Rother District Council Local Plan 2011-2028

Habitat Regulations Assessment Initial Screening Report

for:

Rother District Council Development and Site Allocations Plan

Neighbourhood Plans forming part of the Development Plan for Rother

August 2016

Draft (incorporating Natural England comments)

Rother District Council Local Plan 2011-28

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Contents

1. Introduction and Context

1.1 Introduction

1.1.1 The Habitats Regulations require that Rother District Council ensure that no significant harm comes to any protected international wildlife site. Therefore, when preparing development plans for the District, Rother District Council (as the relevant competent authority) is required to undertake a 'Habitat Regulations Assessment' (HRA). The HRA comprises between one and four stages and this report represents Stage 1 – 'Screening'.

1.2 Protected Sites Covered by the Habitats Regulations

1.2.1 The following types of site are protected by the Habitat Regulations:

- Special Areas of Conservation - These are sites designation for flora, fauna and habitats of international interest. They are commonly referred to as SACs.
- Special Protection Areas - These are sites designated to conserve the habitats of protected wild birds. They are commonly referred to as SPAs.
- Ramsar Sites - These are sites designated as wetlands of global importance.

1.3 The HRA Process

1.3.1 As part of the HRA process, options must be both 'Screened' and 'Appropriately Assessed'.

1.3.2 The HRA methodology set out by the European Commission (2001) identifies four key stages in the HRA process, as shown in Table 1.

Table 1: The four stages of HRA

Stage	Description
Stage 1 – Screening	The screening process identifies Natura 2000 sites in and around the plan/strategy area, examines the conservation objectives of the interest features and reviews the potential effects of policies and proposals on these objectives to determine if significant effects on the integrity of the sites could occur. If no effect likely – report no significant effect, but where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.
Stage 2 - Appropriate Assessment	The appropriate assessment process considers the impact on the integrity of the Natura 2000 site, either alone or in combination with other projects or plans, with respect to the sites structure and function and its conservation objectives. Additionally, where there are adverse impacts, an assessment of the potential mitigation of those impacts is required.
Stage 3 - Assessment of alternative solutions	If it is not possible during the Stage 2 assessment to reduce impacts to acceptable, non-significant levels by avoidance and mitigation, Stage 3 of the HRA process must be undertaken, which is to objectively assess whether alternative solutions exist by which the objectives of the plan or project can be achieved. Explicitly, this means alternative solutions that do not have negative impacts on the conservation objectives of the Natura 2000 site. The Stage 3 assessment examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the Natura 2000 site.
Stage 4 - Assessment where no alternative solutions exist and where adverse impacts remain	This is an assessment of compensatory measures where, in the light of an assessment of imperative reasons of overriding public interest (IROPI), it is deemed that the project or plan should proceed.

1.3.3 A hierarchy of avoidance, mitigation and compensatory measures is promoted by the Directive. First, the plan should aim to avoid any negative impacts on European sites by identifying possible impacts early on in the planning process, and writing the plan in order to avoid such impacts. Second, mitigation measures should be applied during the AA process to the point where no adverse impacts on the site(s) remain.

1.3.4 If the plan is still likely to result in adverse effects, and no further practicable mitigation is possible, then the plan is rejected. Under such a worst-case scenario, the plan may have to undergo a Stage 3 assessment for alternative solutions. Under Stage 4 compensatory

measures are required, but they are permitted only if (a) there are no alternative solutions and (b) the plan is required for "imperative reasons for overriding public interest" (the IROPI test).

1.3.5 This report addresses the first 'Screening' stage of the Habitat Regulations Assessment of both:

- Rother's Development and Site Allocations Plan (as set out in Section 4), and;
- The various Neighbourhood Plans within Rother District that both currently exist and may potentially emerge in future (as set out in Section 5).

1.3.6 More detail on the screening stage can be found in Section 7 of this report.

2. Background to Legislation

2.1 EU and UK law

2.1.1 The need for Appropriate Assessment is set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by The Conservation of Habitats and Species Regulations 2010. These regulations are commonly referred to as the 'Habitat Regulations'.

2.1.2 Under these Regulations, land use plans must be subject to Appropriate Assessment if they are not directly connected to or necessary to the management of the site and likely to have a significant [adverse] effect on a Natura 2000 site (Special Areas of Conservation, SACs and Special Protection Areas, SPAs). It is Government policy for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status to Natura 2000 sites. As such, Appropriate Assessments also cover these sites.

2.1.3 With reference to Table 1 above, Stages 1 and 2 relate to Article 6(3) of the Habitats Directive; and Stages 3 and 4 to Article 6(4).

Habitats Directive 1992

Article 6 (3) states that:

"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives."

Conservation of Habitats and Species Regulations 2010

The Regulations state that:

"A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... shall make an appropriate assessment of the implications for the site in view of that sites conservation objectives... The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site".

2.2 Terminology of HRA and AA

2.2.1 In recent years the term 'Habitat Regulations Assessment' (HRA) has come into common currency to describe the entire assessment process set out in the Regulations. An appropriate assessment (AA) is part of the HRA process and it is required when a plan or project potentially affects a Natura 2000 site. The terms are therefore used in that manner in this report.

2.3 The Precautionary Approach

2.3.1 The Habitats Directive applies the 'precautionary principle' to protected areas; plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of international sites or European offshore marine sites. Therefore this assessment will be undertaken in accordance with the precautionary approach. Plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

2.3.2 The screening examines all European sites within the District boundary and within 15km of the District boundary. The 15 km buffer zone has become best practice for carrying out Habitat Regulations Assessments. It was also applied during the Rother Core Strategy screening in December 2007. Natural England has confirmed agreement with this approach.

3. Identification and Characterisation of International Sites Potentially Affected

3.1 As visible on Map 1 below, there are a number of Natura 2000 and Ramsar sites within, or potentially affecting, Rother District; namely:

- Dungeness complex of existing international sites
  - Dungeness SAC,
  - Dungeness, Romney Marsh and Rye Bay SPA[1]
  - Dungeness, Romney Marsh and Rye Bay Ramsar site[2]
- Pevensey Levels Area
  - Ramsar Site; and
  - Special Area of Conservation[3]
- Hastings Cliffs SAC
- Ashdown Forest SAC

3.2 Neither the Hastings Cliffs nor the Ashdown Forest SAC are within the boundary of Rother District. However, Hastings Cliffs SAC, which is wholly within Hastings Borough, directly abuts Rother District sharing a boundary for more than 1km.

3.3 Ashdown Forest SAC is further afield, but a tiny area of Rother District (far western fringes of Ticehurst and Burwash Parishes) is within 15km of the SAC (see Map 2).

3.4 Essentially Dungeness Special Area of Conservation (SAC) reflects the shingle habitats and species; Dungeness, Romney Marsh and Rye Bay SPA reflects the international bird species and supporting habitats;

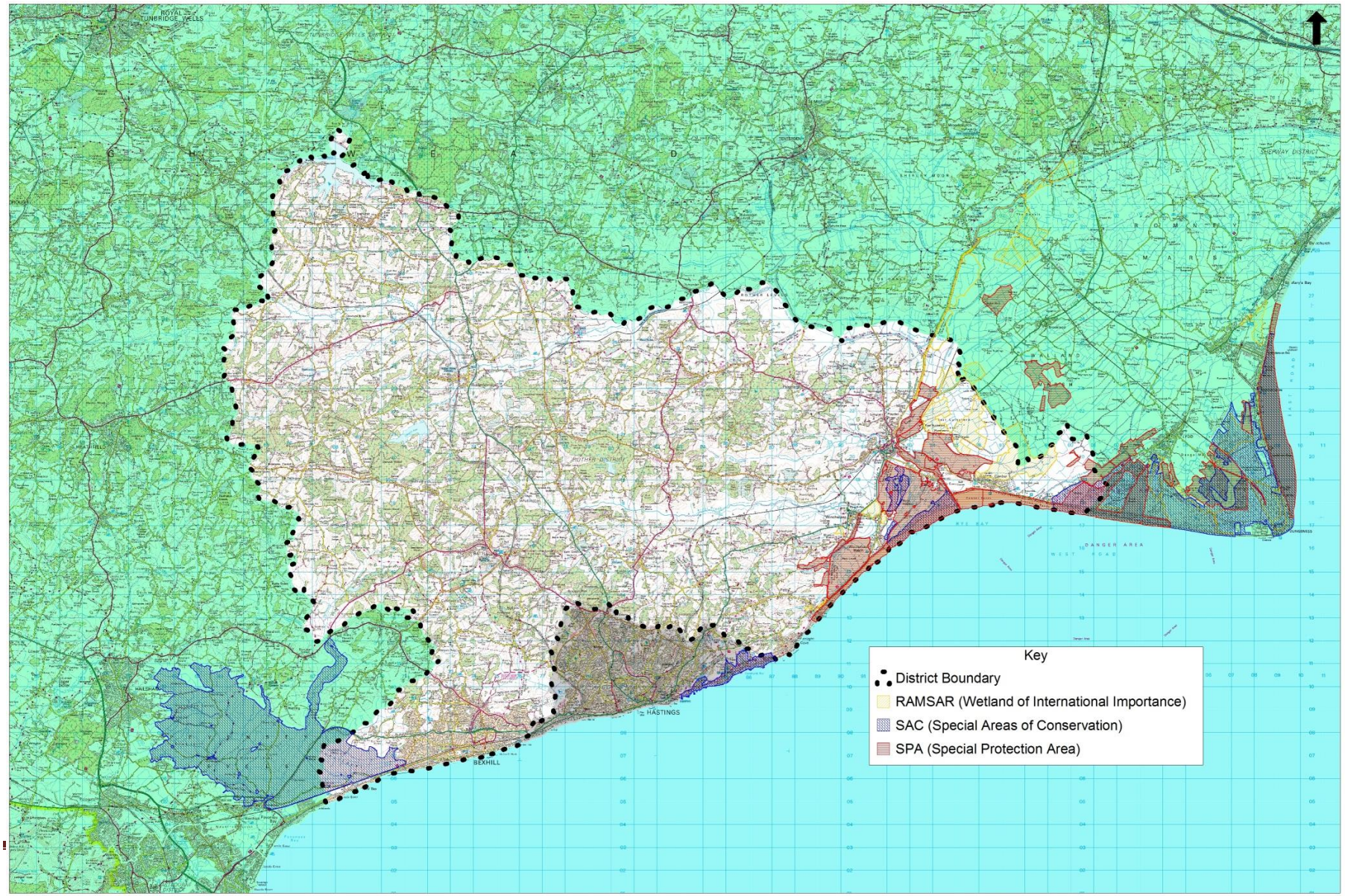
[1] Expanded in March 2016 so as to incorporate and replace the 'Dungeness to Pett Level SPA'
[2] Recently implemented and upgraded from proposed Ramsar status
[3] Recently implemented and upgraded from proposed SAC status 'Pevensey Levels Site of Community Importance (SCI)'

while Dungeness, Romney Marsh and Rye Bay Wetland of International Importance under the Ramsar Convention - reflects wetland habitats and associated species. Whilst there is significant overlap between some of these sites, each designation supports its own specific interest features that are considered as part of the screening assessment. A summary of these is in Table 4 below. The detailed Natura 2000 data forms for sites (as submitted to Europe) are in Appendix 1.

Table 2: Key Interest Features of the International Sites

Site	Key Interest Features
Dungeness SAC –	• Annual vegetation of drift lines. • Perennial vegetation of stony banks (i.e. coastal shingle vegetation) which covers some 1,600 ha including areas of intact parallel ridges with characteristic zonation of vegetation. It is the most diverse and most extensive example of stable vegetated shingle in Europe. • Great crested newt *Triturus cristatus.*
Dungeness, Romney Marsh and Rye Bay SPA	• The site regularly supports more than 1% of the GB populations of 12 species listed in Annex I of the EC Birds Directive. The 12 species are Marsh harrier *Circus aeruginosus*, Avocet *Recurvirostra avosetta*, Mediterranean gull *Larus melanocephalus*, Sandwich tern *Sterna sandvicensis*, Common tern *Sterna hirundo*, Little tern *Sterna albifrons*, Bewick's swan *Cygnus columbianus*, Bittern *Botaurus stellaris*, Hen harrier *Circus cyaneus*, Golden plover *Pluvialis apricaria*, Ruff *Philomachus pugnax*, Aquatic warbler *Acrocephalus paludicola*, Shoveler *Anas clypeata* and Mute swan *Cygnus olor*. • The site regularly supports more than 1% of the biogeographical population of one regularly occurring migratory species, namely Shoveler *Anas clypeata*. • The site regularly supports more than 20,000 water birds during the non-breeding season. In the non-breeding season, the area is regularly used by 34,625 individual water birds (5 year peak mean 2002/3 – 2006/7), including (but not limited to) Bewick's swan Cygnus columbianus bewickii, European white-fronted goose Anser albifrons albifrons, wigeon Anas penelope, gadwall A. strepera, shoveler A. clypeata, pochard Aythya ferina, little grebe Tachybaptus ruficollis, great crested grebe Podiceps cristatus, cormorant Phalacrocorax carbo, bittern Botaurus stellaris, coot Fulica atra, golden plover Pluvialis apricaria, lapwing Vanellus vanellus, sanderling Calidris alba, ruff Philomachus pugnax, whimbrel Numenius phaeopus and common sandpiper Actitis hypoleucos.
Dungeness, Romney Marsh and Rye Bay Ramsar site	• In addition to supporting internationally important populations of birds, the site also qualifies for the following reasons: • The site contains representative, rare, or unique examples of natural or near-natural wetland types such as vegetated annual drift lines, perennial vegetated stony banks, natural shingle wetlands, saline lagoons, freshwater pits and basin fens. • The site supports vulnerable, endangered, or critically endangered species or threatened ecological communities associated with wetland habitats. These communities include rich and diverse assemblages of bryophytes, vascular plants and invertebrates that are rare, threatened or specially protected.
Pevensey Levels Ramsar site	• The site supports an outstanding assemblage of wetland plants and invertebrates including many British Red Data Book species. • The site supports 68% of vascular plant species in Great Britain that can be described as aquatic. It is probably the best site in Britain for freshwater molluscs, one of the five best sites for aquatic beetles Coleoptera and supports an outstanding assemblage of dragonflies Odonata.
Pevensey Levels SAC	• Submitted for SAC designation, based upon site supporting a wide spatial distribution and good population of the Little whorlpool ram's-horn snail *Anisus vorticulus*.
Hastings Cliffs SAC	Vegetated sea cliffs of the Atlantic and Baltic Coasts, including woodland and scrub habitats that support an unusual 'Atlantic' bryophyte flora, in particular the liverwort *Lophocolea fragrans* at its only south-east England locality.
Ashdown Forest SAC	<u>Northern Atlantic wet heaths with Erica tetralix and European dry heaths</u> Ashdown Forest contains one of the largest single continuous blocks of lowland heath in south-east England, with the larger proportion being wet heath. The site supports important assemblages of beetles, dragonflies, damselflies, butterflies and birds of European importance.

Map 1: Natura 2000 and Ramsar Sites affecting Rother District



4. The Rother District Council 'Development and Site Allocations Plan'

4.1 Rother District Council (RDC) is responsible for the 'Development and Site Allocations Plan'. The Development and Site Allocations Plan (DASA) will form Part Two of the Council's new Local Plan, and will develop the spatial strategies and core policies set out in the 'Core Strategy' (which represents Part One of the Local Plan).

4.2 The DASA will:

- Review existing site allocations and development boundaries, and by allocating specific areas of land for particular uses in line with the development provisions of the Core Strategy.
- Set out more detailed policies, where these are needed, to provide guidance for the effective management of development in relation to key issues, such as affordable housing.

4.3 Part 1 of the RDC Local Plan, the now adopted 'Core Strategy' has already been subject to HRA. The HRA process as previously applied to the Core Strategy is summarised within Section 8.

4.4 RDC, as the relevant competent authority, is now conducting this HRA screening exercise for the DASA – Part Two of the Local Plan. The screening exercise applies to both site specific and development management policies.

5. The Neighbourhood Plans within Rother District and their Proposals

5.1 There are currently nine Neighbourhood Plans at various stages within Rother District (Battle, Rye, Robertsbridge, Ticehurst, Sedlescombe Fairlight, Crowhurst, Etchingham and Burwash). The decision to undertake a Neighbourhood Plan rests with the local community (generally a Town or Parish Council) so others could potentially emerge.

5.2 RDC, as the relevant competent authority, is conducting this HRA screening exercise as a composite that will apply to all Neighbourhood

Plans, including any that may subsequently emerge during the plan period. This is on the basis that both the DASA and Neighbourhood Plans are similarly required to be in general conformity with the Local Plan Core Strategy.

6. Description of the Relevant Plans and Strategies to be considered 'in Combination'

6.1 In response to Article 6(3) of the Habitats Directive, the authority must consider any effects 'in combination' with other plans and/or projects. Therefore, it is necessary to review these plans and policies that may also (in combination), have significant impacts on these designated sites. Relevant regional plans have been identified and are detailed below.

6.2 HW AONB Management Plan 2014-19. This Plan is the 3rd edition, mid-term review of the AONB Management Plan 2004: A 20 year strategy. It does not allocate land for development, but it is focused on delivering the statutory purpose of AONB designation: conserving and enhancing natural beauty. Considerations relating to wider environmental issues, the rural economy and communities are dealt with in the context of delivering this purpose. The Hastings Cliffs SAC, Ashdown Forest SAC, Dungeness, Romney Marsh and Rye Bay SPA and Ramsar are all within the HW AONB. The HW AONB Management Plan has been subject to its own HRA/AA screening process. The result of screening shows most objectives are unrelated and therefore not applicable or have no effect. Almost a quarter of the outcomes highlighted compatibility concerns between the two sets of objectives. The majority of these are potential concerns and many can be reconciled by ensuring management regimes are compatible. 10% of the objectives screened produced an 'uncertain' result. All of these objectives related to climate or socio-economics, and it was unclear how these would affect (positively or negatively) the conservation objectives of the designated sites. Finally, 5% of the objectives screened positively reinforced the objectives of the designated sites. The screening results comment that the AA process is designed to ensure that any options identified as having a significant detrimental effect on European sites will be amended during the process of plan formation.

6.3 East Sussex, South Downs and Brighton & Hove: Waste and Minerals Local Plan (adopted 19 February 2013) - sets out the strategic policy decisions for waste and minerals in the Plan Area. A waste and minerals sites document is being currently produced that uses the policies set out in this Plan to identify the most suitable areas for waste and minerals development.

6.4 Shepway District Core Strategy (2013) – approximately 8,000 dwellings between 2006/7 and 2025/26 (400 per annum), with 20ha of new industrial, warehousing and offices, and 35,000sq.m of retail. RDC's is currently working jointly with Shepway on a 'Sustainable Access Strategy' to address the issue of recreational pressure on the Dungeness complex of international sites, an outcome stemming from the HRA process.

6.5 Ashford Borough Council's Core Strategy was adopted in July 2008. Under Policy CS2, land for about 16,770 new dwellings and related uses, and about 16,700 additional jobs plus contingency allowances of about 10% and 40% respectively will be identified within the Ashford Growth Area. In the rest of the Borough, subject to any amendments made in the Tenterden & Rural Sites DPD, land for about 1,180 new dwellings will be identified by 2021, alongside appropriately scaled employment opportunities. The impact of development in Ashford relates largely to the issue of recreational pressure on the Dungeness complex of international sites, an outcome stemming from the HRA process, which is being addressed by Rother DC's and Shepway DCs partnership working on the 'Sustainable Access Strategy'.

6.6 The Hastings Borough Council Local Plan 2011 – 2028 identifies a minimum 3,400 new homes by 2028 (including units completed since 2011). Policy DS2 promotes development **of** up to 70,000m2 of employment floorspace between 2008 and 2028. This figure has remained consistent during the evolution of the plan, including adopted Core Strategy (February 2014) and adopted Development Management Plan (September 2015). Therefore the implications of this figure have already been screened out of Rother's HRA process at Core Strategy stage. In addition, it is notable that a screening report was undertaken in 2014 to support the Development Management Plan. This screening report determined that the Plan policies, either in isolation or in combination (including with other plans and policies) were not likely to result in significant adverse effects on the European sites, and as such, a more detailed Stage 2 HRA was not considered necessary.

6.7 Wealden District Core Strategy Local Plan (adopted February 2013) – At least 4,525 additional dwelling over the period 2010-2027, and 128,695 sq. metres net floor-space between 2006 and 2030. The

Issues, Options and Recommendations document for a new Local Plan was published in October 2015.

6.8 Eastbourne Borough Core Strategy Local Plan (20 February 2013) - 5,022 new dwellings between 2006 and 2027 (222 per year until 2027).

6.9 Lewes District Local Plan, Part 1 Joint Core Strategy Proposed Submission Document (January 2013) was examined in August 2015. - The HRA for Lewes District Core Strategy screened out potential effects on the Pevensey Levels Ramsar site and SAC.

6.10 Tunbridge Wells Borough Council – Site Allocations Plan HRA (February 2013) concluded that "Given the commitment of Tunbridge Wells Borough Council to contribute to monitoring of air pollution on the SAC and SPA and to commit to contributions where any development would interact with the SAMM, it is likely that the HRA of the Site Allocations DPD will be able to conclude that no site-specific measures are likely to be required for any individual site allocations within the Borough.

6.11 East Sussex Local Transport Plan 3 (2011-26) - The local transport authority's vision, objectives and strategy reflect the objectives and priorities outlined in the Sustainable Community Strategy for East Sussex, 'Pride of Place' and the East Sussex Council Plan. It also reflects the wider policy context in which LTP3 sits, including its role in helping deliver infrastructure required to enable sustainable economic growth through the Local Enterprise Partnership (LEP). A screening exercise was conducted in March 2011 which led to the majority of measures being screened out.

6.12 England Coast Path: Camber to Folkestone. Since 2012, Natural England has been preparing proposals to improve public access along a 49 km stretch of the south east coast between Camber, East Sussex and Folkestone in Kent. Given the concerns highlighted via the Rother & Shepway Core Strategies HRA processes regarding recreational pressure on the Dungeness complex of international sites, it is also relevant to consider this proposal 'in combination' Following screening, Natural England concluded on the *Likelihood of significant effects (LSE)* that: 'As the project is unlikely to have significant effects (either alone or in combination with other plans or projects) on any of the Qualifying Features, no further assessment is required and permission/authorisation/assent may be given.'

6.13 In summary, no significant adverse effects on European site's that are relevant to the Rother DASA or Rother Neighbourhood Plans have been identified in relation to the HRA assessments for other Local Plan documents for adjoining and nearby districts /boroughs.

7. The Likely Significant Effect Testing (Screening) Stage

7.1 As outlined in section 1.3 above, there are four stages of HRA. The first stage (and subject of this report) is a Likely Significant Effect (LSE) test or 'screening' stage. This is essentially a high level risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:
"Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?"

7.2 The objective is to 'screen out' those plans and projects (or site allocations/policies) that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites, usually because there is no mechanism or pathway for an adverse interaction with European sites. In addition, European sites may be screened out where there is no mechanism or pathway for an adverse effect from any element of a plan or project.

7.3 The Screening:

- Identifies European sites within and outside the Plan area that may potentially be affected (see Section 3).
- Identifies the characteristics of these European sites and their conservation objectives (see Section 3)
- Provides details of the Plans and their proposals (see Sections 4 and 5).Provides a screening to examine whether the Development and Site Allocations Plan; or any of the Neighbourhood Plans (alone or in combination with other relevant plans or projects), are likely to have a significant impact on any of the international designated nature conservation sites, in view of their conservation objectives.
- Identifies the potential effects on the European site; and
- Assesses the significance of any effects on the European site. If effects (in combination) are judged likely or uncertainty exits, the precautionary principle applies and the assessment should proceed to *Stage 2: Appropriate Assessment* (see Table 1 for explanation of stages).

Who carried out the HRA Screening?

7.4 This HRA was carried out by Rother District Council. As a statutory consultee, Natural England provided initial comments on 03/11/15. Natural England and the Environment Agency also provided comments on the revised version (on 08/08/16 and 17/07/16 respectively). All NE and EA comments are included in Appendix 7.

8. Relationship to other Habitat Regulations Assessments, including those previously undertaken in support of the Rother District Local Plan 2011-28

8.01 An additional consideration factor for all Neighbourhood Plans, and Local Planning Documents that will form part of the Development Plan for Rother is the extent to which they have already been subject to HRA (as part of the Core Strategy) to the extent that they can be considered to have already been 'screened out'.

8.02 Summary explanation of the HRA tasks/documents that have been completed for the District prior to Core Strategy adoption in 2014 are as follows:

8.1 Rother DC incorporating Natural England comments 'RDC Local Development Framework Core Strategy AA Screening Report' (Dec 2007)

8.1.1 This report was the first stage of the Habitats Regulations Assessment of the Rother Core Strategy Development Plan Document, to meet the requirement of the Habitats Directive. It was prepared by Rother District Council, as the relevant competent authority.

8.1.2 The outcome of the assessment was that the following potential impacts were identified, triggering the requirement to proceed to the next stage of Appropriate Assessment:

Dungeness SAC:

- *Potential for impacts from housing provision and associated infrastructure on water quality and quantity that could affect the integrity of the site.*
- *Potential for impacts on species that forage outside the site's boundary.*
- *Potential for increased recreational pressure and disturbance that* could affect the integrity of the site.
- *Potential for changes in pollution levels from increased traffic levels related to housing provision and associated infrastructure.*

Dungeness to Pett Level SPA[4] and proposed Ramsar Site[5]:

- *Potential for impacts from housing provision and associated*

[4] Now incorporated within the Dungeness, Romney Marsh and Rye Bay SPA
[5] Now confirmed as of March 2016

infrastructure on water quality and quantity that could affect the integrity of the site.

- *Potential for impacts on species that forage outside the site's boundary.*
- *Potential for increased recreational pressure and disturbance that could affect the integrity of the site.*
- *Potential for changes in pollution levels from increased traffic levels related to housing provision and associated infrastructure.*

Pevensey Levels Ramsar Site[1]:

- *Potential for impacts from housing provision and associated infrastructure on water quality and quantity that could affect the integrity of the site*
- *Potential for changes in pollution levels from increased traffic levels related to housing provision and associated infrastructure.*

Hastings Cliffs SAC:

- *Potential for increased recreational pressure and disturbance that could affect the integrity of the site.*

8.2 URS / Scott Wilson 'Rother and Shepway Core Strategies 'Habitat Regulations Assessment (Dungeness SAC; Dungeness to Pett Level SPA and SPA extension[6]; and Dungeness, Romney Marsh and Rye Bay proposed Ramsar site[7])' (Final Report July 2011) and (Final report following Publication Stage consultation January 2012)

8.2.1 The report(s) conducted a further screening exercise of the emerging Rother Core Strategy, with draft Core Strategy policies having been made available by this time. It concluded that a total of seven policies could not be immediately screened out as being unlikely to lead to significant effects:

- OSS1: Overall Spatial Development Strategy;
- BX3: Development Strategy (Bexhill);
- RY1: Policy Framework for Rye and Rye Harbour;
- BA1: Spatial Strategy for Battle;
- CO3: Improving Sports and Recreation Provision;
- EMP2: Business Land and Premises; and
- EMP6: Tourism Activities and Facilities.

[6] Now incorporated within the Dungeness, Romney Marsh and Rye Bay SPA
[7] Now confirmed as of March 2016

8.2.2 The potential impacts and effects of these policies were evaluated against the European sites on a topic by topic basis, as follows:

Disturbance

8.2.3 The HRA noted that visitor pressure was one of the issues that could theoretically have an impact upon these interest features either by trampling of shingle vegetation or by disturbance of SPA birds, particularly at:

- Dungeness RSPB Reserve;
- Dungeness Point and National Nature Reserve outside the RSPB Reserve;
- Camber Sands & the Broomhill frontage; and
- Rye Harbour Local Nature Reserve.

8.2.4 A potential disturbance route from activities at the Port of Rye was also noted, and it could not be concluded that adverse effects would not result without further safeguards. The HRA recommended that text to be included within the Core Strategy in this regard; and also that individual proposals be subject of their own HRA.

8.2.5 The HRA noted that the RSPB reserve at Dungeness was already well aware of the problem and this has led them to declaring a visitor cap of 40,000 per annum. More recent clarification (in December 2015) has been sought with RSPB regarding this point. In the event of approaching the 40,000 figure they would consider ways of managing visitors, which may include a review of things like wardening, trail locations, additional screening, etc. However, the RSPB confirm that current visitors to the Dungeness Reserve number about 28,000 per annum (as counted through the visitor centre on a daily basis) so there is considerable leeway before the need to apply such measures.

8.2.6 A calculation was presented demonstrating that the probable increase in visitors to the Dungeness sites as a result of the projected population increases in Rother is expected to be about 4%. The HRA also stated *"5.4.7: What is clear is that visitors to the Dungeness sites come from a large area covering not only Shepway and Rother but also the surrounding districts and elsewhere in the south-east. While there may be an increase of 10% or more in visitors to the Dungeness Complex over the Core Strategy period, future Shepway/Rother residents are likely to make a relatively modest contribution to the overall increase in pressure (constituting approximately 10% of the additional visitors, with the remaining 90% living further afield). However, recreational pressure arising from new residents still contributes to overall pressure and must also be placed within the context of other initiatives within the Core Strategies that may lead to an increase*

in recreational pressure. As such, while there would be unlikely to be an adverse effect from development in Shepway and Rother in isolation, there would be an 'in combination' effect to which development in both districts will contribute. Kite surfing, day trippers, cyclists, dog walkers, bait diggers all have the potential to impact the interest features."

8.2.7 Three RDC Core Strategy policies (RY1, CO3, EMP6) promoting tourism were highlighted, leading to the comment *"5.4.11 As such, the overall increase in potential tourist visits over the Core Strategy period will also be a function of the two Core Strategies".*

8.2.8 Overall, regarding 'disturbance' the report noted *"5.4.12 It is considered that the contributions to future recreational pressure from Rother/Shepway residents is likely to be sufficiently small that a restrictive development control policy applied to the two districts would be ineffective in actually managing the vast majority (potentially over 90%) of the future increase in visitors to Dungeness since most visits will probably originate outside the two districts. Therefore a more generally applied 'sustainable access' policy is required and this is covered in further detail in the recommendations section"*

8.2.9 It also noted that the amount of new housing at Ashford could lead to population increases beyond the predictions used in analysis and may involve increased access to the northern parts of the Ramsar site close to Ashford.

8.2.10 Also, quarrying of minerals activities may lead to disturbances, although it was noted that the East Sussex Minerals and Waste Plan is subject to its own HRA.

8.2.11 The HRA recommended that, owing to the potential recreational disturbance, the Core Strategy should highlight the need for sustainable use of the area benefitting both users and wildlife. This would include a statement detailing how the policy commitments will be achieved without an adverse effect on their conservation status and integrity. This should include details of funding, implementation, monitoring and details of remedial measures to be implemented if any recreation management measures proved less effective than anticipated. It recommended the first step would be updated surveys of visitor usage and activity (which has now been completed in the form of Phase 1 of the Sustainable Access Strategy).

8.2.12 NE also indicated a role for GI in deflecting visitors away from European sites, highlighting a role for the Combe Valley Countryside Park in this respect (formerly Pebsham CP).

8.2.13 The HRA noted that text and policy had been included in the Core Strategy as a result of the recommendations and concluded that *'With*

the recommendations incorporated, it is considered that the Rother and Shepway Core Strategies would have sufficient safeguards in policy/supporting text that they would be unlikely to lead to significant effects on the Dungeness international sites through disturbance impacts'.

