

# **Habitats Regulations Assessment**

for

Rother District Council  
Camber Supplementary Planning Document

**March 2013**

## Quality control

### Habitats Regulations Assessment

for

Rother District Council  
Camber SPD

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# Summary

## *Introduction*

This document is the Assessment of impacts of the Camber Supplementary Planning Document (SPD), under the Conservation of Habitats and Species Regulations 2010. The Camber SPD sets out proposals and aspirations for the village of Camber, which would be progressed through a series of developments requiring planning permission or through changes to management systems and processes. For example, the SPD includes redevelopment of the Central Car Park to include better visitor facilities and commercial / retail / accommodation uses, with car parking spaces displaced to a nearby field. There would be a Park and Ride service and increased car parking at the Western Car Park. ~~Sand dunes would be managed to reduce visitor impacts, such as provision of boardwalks, rotational path closures and an expansion of dune at the Central Car Park.~~ Design and landscape guidelines are provided to enable a quality of implementation.

## *European sites potentially affected*

European sites potentially affected include Dungeness SAC, Dungeness to Pett Level SPA (a wide variety of coastal habitats along the coast of Rother and Shepway Districts), Dungeness, Romney Marsh and Rye Bay potential SPA and Dungeness, Romney Marsh and Rye Bay proposed SPA. In the Camber area, habitats sensitive to SPA bird disturbance in summer would include reedbeds (although the dense nature of reed growth is such that disturbance from edges of reedbeds is limited), saltmarsh, islands within lagoons or gravel pits, and undisturbed shingle beaches. Habitats sensitive to SPA bird disturbance in winter would include reedbeds, grazing marsh, and coastal lagoons.

## *Possible likely significant effects*

All proposals in the SPD were included in a scoping exercise to determine a likely significant effect. A list of the policies, and the results of the scoping, is included in Appendix 1.

Land-take, reduction in water quality, reduction in water availability, air quality, constraint of coastal processes, and loss of habitat outside European sites which contributes to supporting some species of those European sites were determined to have no likely significant effect, with some minor issues to be addressed at planning application stage.

There are a number of developments which could change the number of people in Camber, and/or the activity of people in relation to surrounding European sites. The effects of these developments would be to make minor changes to visitor capacity within Camber, change/relocate the activities carried out by those visitors, minor increases to the resident population, and development close to a European site which might cause disturbance to SPA species.

Planting non-native invasive species could also have a likely significant effect on European sites

## *Appropriate assessment*

Dune impacts are briefly assessed, although not within European sites, to give a fuller picture of the impacts of the SPD.

An increase of twelve dwellings, additional holiday accommodation at the Central Car Park, and a glamping site is a minor increase compared to existing provision.

~~Three~~ new walking routes would have no adverse affect upon the integrity of the SPA provided that they were not promoted for winter use. Broomhill car park proposals would attract a greater number of visitors than at present with visitors likely to concentrate on the beach, with no SPA birds or Ramsar features present and would not adversely affect any European sites.

An increase of around 100 – 200 car parking spaces is proposed at the Western car park. This would potentially increase visitor pressure on the adjacent dunes and beach by up to 11%. There is significant recreational impact upon dunes close to the central car park, adjacent to paths across dunes from Old Lydd Road and the western car park, and along the entire beach / dune frontage. The primary impact is vegetation erosion, with secondary issues of excess sand mobility and erosion of dunes. Impact is caused by visitors enjoying the topographical variation provided by the dunes compared to the beach with, for example, typical activities such as children's play, people climbing to height for viewpoints, and sunbathing. The impact of each individual person or group is slight, but the cumulative impact of many people over time

is significant. There are a significant number of measures within the SPD to prevent further damage to dunes and to reduce current problems. ~~Proposal P4 is to maintain and enhance the dunes and protect from damage, although this is aspirational rather than an implementable scheme. Proposal N8 provides boardwalks from the western car park over the dunes, so that the width of the affected area is reduced, and current wide eroded paths may revegetate. Proposal N8 also includes for managed rotational closures of paths (where no boardwalk is provided) through the dunes, so that trampling damage may revegetate naturally in closed periods. Rotational closures would not apply to those paths over the dunes which are public footpaths, but these would be the specified location for boardwalks.~~

~~It is recommended that a delivery mechanism for the dune management in proposals N8 and Public Realm Strategy is made into a formal commitment by Rother District Council on adoption of the SPD as there is no delivery mechanism proposed within the SPD itself.~~ An increase in car parking in the Western car park would not result in an adverse impact on any European site.

The Central Car Park development brief contains proposals to upgrade the built facilities in that location, by construction of quality buildings and an attractive public realm. Buildings may be used for commercial uses (e.g. retail, food), holiday accommodation and visitor information. ~~The brief includes for expansion of the sand dunes at that point, with an accessible path to the beach.~~ Visitor management would be used to reduce existing pressure on dunes. It is considered that the Central Car Park development brief would not result in an adverse impact on any European site.

