project as this, with 1,180 houses and a marina is equally as important as Peel Ports marina projected, and should have been publicised better. Even some businesses backing on to the creek did not know about the consultation period.</p> <p>The date for the close of the consultation should be extended and it should co inside with 'Bearing fruits' and because the HCA has not yet finished it consultation to Queenborough Town Council, and for the public's question and answer session,</p>		

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
Page 232			<p>which is due at the Guildhall Monday the 15th 7.30pm after the SBC's 5pm deadline!</p> <p>Loss of Businesses and jobs The Island does not have even one single marina, but the demand is high for marina services, and has a lot of catching up to do, to take advantage of the Multi-billion pound marine industries, the South-East growth is set to boom in this area, but SBC and the island, will miss out, as already Medway and Medway council have enjoyed much revenue, jobs businesses etc from more than 20 established marina's, based 10/15 miles further up the river.</p> <p>A lot of the design concepts and principles that have been lost as above have been retained and included in an alternate cost effective plan and report for the creek area, which is attached, which should be considered and implemented by Swale Borough Council and the Homes & community Agency.</p> <p>Statement by SBC "We intend to further encourage tourism and other businesses that are linked by and harmonised with our landscapes and communities" I hope SBC council will live up to this statement by supporting an alternative creek marina as attached</p>		
QR/054	S.E.A.L	Object	We object to the deletion of the Marina at Queenborough, there is no justification for doing so, the people of Queenborough and Sheppey have been promised one after years of	1. Supports the Alternative Creek Marina Plan (Orpin, MacDonald & Bell) due to the social and economic benefits it would bring.	1. See response to respondent QR/001. Change Proposed.

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
			consultation. What a wonderful place Queenborough could become with badly needed maritime facilities. Details of a more realistic and deliverable project are to be found in the alternative Creek Marina Plan by Orpin, MacDonald, and Bell. Please reconsider this plan and reinstate the Marina as described in the Queenborough Creek Marina Plan.		
QR/055	Eric Williams	Object	I support the alternative creek marina plan by Orpin, Macdonald and Bell marine facilities they are badly needed.	1. Supports the Alternative Creek Marina Plan (Orpin, MacDonald & Bell) due to the social and economic benefits it would bring.	1. See response to respondent QR/001. Change Proposed.
QR/056	Linda Brinklow	Support, comment and object	Whilst I appreciate the importance of sticking to deadlines, there are more important issues than just building houses. There is the sustainability of the community to be considered. There are communities that would benefit from a marina and once the plans have been set there may be no going back on them. I have consulted the National planning Policy Framework and I enclose a copy of the relevant part to see where we feel that the consultation process could have been more inclusive. We have done our best to remedy the situation, but in the time available meeting such a tight deadline has been impossible. Also enclosed is the research into the benefits of	1. I have consulted the National planning Policy Framework and I enclose a copy of the relevant part to see where we feel that the consultation process could have been more inclusive. We have done our best to remedy the situation, but in the time available meeting such a tight deadline has been impossible. Very few people in Queenborough knew about the consultation. Little attempt was made to consult the people for whom a marina	1. All residential and business addresses within the Masterplan area received a letter notifying them of the consultation, along with a large number of statutory consultees and local amenity groups. There was also a press release and all of the information was placed on SBC's website. Officers from both SBC and HCA have also attended two Queenborough Town Council meetings to answer questions and discuss the changes to the Masterplan. The yachting and sailing clubs were all consulted. 2. Noted. We will inform the HCA of

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
Page 234			<p>having additional services attached to a marina.</p> <p>National Planning Policy Framework –2 Guidance</p> <p>What local planning authority consultation takes place before a planning application is decided, and with who?</p> <p>Paragraph: 001 Reference ID: 15-001-20140306</p> <p>After a local planning authority has received a planning application, it will undertake a period of consultation where views on the proposed development can be expressed. The formal consultation period will normally last for 21 days, and the local planning authority will identify and consult a number of different groups.</p> <p>The main types of local planning authority consultation are:</p> <ul style="list-style-type: none"> • Public consultation – including consultation with neighbouring residents and community groups. • Swale Borough Council did consult with the people in Rushenden. It did consult with the parish councils i.e. Queenborough and Minster. It did consult with the Queenborough Harbour Trust. • It did not consult with the people of Queenborough or the businesses bordering the creek on the northern side. The area is called Queenborough and Rushenden. Very few people in Queenborough knew about the consultation. 	<p>would have been an asset. i.e. the yacht clubs.</p> <p>2. At present HCA do not own the land around the creek. Our group would like is to be given a chance to influence the plans for that area once HCA take ownership of that land – next September. For that reason, we would like to become consultees/help with the planning in the next stage of the process.</p> <p>3. Support the Alternative Marina Creek Plan.</p> <p>4. Will the houses include energy savings and energy creation and regeneration systems in their design; making them sustainable as well as comfortable?</p> <p>5. There is much good sense in the following suggestions: “There is now much greater certainty regarding the delivery of the school, which represents a key element of new social/ community infrastructure, given its new location on land owned by the</p>	<p>your offer.</p> <p>3. See response to respondent QR/001. Change Proposed.</p> <p>4. Yes. The Government intends to increase energy standards and reduce carbon emissions through Building Regulations and other national standards, with the aim of achieving net zero carbon emissions for new housing by 2016, new public buildings by 2018 and for new commercial development by 2019. Reductions in carbon emissions are to be implemented through energy efficient design and delivery of on-site low carbon or renewable energy.</p> <p>5. Noted.</p> <p>6. Noted.</p> <p>7. This is an issue that would be dealt with at the planning application stage.</p> <p>8. Noted.</p> <p>9. See response to respondent QR/001. Change Proposed.</p> <p>10. Noted.</p>

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
			<ul style="list-style-type: none"> • Statutory consultees – where there is a requirement set out in law to consult a specific body, who are then under a duty to respond providing advice on the proposal in question. • Any consultation required by a direction – where there are further, locally specific, statutory consultation requirements as set out in a consultation direction. • Non statutory consultees where there are planning policy reasons to engage other consultees who – whilst not designated in law – are likely to have an interest in a proposed development. • The initial plans for the area, as drawn up by SEEDA, and as originally agreed by SBC, included jobs associated with a marina. The marina was scrapped in the new draft plans. • Very little attempt was made to consult the people for whom a marina would have been an asset. ie the yacht clubs. • It is appreciated that the Queenborough Harbour Trust is working hard to make provisions for this section of society. However, research shows that where additional services are provided, there is additional benefit to the larger community in the way of jobs and revenue. • It is this additional benefit that the scrapping of plans for a marina with associated jobs, has failed to address. 	<p>Homes and Communities Agency. The school also now sits in the heart of the new residential community, and on a key new pedestrian axis, linking Queenborough and Rushenden.”</p> <p>6. Agree with the delivery of a “Waterside Hub”.</p> <p>7. Will public access along the seafront and the south side of the Creek include both footpath and cycle way?</p> <p>8. Agree with a visitor centre as how well the harbour functions will depend upon what is on offer for the visitors. I have some thoughts about making the whole area south of the creek, an information/arts area, with information dispersed throughout the various facilities.</p> <p>9. For water-related uses to happen it would be better to have deep water for longer periods. The idea of a lock gate system would enable this to happen.</p>	