8.2.14 Rother District Council and Shepway District Council, in partnership with NE and other environmental bodies, are currently undertaking a 'Sustainable Access Strategy' of the Natura 2000 area to address the recommendations above. This was referenced in Rother's adopted Core Strategy (paragraph 10.21 and 17.42).

Water quality

8.2.15 It was noted that Rye, Rye Harbour and Winchelsea are all served by Sewage Treatment Works (STWs) that discharge to the River Rother or other watercourses that drain into the Natura 2000 area. The HRA noted the level of development planned in the Rye, Rye Harbour area and suggested it unlikely that such an increase would exceed the headroom available at the necessary STWs.

8.2.16 The HRA additionally noted that commercial operations at Rye Harbour pose a potential risk of water quality impacts. It recommended that the Core Strategy clarify that any proposals for expansion of the Port give full weight to the constraint posed by the international designations surrounding the Port.

8.2.17 With these recommendations incorporated, the HRA considered that the Rother Core Strategy would have sufficient safeguards in policy/supporting text that they would be unlikely to lead to significant effects on the Dungeness international sites through water quality impacts. Core Strategy Policy RY1(vii) is now incorporated into the adopted Core Strategy to satisfy this concern.

Water resources

8.2.18 There is no link between development in Rother and abstraction from the Denge gravel aquifer underlying Dungeness. Since abstraction from the gravels is already restricted by the EA, the issue was screened out.

Air quality

8.2.19 Following recommendations in the HRA addressing Rye Harbour/Port of Rye, the Rother Core Strategy incorporated text into paragraphs 10.18 and Policy RY1. With the recommendations incorporated, the HRA considered that the Rother and Shepway Core Strategies would have sufficient safeguards in policy/supporting text that they would be unlikely to lead to significant effects on the Dungeness international sites through air quality impacts.

Coastal squeeze and inhibition of coastal processes

8.2.20 The HRA concluded that the development proposed through the Rother Core Strategy would be unlikely to lead to significant effects on the Dungeness international sites through coastal squeeze or disruption of coastal processes.

Land outside European site boundaries

8.2.21 The HRA concluded that there is currently no indication that Core Strategy development in Rother will lead to loss of important areas of supporting habitat outside the pSPA or pRamsar site boundaries. Rother only intends to deliver 350 new dwellings in the Rye/Rye Harbour area over the Core Strategy period, most of which will be centred on the 'urban' areas of Rye/Rye Harbour as infilling rather than in the open countryside. As such, the risk of significant loss of supporting habitat is sufficiently small that no special measures are required.

8.3 URS / Scott Wilson 'Rother DC Core Strategy 'Habitat Regulations Assessment – Likely Significant Effects (Hastings Cliffs SAC) Final Report' June 2011.

8.3.1 Hastings Cliffs are one of the finest examples of vegetated soft rock cliffs in the UK. The Hastings Cliffs SAC is part of Hastings Country Park Nature Reserve. The Country Park, SAC, SSSI and an additional area of farmland were consolidated under the designation of the Local Nature Reserve in 2006. The Report noted that *'the Reserve is heavily used for recreational activity (receiving an estimated 500,000 visits per year[8], of which a large proportion derive from tourists) and contains many footpaths and trails. The JNCC citation for the SAC does note that "The SAC includes part of a country park where there are pressures to manage visitors." However, that comment was made several years ago and since that time a carefully managed network of footpaths, trails and viewing areas has been developed by Hastings*

[8] http://www.lnr.naturalengland.org.uk/Special/lnr/lnr_details.asp?C=0&N=&ID=1189

Council. These are actively managed by Hastings Council Ranger service and an active group of volunteers.'

8.3.2 The HRA commented that there are no indications that the Country Park is at or close to visitor capacity or that any future increase in visitors cannot be managed. In addition it was noted that recreational activity in the Reserve (and SAC) is well-managed and there is sufficient scope to control recreational access to the SAC. To enable management of any increase in recreational visitors a detailed framework and mechanism already exists to ensure that any necessary access management can be delivered. Section 3.6.2 also outlined a number of access management measures in place or in the pipeline.

8.3.3 As a consequence it was concluded that while Rother is likely to make a contribution to visitors within the Country Park and SAC, it is considered that impacts on this site can be screened out of the Rother Core Strategy HRA, as they had been for Hastings itself.

8.3.4 In their comments on this screening report, Natural England raised concerns over the evidence that Hastings Cliffs SAC can demonstrably meet visitor demand (see Appendix 6). In light of this point, cross-reference should be made to section 8.8 which details that Hastings Borough Council HRA processes (noting that the Hastings Cliffs SAC is entirely in Hastings). In 2014, Hastings BC undertook a screening report to support the Development Management Plan. This screening report determined that the Plan policies, either in isolation or in combination (including with other plans and policies) were not likely to result in significant adverse effects on the European sites, and as such, a more detailed Stage 2 HRA was not considered necessary. The Rother development targets were well established in Submission Core Strategy at that stage and it is these numbers upon which the DASA and Neighbourhood Plan development targets will be based. Therefore, it is considered that impacts on this site are 'screened out' of the Rother DASA & Neighbourhood Plans HRA, as they had been for Hastings itself.

8.4 URS / Scott Wilson 'Appropriate Assessment and Air Quality Local to the Pevensey Levels Ramsar Site. A Report to Support the Appropriate Assessment for Rother, Wealden, Hastings and Eastbourne Core Strategies' (June 2009)

8.4.1 The steps that were followed for undertaking this assessment with regard to air quality issues were as follows:

- Determine what proportion of the Ramsar site is within 200m of the A259 and any minor roads that the authorities have reason to believe are likely to experience a substantial increase in traffic as a result of the planned development.

- Interrogate the UK Air Pollution Information System (APIS) to determine whether the current background NOx concentration is beyond the critical level for the key habitats within the Ramsar site (i.e. those habitats on which the invertebrates and birds rely and for which the site was designated).

- Estimate the relative increase in traffic generation along the A259 by the end of the plan period.

- Use the percentage increase in traffic to determine the likely increase in nitrogen deposition.

8.4.2 Following advice from Natural England it was determined that the principal approach to 'in combination' assessment should be to not only appraise the housing and commercial development to be delivered under a single Core Strategy but for those to be delivered by the Core Strategies for Eastbourne, Hastings, Rother and Wealden to be considered 'in combination', as well as any increase in vehicles on the A259 may also be expected to arise from the East Sussex Minerals & Waste Development Framework.

8.4.3 Using this appraisal, the HRA concluded that it seems unlikely that the additional housing to be delivered across the four districts will, even when considered 'in combination' with each-other and the other contributors to a predicted increase in vehicle movements on the A259 (such as the emerging East Sussex Waste & Minerals Development Framework) result in exceedence of the critical level or critical load for the Pevensey Levels Ramsar site, particularly when the increase vehicle flows is considered within the context of current national predictions that exhaust emissions are likely to improve over the plan period. No measures to either avoid or mitigate effects will therefore be required because the predicted increase in traffic is unlikely to cause either NOx concentrations or rates of nitrogen deposition to exceed the critical level or critical load.

8.4.4 Natural England have been consulted on this report and commented that they: 'would concur with the conclusion that while there is likely to be an increase in nitrogen deposition and NOx concentrations these will still be below the Critical Levels applicable to Pevensey Levels and therefore there is unlikely to be a significant effect on the Ramsar site from the proposed levels of housing from these pollutants'.

8.5 Rother DC and Wealden DC 'Wealden & Rother Core Strategies Appropriate Assessment Hydrology Local to the Pevensey Levels' (September 2010)

8.5.1 This HRA was produced for both Rother District Council and Wealden District Council. It identified the key environmental conditions of importance in sustaining the site integrity as

- Unpolluted water;
- Low levels of nutrient enrichment (primarily from surface runoff and hydrological pathways, but also from atmospheric deposition);
- Control of non-native species (e.g. pennywort and *Crassula* sp.);
- Maintenance of appropriate hydrological regime; and
- Control of recreational disturbance.

8.5.2 The steps that were followed for undertaking the assessment with respect to hydrological impacts of development on the Pevensey Levels Ramsar site included:

- Discussions with the Environment Agency and Natural England
- A review of the Pevensey Levels Catchment and the Water Level Management Plan to determine how the Pevensey Levels functions and how the hydrology of the site is managed;
- A review of the current conditions of the Pevensey Levels Ramsar Site;
- Establishing whether future development within the hydrological catchment area of the Pevensey Levels would significantly impact on the conservation objectives of the site;
- A review of how the Pevensey Levels are managed in relation to waste water treatment. This involves considering the discharge consent and waste water capacity of the treatment works to assess the effect of waste water on the Pevensey Levels; and
- Identifying whether avoidance or mitigation would be required and if necessary make appropriate recommendations.

8.5.2 The HRA considered Bexhill's relationship to the Pevensey Levels. The main focus of planned growth is by urban extensions principally to the

north-east of the town, which are outside the hydrological catchment area of the Pevensey Levels. It was recognised that this will be supplemented over time by expansion onto greenfield sites to the north and west of Bexhill. Only the latter would be in the catchment of the Pevensey Levels. The precise scale and location of these will be determined through preparation of the 'Site Allocations and Development Plan.

8.5.3 The HRA recommended that given the potential for significant effects from increased surface water run-off on the Conservation Objectives of the Pevensey Levels Ramsar Site it would be necessary for mitigation measures to be incorporated by way of a specific policy into Site Allocation DPDs to ensure that no adverse effects result. For the regulation and remediation of increased surface water run-off / pollutants and to mitigate the loss of natural drainage patterns it is recommended that the relevant Plan include a policy which requires all new development, that creates impermeable surfaces, within the hydrological catchment area of the Pevensey Levels to incorporate suitable sustainable drainage systems (SuDS). This was subsequently achieved via Core Strategy Policy SRM2.

8.5.4 The HRA recommended *further assessment* and identified three measures for the Core Strategies that will manage impacts of development on the Pevensey Levels to an acceptable level:

- A commitment to implement SuDS;
- managing levels of development within the current consented capacity of waste water treatment works (Relevant only to Wealden DC); and
- implementing water efficiency measures.

8.5.5 For the Development and Site Allocations Plan, the HRA recommended the following in terms of further assessment:

1. The identification of appropriate SuDS techniques to mitigate surface water and water quality concerns;
2. Analysis of the results from the Review of Consents;
3. Analysis of Waste Water issues and Southern Water's research, should it be available, on a new location for a WwTW if necessary. Impact on water resources and levels will be an important consideration if it is necessary for flows are to be diverted (Relevant only to Wealden DC);

8.5.6 These recommendations relate primarily to the defined hydrological catchment of the Pevensey Levels, as visible in Appendix 3. Therefore they only have implications for the following areas within Rother:

- West Bexhill (St Stephens, Kewhurst, Collington, Sidley and St Marks wards)
- Normans Bay
- Catsfield Parish (west part)
- Battle Town area (north-west part)
- Penhurst Parish
- Ashburnham Parish
- Brightling Parish (south part)
- Dallington Parish (south part)

8.6 URS on behalf of Rother District Council 'Core Strategy Housing Numbers Habitat Regulations Implications Analysis' (July 2013)

8.6.1 Following publication of the HRA documents discussed in previous sections (paragraphs 7.2 to 7.36), Rother DC was obliged to increase its housing numbers. This occurred following commencement of the Core Strategy Examination. As a consequence, URS was commissioned to undertake an analysis of the revised housing numbers to identify whether these involve any implications for the conclusions of the studies previously undertaken into the effect of housing in Rother District on European sites. This most recent HRA report for Rother District Council also usefully summed up the previous work.

8.6.2 Regarding the Dungeness complex of sites, it was noted that the main mechanism that will ensure that no adverse effect on the Dungeness complex will occur is a Sustainable Access Strategy to manage future access around the Dungeness complex to a greater degree than is currently the case.

8.6.3 Regarding the Pevensey Levels Ramsar site, the conclusion was reached that there would be no adverse effect on its integrity as a result of air quality impact associated with increased traffic flows. Regarding hydrological impacts on the Pevensey Levels, URS commented that 'As the broad scale and location of development in the catchment is not affected by the proposed increase in housing numbers, and the provision of SuDS will be a future requirement, it is understood that this component of the earlier AA remains valid'.

8.6.4 Regarding Hastings Cliffs SAC the conclusion was that there would be no adverse effect on the SAC as a result of additional housing because

there are no indications that the Country Park is at or close to visitor capacity or that any future increase in visitors cannot be managed.

8.6.5 Following further assessment of all three areas, the July 2013 HRA Report concluded that the change in housing numbers compared to the submitted Core Strategy will not require the conclusions of the HRA work undertaken to support the Core Strategy to be altered.

8.7 Relationship to Ashdown Forest HRA within Wealden District Council area

8.7.1 The Ashdown Forest HRA is the only assessment discussed here in Section 7 that was not undertaken in support of the Rother District Core Strategy. Nonetheless, it is relevant to consider as part of this HRA screening exercise for the DASA and Neighbourhood Plans for the reasons set out below.

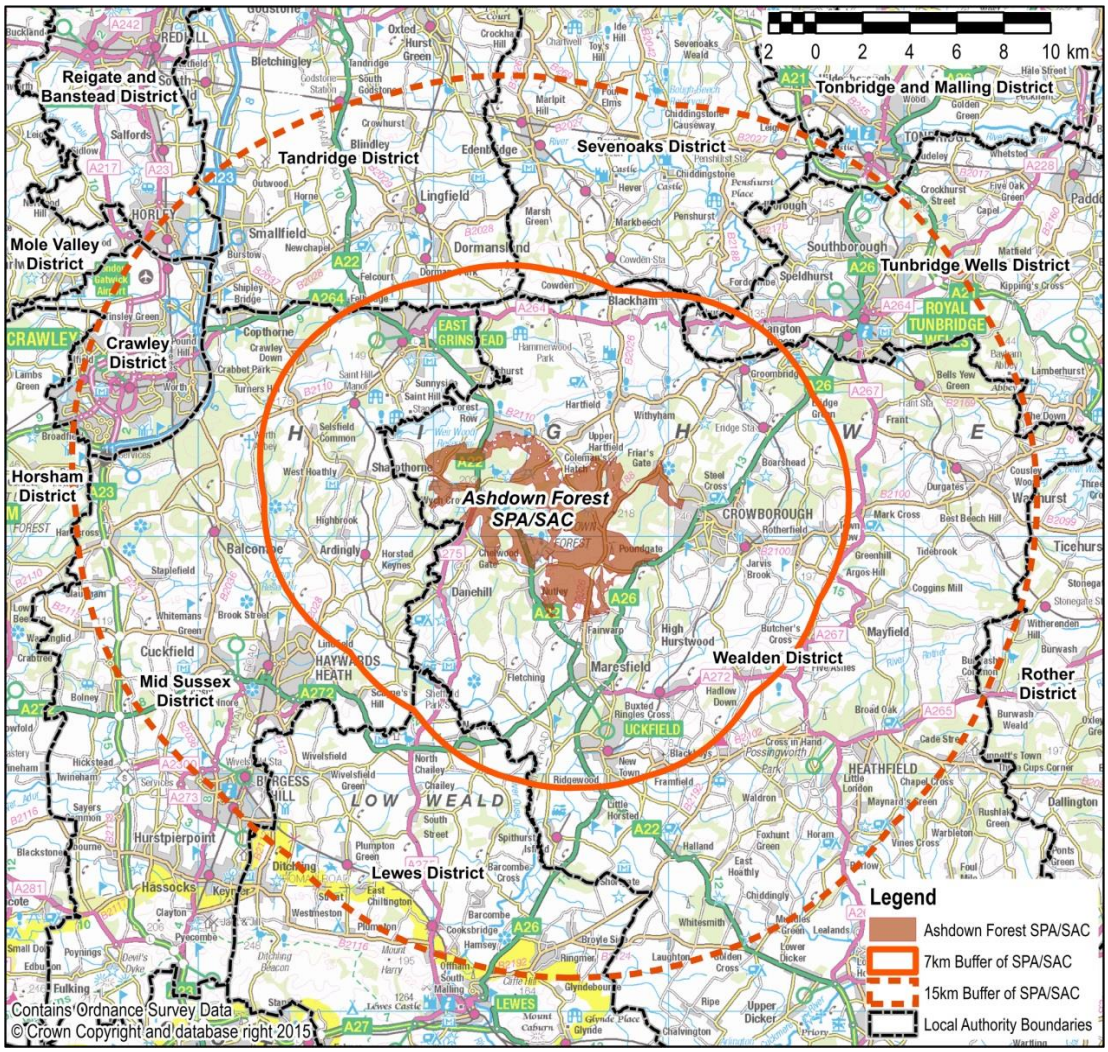
8.7.2 On 9th July 2015, Wealden District Council were obliged to make a change to the adopted Core Strategy Policy WCS12 and associated text within the Core Strategy. After a legal challenge to the High Court concerning the adopted Core Strategy, leave was granted to appeal a 7 kilometre Ashdown Forest Special Protection Area (SPA) mitigation zone and associated mitigation requirements contained within Policy WCS12 and associated text at the Court of Appeal. A Court Order was made on 9th July quashing parts of Policy WCS12 and associated text within the Core Strategy.

8.7.3 In the absence of a specific policy, Wealden District Council has produced guidance to assist applicants dealing with proposals that may require mitigation. The Council will be developing a new policy concerning the Ashdown Forest as part of the new Wealden Local Plan. The 'Ashdown Forest Special Protection Area – Habitat Regulations Assessment Guidelines' recommended that *'based on the evidence, applications for net additional dwellings within around 15 kilometres should be screened to determine whether either alone or in combination development will have a likely significant effect taking into account the evidence shown above.*'

8.7.4 The extension of the Ashdown Forest buffer from 7km to 15km means that areas within Rother are now incorporated within the 15km buffer (see Map 2). However, these constitute only small slivers of Burwash and Ticehurst Parishes – both of which are well within the countryside,

far from existing development boundaries and would not constitute suitable development allocation locations in line with the RDC Core Strategy. Therefore, it is concluded that impacts on this site can be screened out of the Rother Local Plan and any supporting Neighbourhood Plans. Natural England have confirmed they concur with this view.

Map 2: 15km and 7km Buffer Zone around Ashdown Forest SPA/SAC



8.8 Relationship to Hastings Borough HRA / AA processes

8.8.1 The documents below assessed the likely impacts of development set out in the Hastings Planning Strategy and Development Management Plan on the integrity of the Hastings Cliffs Special Area of Conservation (SAC) or the Pevensey Levels Ramsar site, both internationally designated areas.

8.8.2 The first stage of the Hastings Appropriate Assessment process was undertaken in May 2008:

- Appropriate Assessment Consultation version
- Appropriate Assessment: Figure 1
- Appropriate Assessment: Figure 2

8.8.3 Following consultation with statutory organisations on this document, further research was done to assess the 'in-combination' impact on the European Sites and site traffic impact for Ashdown Forest:

- Appropriate Assessment (March 2010) main document including Appendix 1
- Appendix 3
- Appendix 4
- Supplementary Habitat Regulation Assessment for Ashdown Forest (March 2012)

8.8.4 A screening report was undertaken in 2014 to support the Development Management Plan. This screening report determined that the Plan policies, either in isolation or in combination (including with other plans and policies) were not likely to result in significant adverse effects on the European sites, and as such, a more detailed Stage 2 HRA was not considered necessary.

9. Updated Surveys, Monitoring and Assessment of Site Condition and Status

9.1 Purpose, Role and Method of Updated Assessments

9.1.1 All the HRA/AA assessments covered in preceding sections are considered to remain relevant to the current Local Plan process. Nonetheless it is useful to cross-check the status and condition of the internationally protected sites, and their associated key interest features, up to the present day. There are several ways of achieving this.

9.1.2 Section 9.2 analyses the SSSI condition surveys for this purpose.

9.1.3 Section 9.3 provides a further method of monitoring by examining the extent to which the international sites may have been directly affected by planning permissions on site,

9.1.4 Section 9.4 specifically looks at the Priority Habitats within the international sites and the extent to which they exist elsewhere in the District, as well as the extent to which they are protected and enhanced through planning policies.

9.1.5 Section 9.5, supported by Appendix 7, assesses the status of 'key interest features' of the international sites, based on available surveys and evidence. The key interest features are key to the reasons for designation and were set out in Table 2.

9.1.6 Section 10 relates specifically to the Pevensey Levels. It follows up the future recommendations made for the DASA in the September 2010 Appropriate Assessment.

9.1.7 Section 11 relates specifically to the Dungeness complex. It outlines the critical role of the Sustainable Access Strategy, itself an earlier outcome of the HRA process, in particular how surveys and monitoring of the Dungeness Natura 2000 complex are an integral component of the project.

9.2 SSSI Condition Surveys

9.2.1 All international sites assessed within this HRA stage 1 (Ramsar, SPA and SAC) are also designated Sites of Special Scientific Interest (SSSI). Therefore, the regular monitoring of SSSI status by Natural England provides a ready method of assessing protected international sites for HRA purposes.

9.2.2 Any deterioration in their condition may reasonably be taken as an indicator that they have been subject to more recent negative impacts and harm. This is turn may be interpreted as a 'warning flag' that the consequences of planning policy (either via a single plan or as a consequence of several plans acting cumulatively 'in combination') have not been adequately assessed or mitigated by the various HRA processes outlined above.

9.2.3 The caveat is that in some cases the extent of SSSI boundary extends beyond the boundary of international sites. This is particularly the case in the Dungeness complex and Ashdown Forest and in such cases it should be borne in mind that the condition status of the SSSI does not necessarily wholly reflect that of the protected international sites. This is much less the case with Hastings Cliffs and at Pevensey Levels, the Ramsar and SSSI boundaries replicate each other exactly.

9..2.4 As demonstrated in Appendix 5, the overwhelming majority of relevant SSSI area is currently either 'favourable' or 'recovering' condition. This is not grounds for complacency since, by definition, 'recovering' status indicates that progress still needs to be made.

9.2.5 However, in view of the fact that the current condition status is so overwhelmingly favourable or recovering, it has not been considered necessary to undertake more detailed analysis of SSSI within international sites vis-à-vis SSSI outside international sites.

9.2.6 It is also useful to compare the condition status to previous key milestones in the Rother Local Plan/ LDF and HRA process. In 2006, just after adoption of Rother's last Local Plan, the condition of relevant SSSI's was notably worse with just under 29% of the Pevensey Levels SSSI being either 'unfavourable – no change', 'unfavourable – declining' or 'destroyed'; and more than 15% of the Dungeness, Romney Marsh and Rye Bay SSSI having similar status. By 2009[9], the

[9] (the time of the first Stage 2 Appropriate Appraisal for the Rother Core Strategy relating to Air Quality at Pevensey)

conditions had significantly improved, with the respective figures being just under 4% and just over 6%. Today, as visible in Appendix 5, the equivalent figures are just 0.5% and 0.27%. The fact that such tiny proportions of the relevant SSSIs are currently classed as being in a negative condition can be interpreted as reassurance of the validity of the HRA process thus far.

9.3 Infringement of International Sites by Planning Permissions

9.3.1 A further cross-check is an assessment of infringements of international sites by planning applications. Appendix 4 provides confirming less than half of one per-cent of the international sites are infringed by planning permissions. Supporting details of the applications (also in Appendix 4) provided by Sussex Biodiversity Record Centre indicated that there were three permissions or relevance, none of which resulted in likely significant effects.

9.4 Assessment of Associated and Supporting Habitats

9.4.1 The international sites contain very significant areas of a range of BAP priority habitats. Appendix 4 sets out the full list of priority habitats in Rother, the international site they can be found within, their total coverage and the areas that have been infringed by planning applications (which for the habitats found in the international sites, represents a very tiny proportion).

9.4.2 During consultation, Natural England raised a concern over the provision of 'Stepping stone' habitats (i.e. priority habitats located outside the boundaries of international sites but which may encourage species connectivity and movement). This section 9.4 therefore assesses this issue.

9.4.3 The Combe Valley Countryside Park (including Glyne Gap) has a notable role in this respect. The Habitat Management Plan (HMP) for the CVCP identified 30 habitats within the park, including the following 8 Priority BAP habitats. As also seen in Appendix 5, these habitats closely reflect those present within the international sites.

- Reedbed
- Coastal and floodplain grazing marsh
- Coastal vegetated shingle
- Lowland fen
- Maritime cliff and slope
- Open water (including ditches, ponds and larger open water bodies)
- Ancient woodland

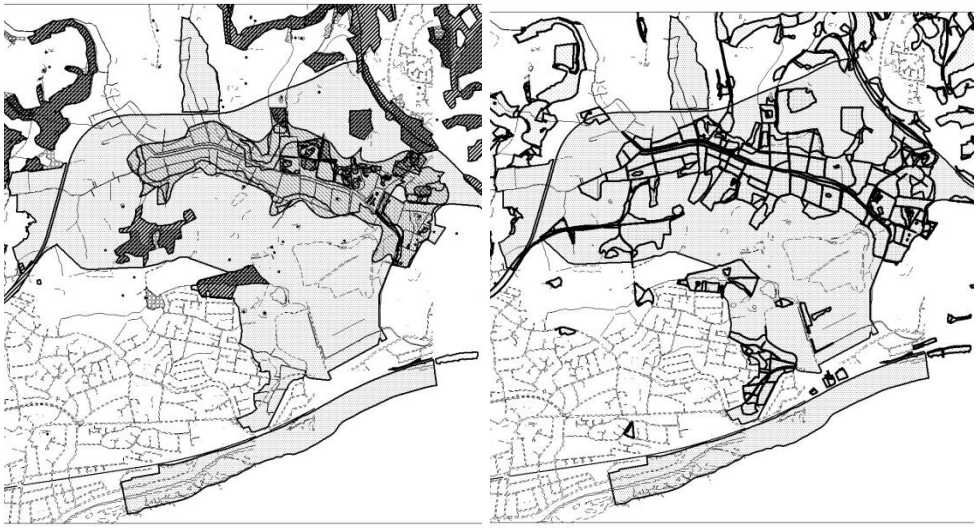
- Species rich grassland

9.4.4 In 2012, Rother District Council (on behalf of the Combe Valley Countryside Park Management Board) oversaw a successful funding bid to Natural England for funding, specifically to enhance and increase Priority BAP habitats within the Combe Valley Countryside Park. The spending of this monies has been overseen by ESCC. The funding financed the production of the HMP later in 2012, as well as sevela other projects including Glyne Gap Local Wildlife Site NVC Survey, ditch management guidelines, hedge management guidelines, Scrub management programme, Soft Cliff Invertebrate Survey, Gorringe Stream site clearance and Freshfields Plantation Management,

9.4.5 Although not necessarily directly related to these initiative, the extent of BAP/Priority habitat in the CVCP has expanded significantly in the most recent survey data as Maps 3a and 3b illustrate.

Maps 3a and 3b Extent of BAP/Priority Habitat in Combe Valley Countryside Park

CVCP BAP /Priority Habitat – Pre 2015 extent (left) and 2016 extent (right)



9.4.6 Enhanced provision of habitats amd green infrastructure is also enshrined in Core Strategy policy EN5 with further measures being developed as part of the Development and Site Allocations DPD. Collectively these should increase the viabilty of connecting habitats beyond the boundaries of theinternational sites.

9.4.6 Further scope is offered by the development of a DASA policy promoting multi-funtional SuDS techniques benefitting biodiversity and habitat, such as ponds and wetlands. This is particularly relavant to

the hydrologiical catchment of the Pevensey Levels as set out in the proceeding Section 10.

9.4.8 The analysis in the above Section 9.4 arguably goes beyond the usual parameters of HRA Stage 1 screening, by firstly examining compenatory/ mitigation measures, and secondly the effects of policies and proposals on areas outside the boundaries of the international sites. As such section 9.4 would more typically more often be seen as a contribution towards the latter 'post-screening' stages of HRA. Nonetheless, these matters are highlighted in this stage 1 screening as evidence of the positive measures being actioned within Rother District to enhance Priority Habitats beyond the international sites boundaries. This should enhance the ecological viability of the international sites themselves by improving connectivity via 'stepping stone' habitats.

9.5 Monitoring of Key Interest Features

9.5.1 Earlier in this report Table 2 summarised the 'Key Interest Features' of the Natura 2000 sites, derived from the detailed DEFRA Natura 2000 sites data forms in Appendix 1.

9.5.2 Given that these features are central to the purposes of designation, monitoring of their on-going status is appropriate, as set out in Appendix 6.

9.5.3 The monitoring does not appear to highligh major concerns. Bird monitoring is based upon British Trust for Ornothology data relating to the proportion of times a species was recorded in species lists over the course of a calendar year. Overall species appear to be in reasonable health, the majority stable in terms of sitings, although the complete absence of Hen Harrier from the Dungeness, Romney Marsh and Rye Bay SPA over the last 5 years is a concerns since it was listed as a qualifying species.

10. Updated Review of Hydrology Local to the Pevensey Levels

10.1 Recommended Further Assessment Work from 2010 AA

10.1.1 As set out in Section 8.5, the Appropriate Assessment Hydrology Local to the Pevensey Levels' (September 2010) recommended the following in terms of further assessment for the DASA:

1. The identification of appropriate SuDS techniques to mitigate surface water and water quality concerns;
2. Analysis of the results from the Review of Consents;
3. Analysis of Waste Water issues and Southern Water's research, should it be available, on a new location for a WwTW if necessary. Impact on water resources and levels will be an important consideration if it is necessary for flows are to be diverted (Relevant only to Wealden DC);

These three matters are dealt with in turn below.

10.2 Appropriate SuDS Techniques for the Pevensey Levels Hydrological Catchment

10.2.1 In terms of the first matter identified for further assessment, the Core Strategy has already adopted a policy (SRM2 iii) specifically in relation to SuDs in the Pevensey Levels hydrological catchment, and the DASA will contain more detailed area specific policies.

10.2.2 In order to identify appropriate SuDS techniques that mitigate surface water and water quality concerns within the Pevensey Levels so as to avoid deterioration of the internationally protected wetland habitats, it is necessary to examine the evidence in more detail.

10.2.3 The Pevensey Levels has a large hydrological catchment area extending much beyond the Ramsar site boundary (see Appendix 2). Three main river systems cut through the Pevensey Levels Ramsar site conveying water from tributaries located in the upland areas to the sea. These include:

- The Western System
- The Wallers Haven
- The East Stream.

The latter two overlap with Rother District.

10.2.4 As described in Section 8.5.1 of this report, the AA identified the key environmental conditions of importance in sustaining the site integrity. These included 'Unpolluted water' and 'Low levels of nutrient enrichment (primarily from surface runoff and hydrological pathways, but also from atmospheric deposition).

10.2.5 The 2010 AA noted that 'Additional new development and increased populations located within the hydrological catchment area of the Pevensey Levels have the potential to impose additional pressure on the conservation status of the Pevensey Levels Ramsar site through: Change in hydrological conditions; and Deterioration of water quality'.

10.2.6 In relation to the Pevensey Levels, hydrology is central in maintaining specific designated species. Hydrology concerns the quantity, duration, rates, frequency and other properties of water flow. The flora and fauna in the Pevensey Levels are not only dependent on the overall maintenance of water levels but also the velocity and volumes at which water is received into the watercourses, which is critical to the success of the ecosystem. The hydrology and consequently the Conservation Objectives of the Pevensey Levels are therefore potentially affected by a number of issues.