The SPD Appendix 'Landscape Guidelines' provides lists of trees, shrubs and non-woody plants for use in planting schemes and gardens at Camber. The list includes Hottentot Fig, Holm oak and Sea buckthorn.

It is not possible to ascertain that planting these invasive species would not adversely affect European sites and it is recommended that these species are removed from lists of species proposed for planting. If this recommendation is implemented there would be no adverse effect upon the integrity of European sites.

# 1 Introduction

## 1.1 The plan being assessed

1.1.1 The Camber Supplementary Planning Document has been compiled on behalf of Rother District Council by Allies and Morrison Urban Practitioners, with input from a number of other practices and from Council staff. It aims to improve Camber for residents and visitors.

1.1.2 The plan has a number of priorities and objectives, which are

### *Shops and services*

Establish a 'heart' to Camber, with shop/café/community use at a central location that relates to the beach

Increase the shops and amenities offer in the village

Improve access to community facilities at Camber Village and in Rye

### *Transport and movement*

Improve local connections to Rye

Improve wider public transport links to Ashford, Hastings and Lydd

Address summer congestion resulting from visitor demand

Improve cycle links through the village and the wider locality and provision for cycle parking

Improve pedestrian links through the village including the holiday parks

### *Community and leisure*

Establish stronger community and parish links with Rye, to develop a joint offer

Identify means of extending the visitor season in the village whilst protecting public amenity

Develop new walking routes to the north of the village, drawing on landscape quality

Encourage a broader mix of visitors to the village, through a more diverse offer and stimulating visitor spend

Carefully develop the extreme sports offer in the locality and manage the impact of this, particularly on the natural environment

### *Housing and character*

Provide a small number of new homes for the area which are affordable, sustainable and safe from flood risk

Address the 'campus' character of the village, opening up areas for public access where possible

Ensure that new development responds to the Camber vernacular identified in key local documents including the Camber Environmental Strategy and the Camber Visitor Management Initiative

Assess development opportunities in the village, including the Central Car Park and Former Putting Green

### *Natural environment*

Preserve and enhance the sensitive dune landscape and ecology through:

- Managing access to the dunes, including access from car parks
- Providing for the winter birds [and] nesting season

- Consideration of careful planting to secure the dunes environment
- Raise the profile of the local ecology as integral to a sustainable tourism offer
- Promote more sustainable/sensitive transport options in the area
- Improve signage, interpretation and education for landscape environment
- Establish new green infrastructure alongside new development
- Support and enhance the bio-diversity and ecosystem of the area

1.1.3 There are a number of proposals associated with each priority/set of objectives.

1.1.4 This document is the determination of likely significant effect under Regulation 102(1) of the Conservation of Habitats and Species Regulations 2010, of Rother District Council's Camber Supplementary Planning Document, which forms part of the Council's Local Development Framework. It is consistent with the Council's Proposed Submission Core Strategy incorporating the Focussed Amendments of July 2012.

## 1.2 Appropriate Assessment requirement

1.2.1 The Appropriate Assessment process is required under the Conservation of Habitats and Species Regulations 2010. These regulations are often abbreviated to, simply, the 'Habitats Regulations'.

1.2.2 Regulation 102 states that

*(1) Where a land use plan—*

*(A) is likely to have a significant effect on a European site in Great Britain or a European offshore marine site (either alone or in combination with other plans or projects), and*

*(b) is not directly connected with or necessary to the management of the site,*

*the plan-making authority for that plan shall, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives.*

*(2) The plan-making authority shall for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority specifies.*

*(3) They shall also, if they consider it appropriate, take the opinion of the general public, and if they do so, they shall take such steps for that purpose as they consider appropriate.*

*(4) In the light of the conclusions of the assessment, and subject to regulation 103 (considerations of overriding public interest), the plan-making authority or, in the case of a regional spatial strategy, the Secretary of State shall give effect to the land use plan only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be).*

*(5) A plan-making authority shall provide such information as the Secretary of State or the Welsh Ministers may reasonably require for the purposes of the discharge of the obligations of the Secretary of State or the Welsh Ministers under this Part.*

*(6) This regulation does not apply in relation to a site which is—*

*(a) a European site by reason of regulation 10(1)(c); or*

*(b) a European offshore marine site by reason of regulation 15(c) of the 2007 Regulations*

*(site protected in accordance with Article 5(4) of the Habitats Directive).*

1.2.3 The plan-making authority, as defined under the Regulations, is Rother District Council. This report is to determine, under Regulation 102(1), whether the Camber SPD land-use Plan is likely to have a significant effect upon any European site. A significant effect could be positive or negative, permanent or temporary, apply to one or more European sites, and could arise from one or more policies or proposals within the Plan. The significant effect could be caused by the plan itself, or could be caused by a combination of the Plan with other plans or projects. Determination of likely significant effect does not require that an effect is identified in detail, but that an effect is likely to occur and further investigations are needed; it does not automatically mean that harm will definitely be caused.