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			<p>Following the initial period of consultation, it may be that further additional consultation on changes submitted by an applicant, prior to any decision being made, is considered necessary. Finally, once consultation has concluded, the local planning authority will consider the representations made by consultees, and proceed to decide the application. See here for more information on the role that consultees' views play in making a decision. Local planning authority consultation does not remove or affect the requirement for the applicant to complete and submit an ownership certificate and agricultural land declaration with an application for planning permission.</p> <p>At present HCA do not own the land around the creek. What our group would like is to be given a chance to influence the plans for that area once HCA take ownership of that land – next September. For that reason, we would like to become consultees/help with the planning in the next stage of the process.</p> <p>The alternative Marina Creek plan</p> <p>Dear Members of the Planning Board,</p> <p>I enclose a copy of the Alternative Creek Marina leaflet which is in part our answer to the consultation over the plans for the Rushenden Queenborough area. We are but a relatively small group of people and getting a reply out in time to test the opinion of the general public, has been</p>	<p>10. The inclusion of residential development on the Istil Mill and Thompsett site has significant urban design benefits. Similarly, the introduction of residential uses along the new Rushenden Link Road will improve the character of this key gateway into Queenborough and Rushenden, and improve pedestrian linkages to the new retail and employment uses at Neatscourt.</p>	

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			<p>quite a tall order.</p> <p>I have not been able to get around to speak to or to leaflet many of the people who may be interested in the project. With such a short consultation period, I have suggested that people reply anyway, by the 30th January - the deadline for the Bearing Fruits feedback. I do hope that you will honour this delayed deadline and give it your proper consideration. It has concerned me somewhat, that the people in Queenborough did not receive the consultation documents, which seem to have only gone out to those living in Rushenden. I do know that the matter has been discussed at the Town Council Meetings.</p> <p>I include:</p> <ul style="list-style-type: none"> • An initial presentation that I produced after taking part in the Wish You Were Here consultation; which was organised by KCC. • My feedback presentation on the recent transcoastal conference and in particular its relevance to the port of Queenborough. (slide 13 is the most important) <p>Please note, these are not professionally produced presentations. They do however, show you that I am more than interested in what happens to the area, and will do anything possible to get the results that people need in order that the area may prosper and be a sustainable and attractive place in which to live.</p>		

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
Page 238			<p>The Vision for the Queenborough/Rushenden Regeneration</p> <p>Comments on this publication by Linda Brinklow</p> <p>STATEMENT -A 'multifaceted' regeneration, using the highest standards of design;</p> <p>Question</p> <p>Will the houses include energy savings and energy creation and regeneration systems in their design; making them sustainable as well as comfortable?</p> <p>STATEMENT an urban scheme which is respectful of the history and character of Queenborough,</p> <p>Question;</p> <p>Can you show how the urban scheme is respectful to the history and character of the area?</p> <p>Opinion;</p> <p>From my point of view,</p> <ul style="list-style-type: none"> • There is too little attention paid to the port facilities and maritime character of the area • And too much emphasis on the need to provide houses. • More emphasis on the maritime heritage would bring much needed jobs to the area. • In scrapping the marina, the jobs that it 		

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			<p>would have created have also been lost.</p> <ul style="list-style-type: none"> • However, were the marina/port jobs to be transferred to the Creek area, then the situation could be reversed. <p>STATEMENT the new regenerated Queenborough and Rushenden will be a very attractive place to live and work.</p> <p>Opinion;</p> <p>Not only should it be an attractive place to live in, it should also continue to function as a port which provides jobs and businesses. The architects might like to dream; People need to work and the port could again be a thriving and bustling place not unlike Whitstable.</p> <p>Key benefits of the changes to the Land Use Plan</p> <p>Opinion – There is much good sense in the following suggestions</p> <p>STATEMENT • There is now much greater certainty regarding the delivery of the school, which represents a key element of new social/ community infrastructure, given its new location on land owned by the Homes and Communities Agency. The school also now sits in the heart of the new residential community, and on a key new pedestrian axis, linking Queenborough and Rushenden;</p> <p>Comment</p>		

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Page 240			<p>(Delighted at this)</p> <p>STATEMENT • the revisions eliminate the potentially high risk/high cost marina;</p> <p>Comment</p> <p>(I sort of agree- The location in the centre of the development did not seem right. It needed to connect the two areas of Queenborough and Rushenden)</p> <p>STATEMENT • Given the loss of the employment/leisure elements potentially associated with the marina, any development should seek to deliver a “Waterside Hub”, which would benefit from an attractive location adjacent to the Creek.</p> <p>Comment</p> <p>(I absolutely agree with this but it needs careful planning and consultation)</p> <p>STATEMENT while viability/marketing testing is required,</p> <p>Comment;</p> <p>(If at all possible, I should like to be personally involved in any market testing and public consultation regarding the creek area. I am very keen to ensure that the decisions made over the future of this area reflect the needs of the local community and visitors to the area and at the same time retain the history and character of the port.)This should not be just about building</p>		

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Page 241			<p>houses.</p> <p>STATEMENT potential uses might include a mixture of some or all of the following: - Public access must be provided both along the seafront and the south side of the Creek.</p> <p>Question</p> <p>Will access include both footpath and cycle way? The plan is not clear on this issue</p> <p>- STATEMENT Visitor Centre (potentially covering environment, local history etc.) - A waterside pub, restaurant or café –</p> <p>Comment</p> <p>(I sort of agree with these statements. How well the harbour functions will depend upon what is on offer for the visitors as well as how well it functions as a commercial port)</p> <p>I do not like the design for the visitors centre given as an example and can see problems in staffing.</p> <p>I have some thoughts about making the whole area south of the creek, an information/arts area, with information dispersed through-out the various facilities. I can elaborate further if required.</p> <p>STATEMENT Limited water-related uses (possibly as part of the visitor centre) e.g. canoeing.</p> <p>Comment</p> <p>For this to happen it would be better to have deep</p>		