10.2.7 The 2010 AA identified that any increase in impermeable surfaces within the hydrological catchment of the Pevensey Levels is potentially problematic. The development of land involving the covering over of natural geology with impermeable materials and structures can reduce the amount of water being received and stored by the underlying geology. As a result, and without mitigation, there is an increase in the amount of overland flow, which means the amount of water being received in a shorter period of time creates greater volumes and velocities of water in the watercourses. Loss of vegetation in the catchment area of the Pevensey Levels would exacerbate this effect. The impact of development through the loss of permeability is dependent on the type of underlying geology and the topography. Existing hard surfaced areas and the current urban drainage systems may also exacerbate the conveyance of water to the watercourses. Increased overland flow may enter the Pevensey Levels watercourses through drainage systems, which provide a direct route to watercourses. Any development, which increases the impermeabilty of land will increase surface water run-off. Development accommodated in the Pevensey Levels catchment area is likely to lead to increased run-off if unmitigated and has the potential to create a change in the hydrology of the Pevensey levels and convey pollutants to its watercourses and drainage network.

10.2.8 The 2010 AA (paragraph 7.4) anticipated that development would create an increase in impermeable surface, which would ultimately

result in increased surface water run-off and increased pollutant loads. In turn, this has the potential to significantly affect the hydrology, soil and flora and fauna of the Pevensey Levels, and ultimately affect the Conservation Objectives of the site.

10.2.9 Based on the precautionary principle it considered that any additional surface water run off would have a likely significant effect on the Pevensey Levels, with the main area of concern being the conveyance of pollutants.

10.2.10 The 2010 AA therefore recommended SuDS policy to apply to both greenfield and brownfield sites and to cover all new development with any proposed hard surface. In other words any proposed development that would lead to an increased rate and volume of surface water run-off leaving a developed site. This would include a proposed small-scale development such as a house extension as well as large or major developments such as proposed housing or commercial development). Both Natural England and the Environment Agency considered this approach to be acceptable at the time.

10.2.11 Since the 2010 AA of the Hydrology of the Pevensey Levels, the Lead Local Flood Authority (LLFA) has been established and published guidance relating to the design of drainage systems. Notably 'Water, People, Places - A guide for master-planning sustainable drainage into developments' (WPP) has been published by the Lead Local Flood Authorities of the South East of England for use by developers and planners and other practitioners involved in the planning and design of the built environment in the South East of England.

10.2.12 The WPP provides guidance on designing SuDS to deliver benefits, including 'Water Treatment' and Biodiversity and Habitat', both of which are pertinent to the issues that the 2010 AA highlighted in relation the Pevensey Levels.

10.2.13 Regarding 'Water Treatment' WPP states *'Pollution typically found in runoff including sediment, oils, metals, fertilizer, pesticides, and rubbish can be harmful to watercourses and coastal waters. The soils, gravels and vegetation present in many forms of SuDS act as filters, removing many pollutants before returning cleansed water to the natural environment.* WPP also advises on techniques to prevent runoff from reducing the quality of a receiving body of water. It notes that *'Different SuDS will provide different types of treatment, and a 'treatment train' of SuDS (see chapter 3) should be introduced to ensure water is exposed to a variety of filtration mechanisms and attenuated to allow pollutants to settle out. For example, runoff can be conveyed from permeable paving to a swale, before being treated in a wetland and discharged to provide three stages of treatment. Any water being discharged into a water body should be well treated to*

remove nutrients and sediments and a greater number of treatment stages is likely to be required when the receiving body quality is high.'

10.2.14 Therefore, in order to minimise the conveyance of pollutants to the Pevensey Levels, it is a recommendation of this HRA that the DASA applies a policy to the Hydrological catchment of the Pevensey Levels requiring a minimum of two types/stages of SuDS treatment. This measure will address the possible effects of 'unpolluted water' and 'nutrient enrichment' from surface run-off and hydrological pathways. This is in accordance with the 'precautionary approach', as outlined in paragraph 2.3.1.

10.2.15 Regarding 'Biodiversity and Habitat' WPP states *'SuDS can be designed to include a range of natural processes for managing and filtering surface water runoff. The inclusion of plants, trees, and other vegetation is often advantageous to slow and store water while providing filtration. These can be designed to support local biodiversity aims. SuDS treatment trains can be used to develop ecological corridors at the same time. They can also incorporate a range of vegetation species, ranging from wetland plantings to more common garden varieties. SuDS should be designed to complement and improve the ecology of the area, however consideration should be given to the effects of both species selection and maintenance requirements on the ability of existing habitats to continue functioning effectively'.* Elsewhere in WPP it notes that 'SuDS can include vegetation and surface water that can contribute to biodiversity and enhance ecology in developed areas. However, SuDS are primarily water management features and their design should carefully consider existing ecological conditions. Initial site surveys should identify areas of interest, including designated areas for nature conservation, areas with protected species and locally important habitats. SuDS should be designed to protect or enhance these areas. While SuDS can include areas of habitat, these should be well thought out in terms of long-term maintenance to ensure that habitat is not harmed during maintenance activities.'

10.2.17 It is notable that by providing biodiversity and habitat benefits, SuDS has the potential to provide additional associated and supporting 'Stepping Stone' Priority BAP habitats (i.e. ponds, watercourses or reedbeds) in accordance with the aims set out in preceding Section 9.4 of this report.

10.2.19 WPP contains a matrix to inform the selection of appropriate SuDS for these benefits. The key sections that apply to the Pevensey Levels hydrological catchment are set out in Table 3 below.

10.2.18 The Pevensey Levels Biodiversity Opportunity Area (BOA) provides further guidance on possible wetland habitat management, restoration and creation. The BOA extends beyond the boundary of the international sites into the surrounding hinterland, even extending into the 'Broad locations' for development identified in the adopted RDC Core Strategy so is a relevant reference in support of the DASA.

Table 3: Proposed SuDS selection Matrix for Pevensey Levels Hydrological Catchment

10.3 Analysis of Results from the Review of Consents

Stages of the Review of Consents Post 2010

10.3.1 In accordance with the recommendations of the 2010 AA, it is necessary to analyse results from the Review of Consents (see paragraph 10.1.1). Further stages of the Review of Consents (RoC) have now taken place since the 2010 AA and it is the role of this DASA HRA Screening Report to assess the implications. In response to requests for information pertaining to the RoC the EA have provided the following:

- *Environment Agency Kent & East Sussex Area 'Habitats Regulations (50) Review of Consents. Stage 3 - Appropriate Assessment - Pevensey Levels Ramsar. March 2011.*
- *Habitats Directive Pevensey Levels WQ RoC Stage 3B Appropriate Assessment March 2016*

10.3.2 The Review of Consents assesses both the Water Quality (i.e. Discharge) and Water Resources (i.e. abstraction) issues.

Water Quality Discharge Issue

10.3.3 Since 2010, all water discharge consents are referred to as Environmental Permits. The implementation of the Habitats Regulations 1994 established a requirement to review existing permits to ensure that no Environment Agency permit results in an adverse effect, directly or indirectly, either alone or in-combination, on the integrity of Natura 2000 sites (including Special Protection Areas, Special Areas of Conservation and Ramsar sites).

10.3.4 The first stage of the Pevensey Levels Review of Consents (RoC) in the year 2000 identified 173 environmental permits which were relevant, of these, 101 were found likely to have a significant effect in Stage 2. These first two stages, which were undertaken in a precautionary manner and in the absence of detailed guidance, eliminated only the surface water, potable water supply and trade dewatering environmental permits (as well as soak ways which were located beyond the site boundary and discharging <5m3/day).

However, since the completion of these first two stages in 2001, standard guidance was developed by the Environment Agency to screen the remaining permits in a more robust way prior to the Appropriate Assessment in a Stage '3A'

10.3.5 The 101 permits remaining at the end of Stage 2 were reviewed in Stage 3A (April 2011) as part of the Appropriate Assessment using the criteria outlined in Table 4 below (taking account of any revocations and modifications) which are based upon standard guidance.

Table 4: Screening criteria applied to permits remaining after the completion of the first two stages of RoC as Stage 3A of this Appropriate Assessment.

Distance Categories	Outcome for consents
Within site	All discharges retained except intermittent discharges and revoked permits
Within 3 km	All discharges retained except intermittent discharges and revoked permits
Within 10 km	All sewage or trade discharges greater than 5 m^3/d between 3 and 10 km from the site will be retained
Within 50 km	Not applicable, the hydrological boundary of the site does not extend beyond 10 km
Beyond 50 km	Not applicable, the hydrological boundary of the site does not extend beyond 50km

10.3.6 One-hundred and one Environmental Permits remained at the end of the second stage of the Pevensey Levels Review of Consents, of these, forty-seven were deemed unlikely to have a significant effect on the site were therefore concluded as having no adverse effect on the integrity of the site. Environmental Permits screened out during Stage 3A were concluded as having no adverse effect on site integrity due to their effects being negligible and inconsequential. Had the detailed guidance been available during the earlier initial Stage 1 and 2 analyses, a conclusion of no significant effect would have been drawn.

10.3.7 The remaining fifty-four Environmental Permits were appropriately assessed as part of stage 3 to ascertain whether or not they can be shown not to have an adverse effect on the integrity of the site. Integrity includes both (1) the structure (physical structure, species composition of relevant biological communities and distribution of these communities across the site) and (2) the function (ability of the site to sustain its interest features) of the site. This assessment was undertaken with specific reference to targets provided by Natural England. Where permissions did not compromise the favourable conditions targets in the conservation objectives, a conclusion of no adverse effect on site integrity was drawn.

10.3.8 The outcome of the Appropriate Assessment of the Pevensey Levels Ramsar for water quality at the conclusion of Stage 3 is summarised in

Table 5 below. Detailed information regarding the individual Environmental Permits may be found in Appendices B1.1 and B1.2 of the Review of Consents Stage 3a.

Table 5: Conclusions of Stage 3a RoC Water quality Assessment

Environmental Permits	Total Number of Permits
Total No. of Agency permissions assessed in Stage 3	101
Can be shown to not be having an adverse effect on the integrity of the site	8
Cannot be shown to not be having an adverse effect on the integrity of the site (alone or in combination)	46
Other*	47

*Other denote Environmental Permits which were revoked or found to not be significant at the end of Stage 3A

10.3.9 Therefore, at the end of Stage 3a, forty-six discharges remained requiring further assessment. In March 2016 a Stage 3b RoC was published. The purpose of Stage 3b was explained by EA (May 2016) as follows: *'Since the publication of the Stage 3 report, EA guidance has been published to screen out WQ Permits that are considered not to be at risk. Therefore an extension was completed to the original Stage 3 outcomes.* Stage 3b added a further STW to the list[10] requiring further assessment meaning there were 47 Discharge Consents where 'no adverse effect on site integrity cannot be shown alone or in combination'.

Table 6: Conclusions of Stage 3b for the Water Quality Function

Function	Total No. of Agency permissions assessed in Stage 3b	No adverse effect on site integrity can be shown	No adverse effect on site integrity cannot be shown alone	No adverse effect on site integrity cannot be shown in-combination	Others
Water Quality	47	6	9	9	32*

*Denotes permissions which have been revoked or found not to be significant prior to commencing the Appropriate Assessment, including 8 discharged or surrendered, 2 found not to enter the SAC and 22 screened out for being a low risk of compliance.

10.3.10 Therefore, at the conclusion of stage 3b, six discharge consents remained as being a risk to site integrity of the site (see Table 7).

[10] It was noticed that Windmill Hill STW (A01222) was missing from Stage 1, 2 and 3. Therefore it was added onto the list for Stage 3b.

Regarding these, the EA commented (May 2016) that '*6 permits will continue into Stage 4. The outcomes of Stage 4 have not been published yet but 4 Permits will be modified in AMP6 (Hooe STW, Hailsham North STW, Hailsham South STW, & Windmill Hill STW), 1 permit will be affirmed (Lunsford Cross STW) and the last permit will be mitigated through physical modifications of the channel (The Lamb Inn STW). Natural England have agreed to the outcomes of Stage 4'.*

Table 7: Six permits remaining at risk prior to Stage 4 RoC

W00382	HOOE S.T.W.
W00380	LUNSFORD CROSS SEWAGE WORKS
A01164	HAILSHAM SOUTH WWTW
A01166	HAILSHAM NORTH STW
A01222	Windmill Hill Herstmonceux
P07064R	THE LAMB INN

10.3.11 Therefore, based on the most recent EA advice provided for this report (May 2016), at the end of stage 4 there will be no permits remaining where 'no adverse effect on site integrity cannot be shown'.

Water Resources Abstraction Issue

10.3.12 Part B2 of Stage 3a assessed the Water Resources Abstraction issue.

10.3.13 The Pevensey Levels catchment is home to a major public water abstraction point at Hazards Green. It is here where South East Water PLC abstracts water from the Wallers Haven, whilst also augmenting it via a system of upstream boreholes. The upstream boreholes ensure suitable water depths in the main channel. The Wallers Haven on the eastern side of the Pevensey Levels is managed as a linear reservoir for public water supply. Summer flows into the eastern system are complicated by the major abstraction at Hazards Green. The abstraction is dependent on water flow. Mitigation is designed to reduce the effects of abstraction through the provision of compensation flows provided by abstraction from upstream boreholes. However, in dry years summer water levels fall to a point where the feeding of water to the ditch system is not possible.

10.3.14 Management of water abstraction is essential as the unsustainable abstraction of water, in relation to new development, has the potential to cause ecological problems by reducing river flow and river levels. This can have implications in relation to the geological processes that occur within wetland systems thus affecting soils,

habitats and can change species composition. Unsustainable abstraction of water has the potential to cause ecological problems by reducing river flow and river levels. This can lead to a concentration of nutrients such as phosphate and nitrate, which can ultimately lead to eutrophication and water quality issues.

10.3.15 In relation to water abstraction, the 2010 AA noted that *'The Catchment Abstraction Management Strategy for The Cuckmere and Pevensey Levels identifies the Pevensey Levels as having 'no water available' This means that there is no water available for further abstraction licences at low flows.'* In this context, the 2010 AA noted that due to the sensitivity of the Pevensey Levels, the abstraction licence issued to South East Water would not be extended and therefore no additional water for the public water supply can be abstracted above that currently permitted. The AA also noted that the current abstraction licence would be subject to review under the Review of Consents.

10.3.16 The Stage 3 Habitats Regulations Review of Consents, stated its objective was to *'to determine whether licensed abstraction prevents optimum management from taking place, rather than to define what the optimum management is.'*

Wallers Haven system:

10.3.17 Assumed 'outputs' from the Wallers Haven system included 'Abstraction for public water supply' and 'Lowland Feeding'. The RoC assumed that if water levels remained sufficiently high after these demands had been met (notably in the problematic Summer months), then there would be no water resource inhibition to optimum site management.

10.3.18 However, the stage 3 model showed the conservation objectives of the site were being compromised during dry years. Proposed measures to improve the situation included repair of the Star Inn Gates and targeting summer levels on the Wallers Haven earlier in the year. The RoC demonstrated that if this strategy had been adopted in the dry years then there would have been sufficient water within the system to buffer and to meet the demands of licensed abstraction and conservation. The analyses demonstrated that through a combination of full licence compliance, asset maintenance and careful planning, the conservation objectives of the Wallers Haven and it supported area were achievable.

The East Stream and its supported areas

10.3.19 The RoC's analysis of geology showed that the licensed abstraction in this area (Sweet Willow Wood) had no effect on the inflow to the Ramsar site via the East Stream or via direct groundwater interaction.

Conclusions of Stage 3 RoC regarding Abstraction

10.3.20 In its conclusions, the stage 3 RoC highlighted that the Water Level Management Plan (WLMP) had already outlined a number of recommendations that would allow proper management of the available water within the system. These included survey/maintenance of the feed sluices and the formulation of a decision making tool to facilitate the operation of individual sluices so as to maximise the use (and not waster) of available water resources more detail on the WLMP is in section 10.5.6). The assessments showed that, if carefully maintained, the system can be managed to secure the conservation objectives of the designated site and that 'The water resource permissions in place provide adequate legal control over abstraction operations to allow this.'

10.3.21 At the end of Stage 3 of the Review of Consents, no water abstraction licences remained where a risk of adverse effect of site integrity remained. Eight EA permission assessments were assessed in Stage 3, seven were shown to have no adverse effect on site integrity (see Table 8 below) whilst one was revoked or found not to be significant prior to commencing the Appropriate Assessment.

Table 8: Seven Abstraction Licences shown to have No Adverse Effect on Site Integrity at the end of RoC Stage 3

Consent Number	Site Name	No adverse effect on site integrity can be shown		No adverse effect on site integrity cannot be shown	
		Alone	In-combination	Alone	In-combination
Water Resources Permissions					
10/41/120302	PWS Surface Water at Hazards Green	x	x		
10/41/121002	PWS Groundwater at Hazards Green	x	x		
20/41/121302	PWS Groundwater at Sweet Willow Wood	x	x		
10/41/122001	Augmentation at Wallers Haven	x	x		
10/41/130403	Spray Irrigation at Marland Sewer	x	x		
10/41/130405	Spray Irrigation on Drockmill Hill Gut	x	x		
10/41/130406	Spray Irrigation on Honeycrock Stream	x	x		

10.3.22 Therefore, the current water abstraction licences can be shown not to have an adverse effect on the integrity of the site, through the EAs own Appropriate Assessment process. Consequently the issue can also be screened out of this RDC DASA HRA

10.3.23 Nonetheless, given the likelihood of continued water pressures in the area (a water stress area), water efficiency measures remain a

priority, as set out in the later section on 'Future Management of Water Supply.'

10.4 Waste Water Treatment Works (WWTWs)

10.4.1 Returning again to paragraph 10.1.1, the Appropriate Assessment Hydrology Local to the Pevensey Levels' (September 2010) made a third recommendation for further assessment for the DASA: *'Analysis of Waste Water issues and Southern Water's research, should it be available, on a new location for a WwTW if necessary. Impact on water resources and levels will be an important consideration if it is necessary for flows are to be diverted (Relevant only to Wealden DC);'* The 2010 AA indicated that WWTW were overwhelmingly located within Wealden District.

10.4.2 As part of this screening report, RDC has sought assurances from the EA that this remains a matter of relevance to Wealden District only, to which the EA replied '*Hailsham North and South Sewage Treatment Works (STW's), Hooe STW, Windmill Hill STW, and Rushlake Green STW are all within the Wealden District Council district area and have environmental improvements planned in Asset Management Plan 6'.*

10.4.3 In February 2016 Southern Water have also confirmed their understanding that none of the WTWs within Rother District discharge to or impact the Pevensey Levels. In addition, Southern Water made the following comments in dialogue with RDC (Feb 2016)

"Southern Water operates its WTWs in accordance with environmental permits issued and enforced by the Environment Agency. The permits set the maximum volume of treated wastewater that the company is permitted to recycle to the environment (in terms of Dry Weather Flow, DWF). They also define the standards of treatment that must be met in order to protect water quality objectives.

If the future release of treated wastewater at a WTW is anticipated to exceed the maximum allowed by the environmental permit (as a result of new development), Southern Water could apply to the Environment Agency for a new or amended permit. This would increase the volumetric permit headroom above that which is currently available. The Environment Agency would normally permit increased flows provided the treatment standards are tightened so that the total load to the environment is not increased. This is in line with the "no deterioration" principle."

"Fundamentally wastewater treatment capacity is not a constraint to future new development even if investment requirements are significant. Southern Water has a statutory obligation to find solutions and provide infrastructure to serve new development. The planning period for Rother's adopted Core Strategy runs to 2028 and there are repeated opportunities through the water industry's five yearly price review process to investigate and implement solutions. Possible options where conventional technology could not achieve the required standards include:

a) Reducing infiltration into the sewerage system
b) Reducing consumption of water by existing and future residents
c) Transfer flow to an alternative discharge location (where the environmental capacity of the receiving water is sufficient to accommodate the discharge)
d) Treat wastewater to a higher standard using non-conventional technology.

The implementation of one or a combination of these options would mitigate the impact of increased volumes of wastewater arising from new development and population growth, so that it would not have an unacceptable adverse effect on water quality objectives and the integrity of protected sites such as SPAs, SACs and SSSIs."

10.5 Management of Hydrology of the Pevensey Levels – Other Relevant Reports

10.5.1 In addition to the Review of Consents, there are a number of other reports and strategies with relevant implications for this issue, as set out below.

The Rother District Council 'Infrastructure Delivery Plan' 2014 (IDP)

10.5.2 It is useful to consider the implications of possible future reductions in abstraction licence consents within the Pevensey Levels hydrological catchment.

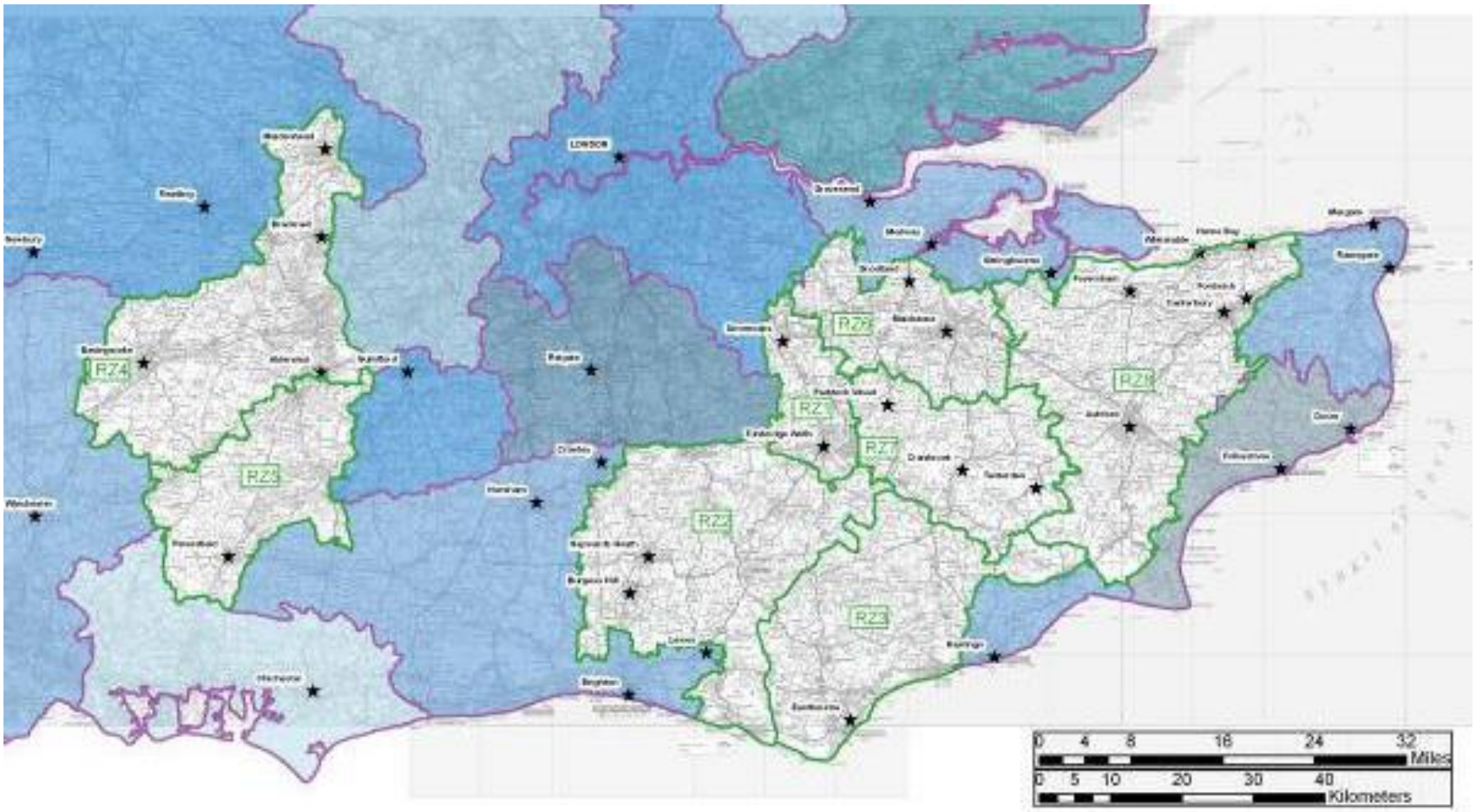
10.5.3 The 'Infrastructure Delivery Plan' (IDP) Schedule indirectly addresses the issue under 'Utilities' as set out in Table 9, setting out that in order *'to meet water supply shortfalls in areas of water stress surpluses from RZ8 from 2024 could be transferred through RZ7 and RZ3 through a strategic mains connection'.* The output would be a Strategic main connection through which Water could be transferred across different areas to meet shortfalls, enabling South East Water to meet their regulatory requirement to provide water.

10.5.4 With reference to Map 4, Resource Zone 3 which wholly comprises the Pevensey Levels, is a recognised area of water stress that would benefit from a delivery of surpluses from RZ8 in Kent.

Table 9: Exert from Infrastructure Delivery Plan (IDP) relating to Water Supply

	Service & Issue	***Output***	***Justification***	***Lead Body***	***Cost***	***Funding***	***Development in Local Plan which depends on output***	***Timeframe delivery of output***	***Scheme Status***	***Importance to Strategy***	***Risk to delivery of output***	***Alternatives and/or Mitigations***
Utilities	To meet water supply shortfalls in areas of water stress, surpluses from RZ8 from 2024 could be transferred through RZ7 and RZ3 through a strategic mains connection.	Water could be transferred across different areas to meet shortfalls. Strategic main connection	Meet regulatory requirement to provide water	South East Water	£22.8m	Not known – further work required	Development in all areas would benefit but is not dependent.	Long Term	Conceptual	Desirable	Medium	Promote water conservation and support water efficiency initiatives through planning policy.

Map 4: Resource Zones (RZs) within the South East Water's Supply Area



South East Water 'Water Resources Management Plan 2015-2040'

10.5.4 SE Water produce a Water Resources Management Plan (WRMP) every five years to set out how water supplies will be secured. The 2015-2040 WRMP was published in June 2015 following approval from DEFRA. The WRMP schemes proposed over the next five years ensure sufficient supplies until 2023, after this point a series of larger schemes are required to ensure a reliable water supply, as set out in the WRMP. The WRMP was also subject to HRA which covered the Pevensey Levels Ramsar and cSAC.

Environment Agency 'South East River Basin District - River Basin Management Plan' (December 2015)

10.5.5 The EAs 'South East River Basin District - River Basin Management Plan' identified priority issues in the Cuckmere and Pevensey Levels catchment including diffuse pollution, physical obstructions to fish passage and non-native invasive species. It included aims and measures to address these. The Cuckmere and Pevensey Levels catchment partnership is jointly led by Sussex Wildlife Trust and South East Rivers Trust. It is supported by over 20 organisations and individuals from across the catchment.

Implementation of the EA Water Level Management Plan (WMP) Objectives

10.5.6 Though not specifically cited in the 2010 AA conclusions, implementation of the Water Level Management Plan (WLMP) objectives also seem to have a critical bearing on the integrity of the Pevensey Levels Natura 2000 sites. The WLMP is produced by the EA and provides a means of determining the required water levels and identifies the water level management actions needed to bring the site to favourable condition. In considering the ecological requirements of key species on the Pevensey Levels the Environment Agency identified the water level management objectives shown in Table 10.

Table 10: Water Level targets for Pevensey Levels Conservation Interest Features

	Objective	Details
1	Maintain water levels in Main River and IDB watercourse at 0.3m below mean field level throughout the year.	Maintain and enhance ditch habitat for which the site is designated by maintaining water level at 0.3 m below mean field level throughout the year and avoiding significant fluctuations in this level.
2	For the rest of the site, maintain water levels 0.3m below mean field level throughout the year as a minimum.	This may be applicable, for example, to those landowners in Environmental Stewardship "bird options" which requires wetter conditions.
3	Restore winter flooding to the site.	Splash flooding of field surfaces for the benefits of breeding/over wintering waders, wildfowl, and wetland plants (including grassland communities) between autumn and spring. Achieved locally on individual basis as parts of Environmental Stewardship.
4	Restore the functioning of the ditch System.	Encourage landowners to undertake regular clearance of ditches to limit scrub encroachment and provide optimum conditions for designated species.

10.5.7 In 2010, when the previous AA had been undertaken it had been envisaged the above objectives will be achieved by the operation of main feed sluices, which provide water to about 60% of the site. However, these measures were not yet in place at that time.

10.5.8 In March 2016, as part of the process of conducting this DASA HRA Screening assessment, there was further dialogue (February 2016) regarding measures to adequately manage the system. the EA confirmed *'The Water Level Management Plan has been implemented on the Pevensey Levels and the objectives have been met.'*

10.6 Water Efficiency Measures in the DASA

10.6.1 It is recognised that the unsustainable abstraction of water has the potential to cause ecological problems and water quality issues.

10.6.2 Due to concerns about the impact of water abstraction the Environment Agency position at the time of the 2010 AA was that, in the Southern Region, as a minimum requirement, homes built before 2016 should achieve internal water use of 105 litres/head/day (as required by Code for Sustainable Homes (CSH) level 3). Where a local authority (or developer) wishes to aim for lower water use this will be supported.

10.6.3 As set out in 10.4.3, in recent dialogue (February 2016), Southern Water commented that *'Reducing consumption of water by existing and future residents'* would be an option to mitigate the impact of increased volumes of wastewater arising from new development and population growth, so that it would not have an unacceptable adverse effect on

water quality objectives and the integrity of protected sites such as SPAs, SACs and SSSIs."

10.6.4 The emerging Development & Site Allocations DPD is proposing a District-wide higher standard for water efficiency in light of the area being a 'water stress area'. The proposed policy for *'Promoting Water efficiency/Tackling Water Stress'* is likely to propose that all new dwellings are required to be designed to achieve water consumption of no more than 110 litres per person per day.

10.6.5 Whilst this does not go as far as the EA position at the time of the 2010 AA (who requested 105 litres/head/day), it should be noted that 105 was the former Code for Sustainable Homes level 5/6 figure. Currently the optional Building Regulations standard is 110, as opposed to the standard design target of 125. Therefore Rother DC's application of the higher optional standard is the most that can be achieved at this point in time.

10.6.6 This measure, combined with the application of the SuDS policies outlined in 10.2 above, will help ensure there is no significant impact on the Pevensey Levels international sites as a result of development levels proposed in the RDC Development and Site Allocations DPD.

11. Dungeness Complex: Role of Sustainable Access Strategy

11.1 As highlighted in earlier sections 8.2 and 8.6, the requirement for a Sustainable Access Strategy was an earlier outcome of HRA supporting the supporting Core Strategies of Rother District Council and Shepway District Council.

11.2 Updated Surveys, Monitoring and Assessment of Site Condition and Status of international sites are implicit in the very purpose of the Sustainable Access Strategy.

11.3 In terms of assessing the impacts of recreational pressure, the Sustainable Access Strategy will be used to ensure that any increased tourism and recreation (resulting from the plan policies of either Shepway District Council or Rother District Council) does not adversely impact on the integrity of the internationally important wildlife sites.

11.4 To achieve this, the strategy will:

- Identify the tourism and recreation pressures. This will draw upon
  - The SAS Visitor Surveys, and:
  - Relevant flora/fauna information sources, studies and surveys (including Habitat Management Plans, Site Improvement Plans, Species surveys and information, etc.)
- Relate these pressures to the 'key interest features' (as summarised in Table 2) of the international sites, including habitats, species, eco-systems.
- Propose appropriate management interventions and solutions to ensure sensitive management in areas of identified pressure (to be agreed with relevant stakeholders and agencies).
- Set interventions and solutions in the context of potential pressures arising from Local Plan policies. Identify / recommend further Local Plan policy measures necessary in the Rother Development and Site Allocations Plan (DASA) and Shepway Sites Plan to refine /elaborate on those policies within the respective Adopted Core Strategies.