1.2.4 If a likely significant effect is determined for all or part of the Plan, an Appropriate Assessment is then required before Rother District Council may decide to adopt the Plan. The Appropriate Assessment process is set out below. The Camber SPD may be subject to an Examination in Public, and any Appropriate Assessment will also be open to scrutiny at that Examination.

### **1.3 Appropriate Assessment process**

1.3.1 The Appropriate Assessment process involves a number of steps, which are set out sequentially below.

#### ***Likely significant effect***

1.3.2 The Council, in consultation with Natural England should decide whether or not the plan is likely to have a significant effect on any European site. This is a 'coarse filter' and any effect, large or small, positive or negative, should be considered.

#### ***Connected to management of the site***

1.3.3 The Council should decide whether the plan is connected to the nature conservation management of the European sites. Invariably, for a development plan, this is not the case.

#### ***Screening***

1.3.4 The combination of decisions on likely significant effect and connections to management is often called 'screening'. If the plan is likely to have a significant effect, and is not connected to the management of the site, an Appropriate Assessment is required. This is given in Section 3.1 below.

#### ***Scoping***

1.3.5 The whole plan must be assessed, but a 'scoping' exercise helps decide which parts of the plan have potential to give rise to significant effects and therefore where assessment should be prioritised. Natural England is an important consultee in this process. Assessment would be required if the whole plan is 'likely to have a significant effect' on a European site, but the scope of the assessment would ensure focus on the relevant parts of the plan. This is described in Section 3.2 below.

#### ***Appropriate Assessment***

1.3.6 The Appropriate Assessment is a further, more detailed, assessment of any matters which are found, during the screening and scoping process, to have a likely significant effect upon any European site. The more detailed assessment looks at development proposals and determines whether or not the proposal would have an adverse effect upon the integrity of any European site. Only if it can be ascertained that there would be no adverse effect upon a European site could a land-use plan be adopted.

1.3.7 Development proposed in a land-use plan is, by the nature of the plan, described at a strategic level. Details of the development, such as exact form of buildings or precise numbers of users, are not usually known. A proposed development could in principle have an adverse effect upon the integrity of a European site, but could also be ascertained not to have such an effect given various limitations. Should this situation arise, it would be acceptable for those limitations to be given in the land-use plan such that it can be ascertained that there would be no adverse effect of the proposal.

**Consultations**

- 1.3.8 Natural England is a statutory consultee, and so should be consulted at the draft plan stage. The public may also be consulted if it is considered appropriate, for example if the appropriate assessment is likely to result in significant changes to the plan.

**Iterations and revision**

- 1.3.9 The process is iterative; the conclusions of the first assessment may result in changes to the plan, and so a revision of the assessment would be required. If the revised assessment suggests further plan changes, the iteration will continue.
- 1.3.10 Iterative revisions typically continue until it can be ascertained that the plan will not have an adverse affect on the integrity of any European site.
- 1.3.11 There are further provisions for rare cases where over-riding public interest may mean that a land-use plan may be put into effect, notwithstanding a negative assessment, where there are no alternatives to development, but these provisions are not expected to be routinely used.

**Guidance and good practice**

- 1.3.12 This Habitats Regulations Assessment has taken account of published guidance and good practice including: Department for Communities and Local Government, 2006, *Planning for the Protection of European Sites: Appropriate Assessment under The Conservation (Natural Habitats &c.) (Amendment) (England and Wales) Regulations 2006: Guidance for Regional Spatial Strategies and Local Development Documents*; Office of the Deputy Prime Minister (ODPM), Circular 06/2005, Department for Environment Food and Rural Affairs Circular 01/2005, *Biodiversity and Geological Conservation: Statutory obligations and their impact within the planning system*; and Royal Society for the Protection of Birds, 2007, *The Appropriate Assessment of Spatial Plans in England: A guide to why, when and how to do it*. The National Planning Policy Framework (2012) has also been considered in this assessment.