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Page 242			<p>water for longer periods. The idea of a lock gate system would enable this to happen.</p> <p>- STATEMENT other active uses possibly in the form of youth provision e.g. BMX, skate park etc.</p> <p>Comment</p> <p>NO to a BMX or a skate park – this is a maritime area.</p> <p>Queenborough and Rushenden already have more amenities than places such as Halfway.</p> <p>- STATEMENT employment uses e.g. managed workspace, workshops, and chandlery</p> <p>Comment</p> <p>The boat yards need to be retained.</p> <p>This place needs to become a Mecca for boat people.</p> <p>It needs to bring work to local people</p> <p>The chandlery is most important.</p> <p>(There is not another such one between Ramsgate and the Medway Ports area.</p> <p>Queenborough is an excellent location.</p> <p>STATEMENT - Attractive public realm • the inclusion of residential development on the Istil Mill and Thompsett site has significant urban design benefits. The removal of industrial uses from part of Rushenden Road helps to create a more integrated development and improve the quality of</p>		

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
Page 243			<p>the environment. Similarly, the introduction of residential uses along the new Rushenden Link Road will improve the character of this key gateway into Queenborough and Rushenden, and improve pedestrian linkages to the new retail and employment uses at Neatscourt.</p> <p>Comment</p> <p>Largely agree with all of the above.</p> <p>See also enclosed 2 presentations that I produced earlier.</p> <p>I am hoping to come to the Sheppey Gateway viewing, where I can discuss these ideas. However, I would be more than willing to chat to any one that would listen. It is so very important that planning at this stage achieves the results that are right for the area.</p>		
QR/057	Malcolm Bennett	Object	<p>The HCA consultants, Knight Frank and Allies Morrison appear to have almost zero competency in marine studies, marine awareness, Marina ethos and considerations and are NOT suitable to advise on the marine issues within the Master Plan.</p> <p>The HCA has seemingly discarded the marina and marine issues without competent advice.</p> <p>My own personal Due Diligence has revealed this.</p> <p>Please ensure that Swale Council obtains proper and competent input from Consultants who know</p>	<ol style="list-style-type: none"> 1. The HCA has seemingly discarded the marina and marine issues without competent advice. 2. The historic significance of the Creek and South Creekside at Queenborough and the retention of the existing green space and the trees, has been poorly considered bearing in mind that it is within an undeveloped 	<ol style="list-style-type: none"> 1. See response to respondent QR/001. Change Proposed. 2. The impact on the Conservation Area was considered during the Masterplanning stage and would again be looked at during the planning application stage. 3. All residential and business addresses within the Masterplan area received a letter notifying them of the consultation, along with a large number of statutory consultees and local amenity groups. There was also

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
Page 244			<p>what they are talking about in this regard.</p> <p>Queenborough deserves better than the cursory disregard that the HCA has given in all matters marine.</p> <p>No regard has been given to the existing leisure and tourism Visitor Centre that exists at The Guild Hall Queenborough.</p> <p>Is there a need to spend / waste money on providing another such facility rather than making better use of, and better funding, the existing facility?</p> <p>2. The historic significance of the Creek and South Creekside at Queenborough has been poorly considered bearing in mind that it is within an undeveloped Conservation Area. No regard has seemingly been made to consider retention of the existing rare green space and the trees within the specific Conservation Area.</p> <p>It would appear that the profit driven ethos by the HCA, as evidenced by the amended master plan, will ensure that the rare green space and trees are ripped out and annihilated rather than enhanced in totality.</p> <p>I understand there are rules that planners are required to follow that oblige any sight view from an existing Conservation Area, (that is in fact all the properties on the north side of the Creek) , to be fully and actively considered in active</p>	<p>Conservation Area.</p> <p>3. Consultation has been inadequate.</p>	<p>a press release and all of the information was placed on SBC's website. Officers from both SBC and HCA have also attended two Queenborough Town Council meetings to answer questions and discuss the changes to the Masterplan.</p>

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
Page 245			<p>consultation with those individual landowners / interested parties specifically.</p> <p>3. It is a fact that those landowners, the individual residents and others, have NOT been individually and specifically consulted.</p> <p>Swale Council, by this consultation process, has not given due regard to a full and satisfactory process to ensure that ALL necessary consultees are actually consulted.</p> <p>In order that a fuller and more robust consultation with appropriate experts can be determined, especially in the case regarding a marina and greater marine ethos, marine job creation and Leisure Tourism with a marine ethos..... would it be possible to defer the Conservation Area considerations alone?</p> <p>This could enable the bulk of the HCA suggestions within the non-contentious Conservation Area, specifically the remainder of the Housing, and School, Community and Health service provision, to continue unfettered and in a timely fashion.</p>		
QR/058	Natural England	Comment	<p>We have commented on previous versions of this document and many of the issues raised are still relevant, albeit that the Masterplan provides a framework in which these matters can be resolved and that we will be consulted where appropriate on the individual phases and development proposals.</p>	<p>1. Recognise the reduction in potential environmental risk arising from the removal of the marina from the Masterplan, and the use of that part of the site for residential.</p> <p>2. Assume that reduction in</p>	<p>1. Noted.</p> <p>2. Yes, the new dwelling numbers include the old ISTIL Mill and Thomsett Way sites, along with the land previously allocated for the marina. It is a reduction in density that has</p>

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
			<p>Natural England recognises the reduction in potential environmental risk arising from the removal of the marina from the Masterplan, and the use of that part of the site for residential.</p> <p>Your letter indicates that the changes result in a reduction in dwelling numbers. I assume that this includes the new residential proposals north of Thomsett Way and on the site previously allocated for the marina; and that the reduction in numbers is achieved through reductions in density.</p> <p>I trust that consideration has been given to the potential of the development (now envisaged) to generate sufficient funds to generate the measures necessary to address potential impact on the Medway Estuary and Marshes SPA/Ramsar and the Swale SPA/Ramsar inter alia.</p> <p>The Campbell Reith HRA, October 2009 is now dated. Although the spatial implications of some of their 24 recommendations may have been reflected in the Rummey Design Masterplan (Circa 2016), that document barely mentions the natural environment and the designated habitats. The associated issues may be covered elsewhere, however, in order to ensure delivery of mitigation through a series of phases, greater clarity about the nature and scale of spatial and management measures is important; and the way in which development will deliver some components and fund others should be set out. In addition, since</p>	<p>dwelling numbers includes the new residential proposals north of Thomsett Way and on the site previously allocated for the marina; and that the reduction in numbers is achieved through reduction in density.</p> <p>3. Development will need to generate sufficient funds to address potential impact on the Medway Estuary and Marshes SPA/Ramsar and the Swale SPA/Ramsar.</p> <p>4. The October 2009 HRA is now dated. Although the spatial implications of some of their 24 recommendations may have been reflected in the Rummey Design Masterplan (Circa 2016), that document barely mentions the natural environment and the designated habitats. In order to ensure delivery of mitigation through a series of phases, greater clarity about the nature and scale of spatial and management measures is important; and the way in which development will deliver</p>	<p>allowed this.</p> <p>3. Noted.</p> <p>4. Noted. The Queenborough and Rushenden Steering Group are aware of the need for delivery of mitigation and that funding will be required. This would be looked at during the planning application process. The work of the North Kent Environmental Planning Group has been highlighted to the HCA who are aware that developers will need to be made aware of it also.</p>