11.5 It follows that completion of the Sustainable Access Strategy is an essential requirement of the HRA process for the DASA and Neighbourhood Plans.

12. Initial Conclusions

12.1 Initial Conclusions regarding the Development and Site Allocations Plan

12.1.1 The Rother District Council Development and Site Allocations Plan (DASA) is effectively part 2 of the Local Plan, following adoption of the Core Strategy in 2014. The Core Strategy sets out a clear distribution of housing allocations, specific to individual settlement level[11]. These policies and objectives of the Core Strategy have already satisfied the requirements of the HRA process subject to provisos[12]. This process is still considered accurate and valid.

12.1.2 Whilst the DASA is a new Development Plan Document (DPD) and an opportunity to re-consider the HRA position. It is considered that DASA policies that conform to the Core Strategy will, by implication, have already satisfied the HRA process and can effectively be 'screened out' provided there has been no significant change in the underlining circumstances that would lead to a different conclusion.

12.1.3 This HRA Screening has re-assessed the key issues identified as part of the Core Strategy HRA process as a check to see whether there has been any change in circumstances that would lead to a conclusion that the Plan, either alone or in combination with other relevant projects and plans, would now likely result in a significant effect upon European sites. Notably this has included:

- Review of Relevant Plans and Strategies *'in Combination'* (Section 6)
- Updated Surveys, Monitoring and Assessment of Site Condition and Status (Section 9)
- Updated Review of Hydrology Local to the Pevensey Levels (Section 10)
- Review of the Role of the Sustainable Access Strategy in relation to the Dungeness Complex (Section 11)

[11] As set out within Core Strategy Figure 8, Policy BX3, HF1, BA1, RY1, RA1 (Figure 12) and Appendix 4

[12] In particular:

- the production of a suitable 'Sustainable Access Strategy' for the Dungeness complex, and
- the provision of SUDs within the Pevensey Levels hydrological catchment.

12.1.4 As a result of this HRA screening, the Development and Site Allocations Plan, either in isolation or in combination (including with other plans and policies) is not considered likely to result in significant adverse effects on the integrity of European sites or associate sensitive areas. This is subject to the requirement for continued conformity with Core Strategy policies.

12.1.5 Therefore there is a caveat. Should DASA policies emerge that deviate significantly from the Core Strategy, then the Plan may need to be 'screened in' and re-assessed once more, as well as possibly subject to more detailed appropriate assessment. In any event, this HRA screening opinion may need to be updated at subsequent stages of plan production to confirm its continuing relevance.

12.1.6 The potential for deviation from the Core Strategy is quite limited due to the planning framework's chain of conformity requirements. However, some examples of future policies that may have implications would potentially include (but not limited to) the following:

a. The scope to significantly *increase* development quantums (including housing numbers and commercial floorspace) above and beyond those established within the Core Strategy, on a *District-wide* basis. It should be noted that Core Strategy development quantities are generally an 'at least' figure and previous screening was undertaken in light of this principle. Most notably, the URS report (described in section 8.6) allowed for some upward flexibility by virtue of having screened the range of housing numbers 5,700-5,920. Therefore, it is a reasonable supposition that only a significant increase may merit re-consideration for HRA purposes.

b. The scope to significantly *increase* development quantums (including housing numbers and commercial floorspace) above and beyond those established within the Core Strategy, on a *settlement* basis. It should be noted that the Core Strategy development quantums apply on both a District-wide basis and also on a settlement basis. For example, housing numbers for individual settlements were defined in Core Strategy Policies BX3, HF1, RY1, BA1, RA1 (including Figure 12), Appendix 4 and paragraph 7.46. Individual settlements significantly increasing their development quantums may also require re-screening as part of the HRA process. This is particularly the case if the settlements concerned are in close

proximity to Natura 2000 sites and hence more likely to have a significant effect – areas of Eastern Rother Ward, Fairlight Parish and areas within the Pevensey Levels hydrological catchment are the most obvious examples.

c. The scope for the *location* of development to have a significant impact, over and above what would have reasonably been anticipated as a result of Core Strategy policy. As with the issue of overall development quantity, the adopted Core Strategy policy has already defined the parameters of what may be considered acceptable development locations to a large extent[13]. Proposals that deviate from this to a significant extent (e.g; by promoting significant development in the open countryside away from existing development boundaries) may require re-screening in for HRA purposes. Negative effects may also be magnified in areas in close proximity to Natura 2000 sites, such as areas of Eastern Rother Ward, Fairlight Parish and areas within the Pevensey Levels hydrological catchment.

d. Any policies that would lead to an increase in visitor numbers and/or negative effects from recreational pressure to the Dungeness complex above and beyond what would already reasonably be expected as a result of Core Strategy policies. For example this may include increased emphasis on the promotion of tourism in the area via DASA policies, or from a failure to prepare an effective Sustainable Access Strategy in parallel with development proposals to address previously identified issues (although it should be noted that Rother District Council is clearly committed to the production of a Sustainable Access Strategy and work is currently proceeding in partnership with Shepway District Council, Natural England and other stakeholders). It may also result of a failure to deliver (or deliver to the previously anticipated extent) Combe Valley Countryside Park located between Hastings and Bexhill, which was previously highlighted in HRA[14] as *'a*

[13] Particularly Core Strategy policies OSS1, OSS2, OSS3, OSS4, BX1, BX2, BX3, HF1, RY1, BA1, RA1, CO1, LHN6, EC2, EC3, EC4, EC7.

[14] Rother and Shepway Core Strategies Habitat Regulations Assessment (Dungeness SAC; Dungeness to Pett Level SPA and SPA extension; and Dungeness, Romney Marsh and Rye Bay proposed Ramsar site) Final report following Publication Stage consultation January 2012

significant sub-regional area of green infrastructure that would also serve to spread the recreational load in the area and potentially alleviate pressure from European sites.'

e. Any policies with potential to negatively impact upon water quality within the Pevensey Levels above and beyond what would already reasonably be expected as a result of Core Strategy policies. In particular, any policies which may increase the levels of nutrient enrichment and polluted water
For example, a failure to implement adequate policies for either Sustainable Drainage (SuDS) in the Pevensey Levels hydrological catchment area (see Map in Appendix 2), or policies promoting Water Efficiency; may trigger 'screening in'. The proposed measures to address these concerns set out in detail in Section 10 of this report, including recommendations for DASA policies.

12.1.7 In the event of any potential issues emerging in the DASA, and based on the precautionary principle, Rother District Council (as the competent authority) will liaise with Natural England and undertake any necessary steps, including further Appropriate Assessment, in order to meet the requirement of the Habitats Directive. Any future Appropriate Assessment will need to ensure any option determined to have an adverse effect on the integrity of a European site or European offshore marine site should not be taken forward unless adequate mitigation measures can be put in place.

12.2 Initial Conclusions regarding Neighbourhood Plans forming part of the Rother Development Plan

12.2.1 Similarly, as set out in the statutory framework, neighbourhood plans must also be in general conformity with the strategic policies of the Rother Local Plan. Neighbourhood plans should reflect Local Plan policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.

12.2.2 Rother District Council's Core Strategy sets out a clear distribution of housing allocations, specific to individual settlement level[15]. These policies and components of the Core Strategy have already satisfied the requirements of the HRA process subject to provisos[16]. This process is still considered accurate and valid. Therefore, as with the DASA, Neighbourhood Plans that conform generally to the Rother District Local Plan have, by implication, already satisfied the HRA process and are effectively 'screened out'. Subject to this conformity requirement, Neighbourhood Plans, either in isolation or in combination (including with other plans and policies) are not considered likely to result in significant adverse effects on the integrity of European sites or associate sensitive areas.

12.2.3 As with the DASA, caveats apply - Neighbourhood Plans that deviate significantly from the Core Strategy may also need be 'screened in' and re-assessed, as well as possibly subject to detailed appropriate assessment. The potential for neighbourhood plan deviation from the Core Strategy is quite limited due to the planning framework's chain of conformity requirements. However, some examples of future neighbourhood plan policies that may have implications would potentially include (but not limited to):

a. The scope to significantly *increase* development quantums (including housing numbers and commercial floorspace) above and beyond those established within the Core Strategy, on a *settlement* basis. Housing numbers for individual settlements were defined in Core Strategy Policies BX3, HF1, RY1, BA1, RA1, Appendix 4 and paragraph 7.46. Individual settlements *significantly* increasing their development quantums may also require re-screening as part of the HRA process. This is particularly the case if the settlements concerned are in close proximity to Natura 2000 sites and hence more likely to have a significant effect – areas of Eastern Rother ward, Fairlight parish and areas within the Pevensey Levels hydrological catchment are the most obvious examples.

[15] As set out within Core Strategy Figure 8, Policy BX3, HF1, BA1, RY1, RA1 (Figure 12) and Appendix 4

[16] In particular:

- the production of a suitable 'Sustainable Access Strategy' for the Dungeness complex, and
- the provision of SUDs within the Pevensey Levels hydrological catchment.

b. The scope for the *location* of development to have a significant impact, over and above what would have reasonably been anticipated as a result of Core Strategy policy. The adopted Core Strategy policy has already defined the parameters of what may be considered acceptable development locations to a large extent[17]. Proposals that deviate from this to a significant extent (e.g.; by promoting significant development in the open countryside away from existing development boundaries) may require re-screening in for HRA purposes. Negative effects may also be magnified in areas in close proximity to Natura 2000 sites (e.g.; areas of Eastern Rother ward, Fairlight parish and areas within the Pevensey Levels hydrological catchment). Negative effects may also include cumulative synergistic effects, which may include the scope for setting a precedent for wider development patterns as a result of deviation from Core Strategy policy.

c. Any policies that would lead to an increase in visitor numbers and/or negative effects from recreational pressure to the Dungeness complex above and beyond what would already reasonably be expected as a result of Core Strategy policies. For example this may include increased emphasis and promotion of tourism in the area from Neighbourhood Plan policies.

d. Any Neighbourhood Plan policies with potential to negatively impact upon water quality within the Pevensey Levels above and beyond what would already reasonably be expected as a result of Core Strategy policies. In particular, any policies which may increase the levels of nutrient enrichment and polluted water. For example, a failure to implement adequate policies for either Sustainable Drainage (SuDS) in the Pevensey Levels hydrological catchment area (see Map in Appendix 2), or policies promoting Water Efficiency; may trigger 'screening in'. The proposed measures to address these concerns set out in detail in Section 10 of this report, including recommendations for DASA policies. By implication this is limited to the hydrological catchment visible in Appendix 2, so is not relevant to any of the current Neighbourhood Plans except Battle.

[17] Particularly Core Strategy policies OSS1, OSS2, OSS3, OSS4, BX1, BX2, BX3, HF1, RY1, BA1, RA1, CO1, LHN6, EC2, EC3, EC4, EC7.

12.2.4 In the event of any potential issues emerging within Neighbourhood Plans within the District, and based on the precautionary principle, Rother District Council (as the competent authority) may re-screen and where necessary require Appropriate Assessment, in order to meet the requirement of the Habitats Directive. Natural England's views will be sought as part of this process. Any future Appropriate Assessment will need to ensure any option determined to have an adverse effect on the integrity of a European site or European offshore marine site should not be taken forward unless adequate mitigation measures can be put in place.

12.3 Way Forward

12.3.1 Based on the above conclusions, the impacts and effects of DASA and Neighbourhood Plans within the District will be monitored to ensure the conclusions of this HRA report remain sound and relevant. In any event, this HRA screening opinion may need to be updated at subsequent stages of plan production to confirm its continuing relevance.

Appendix 1: DEFRA Natura 2000 Sites Data Forms

A1a Dungeness SAC

UK SAC data form

NATURA 2000

STANDARD DATA FORM

FOR SPECIAL PROTECTION AREAS (SPA)
FOR SITES ELIGIBLE FOR IDENTIFICATION AS SITES OF COMMUNITY IMPORTANCE (SCI)
AND
FOR SPECIAL AREAS OF CONSERVATION (SAC)

1. Site identification:

1.1 Type K **1.2 Site code** UK0013059

1.3 Compilation date 199601 **1.4 Update** 200101

1.5 Relationship with other Natura 2000 sites

U	K	9	0	1	2	0	9	1

1.6 Respondent(s) International Designations, JNCC, Peterborough

1.7 Site name Dungeness

1.8 Site indication and designation classification dates

date site proposed as eligible as SCI	199601
date confirmed as SCI	200412
date site classified as SPA	
date site designated as SAC	200504

2. Site location:

2.1 Site centre location

longitude	**latitude**
00 57 10 E	50 55 08 N

2.2 Site area (ha) 3223.56 **2.3 Site length (km)**

2.5 Administrative region

NUTS code	Region name	% cover
UK531	East Sussex	24.00%
UK57	Kent	76.00%

2.6 Biogeographic region

Alpine	Atlantic	Boreal	Continental	Macaronesia	Mediterranean
	X				

3. Ecological information:

3.1 Annex I habitats

Habitat types present on the site and the site assessment for them:

Annex I habitat	% cover	Representativity	Relative surface	Conservation status	Global assessment
Coastal lagoons	0.1	D			

Annual vegetation of drift lines	0.3	B	B	A	A
Perennial vegetation of stony banks	70	A	A	A	A
Embryonic shifting dunes	0.1	D			
Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes")	0.1	D			
Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae*	0	D			

3.2 Annex II species

	Population				Site assessment			
	Resident	Migratory						
Species name		Breed	Winter	Stage	Population	Conservation	Isolation	Global
Triturus cristatus	1001-10,000	-	-	-	C	B	C	B

4. Site description

4.1 General site character

Habitat classes	% cover
Marine areas. Sea inlets	
Tidal rivers. Estuaries. Mud flats. Sand flats. Lagoons (including saltwork basins)	20.0
Salt marshes. Salt pastures. Salt steppes	1.0
Coastal sand dunes. Sand beaches. Machair	2.0
Shingle. Sea cliffs. Islets	64.0
Inland water bodies (standing water, running water)	2.0
Bogs. Marshes. Water fringed vegetation. Fens	10.0
Heath. Scrub. Maquis and garrigue. Phygrana	
Dry grassland. Steppes	
Humid grassland. Mesophile grassland	
Alpine and sub-alpine grassland	
Improved grassland	
Other arable land	
Broad-leaved deciduous woodland	
Coniferous woodland	1.0
Evergreen woodland	
Mixed woodland	
Non-forest areas cultivated with woody plants (including orchards, groves, vineyards, dehesas)	
Inland rocks. Screes. Sands. Permanent snow and ice	
Other land (including towns, villages, roads, waste places, mines, industrial sites)	
Total habitat cover	**100%**

4.1 Other site characteristics

Soil & geology:

Nutrient-poor, Shingle

Geomorphology & landscape:

Coastal, Lagoon

4.2 Quality and importance

Annual vegetation of drift lines

- for which this is one of only four known outstanding localities in the United Kingdom.
- which is considered to be rare as its total extent in the United Kingdom is estimated to be less than 100 hectares.

Perennial vegetation of stony banks

- for which this is considered to be one of the best areas in the United Kingdom.

Triturus cristatus

- for which this is considered to be one of the best areas in the United Kingdom.

4.3 Vulnerability

The shingle vegetation is very vulnerable to disturbance by vehicles and walkers, although the coastal shingle (drift-line) vegetation has much greater potential for recovery than the perennial vegetation of shingle banks that occurs further inland. Extensive areas of the site are now managed as a Nature Reserve at both Dungeness and Rye Harbour, with emphasis on interpretation of the site's value and on appropriate public access. A ranger helps to enforce local bylaws which aim to prevent damage from trampling, motorbike activity and illicit gravel extraction.

The wetlands which support great crested newt were formerly grazed, maintaining open unshaded vegetation. This practice largely ceased in the 1950s, and since then there has been invasion of ponds by willows shading the water. Management by hand has now been undertaken to reduce this problem, and restoration of light grazing is being investigated.

Abstraction of water is thought to have damaged some of the shingle wetlands as well as components of the perennial vegetation of the shingle beach. This will be addressed through the relevant review provisions of the Habitats Regulations.

The site is close to an active airport which carries a potential risk from air pollution, although current levels of air traffic and motor vehicles are not thought to cause a problem.

5. Site protection status and relation with CORINE biotopes:

5.1 Designation types at national and regional level

Code	% cover
UK04 (SSSI/ASSI)	100.0

A1b Dungeness, Romney Marsh and Rye Bay SPA

Register of European sites

Register entry UK9012091 under Regulation 13 of The Conservation of Habitats and Species Regulations 2010

This is the register entry for the European site known as **Dungeness, Romney Marsh and Rye Bay** in the Region of **East Sussex, Kent**. This area has been classified by the Secretary of State for Environment, Food and Rural Affairs pursuant to Article 4(1) or 4(2) of the Wild Birds Directive (Council Directive 2009/147/EC) as a Special Protection Area. The register reference number for this European site is UK9012091 and a folder, kept under this reference as part of this register, contains a map of the European site and a citation, both signed by me, giving the reasons for classification of the site as a Special Protection Area.

Other details of the European site are as follows:

Date classified as a Special Protection Area 30 March 2016

Site centre location[1]

Longitude: 0° 47' 16"E
Latitude: 50° 55' 51" N

Area: **4010.29ha**

Priority status[2]**:** **Yes**

Date of registration: 30 March 2016

Signed:

on behalf of the Secretary of State for Environment, Food and Rural Affairs

[1] This indicates the approximate centre of the site. Where the European site consists of several distinct areas, the co-ordinates of the most important sub-area are entered.

[2] Indicates whether the site has been identified under Article 4.2 of the Habitats Directive (Council Directive 2009/147/EC) as hosting one or more priority natural habitat types or priority species.

Directive 2009/147/EC on the Conservation of Wild Birds
Special Protection Area (SPA)

Name: Dungeness, Romney Marsh and Rye Bay

Unitary Authority/County: East Sussex, Kent

Boundary of the SPA: The SPA boundary is coincident with the boundaries of Dungeness, Romney Marsh and Rye Bay Site of Special Scientific Interest (SSSI).

Site description: Dungeness, Romney Marsh and Rye Bay is located on the south coast of England, on the border of East Sussex and Kent between Hastings and New Romney. This is a large area with a diverse coastal landscape comprising a number of habitats, which appear to be unrelated to each other. However, all of them exist today because coastal processes have formed and continue to shape a barrier of extensive shingle beaches and sand dunes across an area of intertidal mud and sand flats. The site includes the largest and most diverse area of shingle beach in Britain, with low-lying hollows in the shingle providing nationally important saline lagoons, natural freshwater pits and basin fens. Rivers draining the Weald to the north were diverted by the barrier beaches, creating a sheltered saltmarsh and mudflat environment, which was gradually in-filled by sedimentation, and then reclaimed on a piecemeal basis by man. Today this area is still fringed by important intertidal habitats, and contains relict areas of saltmarsh, extensive grazing marshes and reedbeds. Human activities have further modified the site, resulting in the creation of extensive areas of wetland habitat due to gravel extraction. As a whole, Dungeness, Romney Marsh and Rye Bay is important for breeding and wintering waterbirds, birds of prey, passage warblers and breeding seabirds.

Size of SPA: 4010.29 ha.

Qualifying species:
The site qualifies under **article 4.1** of the Directive (2009/147/EC) as it is used regularly by 1% or more of the Great Britain populations of the following species listed in Annex I in any season:

Annex 1 species	Count and season	Period	% GB population
Bewick's swan *Cygnus columbianus bewickii*	155 individuals – wintering	5 year peak mean 2002/3 – 2006/7	1.9%
Bittern *Botaurus stellaris*	5 individuals – wintering	5 year peak mean 2002/3 – 2006/7	5.0%
Hen harrier *Circus cyaneus*	11 individuals – wintering	5 year peak mean 2002/3 – 2006/7	1.5%
Golden plover *Pluvialis apricaria*	4,050 individuals – wintering	5 year peak mean 2002/3 – 2006/7	1.6%
Ruff *Philomachus pugnax*	51 individuals – wintering	5 year peak mean 2000/01 – 2004/5	7.3%
Aquatic warbler *Acrocephalus paludicola*	2 individuals – passage	5 year mean 2004 – 2008	6.1%
Marsh harrier *Circus aeruginosus*	4 females – breeding	5 year mean 2004 – 2008	2.0%
Avocet *Recurvirostra avosetta*	31 pairs – breeding	5 year mean 2004 – 2008	3.5%
Mediterranean gull *Larus melanocephalus*	56 pairs – breeding	5 year mean 2004 – 2008	52.2%
Sandwich tern *Sterna sandvicensis*	350 pairs – breeding	5 year mean 2004 – 2008	3.3%
Common tern *Sterna hirundo*	273 pairs – breeding	5 year mean 2004 – 2008	2.7%
Little tern *Sterna albifrons*	35 pairs – breeding	5 year mean 1992 – 1996[1]	1.5%

The site qualifies under **article 4.2** of the Directive (2009/147/EC) as it is used regularly by 1% or more of the biogeographical populations of the following regularly occurring migratory species (other than those listed in Annex I) in any season:

Migratory species	Count and season	Period	% of population
Shoveler *Anas clypeata*	485 individuals – wintering	5 year peak mean 2002/3 – 2006/7	1.2% NW & C Europe (non-breeding)

Assemblage qualification:
The site qualifies under **article 4.2** of the Directive (2009/147/EC) as it is used regularly by over 20,000 waterbirds (waterbirds as defined by the Ramsar Convention) in any season:

In the non-breeding season, the area is regularly used by 34,625 individual waterbirds (5 year peak mean 2002/3 – 2006/7), including (but not limited to) Bewick's swan *Cygnus columbianus bewickii*, European white-fronted goose *Anser albifrons albifrons*, wigeon *Anas penelope*, gadwall *A. strepera*, shoveler *A. clypeata*, pochard *Aythya ferina*, little grebe *Tachybaptus ruficollis*, great crested grebe *Podiceps cristatus*, cormorant *Phalacrocorax carbo*, bittern *Botaurus stellaris*, coot *Fulica atra*, golden plover *Pluvialis apricaria*, lapwing *Vanellus vanellus*, sanderling *Calidris alba*, ruff *Philomachus pugnax*, whimbrel *Numenius phaeopus* and common sandpiper *Actitis hypoleucos*.

Non-qualifying species of interest: The site is used by breeding bittern and kingfisher *Alcedo atthis* (both species listed in Annex I of the EC Birds Directive) in numbers of less than European importance (less than 1% of the GB population).

Bird counts from:

1) Dungeness Bird Observatory Annual Reports
2) Dungeness RSPB Reserve Records
3) Innogy. 2004. *Little Cheyne Court Wind Farm – Ornithological Assessment: update on wintering birds*. Report to Npower Renewables Ltd, Kent
4) Kent Bird Reports
5) Marsh Environmental. 2003, 2004 & 2008. *Breeding and Wintering Bird Survey of Proposed Wind Farm Area at Little Cheyne Court*
6) MoD Lydd Ranges Conservation Group
7) Wetland Trust Records (Pett Level)
8) Romney Marsh Harrier Recording Group
9) Rye Harbour Local Nature Reserve Records
10) Sussex Bird Reports
11) Wetland Bird Survey (WeBS database)

Status of SPA:
Dungeness to Pett Level SPA was classified under Directive 79/409/EEC on 2 August 1999.

This citation relates to a site entered in the Register of European Sites for England.
Register reference number: UK9012091
Date of registration: 30 March 2016

Signed:
On behalf of the Secretary of State for Environment, Food and Rural Affairs

[1] Little tern is the only species for which the SPA was classified in 1999 where the entire population remains within the previously classified boundary. It is therefore appropriate to retain the original baseline population of 35 pairs.

A1c Dungeness, Romney Marsh and Rye Bay Ramsar site

Ramsar Convention on
Wetlands of International Importance Especially as Waterfowl Habitat

Name: Dungeness, Romney Marsh and Rye Bay

Unitary Authority/County: East Sussex, Kent

Boundary of the Ramsar site: The Ramsar site boundary is coincident with the boundaries of the Dungeness, Romney Marsh and Rye Bay Site of Special Scientific Interest (SSSI).

Site description: Dungeness, Romney Marsh and Rye Bay is located on the south coast of England, on the border of East Sussex and Kent between Hastings and New Romney. This is a large area with a diverse coastal landscape comprising a number of habitats, which appear to be unrelated to each other. However, all of them exist today because coastal processes have formed and continue to shape a barrier of extensive shingle beaches and sand dunes across an area of intertidal mud and sand flats. The site includes the largest and most diverse area of shingle beach in Britain, with low-lying hollows in the shingle providing nationally important saline lagoons, natural freshwater pits and basin fens. Rivers draining the Weald to the north were diverted by the barrier beaches, creating a sheltered saltmarsh and mudflat environment, which was gradually in-filled by sedimentation, and then reclaimed on a piecemeal basis by man. Today this area is still fringed by important intertidal habitats, and contains relict areas of saltmarsh, extensive grazing marshes and reedbeds. Human activities have further modified the site, resulting in the creation of extensive areas of wetland habitat due to gravel extraction. As a whole, Dungeness, Romney Marsh and Rye Bay is important for breeding, wintering and passage waterbirds, wetland plants, bryophytes and invertebrates, and natural or near-natural wetland habitats. In addition to the internationally important wetland habitats and species, the Ramsar site and adjacent areas are also of national and international importance for a variety of non-wetland habitats and species.

Size of Ramsar site: 6377.63 ha.

International importance of Ramsar site: The Ramsar site is a Wetland of International Importance because (Kampala 2005 Criteria):

The site qualifies under **Criterion 1** because it contains representative, rare, or unique examples of natural or near-natural wetland types:

- Annual vegetation of drift lines and the coastal fringes of perennial vegetation of stony banks (Ramsar wetland type E – sand, shingle or pebble shores).

  Dungeness and Rye Harbour comprise the largest cuspate foreland (a low-lying triangular foreland) in Britain and form part of a system of shingle barrier beaches that can be traced 40 km from Fairlight in East Sussex to Hythe in Kent. This is ideal habitat for annual vegetation of drift lines, which occurs on naturally functioning shingle beaches. It is one of the scarcest habitats in the UK. The frontage at Rye Harbour and Dungeness is one of the most important areas in the country for this habitat, with approximately 15 km of shingle foreshore. The annual vegetation of drift lines grows on the seaward and landward sides of the beach ridge where waves deposit seed. The habitat grades into and overlaps with the more stable perennial vegetation of stony banks that grows on ridges inland from the beach.

- Natural shingle wetlands: saline lagoons (Ramsar wetland type J – coastal brackish/saline lagoons), freshwater pits (Ramsar wetland type K – coastal freshwater lagoons) and basin fens (Ramsar wetland type U – non-forested peatlands).

  The vast shingle beach at Dungeness contains a number of natural wetlands, referred to as the Open and Fossil Pits, within Dungeness RSPB Reserve and Lydd Ranges. These wetlands have been subject to colonisation by vegetation and display stages of a classic hydroseral succession, from open water and marginal reed-swamp, through a form of marsh or fen, to grey willow *Salix cinerea* carr. Some of the pits have reached a stage in the hydroseral succession where they have little or no open water. Most have floating rafts of vegetation, varying in the degree to which they have stabilised. These floating rafts of vegetation are typical of the "Schwingmoor" type of basin fen, where layers of peat are separated by lenses of water. The pits contain a range of fen types from nutrient-rich to poor fen, with vegetation ranging from single species swamps to more complex communities. The oldest of the pits are now on the eroding south coast of Dungeness (in Lydd Ranges) and have reverted to saline conditions. They are typical, relatively stable, shingle

percolation lagoons. There is at least one natural shingle wetland at Rye Harbour, which is much younger than those at Dungeness and still retains a brackish character. It complements the older examples at Dungeness by displaying an earlier stage in the evolution and succession of these unique natural wetlands.

The site qualifies under **Criterion 2** because it supports threatened ecological communities:

The consists of a complex network of wetland habitats including saltmarsh, natural freshwater pits, fens, ponds, gravel pits, and grazing marsh and ditches. They support rich and diverse assemblages of bryophytes, vascular plants and invertebrates that are rare, threatened, listed as priority species in the UK Biodiversity Action Plan (BAP) or specially protected under the Wildlife and Countryside Act 1981. Important areas for these assemblages include the gravel pits, ditches and shingle wetlands at Dungeness and Rye Harbour, the grazing marsh and ditches of Walland Marsh, Dengemarsh and Pett Level, ponds throughout the site, the Royal Military Canal, and the saltmarshes of the River Rother.

- Bryophytes
  The bryophyte flora includes an assemblage of wetland thread-mosses *Bryum* species. These mosses are colonists of unshaded calcareous sand that must be persistently damp all year but not inundated by standing water. They occur on wet sand beside large freshwater gravel pits and small pools in Dungeness RSPB Reserve.
- Vascular plants
  Foremost amongst the assemblage are the suites of species associated with grazing marsh and saltmarsh (including brackish ditches and wetlands associated with low-lying depressions within shingle areas). Saltmarshes and other brackish wetlands are particularly rich, with at least eight nationally scarce species, including the vulnerable sea barley *Hordeum marinum*, Borrer's saltmarsh-grass *Puccinellia fasciculata* and slender hare's-ear *Bupleurum tenuissimum*, and the near-threatened sea-heath *Frankenia laevis*. Grazing marshes support the nationally rare (and critically endangered) sharp-leaved pondweed *Potamogeton acutifolius* and at least six nationally scarce species, including the vulnerable divided sedge *Carex divisa* and rootless duckweed *Wolffia arrhiza*. The remaining species are chiefly associated with gravel pits and their margins, saline lagoons, shingle beaches and fens.
- Invertebrates
  The freshwater wetlands (with the exception of the deep, cold and largely sterile open waters of the main gravel pits) exhibit a number of similar characteristics. Shallow open water and emergent vegetation, largely comprising common reed *Phragmites australis* and bulrush *Typha latifolia*, supports a rich water beetle assemblage. Other noteworthy aspects of the invertebrate assemblage include a suite of reed beetles *Donacia*, snail-killing flies (Sciomyzidae) and soldier-flies (Stratiomyidae) that are typical of coastal marshes. Much of this assemblage is found within the ditch systems. The saline and brackish gradients of the saltmarsh, saline lagoons, brackish ditches and damp brackish hollows in the shingle beaches also share many characteristics in terms of the habitats they provide for invertebrates.

The site further qualifies under **Criterion 2** because it supports vulnerable, endangered or critically endangered species:

In addition to the threatened ecological communities, the site is of international importance for nine individual wetland species:

- greater water-parsnip *Sium latifolium* – an endangered UK BAP priority species of wet ditches and tall-herb fens and swamps. The site supports several populations, chiefly in the northern areas of Walland Marsh.
- Warne's thread-moss *Bryum warneum* – a vulnerable UK BAP priority species. A colonist on wet sand beside the margins of freshwater gravel pits in Dungeness RSPB Reserve.
- water vole *Arvicola amphibius* – a UK BAP priority species and is also listed in Schedule 5 to the Wildlife and Countryside Act 1981. The Ramsar site contains the core of an extensive distribution of water voles dependent on the network of ditches that drain the grazing marsh and arable habitats of the Romney Marsh and Rye Bay area.
- aquatic warbler *Acrocephalus paludicola* – a globally vulnerable and declining UK BAP priority species. Between 2004 and 2008 the Ramsar site supported an average of two aquatic warblers

during autumn passage, which represents 6.1% of the GB passage population. Aquatic warblers occur on Pett Level, where they are recorded by bird ringers.