**1.4 European sites**

- 1.4.1 European sites are those sites which are of nature conservation importance in a European context. They are often known as Natura 2000 sites across Europe, and are legally registered as Special Protection Areas (for bird sites) and Special Areas of Conservation (for species other than birds, and habitats). These are usually abbreviated as SPA and SAC respectively. Wetlands of International Importance, designated under the Ramsar Convention, are usually abbreviated as Ramsar sites and are of global importance.
- 1.4.2 Although the Appropriate Assessment process only legally applies to European sites, Government Policy in the National Planning Policy Framework is to apply the same protection to Ramsar sites.
- 1.4.3 As the interest features of the Ramsar sites are usually very similar to the interest features of the SPA and / or SAC designations, both geographically and ecologically, the assessment below, for clarity does not always repeat Ramsar site names. The assessment does however consider Ramsar sites fully, and if an assessment for a Ramsar site was found to differ from that for the respective SPA / SAC, this would be clearly identified.

## 2 European sites potentially affected

### 2.1 European sites within the Camber SPD area and in Rother District

2.1.1 Any European sites (including Ramsar sites) within the Camber SPD area or the remaining part of Rother District could be potentially affected. The area surrounding Camber village contains two existing European sites, a proposed European site and a proposed Ramsar site. Elsewhere in the District there is another European site, and a further European site is close to Rother District but within Hastings Borough.

2.1.2 Habitats in the region of Camber are shown in figure 01, with the location of currently designated sites in Figure 02.

#### ***Dungeness SAC***

2.1.3 Dungeness SAC is primarily based in Kent to the east of Camber, being east of the Camber to Lydd Road. A small part is also found west of Rye Harbour. It is designated for shingle beach containing vegetation, vegetation of the shoreline, and great crested newts.

2.1.4 The designated features are more formally described as

- Annual vegetation of drift lines
- Perennial vegetation of stony banks
- Great crested newt (*Triturus cristatus*)

2.1.5 The Dungeness foreshore is one of two representatives of Annual vegetation of drift lines on the south coast of England and represents Perennial vegetation of stony banks on the south-east coast of England. The SAC supports a large and viable great crested newt population in a range of natural and manmade aquatic and terrestrial habitats.

2.1.6 The Conservation Objectives for Dungeness SAC<sup>1</sup> are,

*With regard to the natural habitats and/or species for which the site has been designated ("the Qualifying Features" listed below):*

*Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.*

*Subject to natural change, to maintain or restore:*

*The extent and distribution of qualifying natural habitats and habitats of qualifying species;*

*The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species;*

*The supporting processes on which qualifying natural habitats and habitats of qualifying species rely;*

*The populations of qualifying species;*

*The distribution of qualifying species within the site.*

*Qualifying Features:*

*H1210. Annual vegetation of drift lines*

*H1220. Perennial vegetation of stony banks; Coastal shingle vegetation outside the reach of waves*

*S1166. *Triturus cristatus*; Great crested newt*

<sup>1</sup> <http://www.naturalengland.org.uk/ourwork/conservation/designations/sac/londonandsoutheast.aspx>

**Dungeness to Pett Level SPA**

- 2.1.7 Dungeness to Pett Level SPA includes a wide variety of coastal habitats along the coast of Rother and Shepway Districts. It includes an area of intertidal habitat south of the Camber dunes and west of Rye Harbour. The SPA supports important populations of breeding, migratory and overwintering birds.
- Breeding populations of Mediterranean gull (*Larus melanocephalus*), little tern (*Sterna albifrons*) and common tern (*Sterna hirundo*)
  - Passage populations of aquatic warbler (*Acrocephalus paludicola*)
  - Over-wintering Bewick's swan *Cygnus columbianus bewickii* and shoveler (*Anas clypeata*).
- 2.1.8 The site is particularly notable for its breeding population of Mediterranean gull, for which the site has recently regularly supported over 50% of the British population.
- 2.1.9 Conservation objectives for Dungeness to Pett Level SPA are currently (March 2013) not available from Natural England.

**Dungeness, Romney Marsh and Rye Bay potential SPA**

- 2.1.10 Natural England held a consultation in 2012 on the proposal to extend the Dungeness to Pett Level Special Protection Area and to rename it Dungeness, Romney Marsh and Rye Bay SPA<sup>2</sup>. The extended and re-named potential SPA supports internationally important bird populations. The potential SPA in the vicinity of Camber includes the entire intertidal habitat south of Camber village, and fields within Romney Marsh immediately to the north-west of the village. Figure 03 shows the location of the pSPA in the area of Camber.
- 2.1.11 The Dungeness Romney Marsh and Rye Bay potential SPA, including the proposed extensions qualifies for the following reasons:
- It regularly supports more than 1% of the GB populations of 12 species - 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 bewickii*, Bittern *Botaurus stellaris*, Hen harrier *Circus cyaneus*, Golden plover *Pluvialis apricaria*, Ruff *Philomachus pugnax*, and Aquatic warbler *Acrocephalus paludicola*.
  - It regularly supports more than 1% of North-west and Central European population of one regularly occurring migratory species (shoveler *Anas clypeata*).
  - It regularly supports more than 20,000 waterbirds during the non-breeding season.
- 2.1.12 The 12 species of birds are either breeding, wintering or passage species. Breeding birds are marsh harrier (reedbed), avocet (saltmarsh/coastal lagoon), Mediterranean gull (islands within gravel pits or pools), Sandwich tern (shingle beaches / islands), Little tern (shingle beaches/islands) and Common tern (shingle beaches/islands). The wintering species are Bewick's swan (grazing marsh), Bittern (reedbeds), Hen harrier (open country), and Golden plover (lowland fields), Ruff (saltmarsh, coastal lagoons, grazing marsh). Aquatic warbler are passage species, i.e. they travel through the UK between wintering and breeding grounds elsewhere, and are found in coastal reedbeds.
- 2.1.13 Potential Special Protection Areas are treated by Government policy in the National Planning Policy Framework as if they were already designated. There are however no Conservation Objectives for the potential SPA.
- 2.1.14 In the Camber area, habitats sensitive to SPA bird disturbance in summer would include reedbeds (although the dense nature of reed growth is such that disturbance from edges of reedbeds is limited), saltmarsh, islands within lagoons or gravel pits, and undisturbed shingle