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response	
Page 297			<p>2009, a great deal of valuable work has been undertaken by the North Kent Environmental Planning Group which should inform the proposals and mitigation to be delivered through the phases at Queenborough & Rushenden.</p> <p>Due to the current pressure of consultations on land-use plans, I have not been able to spend the time I would have wished to fully review and comment on your Masterplan and associated documents. Nevertheless, I hope you find these comments helpful.</p> <p>If there are issues I have not covered, please let me know and I will respond as quickly as possible. If discussion would be helpful, please give me a call.</p>	<p>some components and fund others should be set out. In addition, since 2009, a great deal of valuable work has been undertaken by the North Kent Environmental Planning Group which should inform the proposals and mitigation to be delivered through the phases at Queenborough & Rushenden.</p>		
	QR/059	English Heritage	No comment	No comments to make.	1. No comments to make.	1. Noted.
	QR/060	Estelle Stanton	Object	<p>I would like to object to the removal of the Marina at Queenborough from recent planning for the area, there does not appear to be any justification for doing removing this most valuable asset. I believe that a marina at Queenborough would be a huge benefit not only to the people of the area and tourism, but also for the boating community that visit the Isle of Sheppey both Summer and Winter.</p> <p>A Marina would bring a big increase in tourism to the area, the added shops and restaurants would bring much needed employment to this</p>	<p>1. Object to the removal of the Marina at Queenborough. A marina would be a huge benefit to the people of the area and tourism, and also for the boating community. It would bring a big increase in tourism to the area and bring much needed employment; it would put Queenborough 'on the map' and give a welcoming facility to the</p>	<p>1. See response to respondent QR/001. Change Proposed.</p> <p>2. See response to respondent QR/001. Change Proposed.</p>

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response	
Page 248			<p>beleaguered island, it would put Queenborough 'on the map' and give a welcoming facility to the boating community. In short, it would be a huge boost to this area. The people of Queenborough and Sheppey have been promised a marina at Queenborough after years of consultation, so why the removal ?? I have visited the Marina at Eastbourne which has revitalised the previously shabby and rundown area, it has brought 'gentrification', jobs and prosperity to Eastbourne once again and Queenborough is in dire need of such a transformation. I ask you to reconsider. There are details of a more realistic and deliverable project are to be found in the alternative Creek Marina Plan by Orpin, MacDonald, and Bell.</p> <p>Please reconsider this plan and reinstate the Marina as described in the Queenborough Creek Marina Plan.</p>	<p>boating community.</p> <p>2. A realistic and deliverable project is to be found in the Alternative Creek Marina Plan by Orpin, MacDonald and Bell.</p>		
	QR/061	R.J Collins	Comment and object	<p>Hand written letter with poems which indicate that the respondent is disappointed with the revised plan and that there is a need for council houses in the area.</p>	<p>1. Disappointed in revised plan.</p> <p>2. Need for council houses.</p>	<p>1. Noted.</p> <p>2. 25% of the proposed dwellings will be provided as 'affordable housing.'</p>
	QR/062	William Haylock & Margaret Keay	Support and comment	<p>As a long term Queenborough resident (born in Queenborough) I am 100 percent behind this project we have a delightful area by the creek and the harbour and hopefully improving this area to its full potential would benefit all, though hopefully it will not be spoiling the character of the area. One</p>	<p>1. Support the initiative at Queenborough and Rushenden.</p> <p>2. There are existing parking problems in Queenborough High Street – would like</p>	<p>1. Noted.</p> <p>2. This would be dealt with at the planning application stage.</p>

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
			<p>concern I have is that as a resident of Queenborough high street, the parking in the last year has become a nightmare and it is a miracle if you can get parked outside your property, which as we are part of the elderly community can be difficult when heavy shopping etc is involved. This combined with the popularity of the Dutchman are an on-going problem as although there is a car park opposite most people choose to use the high street. It hasn't been said that if the area is improved and hopefully bringing more people into this area that adequate parking would be assured?</p>	<p>assurance that adequate parking will be provided for the new development.</p>	
<p>QR/063 Page 249</p>	<p>Andrew Crawford</p>	<p>Object</p>	<p>I support the proposals in the attached document except I believe the scheme has to be more comprehensive. The conceptual design as shown would not give a practical modern marina and the costs are insufficient for the level of facilities expected by boat owners. However I also believe the income is understated.</p> <p>I would not expect Swale BC to fund all or any of this development and am at the moment approaching possible inward investors. Therefore if an award investor is found that investor will be making a multi-million contribution to Swale and the Isle of Sheppey. What is required from Swale BC is the enthusiasm and vision to back this scheme and be prepared to fast track planning consents and assist with any land ownership issues.</p> <p>This project would significantly increase local</p>	<p>1. Supports, and attaches, the Alternative Creek Marina Plan (Orpin, MacDonald & Bell) due to the social and economic benefits it would bring.</p>	<p>1. See response to respondent QR/001. Change Proposed.</p>

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
Page 250			<p>wealth, facilities and opportunities and would encourage further inward investment. It is a one-time opportunity which really should not be missed. I was a previous Leader of a District Council where we were presented with a scheme for a marina/property development similar to this. Sadly there was a small number of very vociferous opponents and prevarication within the Council at the crucial point with the potential investors they pulled out. The District was poorer for not grasping the chance when it was available. I would not wish to see that scenario happen here especially as the majority of residents and businesses appear to be in favour of the scheme.</p> <p>I have previously written to Mr P. Raine on this matter and I have added the photo montage views of how the finished project could be, which I previously submitted.</p>		
QR/064	Barry Day	Object	<p>I fully support the proposal for Queenborough Creek Marina, because the area is ripe for regeneration. It would provide much needed employment which would certainly help to eliminate the benefit culture that is widespread on the island at present. Also, it would encourage tourists, especially those interested in marine pastimes, who would hesitate to come here now due to the many sites of dilapidation.</p> <p>I look forward to seeing this improvement completed and many others of the same ilk in the</p>	<p>1. Supports the Alternative Creek Marina Plan (Orpin, MacDonald & Bell) due to the social and economic benefits it would bring.</p>	<p>1. See response to respondent QR/001. Change Proposed.</p>