- great crested newt *Triturus cristatus* - a UK BAP priority species that is listed in Schedule 5 to the Wildlife and Countryside Act 1981 and Annex II to the EC Habitats Directive (92/43/EEC). The particular combination and distribution of aquatic and terrestrial habitats in the site provide exceptional breeding, foraging and hibernation conditions for great crested newts. The site contains three metapopulations; two in the Dungeness area and one at Romney Warren.
- medicinal leech *Hirudo medicinalis* – a rare (Red Data Book category 3) species that is listed in Schedule 5 to the Wildlife and Countryside Act 1981. Medicinal leech is found at a wide range of localities between Dungeness and Rye, and the site is a stronghold for the species in Great Britain. The range of shallow, well-vegetated waterbodies, including ponds, ditches and shallow areas in flooded gravel pits, provide ideal conditions for medicinal leeches.
- a ground beetle *Omophron limbatum* – an endangered (Red Data Book category 1) species living in burrows in sand at the margins of freshwater, where it is active at dusk and at night. It has been recorded from the margins of waterbodies at Dungeness and Rye Harbour and, except for recent records in Suffolk, is not known from any other site in Great Britain.
- marsh mallow moth *Hydraecia osseola hucherardi* – an endangered (provisional Red Data Book category 1) UK BAP priority species, restricted to two main population centres: one on the River Medway south of Rochester, Kent; the other in and around Walland Marsh. The Walland Marsh population centre comprises three discrete colonies at Moneypenny Farm near Rye, Old Cheyne Court near Brookland, and Woodruff's Farm, Fairfield. Marsh mallow moth is associated with the nationally scarce marsh-mallow *Althaea officinalis*, which is the larval food plant.
- De Folin's lagoon snail *Caecum amoricum* – listed in Schedule 5 to the Wildlife and Countryside Act 1981. Until recently, its only known locality in the UK was the Fleet in Dorset. Now the species has been discovered at a further two locations, one of which is the saline lagoons at the seaward end of Lydd Ranges.

The site qualifies under **Criterion 5** because it regularly supports 20,000 or more waterbirds:

- In the non-breeding season, the site regularly supports 34,957 individual waterbirds (5 year peak mean 2002/3 – 2006/7).

The site qualifies under **Criterion 6** because it regularly supports 1% of the individuals in the populations of the following species or subspecies of waterbird in any season:

Species	Count and season	Period	% of population
Mute swan *Cygnus olor*	348 individuals – wintering	5 year peak mean 2002/3 – 2006/7	1.1% Britain
Shoveler *Anas clypeata*	485 individuals – wintering	5 year peak mean 2002/3 – 2006/7	1.2% NW & C Europe (non-breeding)

Bird counts from: 1) Wetland Bird Survey (WeBS database)
2) Innogy. 2004. *Little Cheyne Court Wind Farm – Ornithological Assessment: update on wintering birds.* Report to Npower Renewables Ltd, Kent

Information Sheet on Ramsar Wetlands (RIS)

Categories approved by Recommendation 4.7 (1990), as amended by Resolution VIII.13 of the 8th Conference of the Contracting Parties (2002) and Resolutions IX.1 Annex B, IX.6, IX.21 and IX. 22 of the 9th Conference of the Contracting Parties (2005).

Notes for compilers:

1. The RIS should be completed in accordance with the attached *Explanatory Notes and Guidelines for completing the Information Sheet on Ramsar Wetlands*. Compilers are strongly advised to read this guidance before filling in the RIS.

2. Further information and guidance in support of Ramsar site designations are provided in the *Strategic Framework for the future development of the List of Wetlands of International Importance* (Ramsar Wise Use Handbook 7, 2nd edition, as amended by COP9 Resolution IX.1 Annex B). A 3rd edition of the Handbook, incorporating these amendments, is in preparation and will be available in 2006.

3. Once completed, the RIS (and accompanying map(s)) should be submitted to the Ramsar Secretariat. Compilers should provide an electronic (MS Word) copy of the RIS and, where possible, digital copies of all maps.

1. Name and address of the compiler of this form:

FOR OFFICE USE ONLY.
DD MM YY
Designation date | Site Reference Number

Joint Nature Conservation Committee
Monkstone House
City Road
Peterborough
Cambridgeshire PE1 1JY
UK
Telephone/Fax: +44 (0)1733 – 562 626 / +44 (0)1733 – 555 948
Email: RIS@JNCC.gov.uk

2. Date this sheet was completed/updated:
Designated: 02 February 1999

3. Country:
UK (England)

4. Name of the Ramsar site:
Pevensey Levels

5. Designation of new Ramsar site or update of existing site:

This RIS is for: Updated information on an existing Ramsar site

6. For RIS updates only, changes to the site since its designation or earlier update:

a) Site boundary and area:

** Important note: If the boundary and/or area of the designated site is being restricted/reduced, the Contracting Party should have followed the procedures established by the Conference of the Parties in the Annex to COP9 Resolution IX.6 and provided a report in line with paragraph 28 of that Annex, prior to the submission of an updated RIS.

b) Describe briefly any major changes to the ecological character of the Ramsar site, including in the application of the Criteria, since the previous RIS for the site:

7. Map of site included:

Refer to Annex III of the *Explanatory Notes and Guidelines*, for detailed guidance on provision of suitable maps, including digital maps.

a) A map of the site, with clearly delineated boundaries, is included as:

i) **hard copy** (required for inclusion of site in the Ramsar List): *yes* ✓ -or- *no* □;
ii) **an electronic format** (e.g. a JPEG or ArcView image) Yes
iii) **a GIS file providing geo-referenced site boundary vectors and attribute tables** *yes* ✓ -or- *no* □;

b) Describe briefly the type of boundary delineation applied:

e.g. the boundary is the same as an existing protected area (nature reserve, national park etc.), or follows a catchment boundary, or follows a geopolitical boundary such as a local government jurisdiction, follows physical boundaries such as roads, follows the shoreline of a waterbody, etc.

The site boundary is the same as, or falls within, an existing protected area.

For precise boundary details, please refer to paper map provided at designation

8. Geographical coordinates (latitude/longitude):

50 50 30 N 00 20 32 E

9. General location:

Include in which part of the country and which large administrative region(s), and the location of the nearest large town.

Nearest town/city: Eastbourne

Pevensey Levels is located on the Sussex coast between Eastbourne and Hastings.

Administrative region: East Sussex

10. Elevation (average and/or max. & min.) (metres): **11. Area** (hectares): 3577.71

Min. 1
Max. 5
Mean 3

12. General overview of the site:

Provide a short paragraph giving a summary description of the principal ecological characteristics and importance of the wetland.

Pevensey Levels is one of the largest and least-fragmented lowland wet grassland systems in south-east England. The low-lying grazing meadows are intersected by a complex system of ditches which support a variety of important wetland communities, including nationally rare and scarce aquatic plants and invertebrates. The site also supports a notable assemblage of breeding and wintering wildfowl. A small area of shingle and intertidal muds and sands is included within the site.

13. Ramsar Criteria:

Circle or underline each Criterion applied to the designation of the Ramsar site. See Annex II of the *Explanatory Notes and Guidelines* for the Criteria and guidelines for their application (adopted by Resolution VII.11).

2, 3

14. Justification for the application of each Criterion listed in 13 above:

Provide justification for each Criterion in turn, clearly identifying to which Criterion the justification applies (see Annex II for guidance on acceptable forms of justification).

Ramsar criterion 2

The site supports an outstanding assemblage of wetland plants and invertebrates including many British Red Data Book species.

Ramsar criterion 3

The site supports 68% of vascular plant species in Great Britain that can be described as aquatic. It is probably the best site in Britain for freshwater molluscs, one of the five best sites for aquatic beetles Coleoptera and supports an outstanding assemblage of dragonflies Odonata.

See Sections 21/22 for details of noteworthy species

15. **Biogeography** (required when Criteria 1 and/or 3 and /or certain applications of Criterion 2 are applied to the designation):

Name the relevant biogeographic region that includes the Ramsar site, and identify the biogeographic regionalisation system that has been applied.

a) biogeographic region:
Atlantic

b) biogeographic regionalisation scheme (include reference citation):
Council Directive 92/43/EEC

16. **Physical features of the site:**

Describe, as appropriate, the geology, geomorphology; origins - natural or artificial; hydrology; soil type; water quality; water depth, water permanence; fluctuations in water level; tidal variations; downstream area; general climate, etc.

Soil & geology	basic, shingle, sand, mud, clay, alluvium, peat, nutrient-poor, sedimentary
Geomorphology and landscape	lowland, coastal, floodplain, shingle bar, open coast (including bay)
Nutrient status	eutrophic, mesotrophic
pH	circumneutral
Salinity	fresh
Soil	mainly mineral
Water permanence	usually permanent, usually seasonal / intermittent
Summary of main climatic features	Annual averages (Eastbourne, 1971–2000) (www.metoffice.com/climate/uk/averages/19712000/sites/eastbourne.html) Max. daily temperature: 13.7° C Min. daily temperature: 8.3° C Days of air frost: 15.9 Rainfall: 789.7 mm Hrs. of sunshine: 1848.6

General description of the Physical Features:
No information available

17. **Physical features of the catchment area:**

Describe the surface area, general geology and geomorphological features, general soil types, general land use, and climate (including climate type).

No information available

18. Hydrological values:

Describe the functions and values of the wetland in groundwater recharge, flood control, sediment trapping, shoreline stabilization, etc.

Shoreline stabilisation and dissipation of erosive forces, Recharge and discharge of groundwater, Flood water storage / desynchronisation of flood peaks, Maintenance of water quality (removal of nutrients)

19. Wetland types:

Inland wetland, Marine/coastal wetland

Code	Name	% Area
Other	Other	83.4
4	Seasonally flooded agricultural land	14
9	Canals and drainage channels	1.4
6	Reservoirs / barrages / dams	0.9
O	Freshwater lakes: permanent	0.2
E	Sand / shingle shores (including dune systems)	0.1

20. General ecological features:

Provide further description, as appropriate, of the main habitats, vegetation types, plant and animal communities present in the Ramsar site, and the ecosystem services of the site and the benefits derived from them.

Pevensey Levels supports a range of important communities of wetland flora and fauna. Various stages of succession are present in the ditches. Floating and submerged aquatic plants such as duckweeds *Lemna* spp., pondweeds *Potamogeton* spp. or water fern *Azolla* spp. represent the pioneer stages. These are followed by larger floating or emergent plants such as frogbit *Hydrocharis morsus-ranae*, bur-reed *Sparganium erectum* and arrow-head *Sagittaria sagittifolia*. Finally, common reed *Phragmites australis* or hawthorn *Crataegus monogyna* becomes dominant. Left undredged, the ditches lose their diversity and varied structure. A rich bankside flora is also present on site. An area of shingle and intertidal muds and sands is another important component of the site. Some flora associated with the shingle is present. For example, yellow horned-poppy *Glaucium flavum* and sea campion *Silene uniflora*.

The site supports outstanding invertebrate populations and is a top site for Mollusca and aquatic Coleoptera. Over 15 species of dragonfly (Odonata) have been recorded, including several scarce species. One of Britain's largest and rarest spiders, the fen raft spider *Dolomides plantarius* has its stronghold at Pevensey.

The lowland wet grassland supports a variety of bird species. For example, wintering lapwing and snipe. Breeding bird species include sedge warblers, reed warblers which nest in the scrub and reeds in the ditches respectively.

Ecosystem services

21. Noteworthy flora:

Provide additional information on particular species and why they are noteworthy (expanding as necessary on information provided in 12. Justification for the application of the Criteria) indicating, e.g. which species/communities are unique, rare, endangered or biogeographically important, etc. *Do not include here taxonomic lists of species present – these may be supplied as supplementary information to the RIS.*

Nationally important species occurring on the site.

Higher Plants.

Althaea officinalis, Ceratophyllum submersum, Crambe maritima, Potamogeton acutifolius, Potamogeton friesii, Potamogeton trichoides, Sium latifolium, Stratiotes aloides

22. Noteworthy fauna:

Provide additional information on particular species and why they are noteworthy (expanding as necessary on information provided in 12. Justification for the application of the Criteria) indicating, e.g. which species/communities are unique, rare, endangered or biogeographically important, etc., including count data. *Do not include here taxonomic lists of species present – these may be supplied as supplementary information to the RIS.*

Birds

Species Information

Nationally important species occurring on the site.

Invertebrates.

Segmentina nitida, Anisus vorticulus, Valvata macrostoma, Hydrophilus piceus, Gyrinus suffriani, Elmatophilus brevicollis, Bagous puncticollis, Dolomedes plantarius, Atylotus rusticus, Odontomyia ornata, Pherbellia argyra, Psacadina zernyi, Limophalia pictipennis, Tipula marginata, Placobdella costata

Assemblage of International importance

The site supports an appreciable assemblage of rare, vulnerable or endangered species or sub-species of plant or animal. Pevensey Levels is probably one of the best sites in Great Britain for freshwater molluscs, one of the very best sites for aquatic Coleoptera and also supports an outstanding assemblage of Odonata.

23. Social and cultural values:

Describe if the site has any general social and/or cultural values e.g. fisheries production, forestry, religious importance, archaeological sites, social relations with the wetland, etc. Distinguish between historical/archaeological/religious significance and current socio-economic values.

Aesthetic
Aquatic vegetation (e.g. reeds, willows, seaweed)
Archaeological/historical site
Environmental education/ interpretation
Livestock grazing
Non-consumptive recreation
Scientific research
Sport fishing
Sport hunting
Tourism
Traditional cultural

b) Is the site considered of international importance for holding, in addition to relevant ecological values, examples of significant cultural values, whether material or non-material, linked to its origin, conservation and/or ecological functioning? No

If Yes, describe this importance under one or more of the following categories:

i) sites which provide a model of wetland wise use, demonstrating the application of traditional knowledge and methods of management and use that maintain the ecological character of the wetland:

ii) sites which have exceptional cultural traditions or records of former civilizations that have influenced the ecological character of the wetland:

iii) sites where the ecological character of the wetland depends on the interaction with local communities or indigenous peoples:

iv) sites where relevant non-material values such as sacred sites are present and their existence is strongly linked with the maintenance of the ecological character of the wetland:

24. Land tenure/ownership:

Ownership category	On-site	Off-site
Non-governmental organisation (NGO)	+	
Local authority, municipality etc.	+	+
Private	+	+
Public/communal	+	+

25. Current land (including water) use:

Activity	On-site	Off-site
Nature conservation	+	+
Tourism	+	+
Recreation	+	
Current scientific research	+	
Fishing: recreational/sport	+	+
Arable agriculture (unspecified)	+	+
Permanent arable agriculture	+	+
Permanent pastoral agriculture	+	+
Hay meadows	+	+
Hunting: recreational/sport	+	+
Sewage treatment/disposal	+	+
Flood control	+	
Domestic water supply	+	+

26. Factors (past, present or potential) adversely affecting the site's ecological character, including changes in land (including water) use and development projects:

Explanation of reporting category:

1. *Those factors that are still operating, but it is unclear if they are under control, as there is a lag in showing the management or regulatory regime to be successful.*
2. *Those factors that are not currently being managed, or where the regulatory regime appears to have been ineffective so far.*

NA = Not Applicable because no factors have been reported.

Adverse Factor Category	Reporting Category	Description of the problem (Newly reported Factors only)	On-Site	Off-Site	Major Impact?
Introduction/invasion of non-native plant species	2		+		+
Pollution – domestic sewage	2			+	+

For category 2 factors only.
What measures have been taken / are planned / regulatory processes invoked, to mitigate the effect of these factors?
Introduction/invasion of non-native plant species - Floating pennywort *Hydrocotyle ranunculoides*: Strategy being worked up and research conducted into chemical treatment. Effective solution has not yet been found
Crassula *Crassula helmsii*: Work currently being undertaken (October 2004) to remove *Crassula* by mechanical diggers.

Pollution – domestic sewage - Sewage Treatment Works: Phosphate-stripping has been introduced.
Further study of pollution likely under the water company's Asset Management Plan AMP4.

Is the site subject to adverse ecological change? NO

27. Conservation measures taken:

List national category and legal status of protected areas, including boundary relationships with the Ramsar site; management practices; whether an officially approved management plan exists and whether it is being implemented.

Conservation measure	On-site	Off-site
Site/ Area of Special Scientific Interest (SSSI/ASSI)	+	
National Nature Reserve (NNR)	+	
Land owned by a non-governmental organisation for nature conservation	+	
Management agreement	+	+
Site management statement/plan implemented	+	

b) Describe any other current management practices:
The management of Ramsar sites in the UK is determined by either a formal management plan or through other management planning processes, and is overseen by the relevant statutory conservation agency. Details of the precise management practises are given in these documents.

28. Conservation measures proposed but not yet implemented:

e.g. management plan in preparation; official proposal as a legally protected area, etc.

No information available

29. Current scientific research and facilities:

e.g. details of current research projects, including biodiversity monitoring; existence of a field research station, etc.

Contemporary.

A survey of *Dolomedes plantarius* is shortly to be undertaken, repeating the one done in 1990 (Jones 1990), to monitor its status.
The National Nature Reserve is comprehensively monitored by English Nature and the Sussex Wildlife Trust.

Completed.

Surveys of ditch flora, invertebrates, Odonata, Mollusca and Coleoptera have been carried out, as have routine river corridor surveys. Overwintering and breeding bird surveys have also been done by the RSPB. All these are likely to be repeated from time to time to monitor any changes.

30. Current communications, education and public awareness (CEPA) activities related to or benefiting the site:

e.g. visitor centre, observation hides and nature trails, information booklets, facilities for school visits, etc.

The National Nature Reserve Site Managers lead guided walks on the NNRs, and teach students from local Universities and Schools. East Sussex County Council also have programmes for site visits by the general public.

There are a few interpretive panels at Pevensey Castle.

Future activities: There are proposals for a nature trail and further interpretive panels on the less sensitive parts of the NNR. In the long term, an interpretive centre may be set up.

31. Current recreation and tourism:

State if the wetland is used for recreation/tourism, indicate type(s) and their frequency/intensity.

Activities and facilities provided.

Land-based recreation:

Walking (including dog walking) and horse riding occur on the many public footpaths and bridleways. There is a golf course on the south-east corner. The roads within the site are used for recreational cycling. Two fields are used for the flying of radio-controlled model aircraft under time-limited conditions.

Water based recreation:

The Wallers Haven is occasionally used for rowing training by a local school. All the major Havens are used for angling.

Hunting:

There is a beagle pack located on the site which regularly hunts hares. The site is also used for occasional fox hunting and by bloodhounds. Illegal hunting of hare, and taking of eels also go on. A few owners have licences to shoot wildfowl.

Facilities provided.

The coastal area to the South of the Site has caravan parks and is used as a beach resort.

Seasonality.

Mainly during the summer months. Shooting is over winter.

32. Jurisdiction:

Include territorial, e.g. state/region, and functional/sectoral, e.g. Dept. of Agriculture/Dept. of Environment, etc.

Head, Natura 2000 and Ramsar Team, Department for Environment, Food and Rural Affairs, European Wildlife Division, Zone 1/07, Temple Quay House, 2 The Square, Temple Quay, Bristol, BS1 6EB

33. Management authority:

Provide the name and address of the local office(s) of the agency(ies) or organisation(s) directly responsible for managing the wetland. Wherever possible provide also the title and/or name of the person or persons in this office with responsibility for the wetland.

Site Designations Manager, English Nature, Sites and Surveillance Team, Northminster House, Northminster Road, Peterborough, PE1 1UA, UK

34. Bibliographical references:

Scientific/technical references only. If biogeographic regionalisation scheme applied (see 15 above), list full reference citation for the scheme.

Site-relevant references:

Belden, P (1987) *Pevensey Levels dragonflies*. Nature Conservancy Council, Peterborough

Bratton, JH (ed.) (1991) *British Red Data Books: 3. Invertebrates other than insects*. Joint Nature Conservation Committee, Peterborough

Carr, R (1983) *A survey of the aquatic Coleoptera of the Pevensey Levels*. Nature Conservancy Council, Peterborough

Clark, J & Murdoch, J (1997) Local knowledge and the precarious extension of scientific networks: a reflection on three case studies. *Sociologia Ruralis*, 37(1), 38-60

Drake, M (1991) Ephemeroptera and Plecoptera in freshwater and brackish ditch systems on British grazing marshes. *Entomologists Gazette*, **42**, 45-59

Dulley, AJF (1966) The Level and Port of Pevensey in the Middle Ages. *Sussex Archaeological Collections*, **104**, 26-45

Environment Agency (1996) *A fisheries management strategy for the Pevensey Levels*. Environment Agency Southern Region

Gliading, PR (1986) *A botanical survey of ditches on the Pevensey Levels*. Nature Conservancy Council, Peterborough

Hart, C & Douglas, S (1993) Nature conservation and the management of a drainage system habitat. *Proceedings of the ICOLE Conference 1993*

Hingley, MR (1979) The colonization of newly-dredged drainage channels on the Pevensey Levels (East Sussex), with special reference to gastropods. *Journal of Conchology*, **30**, 105-122

Hole, M (1998) Comment – What future in farming for wildlife? A farmer's view from the Pevensey Levels. *British Wildlife*, **10**(1), 9-11

Jones, E (1990) *The status of* Dolomedes plantarius *on Pevensey Levels in August 1990*. Nature Conservancy Council, Peterborough

Keymer, RJ, Blake, C & Drake, M (1989) *Pevensey Levels - final report: proposed boundary for renotification*. Nature Conservancy Council, Peterborough

Killeen, IJ (1994) A survey of the freshwater Mollusca of the Pevensey Levels East Sussex. *English Nature Research Report*, No **124**, Peterborough

Lindsey, BI (1993) English Nature's Pevensey Levels Wildlife Enhancement Scheme. *Sussex Ornithological Newsletter*, No. **125** (Summer 1993)

Munday, R (1993) *Pevensey Levels ditch survey*. Sussex Wildlife Trust/Environment Agency, Worthing

National Rivers Authority (1995) *Pevensey Levels biological survey Summer 1994*. National Rivers Authority (S) Science Group

O'Neil, P & Beeber, TJC (2005) The great silver water beetle in Britain: a cry for help *British Wildlife*, **16**(4), 265-269

Palmer, M (1984) *A comparison of the flora and invertebrate fauna of watercourses in old pasture and arable land in the Pevensey Levels, Sussex*. Nature Conservancy Council, Peterborough

Palmer, M (1986) The impact of a change from permanent pasture to cereal farming on the flora and invertebrate fauna of watercourses in the Pevensey Levels, Sussex. *Proceedings of the EWRS/AAB Symposium on Aquatic Weeds*

Ratcliffe, DA (ed.) (1977) *A Nature Conservation Review. The selection of biological sites of national importance to nature conservation in Britain*. Cambridge University Press (for the Natural Environment Research Council and the Nature Conservancy Council), Cambridge (2 vols.)

Rowland, S & Burges, D (1993) *Pevensey Levels wintering bird surveys 1993*. RSPB/English Nature/Environment Agency, Shoreham

Salzmann, LF (1910) The inning of Pevensey Levels. *Sussex Archaeological Collections*, **53**, 30-60

Shirt, DB (ed.) (1987) *British Red Data Books: 2. Insects*. Nature Conservancy Council, Peterborough

Steel, C (1976) *The ecology of Pevensey Levels in relation to the drainage system*. Unpublished M.Sc dissertation, University of London

Stewart, A, Pearman, DA & Preston, CD (eds.) (1994) *Scarce plants in Britain*. Joint Nature Conservation Committee, Peterborough

Watson, AM & Ormerod, SJ (2004) The distribution of three uncommon freshwater gastropods in the drainage ditches of British grazing marshes. *Biological Conservation*, **118**(4), 455–466

Wigginton, M (1999) *British Red Data Books. 1. Vascular plants*. 3rd edn. Joint Nature Conservation Committee, Peterborough

Willis, J (1995) *A contingent valuation study of the Pevensey Levels*. English Nature, Peterborough

Willis, J, Garrod, GD, Benson, JF & Carter, M (1996) Benefits and costs of the Wildlife Enhancement Scheme: A case study of the Pevensey Levels. *Journal of Environmental Planning and Management*, **39**(3), 387-401

A1e Pevensey Levels Special Area of Conservation

NATURA 2000 - STANDARD DATA FORM

**For Special Protection Areas (SPA),
Proposed Sites for Community Importance (pSCI),
Sites of Community Importance (SCI) and
for Special Areas of Conservation (SAC)**

SITE UK0030367

SITENAME Pevensey Levels

TABLE OF CONTENTS

1. SITE IDENTIFICATION

Back to top

1.1 Type	1.2 Site code
B	UK0030367

1.3 Site name

Pevensey Levels

1.4 First Compilation date	1.5 Update date
2011-02	2015-12

1.6 Respondent:

Name/Organisation:	Joint Nature Conservation Committee
Address:	Joint Nature Conservation Committee Monkstone House City Road Peterborough PE1 1JY
Email:	

Date site proposed as SCI:	2011-02
Date site confirmed as SCI:	2012-11
Date site designated as SAC:	No data
National legal reference of SAC designation:	Regulations 11 and 13-15 of the Conservation of Habitats and Species Regulations 2010 (http://www.legislation.gov.uk/uksi/2010/490/contents/made).

2. SITE LOCATION

2.1 Site-centre location [decimal degrees]:

Longitude	Latitude
0.350555556	50.8525

2.2 Area [ha]:

3585.38

2.3 Marine area [%]

0.0

2.4 Sitelength [km]:

0.0

2.5 Administrative region code and name

NUTS level 2 code	Region Name
UKJ2	Surrey, East and West Sussex

2.6 Biogeographical Region(s)

Atlantic (100.0 %)

3. ECOLOGICAL INFORMATION

Back to top

3.2 Species referred to in Article 4 of Directive 2009/147/EC and listed in Annex II of Directive 92/43/EEC and site evaluation for them

Species					Population in the site						Site assessment			
G	Code	Scientific Name	S	NP	T	Size		Unit	Cat.	D.qual.	A|B|C|D	A|B|C		
						Min	Max				Pop.	Con.	Iso.	Glo.
I	4056	Anisus vorticulus			p				P	DD	A	A	C	A

- **Group:** A = Amphibians, B = Birds, F = Fish, I = Invertebrates, M = Mammals, P = Plants, R = Reptiles
- **S:** in case that the data on species are sensitive and therefore have to be blocked for any public access enter: yes
- **NP:** in case that a species is no longer present in the site enter: x (optional)
- **Type:** p = permanent, r = reproducing, c = concentration, w = wintering (for plant and non-migratory species use permanent)
- **Unit:** i = individuals, p = pairs or other units according to the Standard list of population units and codes in accordance with Article 12 and 17 reporting (see reference portal)
- **Abundance categories (Cat.):** C = common, R = rare, V = very rare, P = present - to fill if data are deficient (DD) or in addition to population size information
- **Data quality:** G = 'Good' (e.g. based on surveys); M = 'Moderate' (e.g. based on partial data with some extrapolation); P = 'Poor' (e.g. rough estimation); VP = 'Very poor' (use this category only, if not even a rough estimation of the population size can be made, in this case the fields for population size can remain empty, but the field "Abundance categories" has to be filled in)

4. SITE DESCRIPTION

Back to top

4.1 General site character

Habitat class	% Cover
N10	97.5
N06	2.5
Total Habitat Cover	100

Other Site Characteristics

1 Terrestrial: Soil & Geology: nutrient-poor,clay,alluvium,peat,basic,shingle,sand,mud,sedimentary 2
Terrestrial: Geomorphology and landscape: lowland,coastal,floodplain

4.2 Quality and importance

Anisus vorticulus for which this is considered to be one of the best areas in the United Kingdom.

4.3 Threats, pressures and activities with impacts on the site

The most important impacts and activities with high effect on the site

Negative Impacts			
Rank	Threats and pressures [code]	Pollution (optional) [code]	inside/outside [i|o|b]
H	J02		B
H	I01		B
H	H02		B

Positive Impacts			
Rank	Activities, management [code]	Pollution (optional) [code]	inside/outside [i|o|b]
H	D05		I
H	A06		I
H	A02		I
H	A04		I
H	B02		I

Rank: H = high, M = medium, L = low
Pollution: N = Nitrogen input, P = Phosphor/Phosphate input, A = Acid input/acidification,
T = toxic inorganic chemicals, O = toxic organic chemicals, X = Mixed pollutions
i = inside, o = outside, b = both

4.5 Documentation

Conservation Objectives - the Natural England links below provide access to the Conservation Objectives (and other site-related information) for its terrestrial and inshore Natura 2000 sites, including conservation advice packages and supporting documents for European Marine Sites within English waters and for cross-border sites. See also the 'UK Approach' document for more information (link via the JNCC website).

Link(s): http://publications.naturalengland.org.uk/category/3212324
http://jncc.defra.gov.uk/pdf/Natura2000_StandardDataForm_UKApproach_Dec2015.pdf

http://publications.naturalengland.org.uk/category/6490068894089216

5. SITE PROTECTION STATUS (optional)

Back to top

5.1 Designation types at national and regional level:

Code	Cover [%]	Code	Cover [%]	Code	Cover [%]
UK04	100.0	UK01	5.1		

6. SITE MANAGEMENT

6.1 Body(ies) responsible for the site management: Back to top

Organisation:	Natural England
Address:	
Email:	

6.2 Management Plan(s):

An actual management plan does exist:

☐	Yes
☐	No, but in preparation
X	No

6.3 Conservation measures (optional)

For available information, including on Conservation Objectives, see Section 4.5.

A1f Hastings Cliffs SAC

NATURA 2000 - STANDARD DATA FORM

For Special Protection Areas (SPA),
Proposed Sites for Community Importance (pSCI),
Sites of Community Importance (SCI) and
for Special Areas of Conservation (SAC)

SITE UK0030165

SITENAME Hastings Cliffs

TABLE OF CONTENTS

1. SITE IDENTIFICATION

1.1 Type	1.2 Site code Back to top
B	UK0030165

1.3 Site name

Hastings Cliffs

1.4 First Compilation date	1.5 Update date
2001-03	2015-12

1.6 Respondent:

Name/Organisation:	Joint Nature Conservation Committee
Address:	Joint Nature Conservation Committee Monkstone House City Road Peterborough PE1 1JY
Email:	

Date site proposed as SCI:	2001-03
Date site confirmed as SCI:	2004-12
Date site designated as SAC:	2005-04
National legal reference of SAC designation:	Regulations 11 and 13-15 of the Conservation of Habitats and Species Regulations 2010 (http://www.legislation.gov.uk/uksi/2010/490/contents/made).