<sup>2</sup> [http://www.naturalengland.org.uk/regions/south\\_east/ourwork/dungenessconsultation/default.aspx](http://www.naturalengland.org.uk/regions/south_east/ourwork/dungenessconsultation/default.aspx)  
accessed 30<sup>th</sup> March 2012 but undated website

beaches. Habitats sensitive to SPA bird disturbance in winter would include reedbeds, grazing marsh, and coastal lagoons.

***Dungeness, Romney Marsh and Rye Bay proposed Ramsar site***

2.1.15 Dungeness, Romney Marsh and Rye Bay proposed Ramsar site was included in Natural England's consultation for the potential SPA above. The proposed Ramsar site in the vicinity of Camber includes the entire intertidal habitat south of Camber village, and fields within Romney Marsh immediately to the north-west, north and north-east of the village. Figure 04 shows the location of the Ramsar in the area of Camber.

2.1.16 In addition to supporting the internationally important populations of the potential SPA, the Dungeness, Romney Marsh and Rye Bay proposed Ramsar 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.

2.1.17 Proposed Ramsar sites are treated by Government policy in the National Planning Policy Framework as if they were designated European sites. There are no Conservation Objectives for this site.

***Pevensay Levels SAC / Ramsar site***

2.1.18 Pevensay Levels SAC / Ramsar site is in the west of Rother District with both designations on the same area of land. Pevensay Levels SAC is a large and expansive grazing marsh that supports the snail *Anisus vorticulus* in both a wide spatial distribution and in good population density classes. Pevensay Levels Ramsar site is one of the largest and least-fragmented lowland wet grassland systems in southeast 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.

2.1.19 Conservation Objectives for Pevensay Levels SAC are

*With regard to the natural habitats and/or species for which the site has been designated ("the Qualifying Features" listed below):*

*Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.*

*Subject to natural change, to maintain or restore:*

*The extent and distribution of qualifying natural habitats and habitats of qualifying species;*

*The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species;*

*The supporting processes on which qualifying natural habitats and habitats of qualifying species rely;*

*The populations of qualifying species;*

*The distribution of qualifying species within the site.*

*Qualifying Features:**S4056. Anisus vorticulus; Little whirlpool ram's-horn snail*

- 2.1.20 Ramsar sites do not have Conservation Objectives.

***Hastings Cliff SAC***

- 2.1.21 Hastings Cliff SAC is just outside Rother District, within Hastings Borough. It is a vegetated sea cliff.

***Other European sites***

- 2.1.22 There are no other European sites within Rother District; other sites outside Rother District are at sufficient distance that no further consideration is required.

**2.2 Other relevant plans or projects affecting these sites**

- 2.2.1 In addition to a potential effect from the Camber SPD, the European sites might also be affected by a number of plans or projects, including other Local Plan documents of Rother District, the Local Plan documents of other neighbouring Local Authorities, existing developments and proposed developments, management carried out by land managers with the consent of Natural England and third party effects such as recreation, etc.
- 2.2.2 In the context of this Habitats Regulation Assessment, the most relevant other plans or projects to be considered are
- Rother District Core Strategy
  - Shepway District Core Strategy
- 2.2.3 These plans are considered as part of this determination of likely significant effect of the Camber SPD.
- 2.2.4 A Habitats Regulations Assessment was made of the combined Core Strategies of Rother and Shepway (Scott Wilson, 2012)<sup>3</sup>. The Assessment considered the impact of the proposals for a range of issues, including disturbance to birds and other wildlife, water quality, water resources, air quality, coastal squeeze and inhibition of coastal processes, or loss of habitat outside European sites which contributes to supporting species of those European sites.
- 2.2.5 It was concluded that the Rother and Shepway Core Strategies had sufficient safeguards in policy/supporting text that they would be unlikely to lead to significant effects on the Dungeness international sites through disturbance, water quality, or air quality impacts, or through coastal squeeze or disruption of coastal processes
- 2.2.6 It was concluded that it was unlikely that there would be a significant effect on Dungeness SAC/SPA or the Dungeness, Romney Marsh and Rye Bay potential SPA/proposed Ramsar site through water abstraction from the Denge gravels aquifer to support housing in the Romney Marsh area, because abstraction from these gravels are already being restricted by the Environment Agency to protect the interest features of the international sites.