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
			future.		
QR/65	Mrs Shaw	Object	I'd like to see new people come to the island to show what a pleasant place it can be. A marina would give the place a lift; bring new life, with busy sporty people. We don't want endless housing built for people from run down areas who won't find work or facilities, where the infrastructure is inadequate.	1. Supports the Alternative Creek Marina Plan (Orpin, MacDonald & Bell) due to the social and economic benefits it would bring.	1. See response to respondent QR/001. Change Proposed.
QR/66	R. Young	Object	Excellent, viable scheme. Will tidy up the area considerably and attract smaller day boats to spend in Queenborough. The Sheerness harbour scheme, if it ever gets built, will be too expensive for most sailors to use. A good opportunity for small businesses i.e. chandlery, repair, etc.	1. Supports the Alternative Creek Marina Plan (Orpin, MacDonald & Bell) due to the social and economic benefits it would bring.	1. See response to respondent QR/001. Change Proposed.
QR/67	Queenborough Harbour Trust	Comment and Object	Queenborough Harbour Trust would like to take this opportunity to respond to the proposed changes to the Indicative Revised Use Plan – Addendum to the 2010 Adopted Masterplan with reference to Queenborough and Queenborough Creek in particular. Our primary concern is that the opportunities and advantages that Queenborough Creek offers Queenborough and the Isle of Sheppey as a whole would not be fully exploited by the revised plans. There appears to be no evidence that a viability study has been carried out that would maximise the perpetual use of this unique asset. Evidence should be shown that the following issues have been thoroughly investigated: <ol style="list-style-type: none"> The arrangements for public access to the water on the south side of Queenborough Creek. 	1. Concerned that the opportunities that Queenborough Creek offers Queenborough and the Isle of Sheppey would not be fully exploited by the revised plans. No viability study has been carried out that would maximise the perpetual use of this unique asset. 2. Evidence should show that the following issues have been investigated: <ul style="list-style-type: none"> The arrangements for public access to the water on the south side of Queenborough Creek. 	1, 2 and 3. See response to respondent QR/001. Change Proposed.

Ref No.	Name/organisation	Support/ Object/ Comment	Full representation	Summary of representation	Borough Council's response
Page 252			<p>2. The provision of viable maritime facilities and employment opportunities.</p> <p>3. That the plans contribute significantly to the town's and the broader Island's leisure and tourism offer.</p> <p>Until these fundamental issues are fully addressed the proposed plans can only be considered as incomplete. We would, therefore, look for a fully resourced viability plan for Queenborough Creek to be commissioned which would include within its terms of reference the issues highlighted above and the results from this plan made public.</p>	<ul style="list-style-type: none"> • The provision of viable maritime facilities and employment opportunities. • That the plans contribute significantly to the town's and the broader Island's leisure and tourism offer. <p>3. Until these are addressed the proposed plans can only be considered as incomplete. Would like a fully resourced viability plan for Queenborough Creek which would include the issues highlighted above and the results from this plan made public.</p>	

QUEENBOROUGH



QUEENBOROUGH CREEK MARINA PLAN

*An Alternative Creek Marina Plan to be considered as
an amendment to the Rushenden and Queenborough
Master Plan*

By Orpin, MacDonald, and Bell

November 2014

Page 253

QUEENBOROUGH CREEK MARINA PLAN

*The importance of a marina at Queenborough should **not be underestimated**; it is therefore considered that a cost effective alternative, should be seriously promoted by SBC and the Homes & Communities Agency, due to the upturn in the economic outlook, and for the reasons below. (Alternative to the marina within the development, which has been dropped from the Queenborough and Rushenden regeneration master plan)*

THE ALTERNATIVE MARINA CREEK PLAN

An impounded Queenborough Creek Marina.

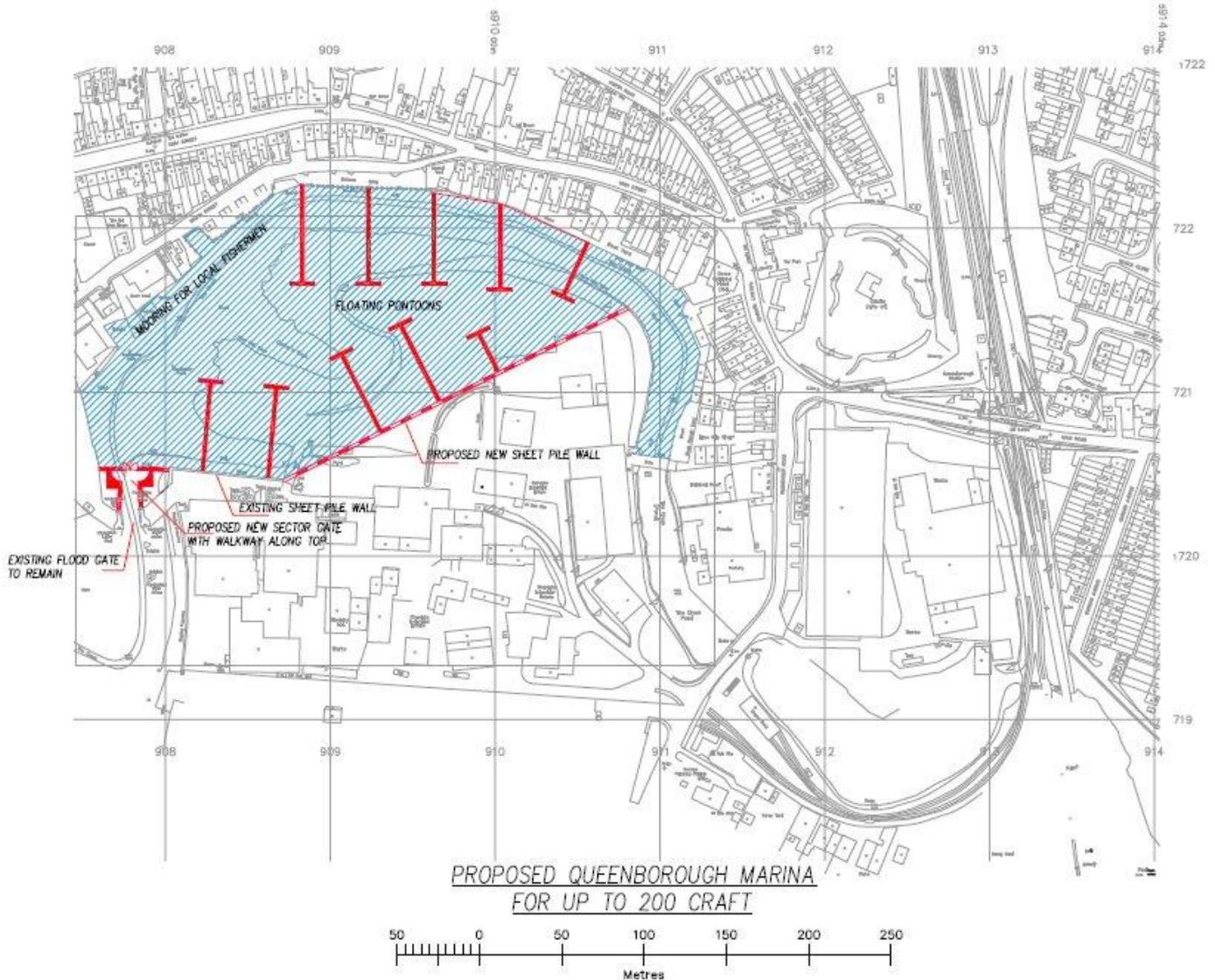
The area under consideration is bounded to the north by the existing quayside and extends southward to include Klondyke Wharf and Cutters Dock.