2. SITE LOCATION

2.1 Site-centre location [decimal degrees]:

Longitude	Latitude
0.652222222	50.86861111

2.2 Area [ha]:

182.47

2.3 Marine area [%]

0.0

2.4 Sitelength [km]:

0.0

2.5 Administrative region code and name

NUTS level 2 code	Region Name
UKJ2	Surrey, East and West Sussex

2.6 Biogeographical Region(s)

Atlantic (100.0 %)

3. ECOLOGICAL INFORMATION

Back to top

3.1 Habitat types present on the site and assessment for them

Annex I Habitat types						Site assessment			
Code	PF	NP	Cover [ha]	Cave [number]	Data quality	A|B|C|D	A|B|C		
						Representativity	Relative Surface	Conservation	Global
1230			54.74		M	B	C	A	B

- PF: for the habitat types that can have a non-priority as well as a priority form (6210, 7130, 9430) enter "X" in the column PF to indicate the priority form.
- NP: In case that a habitat type no longer exists in the site enter: x (optional)
- Cover: decimal values can be entered
- Caves: for habitat types 8310, 8330 (caves) enter the number of caves if estimated surface is not available.
- Data quality: G = 'Good' (e.g. based on surveys); M = 'Moderate' (e.g. based on partial data with some extrapolation); P = 'Poor' (e.g. rough estimation)

4. SITE DESCRIPTION

Back to top

4.1 General site character

Habitat class	% Cover
N07	2.0

N14	10.0
N19	1.0
N16	25.0
N09	8.0
N22	5.0
N04	1.0
N06	5.0
N05	30.0
N08	13.0
Total Habitat Cover	100

Other Site Characteristics

1 Terrestrial: Soil & Geology: nutrient-rich,mud,neutral,shingle,sand,sandstone,acidic,clay,nutrient-poor 2 Terrestrial: Geomorphology and landscape: coastal,lowland,valley,hilly,crags/ledges,slope 4 Marine: Geomorphology: cliffs

4.2 Quality and Importance

Vegetated sea cliffs of the Atlantic and Baltic coasts for which this is considered to be one of the best areas in the United Kingdom.

4.3 Threats, pressures and activities with impacts on the site

The most important impacts and activities with high effect on the site

Negative Impacts			
Rank	Threats and pressures [code]	Pollution (optional) [code]	Inside/outside [i|o|b]
H	J02		B
H	H04		B
H	H02		B

Positive Impacts			
Rank	Activities, management [code]	Pollution (optional) [code]	Inside/outside [i|o|b]
H	A04		I
H	A02		I

Rank: H = high, M = medium, L = low

Pollution: N = Nitrogen input, P = Phosphor/Phosphate input, A = Acid input/acidification, T = toxic inorganic chemicals, O = toxic organic chemicals, X = Mixed pollutions

I = inside, o = outside, b = both

4.5 Documentation

Conservation Objectives - the Natural England links below provide access to the Conservation Objectives (and other site-related information) for its terrestrial and inshore Natura 2000 sites, including conservation advice packages and supporting documents for European Marine Sites within English waters and for cross-border sites. See also the 'UK Approach' document for more information (link via the JNCC website).

Link(s): http://publications.naturalengland.org.uk/category/3212324

http://jncc.defra.gov.uk/pdf/Natura2000_StandardDataForm_UKApproach_Dec2015.pdf

http://publications.naturalengland.org.uk/category/6490068894089216

5. SITE PROTECTION STATUS (optional)

Back to top

5.1 Designation types at national and regional level:

Code	Cover [%]	Code	Cover [%]	Code	Cover [%]
UK04	100.0				

6. SITE MANAGEMENT

Back to top

6.1 Body(ies) responsible for the site management:

Organisation:	Natural England
Address:	
Email:	

6.2 Management Plan(s):
An actual management plan does exist:

- [ ] Yes
- [ ] No, but in preparation
- [x] No

6.3 Conservation measures (optional)

For available information, including on Conservation Objectives, see Section 4.5.

A1g Ashdown Forest SAC

NATURA 2000 - STANDARD DATA FORM

**For Special Protection Areas (SPA),
Proposed Sites for Community Importance (pSCI),
Sites of Community Importance (SCI) and
for Special Areas of Conservation (SAC)**

SITE UK0030080

SITENAME Ashdown Forest

TABLE OF CONTENTS

1. SITE IDENTIFICATION

1.1 Type	1.2 Site code Back to top
B	UK0030080

1.3 Site name

Ashdown Forest

1.4 First Compilation date	1.5 Update date
2001-03	2015-12

1.6 Respondent:

Name/Organisation:	Joint Nature Conservation Committee
Address:	Joint Nature Conservation Committee Monkstone House City Road Peterborough PE1 1JY
Email:	

Date site proposed as SCI:	2001-03
Date site confirmed as SCI:	2004-12
Date site designated as SAC:	2005-04
National legal reference of SAC designation:	Regulations 11 and 13-15 of the Conservation of Habitats and Species Regulations 2010 (http://www.legislation.gov.uk/uksi/2010/490/contents/made).

2. SITE LOCATION

2.1 Site-centre location [decimal degrees]:

Longitude	Latitude
0.070555556	51.05583333

2.2 Area [ha]:

2715.88

2.3 Marine area [%]

0.0

2.4 Sitelength [km]:

0.0

2.5 Administrative region code and name

NUTS level 2 code	Region Name
UKJ2	Surrey, East and West Sussex

2.6 Biogeographical Region(s)

Atlantic (100.0 %)

3. ECOLOGICAL INFORMATION

Back to top

3.1 Habitat types present on the site and assessment for them

Annex I Habitat types						Site assessment			
Code	PF	NP	Cover [ha]	Cave [number]	Data quality	A|B|C|D	A|B|C		
						Representativity	Relative Surface	Conservation	Global
4010			1206.84		G	A	C	B	A
4030			401.95		G	A	C	B	A

- **PF**: for the habitat types that can have a non-priority as well as a priority form (6210, 7130, 9430) enter "X" in the column PF to indicate the priority form.
- **NP**: In case that a habitat type no longer exists in the site enter: x (optional)
- **Cover**: decimal values can be entered
- **Caves**: for habitat types 8310, 8330 (caves) enter the number of caves if estimated surface is not available.
- **Data quality**: G = 'Good' (e.g. based on surveys); M = 'Moderate' (e.g. based on partial data with some extrapolation); P = 'Poor' (e.g. rough estimation)

3.2 Species referred to in Article 4 of Directive 2009/147/EC and listed in Annex II of Directive 92/43/EEC and site evaluation for them

Species			Population in the site						Site assessment	
		Scientific								

G	Code	Name	S	NP	T	Size		Unit	Cat.	D.qual.	A|B|C|D	A|B|C		
						Min	Max				Pop.	Con.	Iso.	Glo.
A	1166	Triturus cristatus			p				C	DD	C	B	C	C

- **Group:** A = Amphibians, B = Birds, F = Fish, I = Invertebrates, M = Mammals, P = Plants, R = Reptiles
- **S:** In case that the data on species are sensitive and therefore have to be blocked for any public access enter: yes
- **NP:** In case that a species is no longer present in the site enter: x (optional)
- **Type:** p = permanent, r = reproducing, c = concentration, w = wintering (for plant and non-migratory species use permanent)
- **Unit:** i = individuals, p = pairs or other units according to the Standard list of population units and codes in accordance with Article 12 and 17 reporting (see reference portal)
- **Abundance categories (Cat.):** C = common, R = rare, V = very rare, P = present - to fill if data are deficient (DD) or in addition to population size information
- **Data quality:** G = 'Good' (e.g. based on surveys); M = 'Moderate' (e.g. based on partial data with some extrapolation); P = 'Poor' (e.g. rough estimation); VP = 'Very poor' (use this category only, if not even a rough estimation of the population size can be made, in this case the fields for population size can remain empty, but the field "Abundance categories" has to be filled in)

4. SITE DESCRIPTION

Back to top

4.1 General site character

Habitat class	% Cover
N08	60.0
N19	40.0
Total Habitat Cover	100

Other Site Characteristics

1 Terrestrial: Soil & Geology: sandstone,acidic,clay,nutrient-poor 2 Terrestrial: Geomorphology and landscape: lowland

4.2 Quality and Importance

Northern Atlantic wet heaths with Erica tetralix for which this is considered to be one of the best areas in the United Kingdom. European dry heaths for which this is considered to be one of the best areas in the United Kingdom. Triturus cristatus for which the area is considered to support a significant presence.

4.3 Threats, pressures and activities with impacts on the site

The most important impacts and activities with high effect on the site

Negative Impacts			
Rank	Threats and pressures [code]	Pollution (optional) [code]	Inside/outside [i|o|b]
H	H04		B
H	J02		B
H	A02		I
H	G01		I

Positive Impacts			
Rank	Activities, management [code]	Pollution (optional) [code]	Inside/outside [i|o|b]
H	A02		I

Rank: H = high, M = medium, L = low
Pollution: N = Nitrogen input, P = Phosphor/Phosphate input, A = Acid input/acidification, T = toxic inorganic chemicals, O = toxic organic chemicals, X = Mixed pollutions
i = inside, o = outside, b = both

4.5 Documentation

Conservation Objectives - the Natural England links below provide access to the Conservation Objectives (and other site-related information) for its terrestrial and inshore Natura 2000 sites, including conservation advice packages and supporting documents for European Marine Sites within English waters and for cross-border sites. See also the 'UK Approach' document for more information (link via the JNCC website).

Link(s): http://publications.naturalengland.org.uk/category/5490068804050216

http://jncc.defra.gov.uk/pdf/Natura2000_StandardDataForm_UKApproach_Dec2015.pdf

http://publications.naturalengland.org.uk/category/3212324

5. SITE PROTECTION STATUS (optional)

Back to top

5.1 Designation types at national and regional level:

Code	Cover [%]	Code	Cover [%]	Code	Cover [%]
UK04	100.0				

6. SITE MANAGEMENT

Back to top

6.1 Body(ies) responsible for the site management:

Organisation:	Natural England
Address:	
Email:	

6.2 Management Plan(s):

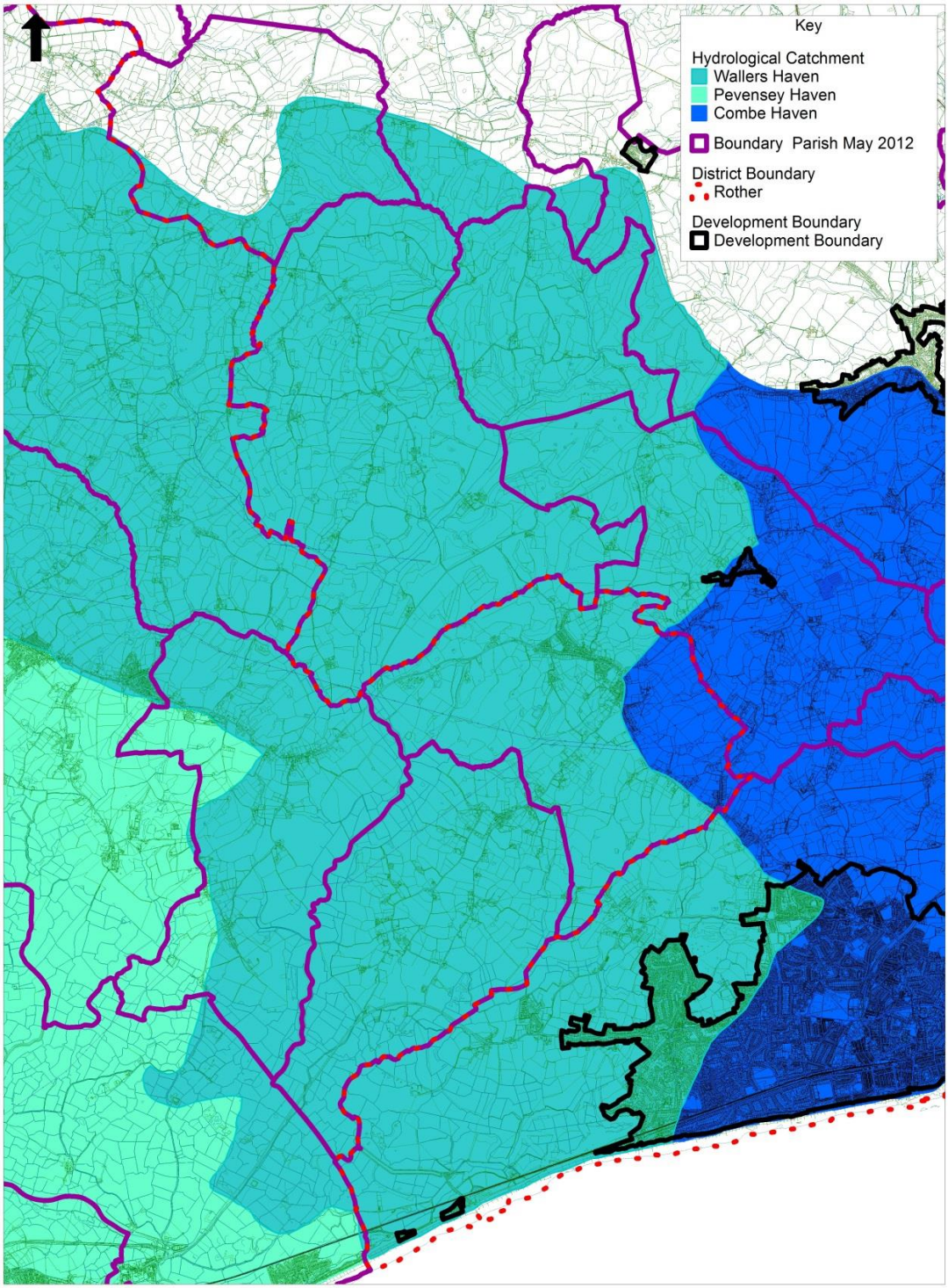
An actual management plan does exist:

☐	Yes
☐	No, but in preparation
☒	No

6.3 Conservation measures (optional)

For available information, including on Conservation Objectives, see Section 4.5.

Appendix 2: Map of the Hydrological Catchment of Pevensey Levels – Rother Parishes



Appendix 3: Natura 2000 Sites in Rother District (Note: prior to March 2016 extensions and confirmations[18]) – Existing area and area infringed by planning applications

Table 1. Designated sites and reserves		Area of designation / reserve in East Sussex (ha)	% of East Sussex	Area of designation / reserve in Rother(ha)	% of Rother	Area of designation / reserve in Rother infringed by planning applications (ha)	% of designation / reserve in Rother infringed by planning applications	Number of planning applications within or abutting designation / reserve
Inter-national	Ramsar	3585.4	2.1	486.5	0.9	0.0	0.0	0
	Special Area of Conservation (SAC)	7220.6	4.2	1023.0	2.0	2.7	0.3	2
	Special Protection Area (SPA)	4324.4	2.5	1117.4	2.2	0.1	0.01	2

Source: Sussex Biodiversity Record Centre

Details of Relevant Applications

RR/2013/420/P – The application site was completely within the Dungeness SAC, making use of an existing MOD walled training facility for civilian war games. Natural England confirmed in their comments that the activity was not likely to have a significant effect on the SAC.

RR/2013/495/P & **RR/2013/493/P** – Both application sites abut the boundary of the Dungeness to Pett Level SPA for the extended occupation period of static caravans. Natural England have trialled requesting that planning application data be filtered so that only those with a likely impact on biodiversity would be included (e.g. new developments, extensions etc) in order to exclude applications such as this from the figures.

RR/2013/93/P – This is likely to be due to an error during digitising of the either the SPA or application site boundary rather than an actual infringement of the SPA.

[18] Updated information not yet available

Appendix 4: Areas of Priority Habitat – Existing area and area infringed by planning applications

Priority Habitats*(Bold text indicates habitat is present iwthin Natura 2000 sites)	Relevant International Site	Other significant locations with Rother District	Area of habitat in East Sussex (ha)	% of East Sussex	Area of habitat in Rother (ha)	% of Rother	Area of habitat in Rother infringed by Planning applications (ha)	% of habitat i Rother infringed b Planning application
Ancient woodland	N/A	High Weald AONB	20906.7	12.1	8054.0	15.5	233.9	2.
Coastal & floodplain grazing marsh	Pevensey Levels Ramsar, Pevensey Levels SAC, Dungeness SAC, Dungeness, Romney Marsh and Rye Bay SPA, Dungeness, Romney Marsh and Rye Bay Ramsar, Dungeness SAC	Combe Valle Countryside Park, Rother Valley, Brede Valley, West Bexhill.	10220.8	5.9	4044.4	7.81	13.6	0.
Coastal saltmarsh	Dungeness, Romney Marsh and Rye Bay SPA, Dungeness SAC		48.3	0.03	35.9	0.1	0.01	
Coastal sand dunes	Dungeness, Romney Marsh and Rye Bay SPA, Dungeness, Romney Marsh and Rye Bay Ramsar		63.5	0.04	63.5	0.1	0.03	
Coastal vegetated shingle	Dungeness, Romney Marsh and Rye Bay SPA, Dungeness, Romney Marsh and Rye Bay Ramsar, Dungeness SAC.	Combe Valle Countryside Park, Hooe Level Foreshore, Fairlight.	412.7	0.2	362.2	0.7	0.1	
Deciduous woodland	N/A	High Weald AONB	19248.1	11.2	6450.9	12.4	156.8	2.
Ghyll woodland	N/A	High Weald AONB	6563.9	3.8	2775.7	5.4	63.3	2.
Intertidal chalk	Hastings Cliffs SAC, Dungeness, Romney Marsh and Rye Bay SPA, Dungeness, Romney Marsh and Rye Bay Ramsar		268.5	0.2	40.2	0.1	0	
Intertidal mudflat	Dungeness, Romney Marsh and Rye Bay SPA, Dungeness, Romney Marsh and Rye Bay Ramsar		231.5	0.1	184.8	0.4	0	
Lowland calcareous grassland	N/A		2100.9	1.2	0.0	0.0	0	
Lowland fen	Dungeness, Romney Marsh and Rye Bay SPA, Dungeness, Romney Marsh and Rye Bay Ramsar	Combe Valle Countryside Park	33.8	0.02	7.5	0.01	0	
Lowland heathland	Hastings Cliffs SAC		1463.4	0.8	66.2	0.1	0	
Lowland meadow	N/A		159.9	0.1	68.9	0.1	0	
Maritime cliff and slope	Dungeness, Romney Marsh and Rye Bay SPA, Hastings Cliffs SAC		104.4	0.1	14.5	0.03	0	
Reedbed	Dungeness, Romney Marsh and Rye Bay SPA	Combe Valle Countryside Park,	119.5	0.1	64.6	0.1	0	
Saline lagoon	Dungeness, Romney Marsh and Rye Bay SPA, Dungeness, Romney Marsh and Rye Bay Ramsar, Dungeness SAC.		133.6	0.1	120.8	0.2	0	

Traditional orchard	N/A		136.7	0.1	76.0	0.1	0	0.
Wood-pasture and parkland	N/A		4132.4	2.4	838.1	1.6	109.5	13.

Note: Statistical breakdown of permitted planning applications within designated sites and habitats in Rother District between 1st April 2014 and 31st March 2015
*Changes in habitat extent year on year may well be a reflection of improved datasets and should not be assumed to be habitat expansion or contraction. Many habitat datasets overlap with one another, e.g. lowland meadow may be classed as grazing marsh and recorded in both inventories.
Source: Sussex Biodiversity Record Centre - November 2015

Appendix 5: Relevant Site of Special Scientific Interest (SSSI) Condition Analysis

Site: Pevensey Levels

Report generated on: 23 Sep 2015

	Sites	Units	Units Assessed
Total number	1	37	37
Total area (ha)	3,603.15	3,603.15	3,603.15

	% meeting area of favourable or unfavourable recovering	Favourable	Unfavourable - Recovering	Unfavourable - No change	Unfavourable - Declining	Partially destroyed	Destroyed	Not Assessed
Area (ha)	3,585.31		3,585.31			17.84		
Percentage	99.40%	0.00%	99.40%	0.00%	0.00%	0.50%	0.00%	0.00%

More detail is available from Natural England web-page here.

Site: Hastings Cliffs to Pett Beach SSSI

Report generated on: 23 Sep 2015

	Sites	Units	Units Assessed
Total number	1	10	10
Total area (ha)	312.41	312.41	312.41

	% meeting area of favourable or unfavourable recovering	Favourable	Unfavourable - Recovering	Unfavourable - No change	Unfavourable - Declining	Partially destroyed	Destroyed	Not Assessed
Area (ha)	312.41	236.19	76.22					
Percentage	100.00%	75.60%	24.40%	0.00%	0.00%	0.00%	0.00%	0.00%

More detail is available from Natural England web-page here

Site: Dungeness, Romney Marsh and Rye Bay SSSI

Report generated on: 23 Sep 2015

	Sites	Units	Units Assessed
Total number	1	194	194
Total area (ha)	9,089.54	9,089.54	9,089.54

	% meeting area of favourable or unfavourable recovering	Favourable	Unfavourable - Recovering	Unfavourable - No change	Unfavourable - Declining	Partially destroyed	Destroyed	Not Assessed
Area (ha)	9,065.23	5,970.71	3,094.52	12.70	11.71			
Percentage	99.73%	65.69%	34.04%	0.14%	0.13%	0.00%	0.00%	0.00%

More detail is available from Natural England web-page here

Site: Ashdown Forest SSSI

Report generated on: 23 Sep 2015

	Sites	Units	Units Assessed
Total number	1	127	127
Total area (ha)	3,209.28	3,209.28	3,209.28

	% meeting area of favourable or unfavourable recovering	Favourable	Unfavourable - Recovering	Unfavourable - No change	Unfavourable - Declining	Partially destroyed	Destroyed	Not Assessed
Area (ha)	3,196.27	657.90	2,538.38		13.01			
Percentage	99.49%	20.50%	79.09%	0.00%	0.41%	0.00%	0.00%	0.00%

More detail is available from Natural England web-page here

Definition of Favourable

The designated feature(s) within a unit are being adequately conserved and the results from monitoring demonstrate that the feature(s) in the unit are meeting all the mandatory site specific monitoring targets set out in the FCT. The FCT sets the minimum standard for favourable condition for the designated features and there may be scope for the further (voluntary) enhancement of the features / unit. A unit can only be considered favourable when all the component designated features are favourable.

Definition of Unfavourable Recovering

Often known simply as 'recovering'. Units/features are not yet fully conserved but all the necessary management mechanisms are in place. At least one of the designated feature(s) mandatory attributes are not meeting their targets (as set out in the site specific FCT). Provided that the recovery work is sustained, the unit/feature will reach favourable condition in time.

Definition of Unfavourable no change

The unit/feature is not being conserved and will not reach favourable condition unless there are changes to the site management or external pressures and this is reflected in the results of monitoring over time, with at least one of the mandatory attributes not meeting its target (as set out in the site specific FCT) with the results not moving towards the desired state. The longer the SSSI unit remains in this poor condition, the more difficult it will be, in general, to achieve recovery. At least one of the designated feature(s) mandatory attributes and targets (as set out in the site specific FCT) are not being met.

Definition of Unfavourable Declining

The unit/feature is not being conserved and will not reach favourable condition unless there are changes to site management or external pressures. The site condition is becoming progressively worse, and this is reflected in the results of monitoring over time, with at least one of the designated features mandatory attributes not meeting its target (as set out in the site specific FCT) with the results moving further away from the desired state. The longer the SSSI unit remains in this poor condition, the more difficult it will be, in general, to achieve recovery.

Appendix 6: Monitoring of Key Interest Features

This section assesses the recent status of some of the qualifying species/key interest features present in the Natura 2000 sites.

Qualifying species are summed up in Table 2 (page13) and set out in full in Appendix 1.

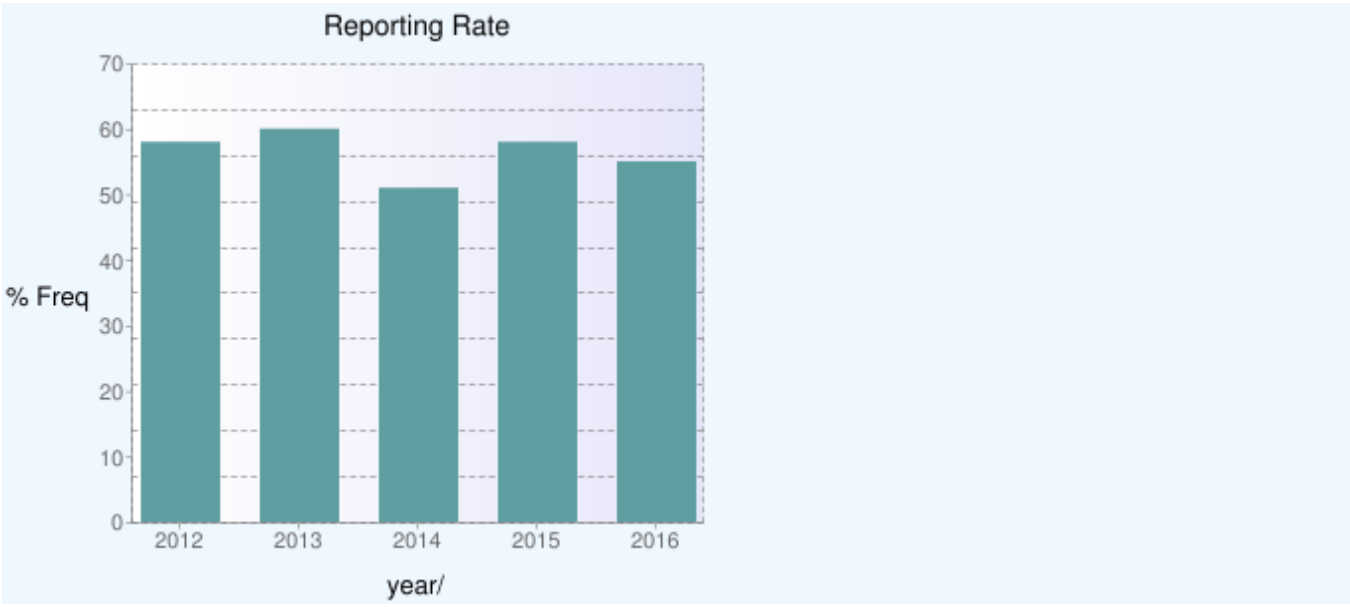
Dungeness, Romney Marsh and Rye Bay SPA Qualifying Species

Data has been obtained from three sites within the SPA for qualifying bird species. The three sites are Dungeness (in Shepway District), Rye Harbour and Pett Level (both in Rother District)

There is too limited data for analysis of the Little Tern or the Aquatic Warbler.

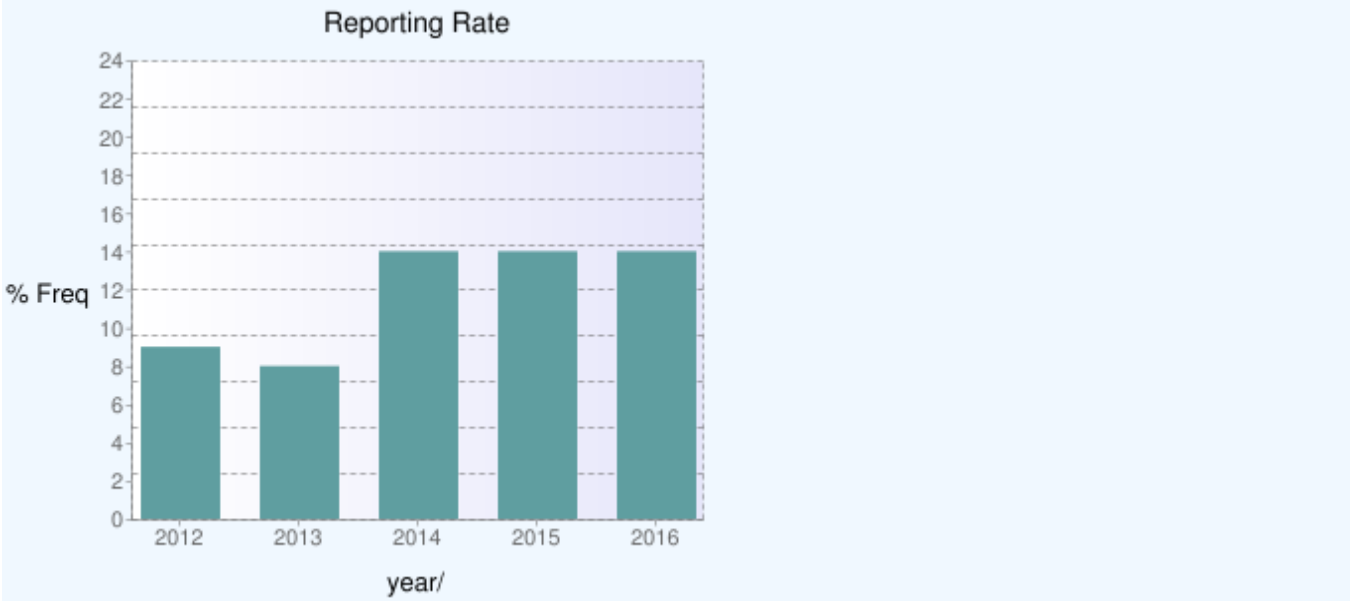
Shoveler

Dungeness - all months (2km border)



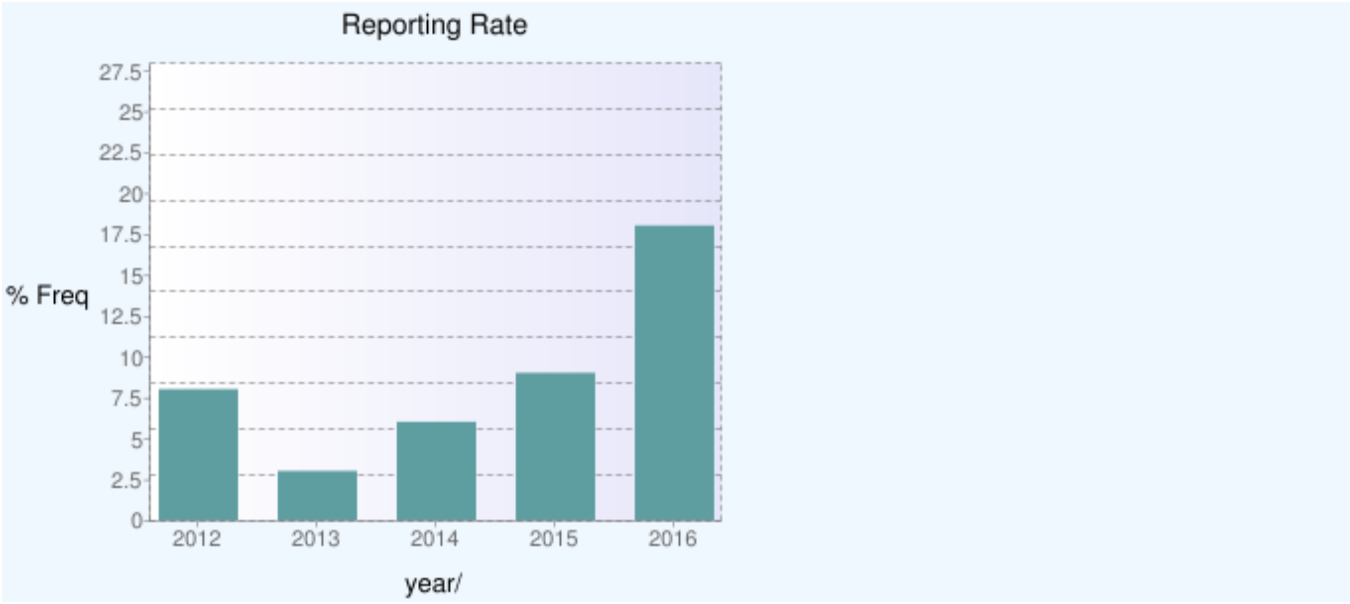
Source: BTO Birdtrack

Rye Harbour Nature Reserve - all months (2km border)



Source: BTO Birdtrack

Pett Level - all months (2km border)