<sup>3</sup> Scott Wilson (January 2012) *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)*. Report for Rother District Council.

### 3 Possible likely significant effects

#### 3.1 Introduction to possible likely significant effects ('screening')

3.1.1 Possible likely significant effects arising from development resulting from the Camber Supplementary Planning Document need to be considered to determine their effect on any European site. The matters to be considered are

- Land-take from any European site
- Reduction in water quality of a European site
- Increased water use requiring water companies to abstract water which would result in a wetland European site drying unacceptably
- Reduction in air quality, such as new roads close to sensitive vegetation on SAC sites
- Coastal squeeze and inhibition of coastal processes
- loss of habitat outside European sites which contributes to supporting species of those European sites
- Development which would result in harmful recreational pressure or other disturbance to a European site, for example disturbance to birds from increased visitor numbers within or close to the potential SPA, or trampling upon SAC vegetation
- Planting of non-native invasive species which might spread onto European sites or dunes

3.1.2 These matters may be more or less relevant to different proposals or sites allocated for development within the Camber Supplementary Planning Document depending upon their size, characteristics and location. Rother District's Core Strategy contains Policy EN5 'Biodiversity and Green Space' which requires developers to avoid adverse impacts upon biodiversity. The Appropriate Assessment of the Core Strategy does recognise that there is a need to manage recreation and tourism activities so they do not harm the integrity of European sites. The Camber Supplementary Planning Document sits within the context of the over-arching Core Strategy.

#### 3.2 Consideration of likely significant effects ('scoping')

##### *List of proposals assessed.*

3.2.1 All proposals in the SPD were included in this scoping exercise. A list of the policies, and the results of the scoping, is included in Appendix 1.

##### *Land-take from any European site*

3.2.2 There is no allocation or policy resulting in development within a European site so this matter would have no likely significant effect upon any European site. Early discussions during the formation of the SPD determined that it would not be appropriate to propose development on European sites; for example the location for the proposed Park and Ride development at East Guldeford was deliberately chosen to avoid the proposed SPA and Ramsar site, and existing SSSI.

3.2.3 Land-take from any European site is therefore **scoped out** of the assessment.

##### *Reduction in water quality of a European site*

3.2.4 All but one of the proposals are of a character and location that no pollution could potentially be caused. However, proposal T1 for a Park and Ride facility at East Guldeford could potentially contribute some pollutants to the local ditch network, where there may be connections with the ditches in the nearby European site. This is particularly relevant to the proposed Ramsar site, because the ditch flora and fauna are part of the reasons for the designation. Potential pollutants which might be produced as a result of this development, particularly during the operational phase, would be

- Oil and other fluid spills from vehicles running off the car park into ditches

- De-icing chemicals used in winter

- 3.2.5 It is considered that there are likely to be engineering solutions to prevent oil and other fluid spills from reaching the ditch network, such as oil interceptors and other measures. Spills are not expected to be common, as the vast majority of cars and buses using the Park and Ride would be sufficiently roadworthy as to reach the site. This issue is a detail requiring attention at planning application stage, but at the strategic level of the SPD it is **scoped out** of the assessment.
- 3.2.6 The Park and Ride would operate at peak season, primarily the Spring bank holidays, and in the summer. At other times, when visitor numbers are lower, there would be sufficient parking capacity within Camber to not require a Park and Ride service. Consequently, the service would not operate in the winter and there would be no need for de-icing chemicals. The potential pollution of de-icing chemicals is **scoped out** of the assessment.
- 3.2.7 Proposal T1 of the SPD is therefore considered to not have a likely significant affect on any European sites at this strategic scale although would need a project-level Habitats Regulations Assessment at planning application stage.