A sector gate will be added to impound the water in the creek

- *The main pedestrian crossing and link will be provided by the lock gate.*
- *It is anticipated that the impounded arrangement will provide navigable access/egress to the inner creek from the Swale over a five hour period each high tide and that the water level may fluctuate. This variation in water level will create **VISUAL INTEREST** and ensure that the inner creek is subject to water movement and flushing action.*
- *The Sector Gate will give **additional safeguard from flooding** if the existing Environment Agency gate fails to operate.*
http://www.kgal.co.uk/sector_gates_flood_defence.html
- *The Swale mooring arrangements by the Queenborough Harbour Trust will be continued and expanded, but will be enhanced by the introduction of a dedicated visitor berthing within the impounded Creek which front the Town Quay adjacent to South Street. The main advantages of the facility will be:-*
 - *Direct access to the shore and Queenborough Town.*
 - *Attractive to Club rallies and visiting craft from wide ranging destinations.*
 - *Berthing against pontoons with modern services.*
 - *Create public interest and focus for waterfront development.*
 - *The marina will be designed to provide around 200 berths varying in size.*
 - *Marina berth holders will be able to gain direct pedestrian access to Queenborough Town via the top of the lock gate. An important aspect of the marina' and viability of the marina business will be the ability to store boats ashore. It is the allocation of storage ashore space that will also help to support commercial business and attract customers and new business interests to Queenborough.*
 - *An available Community waterspace area, Sea Cadets, youth and disabled persons sailing.*

Most of the marina development would be developed on the Southside of the creek, and especially at KLONDIKE wharf and CHALK wharf on land previously used for heavy industrial such as the glue works. Here is where slipways, with boat hoist, boat storage and marine type services will be developed.

THE CREEK MARINA PLAN



CAPITAL COST

1) Sheet pile wall	£1,300,000
2) Excavation and dredging	£2,100,000 (excluding any remediation)
3) Civil Works for sector gate	£600,000
4) Gate	£811,000
5) Securing piles for floating Pontoons	£40,000
6) Pontoons	£350,000
7) Facility Building and hard standing	£350,000
TOTAL	£5,551,000

PROJECTED REVENUE

With 90 percent occupancy and maximum of 200 berths = 180 @ average mooring rate of between £209 and £306 per metre per year, with an average length boat of 9 metres

Berthing revenue	180 x 250 x 9 = £405,000
Other marina services	£100,000

TOTAL £505,000 PER ANNUM
Page 255

THE CREEK MARINA FEASIBILITY STUDY

The technical and practical feasibility of the marina has been verified by British Waterways.

http://www2.swale.gov.uk/media/adobe/pdf/7%2Fe%2FAppendix_8_Reduced_Size_Pages_47-71.pdf

It has been shown that this site doesn't have the planning restraints in an area designated as a Ramsar Site, or a site of special scientific interest.

As the creek is a natural watercourse its new bed level will not require to be lined, and it is assumed that the existing quay walls will not require any significant works. There is an existing entry creek from the Swale bringing water to the heart of the scheme.

Any excavated soil could be used in the levelling for minimum Ordinance Datum (OD) levels of the whole scheme.

MARINA VIABILITY

*Swale Borough Council's viability assessment, in support of its Local Plan, shows the low viability on the Isle of Sheppey, due to low house values and land values. However the judgement applied to a marina by SBC is possibly flawed, because the marina's viability should be assessed not on houses prices, but as a **separate scheme**, based on cost, the supply and demand of berths, the income generated, the jobs and business it could create, increased tourism, and the value and confidence it would give to an area. This in turn would increase significantly the value of housing and land around the scheme.*

Faversham and Conyer are good examples where house prices are higher. Property by creeks and waterways can command three times general values. Whitstable is another good example where values are higher by the exploitation of its harbour!

Sheppey needs schemes to add to the value of land and houses, by capitalising on its geographical natural assets - the Island, the harbour and the creek! The added value helps to finance infrastructure.

The Time Is Right Now for a building a Marina Because:

- 1. There is an upturn in the economy.*
- 2. There is a need for jobs, new business and tourism*
- 3. There is a demand in this area for berths and marina services*
- 4. Its in one of the very few available areas that lends itself to such a development in the Swale area (Which could be lost for ever)?*
- 5. This scheme is available with little reduction in land for housing development.*
- 6. There is a need to increase property value in the area.*
- 7. There is a need for a community waterspace area*