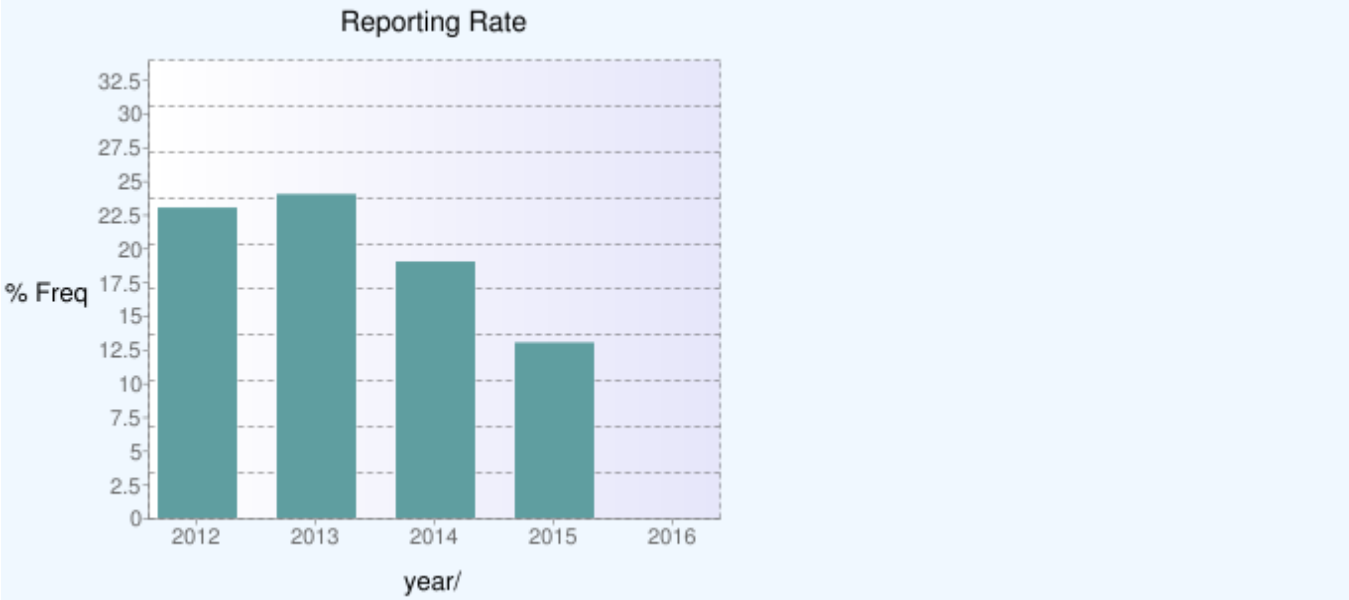


Source: BTO Birdtrack

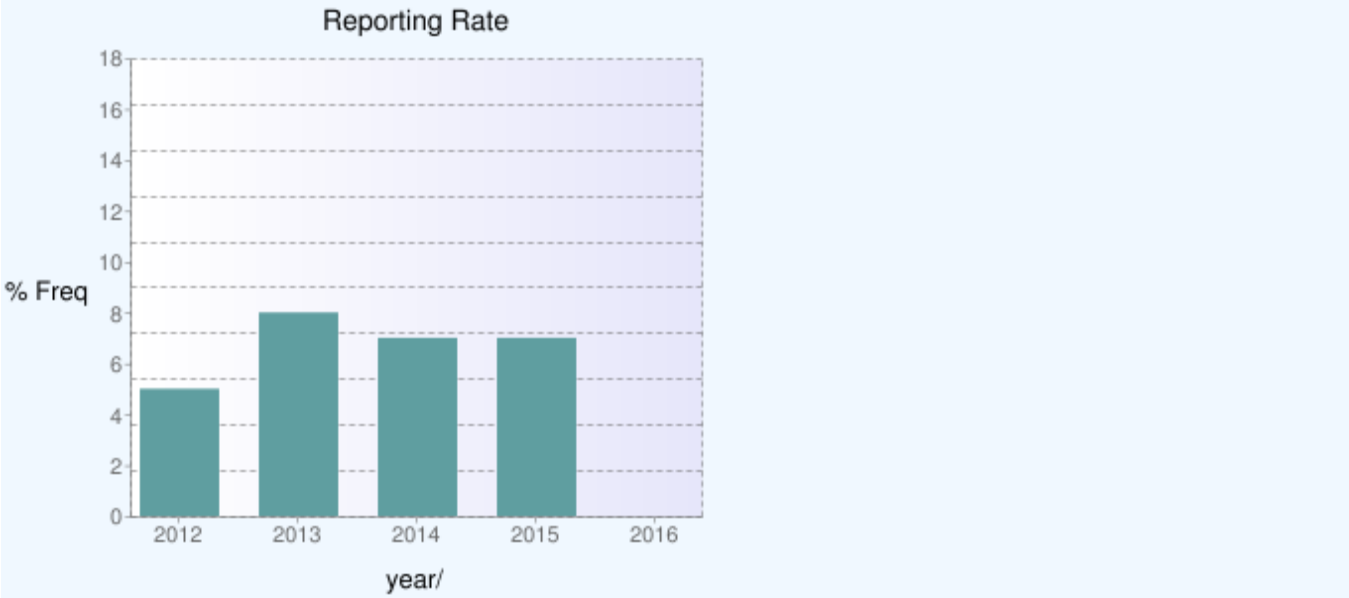
Reported sightings of the Shoveler have increased in frequency over the last five years within the two sites within Rother District, whilst exhibiting very marginal decline in Dungeness. Overall, across the SPA the species appears to be flourishing, based on 5 yearly sightings.

Common Tern

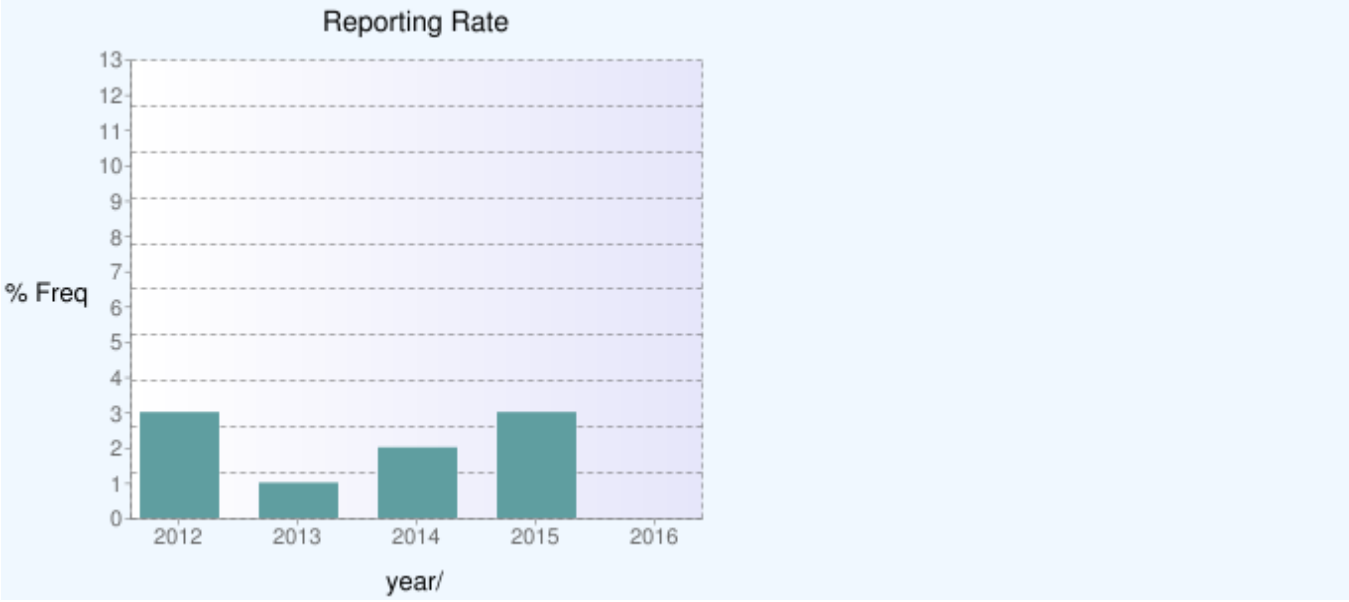
Dungeness - all months (2km border)



Rye Harbour Nature Reserve - all months (2km border)



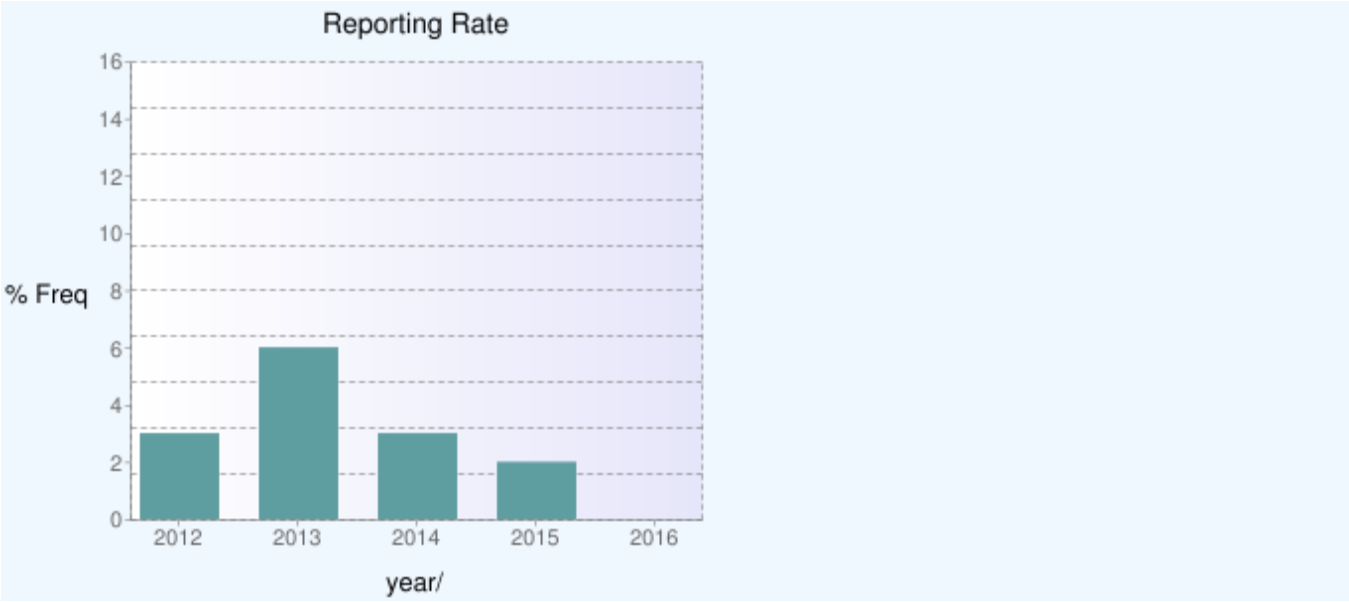
Pett Level - all months (2km border)



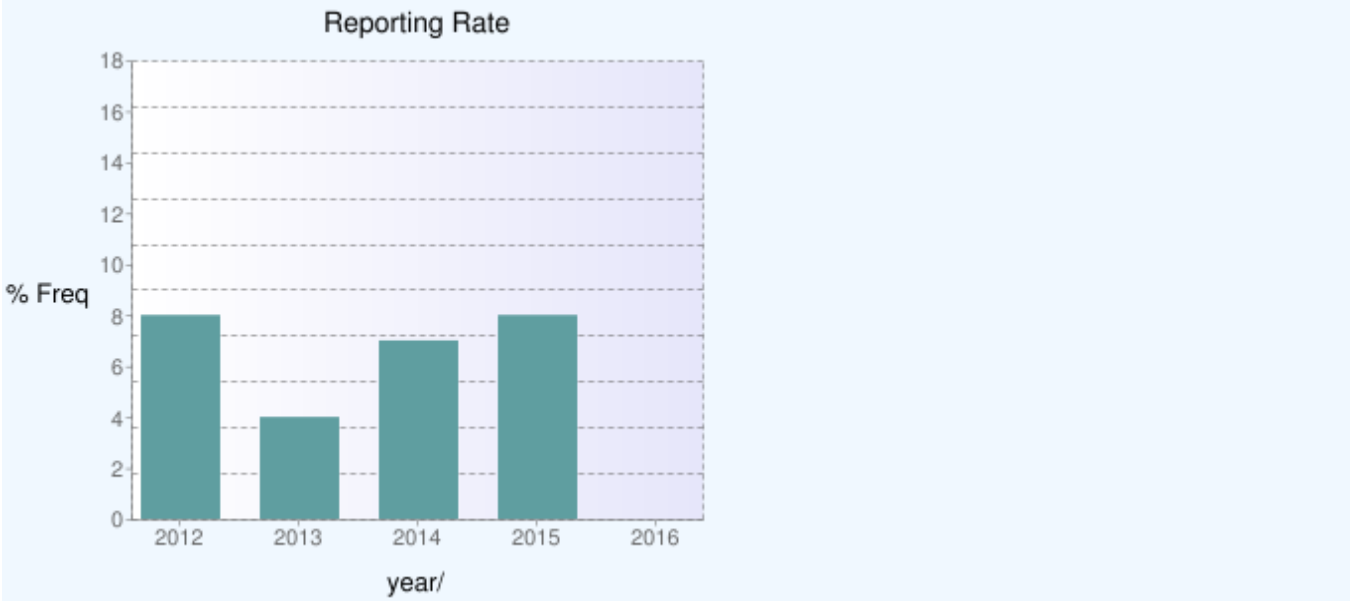
Reported sightings of the Common Tern, although inconsistent, appear stable within Rother (Rye Harbour and Pett Level), whilst declining in Dungeness (Shepway District).

Mediterranean Gull

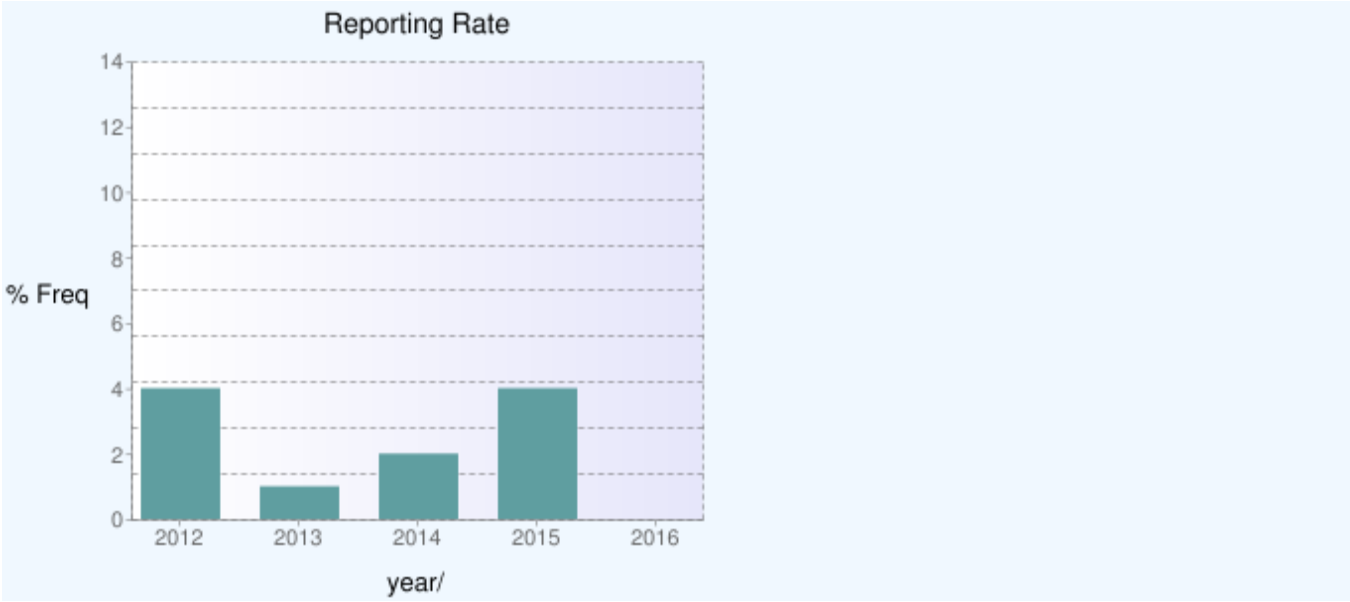
Dungeness - all months (2km border)



Rye Harbour Nature Reserve - all months (2km border)



Pett Level - all months (2km border)



Reported sightings of the Mediterranean Gull, although inconsistent, appear stable within Rother (Rye Harbour and Pett Level), whilst declining in Dungeness (Shepway District).

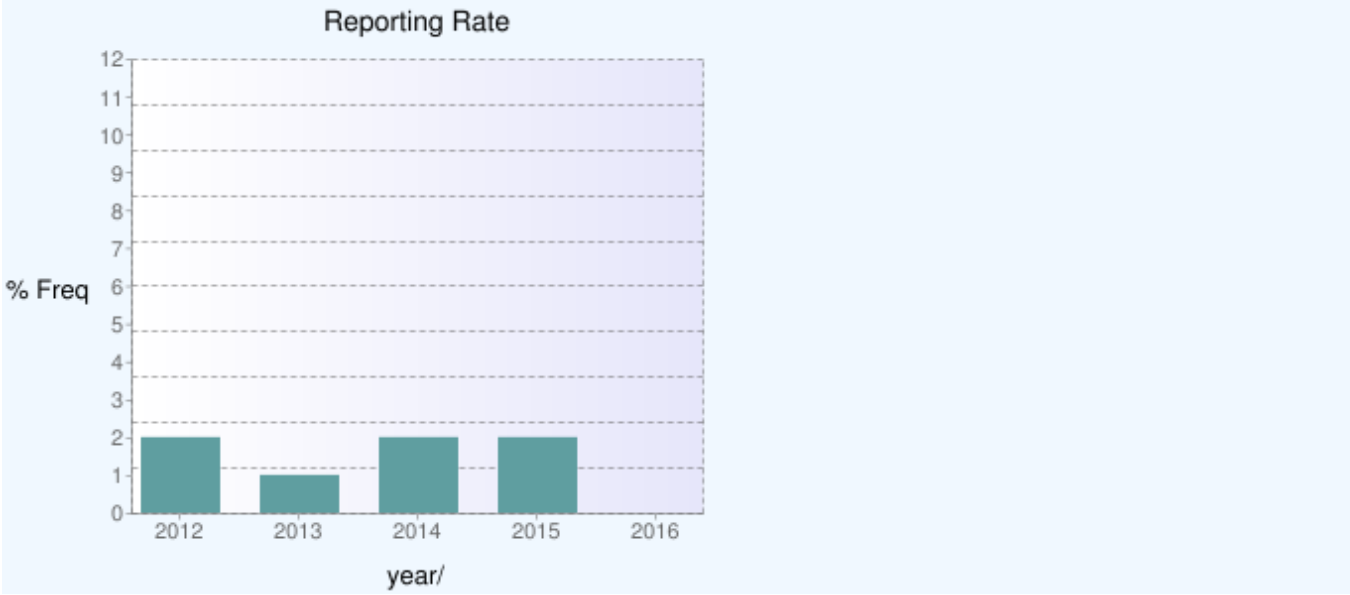
Bewick's Swan

Dungeness - all months (2km border)

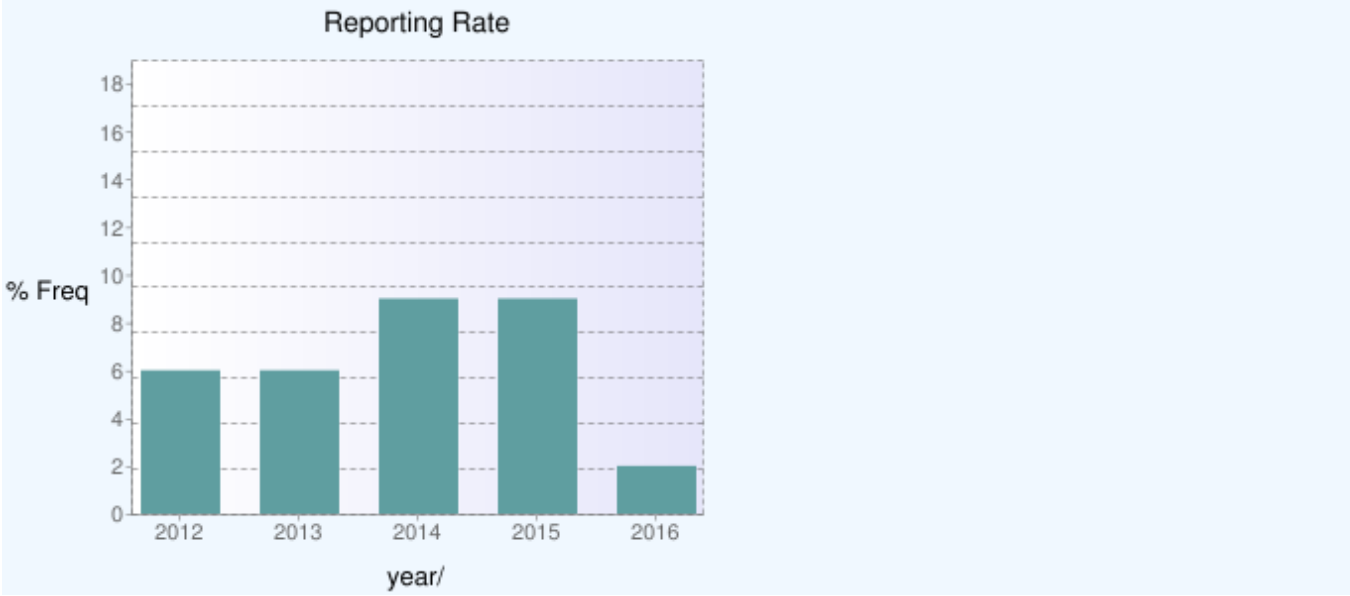
Berwick's Swan have not been reported in Rother District. A small number have been reported in nearby Dungeness, although absent from the records of the last two years.

Avocet

Pett Level



Rye Harbour

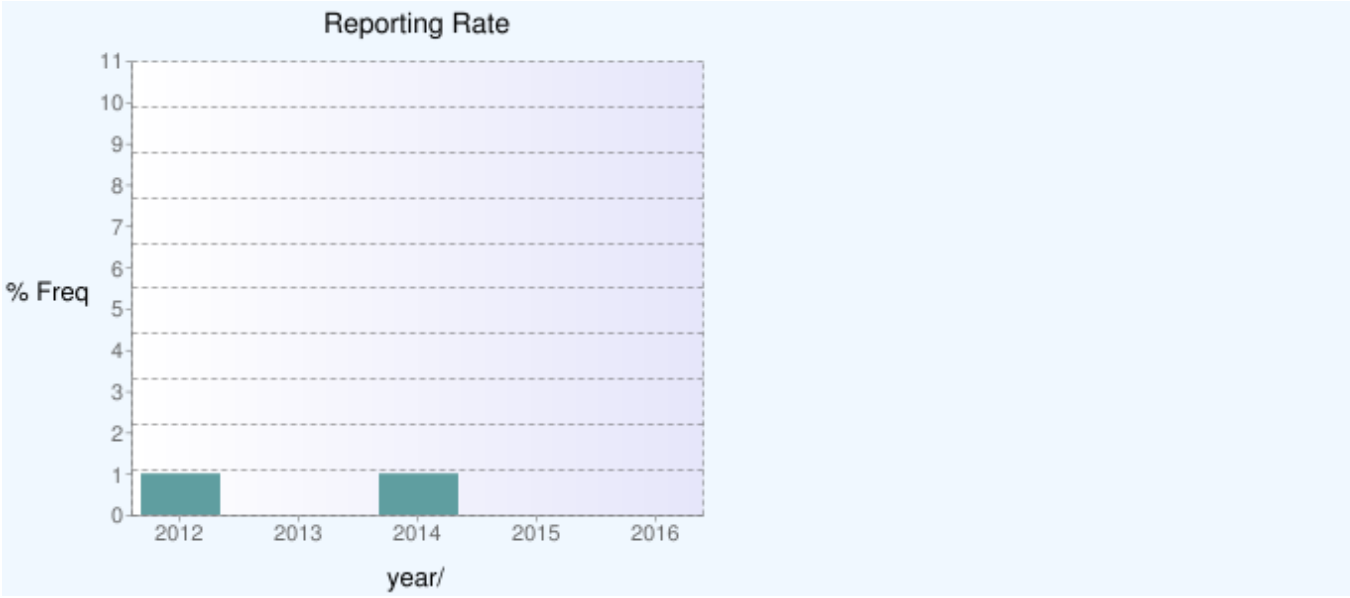


Note: 2016 figure is up to 11/02/16 only

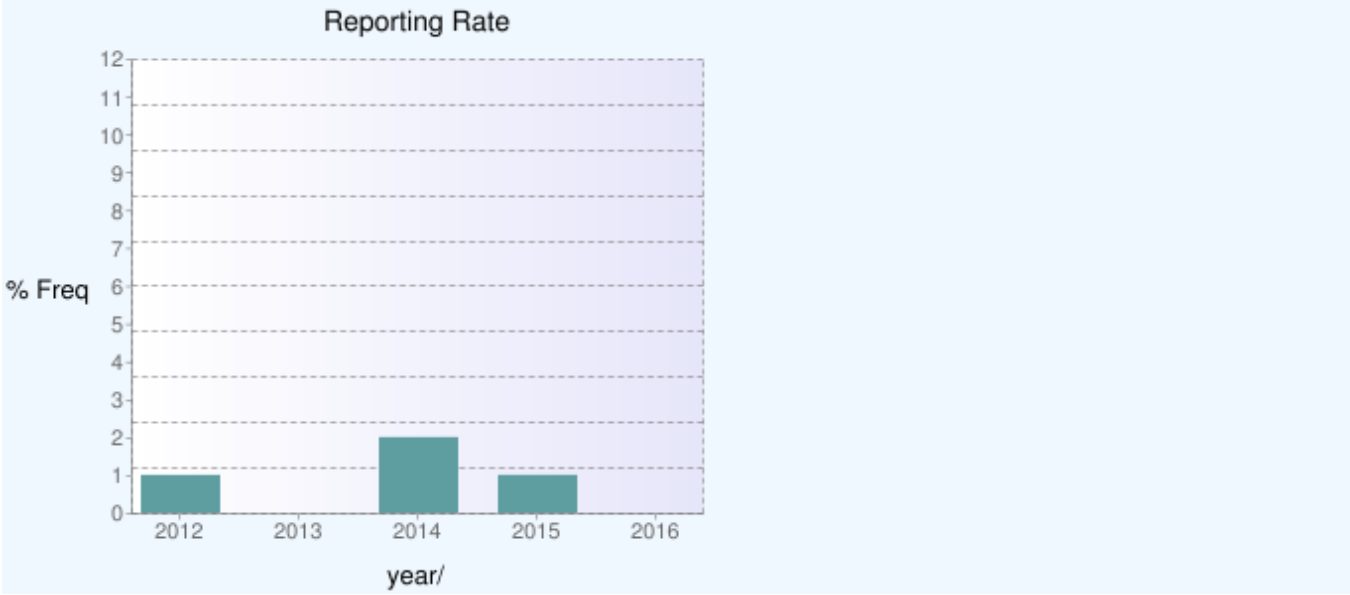
Discounting the 2016 figure (which is only up to 11/02/16) the Avocet appears to be increasing in the last couple of years at Rye Harbour and stable at Pett Level, so the monitoring of this species has not raised any concerns.

Bittern

Pett Level



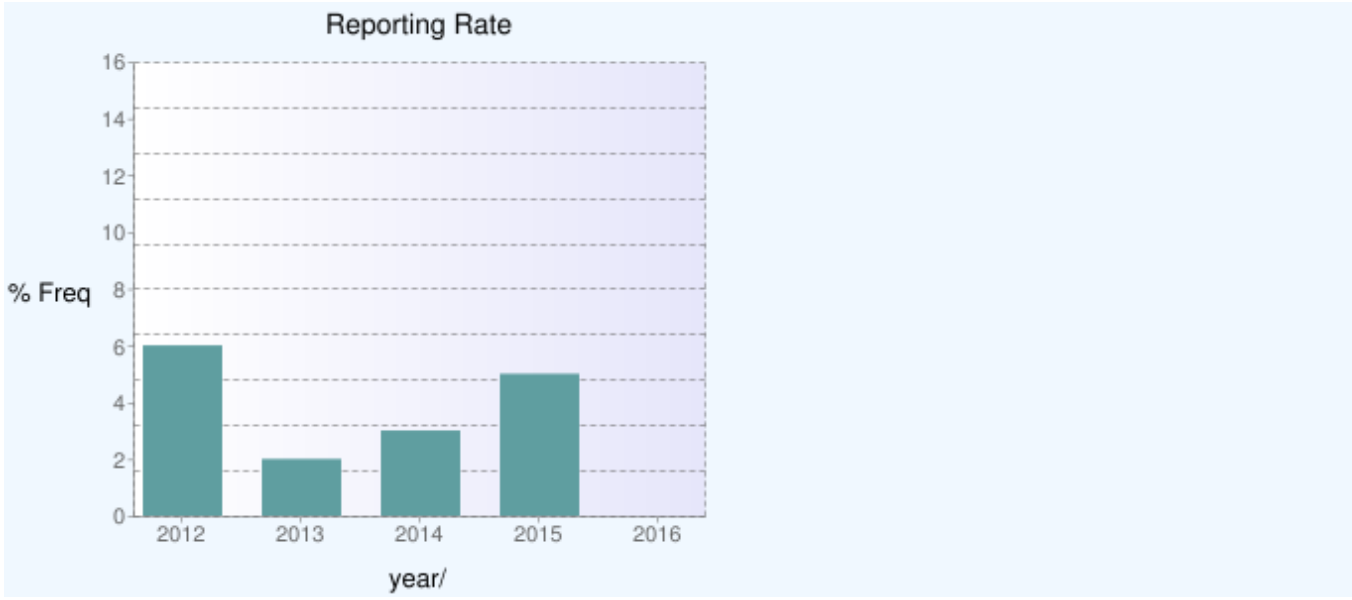
Rye Harbour



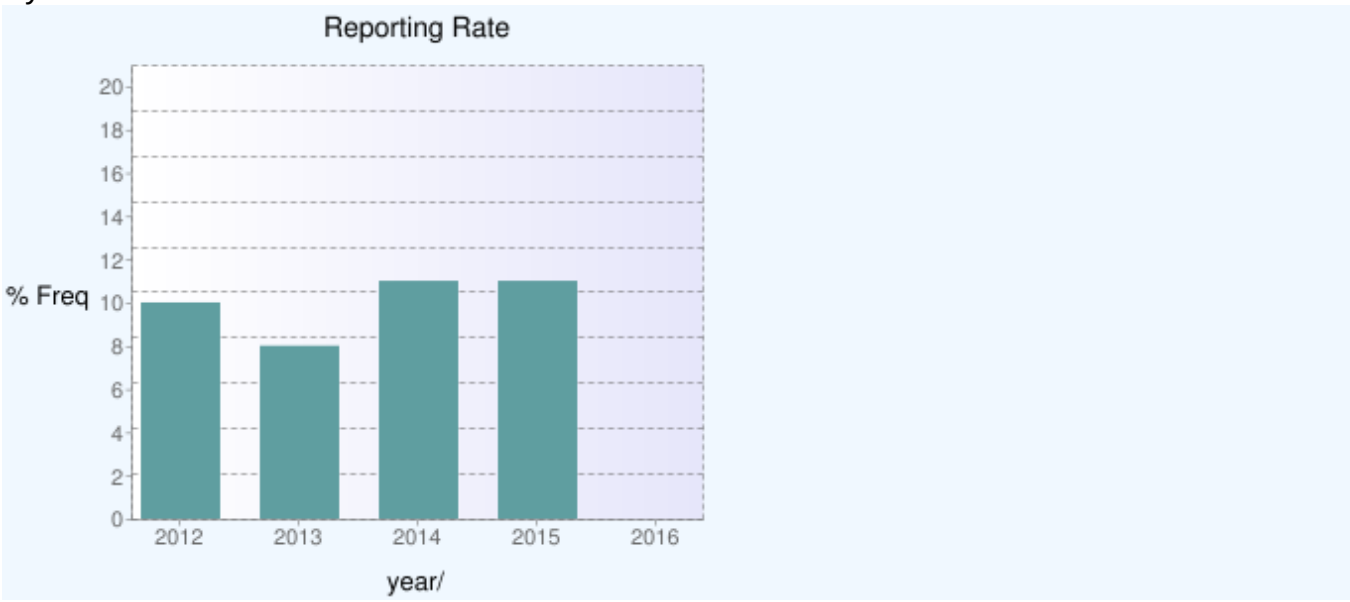
The Bittern was completely absent from both sites in 2013, but re-appeared in 2014 and 2015. As a rarely spotted species, it is difficult to draw conclusions from the limited data although there is nothing to suggest it has declined in recent years.