### ***Water resources***

- 3.2.8 The proposals are intended to increase the 'shoulder' seasonal use of the village, rather than increase peak use. At shoulder times (early spring and autumn) there is generally less demand for water, for example with fewer tourists and with residents watering their gardens less, and so increased tourism at those times would add no further strain on the water infrastructure.
- 3.2.9 The Appropriate Assessment of Rother's Core Strategy looked at the impact of all development across Rother and Shepway districts on water demand, and supply possibilities. Southern Water covers the area of Rother around Rye/Rye Harbour and Camber as part of their Sussex Hastings Water Resource Zone (WRZ), and the remainder of Rother is covered by South East Water's Resource Zone (RZ)3 (along with a very small amount within RZ27).
- 3.2.10 Within the Southern Water area around Rye and Camber, groundwater abstraction is from the Chalk aquifer or the Lower Greensand, neither of which are hydrologically connected to the interest features of Dungeness SAC, Dungeness to Pett Level SPA or Dungeness, Romney Marsh and Rye Bay pSPA/pRamsar site. Southern Water expects to have sufficient water within the Core Strategy period (i.e. beyond the life of this SPD) and there will be little need for additional abstractions in this WRZ to meet expected demand. The possible exception is that there are plans to reactivate the Cadborough borehole which lies 1km from Dungeness to Pett Level SPA and 3km from Dungeness SAC. The Appropriate Assessment for the Southern Water's Water Resource Management Plan identified that there was unlikely to be any drawdown impact on the great crested newt habitat in the SAC or the marshes of use to SPA waterfowl but that a project specific HRA would be necessary if this borehole were to be reactivated.
- 3.2.11 The proportionately small demand for water resulting from this SPD, compared to the already assessed Core Strategy, shows that the proposals are not likely to have a significant effect upon any European sites and water resources may be **scoped out** of this assessment.

### ***Air quality***

- 3.2.12 The developments arising from the SPD are of a character and location that no air pollution could potentially be caused from each development. The general thrust of the SPD is to encourage public transport and cycling, with no increase in car-related traffic. However, proposal T1 for a Park and Ride facility at East Guldeford could potentially act as a point source of nitrogen oxides from vehicle exhausts.
- 3.2.13 Air pollution associated with road traffic generally reduces to background levels within 200m of the road<sup>4</sup>. A check of current air quality at a grid reference in the region of East Guldeford using the Air Pollution Information System ([www.apis.ac.uk](http://www.apis.ac.uk)) showed that the critical level of nitrogen oxides for coastal and floodplain grazing marsh was 30 µg NO<sub>x</sub> (as NO<sub>2</sub>) m<sup>-3</sup>.

<sup>4</sup> Highways Agency DMRB Volume11, Section3, Part 1, *Air Quality* (revised May 2007, Ref HA 207/07).

However, the current concentration is 12.96 µg NO<sub>x</sub> (as NO<sub>2</sub>) m<sup>-3</sup>, well below the critical level (Appendix 2). It is very unlikely that a Park and Ride facility would increase the concentration of nitrogen oxides in any European site above a critical level, and it is also relevant that overall fuel use would be reduced by replacing car traffic with a smaller number of bus journeys.

- 3.2.14 The proposals in the SPD are not likely to have a likely significant effect on any European sites by reason of air pollution. Air quality is **scoped out** of this assessment.

***Coastal squeeze and inhibition of coastal processes***

- 3.2.15 The proposals within the SPD do not constrain coastal processes.

- 3.2.16 Proposal T12 for a new crossing to Rye Harbour suggests that a retractable bridge or ferry are options to explore. Construction works to provide a crossing might alter coastal processes in the estuary mouth, which is SPA. The Camber Supplementary Planning Document does not permit or cause the crossing to be created, and exploration of options would need to include an assessment of any effect upon European sites. It is envisaged that there might be options available which do not adversely affect European sites. The SPD itself would not result in a likely significant effect upon any European site by reason of coastal squeeze or inhibition of coastal processes and so this matter is **scoped out** of the assessment.

- 3.2.17 Proposal P4 is a general statement of the wish to maintain the dunes and protect from damage. Proposal N3 and the Central Car Park development brief both include proposals to extend the sand dunes, thus contributing to a restoration of coastal processes in the current car park area and having a minor beneficial impact upon European sites.

***Loss of habitat outside European sites which contributes to supporting some species of those European sites***

- 3.2.18 Bird species for which the Dungeness SPA/pSPA (and the proposed Ramsar site) is designated do make use of habitats outside the designated site boundaries. The Dungeness, Romney Marsh and Rye Bay SPA and pRamsar designation encompasses the majority of the habitat of value to birds, however there are exceptions, most notably species such as European white-fronted goose that are known to move widely across farmland and grazing marsh within the area. Equally, great crested newts breeding within the SAC/pRamsar may forage or overwinter up to 500m from the boundary<sup>5</sup>. The known metapopulations of great crested newts could in theory disperse beyond designated site boundaries, and there may be populations yet to be discovered.