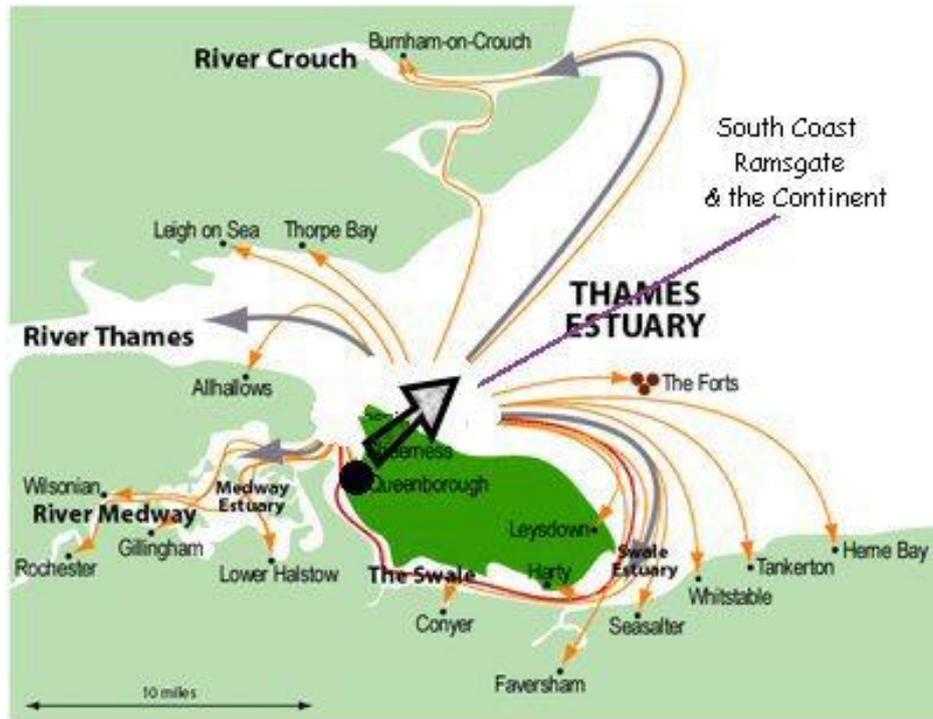
Economic Viability Assessment, Swale Borough Council Local Plan (Peter Brett Associates LLP)

*"With regard to non-residential element of the planned development, the delivery of schemes taking place is less affected by the impact of 'policy burdens' and more sensitive to **wider economic market conditions of demand and supply for such development**. The viability assessment assessed a range of speculative development scenarios, without the imposition of any planning obligations and found the schemes most likely to take place are those that have an identified client requiring specific development requirements rather than speculative delivery."*

SBC has now shown confidence in the economic upturn by supporting the £110m Regeneration of Sittingbourne High Street Scheme, and therefore the time is right to also support this marina scheme, which will attract international visitors to the area.

THE IMPORTANCE OF A MARINA AT QUEENBOROUGH

IMPORANT KEY LOCATION



NEEDED RESOURCES AND FACILITIES

Much needed important resources, and services are required to bring Queenborough harbour and creek to a 21st century standard. The demand has been acknowledged by the Queenborough Harbour Trust, British Marine Federation (BMF) and other marine consultants and identified in The Queenborough and Rushenden Masterplan for Queenborough.

Over fifteen hundred vessels from France, Germany, Belgium, Holland, and even from Sweden and the USA visited Queenborough in 2013 (with inadequate facilities).

However with the building up of harbour amenities by the Harbour Trust (QHT), the number of visitors will increase and add to the prosperity of the area. What is lacking is 'marina type services', land for boat repairs, lifting out boat storage, and all the associated marine activities of boat chandlers, repair workshops, bars, cafes, and restaurants that go with a marina! Without such facilities it would be a severe setback to the QHT, to Queenborough, the harbour and the Island.

Marina

The Masterplan clearly indicated the importance of a marina in the Regeneration.

"The proposed marina will create a viable and water base activity; it will become a focus of attraction and destination in its own right with the existing attraction and historical core of Queenborough become a **KEY COMPONENT** in the development proposals"

Waterspace

“Water should play a key part in the development of Queenborough and Rushenden and the island as a whole, the Masterplan sets out a series of principles that build on this. One of the most important proposals is for a marina and community Waterspace. This is intended to be a viable and commercially run facility with a dedicated area for community use including boat launching. The intention is to add to the facilities to complement the Harbour Trust work, with the All Tide landing, to build up the much needed capacity for mooring, repair and marine related activity.

As part of the management strategy it is intended that the proposed and existing water related activities could be brought together and managed as a whole, under the umbrella of the Queenborough Harbour Trust. This marina will also provide a focus for confidence in the regeneration proposals and will bring very important life and vitality into the scheme and confidence for business, and developers adding value to the Island and Queenborough!

Employment Tourism and Leisure

Exploiting the Island and its geographical assets

“It is anticipated that the Marina will bring employment opportunities and also act as a hub or attraction bringing international visitors to the project. The facilities adjacent to this marina may include cafes, restaurants and bars and hotel and retail”

Historic Creek

*Queenborough Town Council and many others would not like the charm of the creek and the old town to be lost. The creek marina will help in protecting this charm, adding to the conservation area, with special features as indicated in the feasibility study by British Waterways. By providing berths for feature vessels, (Thames Sailing Barges or Old Gaffers) and impounding the water in the creek, this would **visually** add to the attraction of the area. The protection and use of the Klondike wharf and regeneration of Chalk wharf will encourage Thames sailing barges back to Queenborough.*

The North side of the creek would be left as it is with most of the development taking place on the Southside of the creek to add to the old town’s charm, and adding a buffer to any housing development on the South side.

Removal of Redundant Sluice barrier

One special feature could be to remove the old redundant sluice barrier/gate and open the whole length of the creek to bring vessels into the heart of Queenborough and up to Rushenden road thereby increasing available berth spaces and to add to the vitality of that area.

The marina could become a focus for the area, including the island as a whole; adding value and amenity whilst bringing confidence and prosperity to the area. This would complement the activities of the North side of the creek and harbour. It will give waterside activities a focus and become an attraction in its own right. Opportunities for play, eating and shopping could be available, and could attract business prospects.

Swale Waterfront

An added advantage of using a lock-gate with an impounded creek would be an interconnecting path and pedestrian/cyclist route across the top of the lock-gate as recognized in the Masterplan connecting

Queenborough, Rushenden and beyond. It could add to the charm like Heybridge Marina Basin and Maldon in Essex.

Public Open Space Strategy

The public open space strategy is a key element of the Masterplan and sets out a range of new opportunities opening up a Swale waterfront or a waterfront park like at Maldon in Essex and critically linking these to other open spaces with a comprehensive footpath and cycle network to Swale Park and Swale waterfront along the existing footpath past Chalk wharf and continuing across the lock-gate giving access to Queenborough and Queenborough park and harbour front.

Creating place and distinctiveness

Queenborough Creek is one of its most striking assets and still a working creek. Water plays an important part in the character and history of Queenborough whether it is sailing and navigation or the control of flooding and drainage. Its location is traditionally favoured by visiting sailors. Regeneration and development opportunities will include a very positive response to the opportunities that this historic and present use provides, bringing in visitors and vessels to the heart of the town.

The Sea Influences the Land

Impounding the sea would give the area distinctiveness and become a focal point adding character and charm and influencing the style and type of homes and business in the development with little decrease in land for housing, and businesses.