Sandwich Tern

Pett Level



Rye Harbour



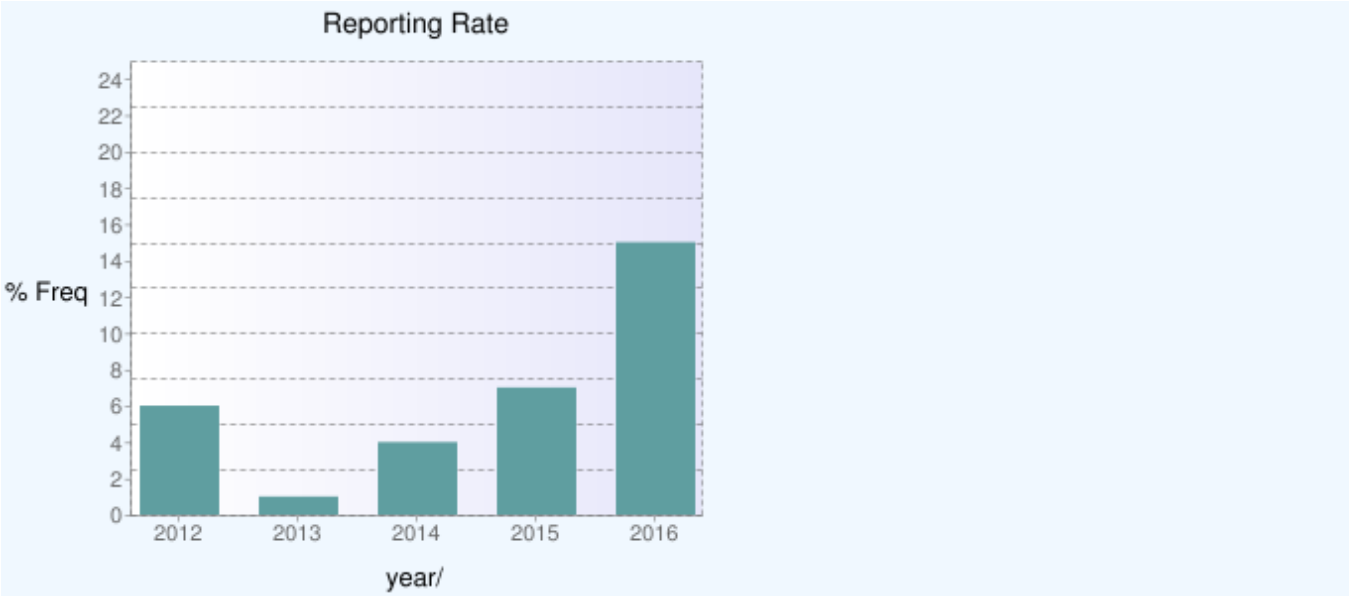
The Sandwich Tern appears relatively stable across the two Rother sites, although there was a marked decline at Pett Level from 2012 to 2013, sightings have since picked up. At Rye Harbour sightings have risen very slightly. Overall there does not appear to be grounds for concern with this species based on recent reporting rates within the District.

Hen harrier

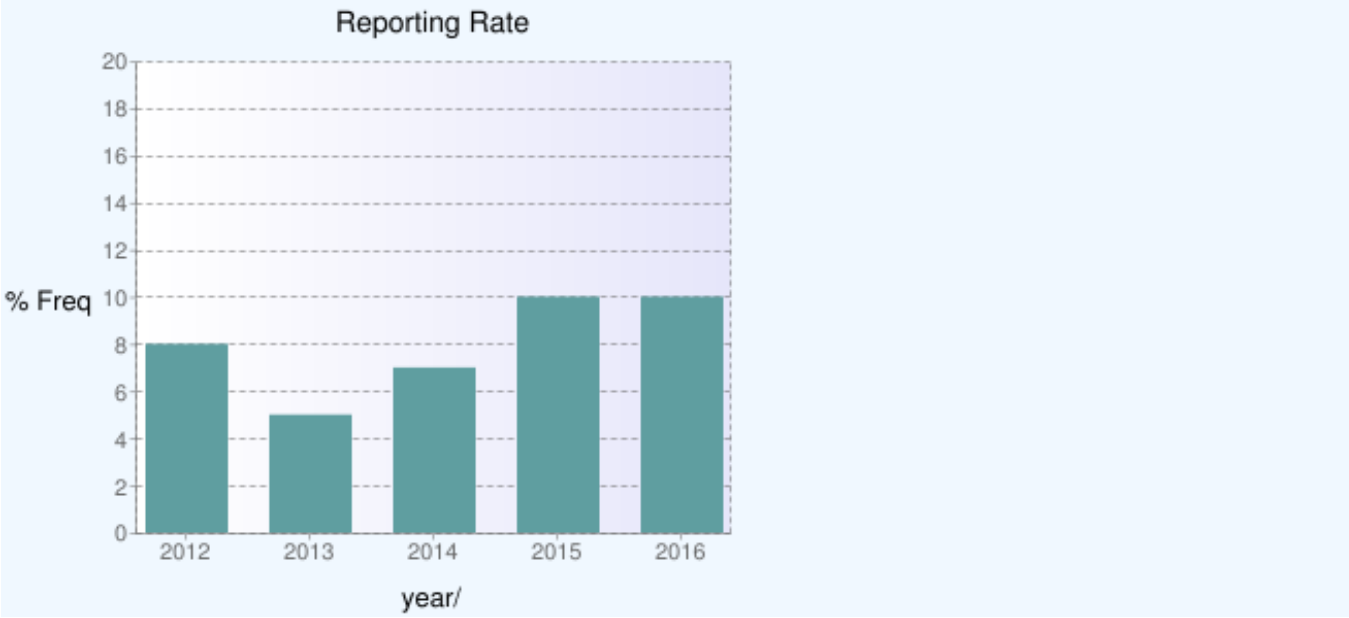
There are no records of this species at either RSPB Dungeness, Pett Level or Rye Harbour from the last 5 years. This is a concern as it was cited as one of the qualifying species for the originally proposed SPA.

Marsh Harrier

Pett Level



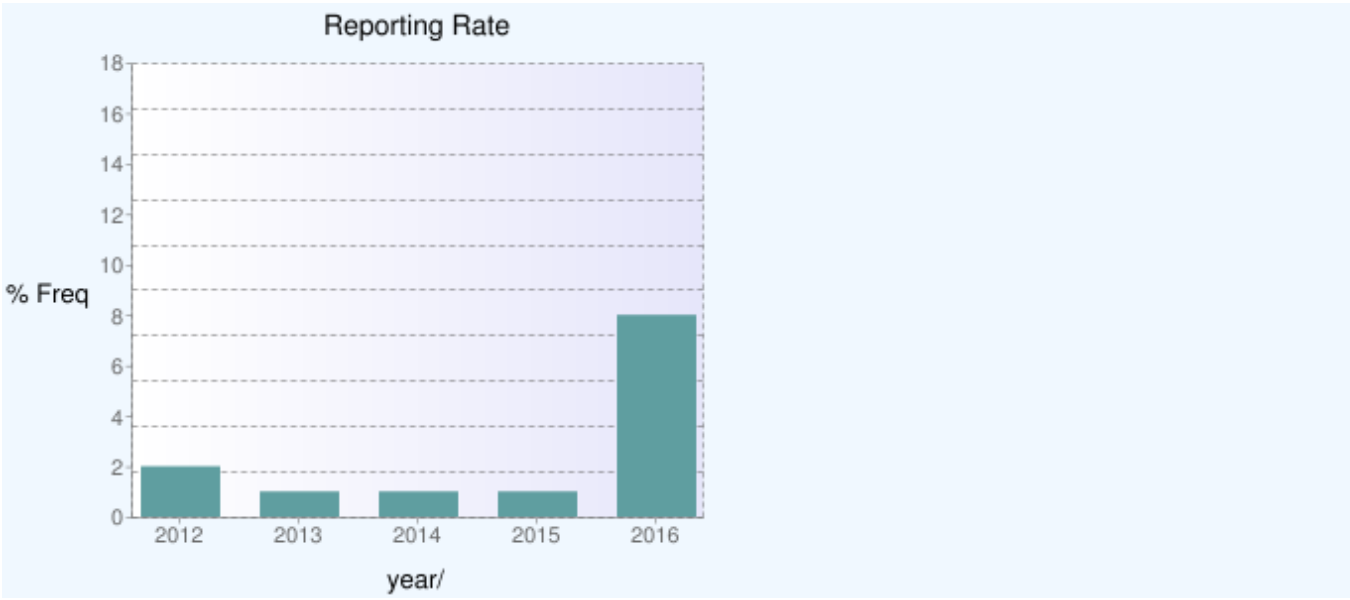
Rye Harbour



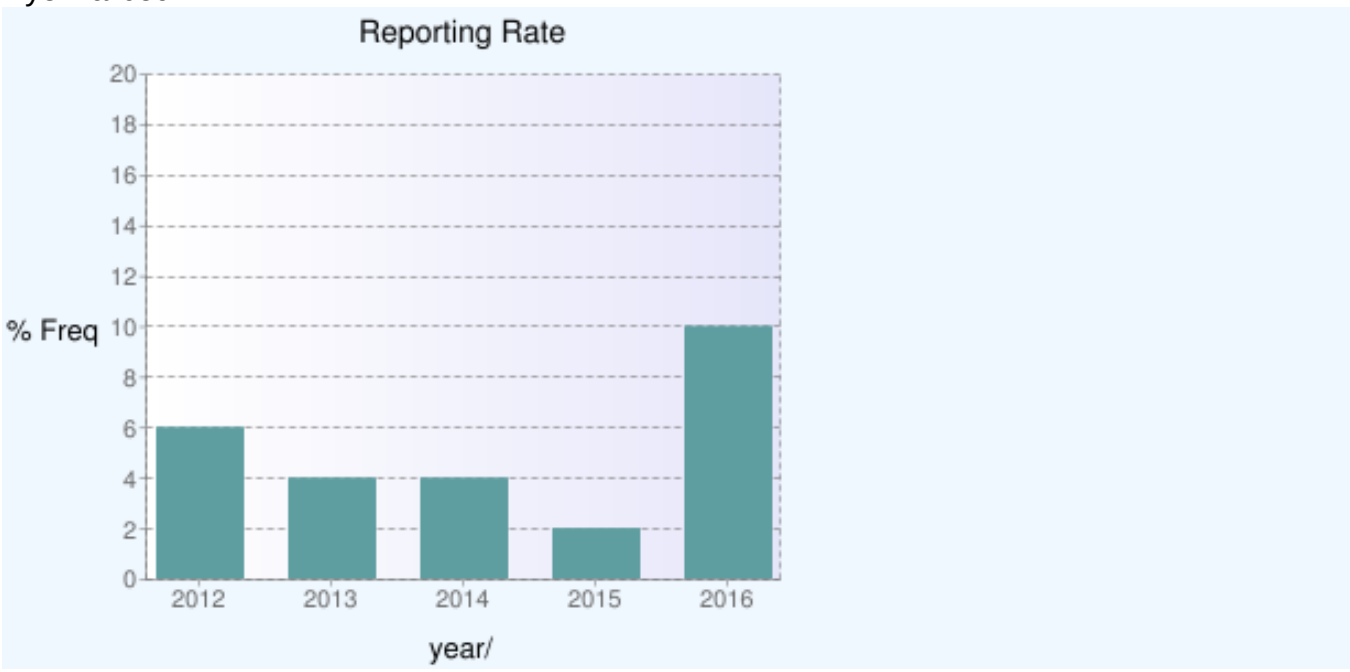
Sightings of the Marsh Harrier have increased in frequency, particularly at Pett Level.

Golden Plover

Pett Level



Rye Harbour

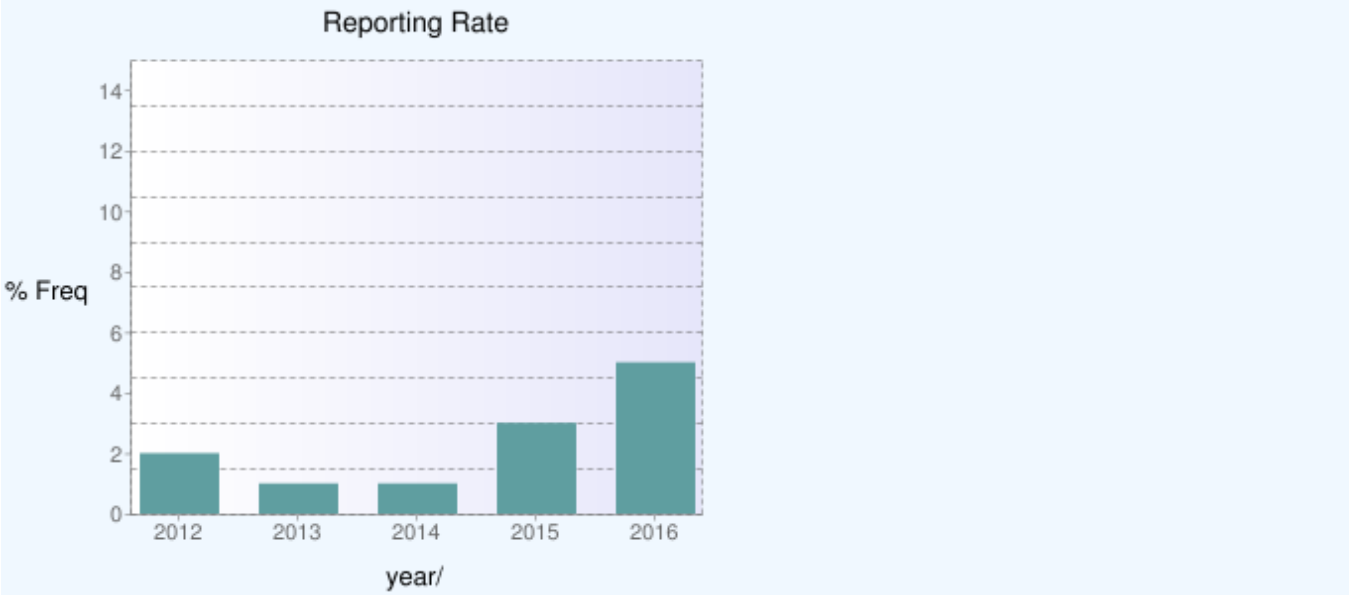


Note: 2016 figure is up to 11/02/16 only

The Golden Plover has exhibited steady decline save for a marked increase in 2016, which cannot be considered statistically significant given the species is a Winter visitor and record are only up to 11/02/16.

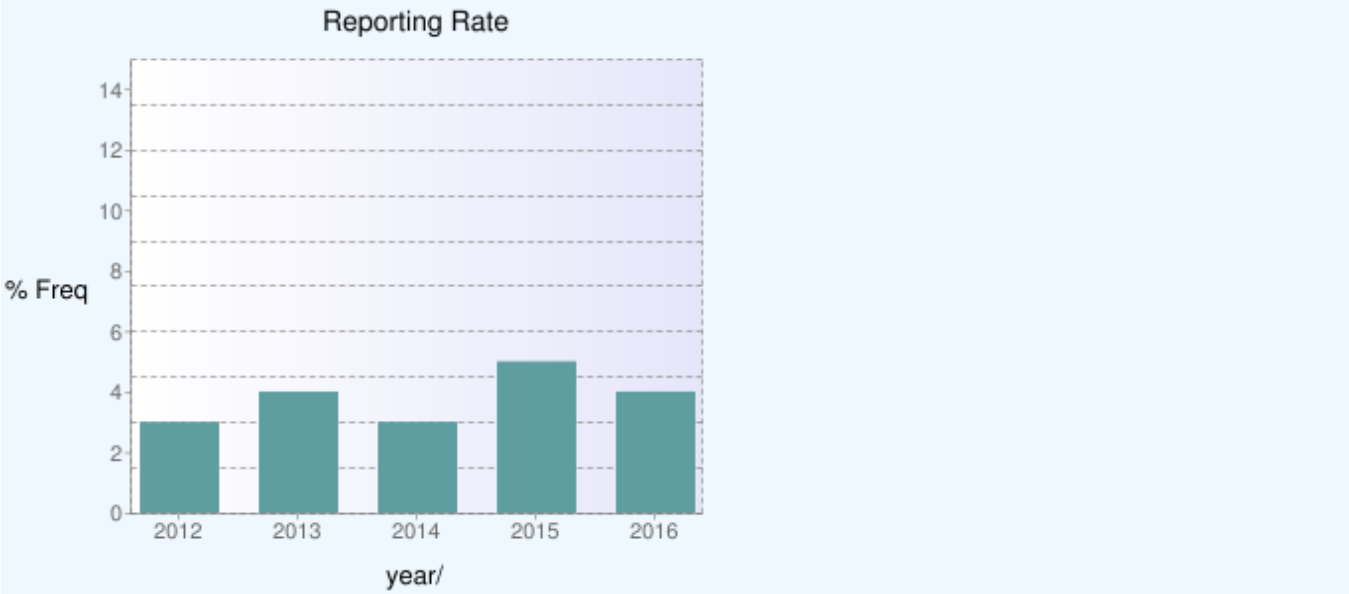
Ruff

Pett Level



Note: 2016 figure is up to 11/02/16 only

Rye Harbour

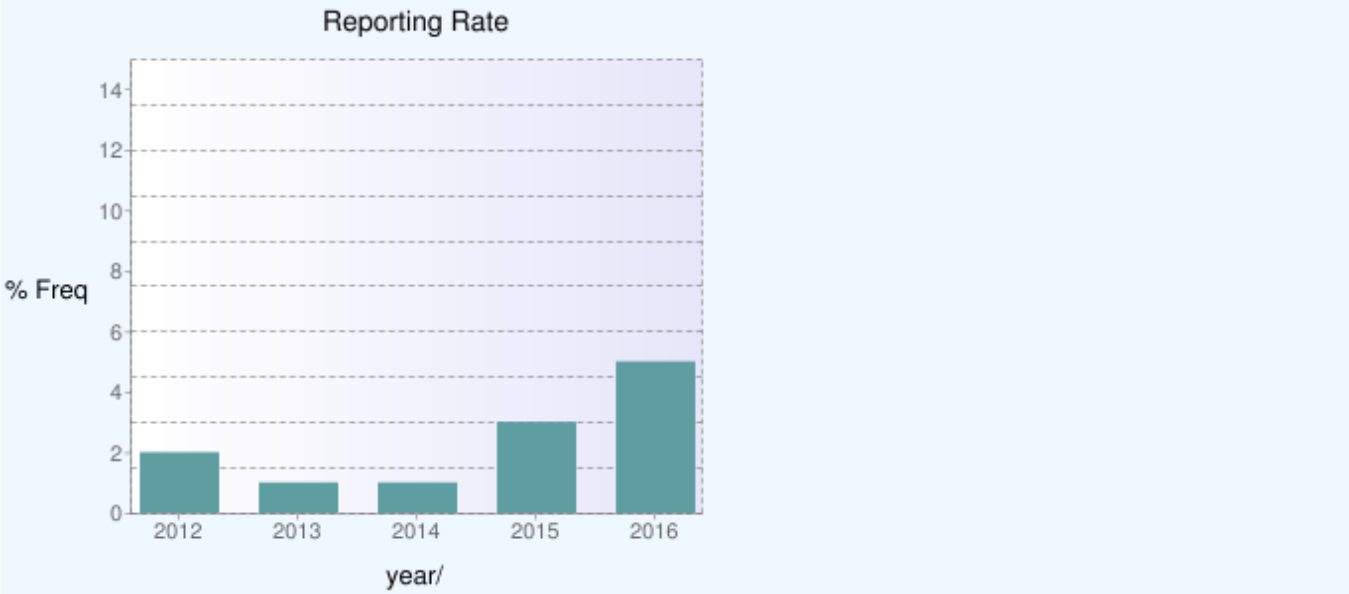


Note: 2016 figure is up to 11/02/16 only

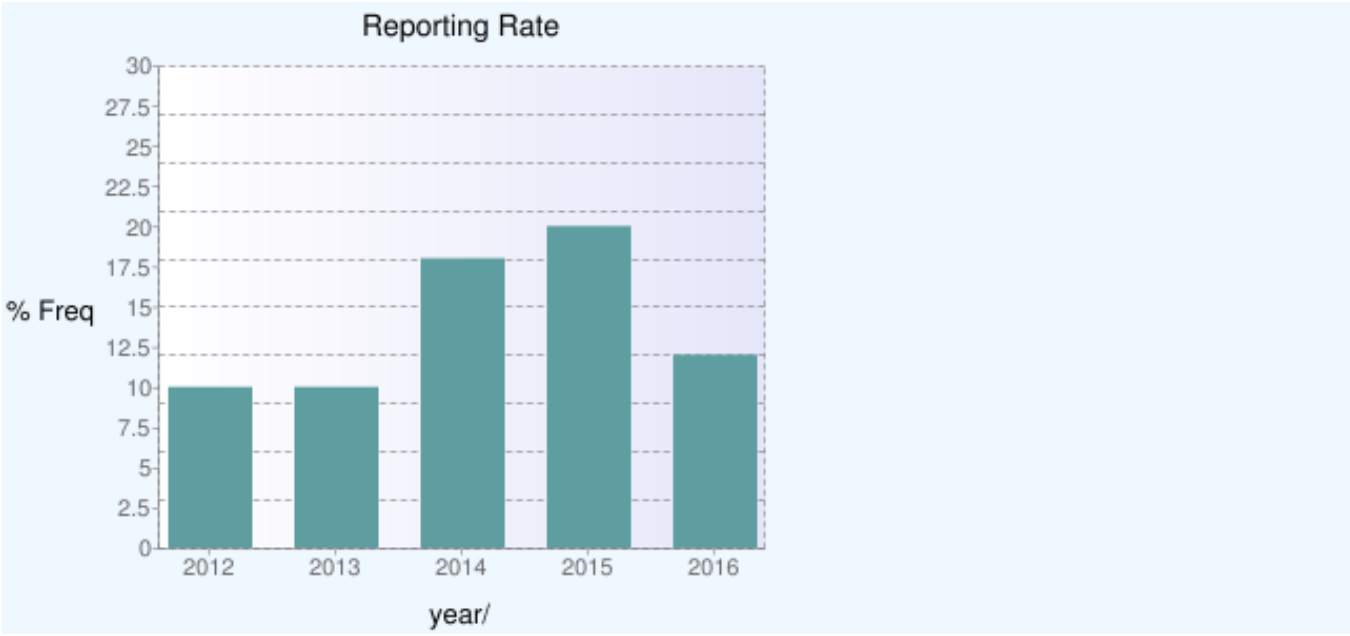
The Ruff has exhibited a slight increase in sighting over recent years.

Mute Swan

Pett Level



Rye Harbour



The Mute Swan has exhibited a slight increase in sighting over recent years within the two Rother sites.

Dungeness SAC Qualifying Species

Vegetated Shingle Habitat

This priority habitat is a key interest feature of the Dungeness SAC.

Appendix 5 indicates this covers some 362ha of Rother District (0.7% of total District area), upon which there has been no significant impact from planning applications in the past four years.

Great Crested Newt

This amphibian is a key interest feature of the Dungeness SAC. There is limited information regarding the state of local populations. However, it is notable that the importance of protecting and enhancing BAP Priority Habitats (including ponds, the GCNs primary habitat) is recognised by policies within the Rother DC Local Plan.

Dungeness, Romney Marsh and Rye Bay Ramsar Key Interest Features

As highlighted in Table 4, key interest features include saline lagoons and basic fens.

Appendix 5 indicates these priority habitats have not been infringed by planning applications within the last year (nor indeed in the previous three years).

Hastings Cliff SAC Qualifying Species

The main key interest feature is vegetated sea cliffs of the Atlantic and Baltic Coasts**,** for which the main threat is recreational pressure. Whilst**,** impacts of Rother development were screened out in 2011 and 2014; it is also notable that section 3.6.2 of the 2011 HRA also outlined a number of access management measures in place or in the pipeline. On this basis it is considered likely that the recreational pressure on the feature will have decreased in the intervening period.

The only species specifically highlighted as a key interest feature of the SA was the *Lophocolea fragrans*,

The Friends of Hastings Country Park Nature Reserve highlight that this is located on an area of undercliff that is inaccessible due to dangerous unstable ground. The risk of recreational pressure is therefore considered negligible.

Pevensey Levels Ramsar

The Ramsar designation key interest features include a wide variety of individual species such as freshwater molluscs, aquatic beetles, dragonflies Odonata.

The Pevensey Levels SCI mentions a specific species 'Little Whorlpool Ram's-Horn Snail *Anisus Vorticulus'.* Actions to deal with the specific threats to this species (including inappropriate water levels, invasive species and water pollution) have been identified in the Pevensey Levels Site Improvement Plan. The delivery bodies for these actions are the Environment Agency, Natural England and the Internal Drainage Board(s) as well as the local authorities (in the case of inappropriate water levels). This issue has been addressed by Policy SRM2 of the adopted Rother District Council Core Strategy and will continue to be addressed by further measures in the Development and Site Allocations DPD.

Appendix 7: Natural England and Environment Agency Comments on the Screening Opinion

Date: 03 November 2015

From:
John Lister
Lead Adviser
Sussex & Kent Area Team (Area 14)
Natural England,
International House,
Dover Place, Ashford,
Kent, TN23 1HU.
www.gov.uk/natural-england

Thank you for consulting Natural England on your HRA screening opinion.

This is the latest part of a long and complex process. It has been difficult to develop a detailed understanding of the process and I am very grateful for your helpful section 8, which sets out a good summary of the key documents. It appears that we have reached agreement at key stages in the plan making process, including the later stages of the Core Strategy and I trust the plan has been amended and modified accordingly.

My brief comments on this screening opinion are as follows:

- Para 2.3.2 – the use of a 15km envelope seems appropriate at this stage.
- Map 1 - I understand that the data on magic.gov.uk is correct. If you have any doubts, please let me know and I will recheck.
- Section 6 does not mention Ashford or Hastings.
- Para 8.2.5 – Does the RSPB monitor and report visitor levels? What provision is being made to address issues that may arise when numbers reach 40k?
- Is there a clear commitment (by relevant authorities and agencies) to the Sustainable Access Strategy and has provision been made for funding and delivering key components?
- Para 8.3.1 – notes that "*The HRA commented that there are no indications that the Country Park is at or close to visitor capacity or that any future increase in visitors cannot be managed*". The term "no indications" seems weak. Unless the Park can demonstrably meet demand, consideration should be given to monitoring, identifying issues and making any necessary provision for funding measures mentioned under paragraph 8.3.2.
- The work outlined in section 8.6 is welcomed.

- Some components in the string of HRA reports are dated, and while the 2013 report on housing numbers is useful, it is not immediately clear if consideration has been given to the impact of any changes in the scale of development now expected for adjoining planning areas.
- Section 8.7 - there have been discussions between Marian Ashdown and Wealden DC on the current issues. She is on leave this week and I will check for the latest news on her return and let you know next week.
- Section 8.8 is helpful, however the condition and direction of travel of SSSIs is not a perfect monitor for the condition of the associated N2K sites. More detailed surveys and monitoring of international designated sites, on which there is a likely significant effect arising from development, is appropriate.
- I broadly agree with the conclusions set out in section 9, as a basis for considering the DASA and NPs, and for rescreening where appropriate.
- A commitment to monitoring impacts and effects through the development and implementation of the plan is essential to providing a framework for adapting policies and mitigations to meet changing circumstances.

Due to the current pressure of consultations on land-use proposals, plans and appeals, I have not been able to spend the time I would have wished to review and comment on your Screening Opinion. Nevertheless, I hope you find these comments helpful.

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.

If you wish to comment on the service provided by Natural England, please use the appended form.

Yours sincerely

John Lister

Date: 19 July 2016

From:
Jennifer Wilson,
Planning Specialist (KSL - Kent),
Environment Agency.

Thank you for consulting us on the above. We have no comments to make on the assessment.

One observation worth noting is ensuring that the newly designated Dungeness, Romney Marsh and Rye Bay SPA and Ramsar site are correctly referred to throughout, for example section 6.2 still refers to the proposed sites.

Kind Regards

Jennifer Wilson

Date: 08 August 2016

From:
Rebecca Bishop – MRTPI,
Adviser
Sustainable Development,
Sussex & Kent Team,
Natural England
www.gov.uk/natural-england

Dear Roger Comerford,

Thank you for your consultations on the above dated 20/06/2016 and 04/07/2016. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Development & Site Allocations Plan (DASA) & Neighbourhood Plans - HRA Screening Opinion

We accept your conclusions, in paragraphs 12.1.4 (the first one – please note that the numbering needs to be amended) and 12.1.3; that;

…"the Development and Site Allocations Plan, either in isolation or in combination (including with other plans and policies) is not considered likely to result in significant adverse effects on the integrity of European sites or associate sensitive areas. This is subject to the requirement for continued conformity with Core Strategy policies." And with the caveat that:

…" Should DASA policies emerge that deviate significantly from the Core Strategy, then the Plan may need to be „screened in" and re-assessed once more, as well as possibly subject to more detailed appropriate assessment. In any event, this HRA screening opinion may need to be updated at subsequent stages of plan production to confirm its continuing relevance."

We would add that, subject to the above, it could also be concluded that a full Appropriate Assessment is not deemed necessary.

Questions raised in your consultation email of 21st June 2016:

1. Is it reasonable to assume that this District-wide screening negates the need for individual Neighbourhood Plans to undertake HRA screening? (subject to the caveats in section 12.2)

We agree that HRA of future Neighbourhood Plans may not be required in addition to the District-wide assessment, subject to re-assessment, as required; as per your paragraph below:

"12.3.1 …the impacts and effects of DASA and Neighbourhood Plans within the District will be monitored to ensure the conclusions of this HRA report remain sound and relevant. In any event, this HRA screening opinion may need to be updated at subsequent stages of plan production to confirm its continuing relevance."

2. Does this report still fall within the Stage 1 of the HRA process? Or is the work of such extent that it should be re-packaged as Stages 1 & 2?

Your report would appear to fall within Stage 1 of the HRA process, i.e. the screening stage. It is therefore recommended that the wording in paragraph 12.1.4 (copied below) be amended (where underlined) to refer to the plan being '…a significant effect on…', so as to keep the wording in line with this stage of the HRA process.
"12.1.4 As a result of this HRA screening, the Development and Site Allocations Plan, either in isolation or in combination (including with other plans and policies) is not considered likely to result in significant adverse effects on the integrity of European sites or associate sensitive areas. This is subject to the requirement for continued conformity with Core Strategy policies."