The following images capture some of the qualities of Queenborough today.

With the water impounded



With the water not impounded



DEMAND

Currently there is a two year waiting list, for berths alongside the Town Quay and in the creek, the BMF and another marine consultant commissioned by the QHT have indicated that the demand for berths nationally and locally here in the Medway and Swale has exceeded the numbers of berths available which has been limited due to planning restraints and available sites suitable for berthing boats.

Most of the marinas in the Medway are full. Gillingham Marina had its best year in 2013 being 100 percent full with its workshop operating to capacity in an attempt to keep up with the demand.

The demand at Queenborough is likely to increase given the right facilities because of its location right on the doorstep to the estuary and not 10 mile up the river. Many suffer the extra 20 miles to go upstream and back because of the better facilities there helped by Medway Council.

The other important influencing factor for Queenborough is being on the confluence of three waterways and the Thames Estuary, being an international 'All Tide port' unlike the tidal restrictions on the other side of the Estuary.

This adds to the numbers of visitors Queenborough attracts, vessels waiting for a favourable tide for the Thames to London, or to shelter in a storm.

The situation and demand will grow even stronger as the population now have more time and money to invest in boating and the price of boats continues to fall.

Sheppey's Road Crossing and good rail transport adds to the likely demand for berths in this location (being one of the closest to London for berths)

Sustainability

With water impounded in the creek, the heat from which, could be extracted for homes and business by ground sourced heat pumps (which is the most efficient way for heat pumps to transfer heat, for every one watt of energy used you get more than 3 watts of heat out, (an efficient of more than 300 percent).

Wider Community Benefits

The location of this scheme is between the two settlements of Queenborough and Rushenden linked with the potential development of a district marina centre and commercial opportunities make this highly favourable. The benefits of linking the two communities, both physically and socially, to a new district centre focus cannot be underestimated, particularly if these included community opportunities at the end of the creek. The scheme could provide a single pontoon, providing the opportunities for dinghy sailing, canoeing and other leisure pursuits.

It would make an ideal base for disabled persons sailing with lift in/out facilities, youth sailing and the Sea Cadet Corps, which includes the Sittingbourne Unit who no longer have a boating base.

Culture and Tourism

Through research, it is anticipated that there would be some local movement of boat owners from existing moorings facilities/marinas nearby into a new facility such as this proposed option. However it is anticipated that the main influx would be from the Thames Estuary, Medway Towns and a radiused hinterland of about 15 miles. Also, there is likely to be many visitors from the continent, from France, Germany, and Holland, who are likely to stop at the marina, particularly if there were retail, community and leisure pursuits opportunities.

Industry and Commerce

This scheme option will benefit from the close location of the new Rushenden relief road and A249 connecting conveniently with the marina location. This will clearly bring industrial and commercial opportunities to the marina operation. Commercial operations for the marina are proposed in the form of a quay and use of the Klondyke and Chalk wharf which could accommodate historic vessels and could integrate well with commercial boats for added interest. A lively and active basin of high quality would be able to command higher berthing rates.

Sport, Health and Education

The option would allow free and easy movement for the communities of Queenborough and Rushenden by using extensive public open space, walkways as in the public open space strategy as above and green links to provide interesting routes to the community facilities and leisure pursuits. The potential for safe, well monitored water related activities within a purpose made marina environment provides education to the heart of the new district centre.

Local government and development proposals

*Swale Borough Council resolved to adopt the Queenborough and Rushenden Masterplan. The Council adopted it on 12th November 2010. This now forms part of the Local Development Framework for Swale Borough Council. This Masterplan forms the basis for the proposed Creek Marina, working with existing local government structures. Swale Borough Council already has in place a key priority of working with **private and public sector partners** to create the conditions for growth and to promote a positive image for the borough in **attracting inward Investment**.*

Peel Ports Marina Plans

The long term plan (projected to be 20 -25years) is in its very early stage for a possible marina at Sheerness should not have any effect on a plan for a Marina at Queenborough, and would complement both marinas if it ever went ahead. Demand in the Southeast will only grow in that time and the Peel Port Marina may cater for different types of vessels, larger boats (over 60ft) than currently moored in Queenborough

Attracting Inward Investment

*Attracting Inward Investment is the key as there is so much potential at Queenborough. This is once in a lifetime's opportunity to create a very special facility for Sheppey and Queenborough all based around using the water potential. **This must not be lost.***

References listed below from various other schemes show the potential of the area and confidence by others:-

The experts British Waterways

http://www2.swale.gov.uk/media/adobepdf/7%2Fe%2FAppendix_8_Reduced_Size_Pages_47-71.pdf

Option 3

Howard's Venice in Sheppey showing what potential and confidence is in the area

<http://www.blda.co.uk/Documents/VIS.PDF>

Conclusion

*There is a once only chance to make Queenborough's regeneration something very special, This area was designated as a THAMES GATEWAY REGENERATION AREA to help and invest in projects and schemes that would **add viability and value** , create jobs and use the assets of Sheppey, especially at Rushenden and Queenborough .*

*Many creek areas situated in prime locations within or near town centres are in decline. When they lose their **functional relevance** these areas often turn from vibrant focal points of economic activity into unattractive, often poorly integrated parts of town, with little economic dynamism. This should not be permitted to happen to Queenborough where there is a chance to **add value** and stimulate the economic activity.*

*Swale Borough Council and the Island should have **a clear focus and direction** on the way it should go, with promoting investment to help prosperity and replace jobs where there have been losses due to the closure of many of the heavy industries such as the Rolling Mill, The Glue Works, the Potteries.*

*Little vision is required to see this is **a holiday Island**. Thousands of holiday makers come to the Island, with the highest density of caravans and chalets in the South East. Many shrewd businesses are now capitalizing on leisure and tourism, such as Flynn's Bee Farm, the Ferry House Inn, The Bluetown Heritage centre, just to name a few.*

*Now is the time to **exploit the Island's water** and its marine heritage for **tourism and Leisure** to complement the land development, This is the second largest Island in England, and the potential should be seen on the water front . There is a chance for SBC to invest in a way to promote this marine, multi billion pound industries for tourism and leisure. Peel Ports have recognised this is the right direction to go. Queenborough could become the leading water leisure centre of Sheppey, the Medway and Swale, similar to Cowes on the Isle of Wight. The importance of this marine area in the South East cannot be underestimated.*

Local people want and deserve more than just new housing with no infrastructure to give character and charm using its historical roots - thereby opening up the possibilities of jobs and business, tourism and leisure, making Queenborough a better place to live work and play for generations to come.

Plan and report by

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