- 3.2.19 The proposal most relevant to this topic is the proposed Park and Ride facility at East Guldeford, which is proposed for arable land outside the pSPA / Ramsar site. It is considered that the area of the proposed Park and Ride facility is very small in relation to the available habitat and its loss would have an insignificant impact on habitat availability for widely-roaming birds. The arable use of the field suggests it is of below optimal habitat quality for great crested newts, but this species is occasionally found in arable fields. At planning application stage, it would be necessary for a great crested newt survey to have been carried out, and mitigation proposed if necessary to conserve this species. For example, habitat optimisation might be implemented at the periphery of the Park and Ride to substitute for losses of poor quality habitat.

- 3.2.20 Proposal V5 for a 'glamping' site on the edge of the village could potentially be located on land outside a European site where that land might provide habitat for widely-roaming birds or for great crested newts in any ditches. The SPD does not prescribe a location for the glamping site, so does not presume that a site for this would necessarily have an impact on European sites. It is envisaged that there might be options available which do not adversely affect European sites, and this would need to be addressed at planning application stage.

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<sup>5</sup> Scott Wilson (January 2012) *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)*. Report for Rother District Council

3.2.21 There are proposals for habitat creation within the SPD, which would provide additional opportunities for species on nearby European sites, and therefore provide more robust populations of those species. Proposal N1 is to create a new lake adjacent to the caravan park. If created appropriately, with no harmful uses such as fishing, the lake may form a 'saline lagoon', thus increasing the amount of this rare habitat into which Ramsar site plants and invertebrates might colonise. Proposal N2 is to clean out waterways running through the caravan park. This too may create the conditions for Ramsar site plants and invertebrates to colonise, if they are not already present.

3.2.22 The SPD itself would not result in a likely significant effect upon any European site by reason of land take of habitat outside the European site but used by qualifying species for that European site, and so this matter is **scoped out** of the assessment

***Development which could result in harmful recreational pressure or other disturbance to a European site***

3.2.23 There are a number of developments which could change the number of people in Camber, and/or the activity of people in relation to surrounding European sites. The following proposals within the SPD would provide these potential changes individually or in combination:

- Proposal E1: Redevelop the Lydd Road petrol station site with appropriate village uses
- Proposal V1 – Establish three new walking routes around Camber Village
- Proposal V5: Establish a 'glamping' site on the edge of the village
- Proposal V9: Establish a series of beach huts for retail and storage
- Proposal V10: Establish a clear 'extreme sports' area to the beach with amenities
- Proposal V12: Establish new quality visitor accommodation at the central car park
- Proposal T1: Explore potential for a park and ride service at East Guldeford junction
- Proposal T4: Improve Broomhill car park and introduce a small charge for this
- Proposal P11: Establish a pedestrian crossing and defence wall steps at the entrance to the public right of way
- Western car park – increase in car parking spaces
- Central Car Park development brief
- Old Putting Green development brief

3.2.24 The effects of these developments would be to make minor changes to visitor capacity within Camber, change/relocate the activities carried out by those visitors, minor increases to the resident population, and development close to a European site which might cause disturbance.

3.2.25 The possibility of a development or combined developments which would result in harmful recreational pressure or other disturbance to a European site remains a 'likely significant effect and cannot be scoped out at this stage.

***Planting non-native invasive species***

3.2.26 The SPD Appendix 'Landscape Guidelines' provides lists of trees, shrubs and non-woody plants for use in planting schemes and gardens at Camber. The list includes Hottentot Fig, Holm oak and Sea buckthorn. It is illegal to cause Hottentot Fig, a non-native invasive species, to grow in the wild under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). Planting it in domestic situations is not illegal, however it would be bad practice as seeds or other propagules may spread naturally or by dumping of garden waste. Holm oak is also a non-native invasive species and an aggressive coloniser of natural vegetation, spreading through acorn transport by birds, small mammals or humans. Sea buckthorn is native to some English coasts, but is currently causing damage to dune vegetation and is being actively removed as part of dune management.

- 3.2.27 The possibility of these species being planted in Camber and spreading to European sites and causing harm may have a likely significant effect.

### **3.3 Summary of 'likely significant effect' (scoping')**

- 3.3.1 The necessity to consider likely significant effects suggests that it cannot be determined that the SPD has 'no likely significant effect' and an Appropriate Assessment (Section 4) is therefore needed.
- 3.3.2 There are two issues which require further investigation through an appropriate assessment, which is a) the possibility of development which would result in harmful recreational pressure or other disturbance to a European site, and b) the planting of invasive plant species. This is assessed in Section 4 below.
- 3.3.3 No other issues require further assessment.

## **4 Assessment of developments which might result in harmful recreational pressure or other disturbance to a European site**

### **4.1 Change in day visitor capacity at Camber**

#### ***Car park capacity within Camber***

- 4.1.1 The car park capacity changes are reductions of spaces at the Central Car Park and balanced increases at the overspill car park adjacent to Johnson's Field. There would be no net change in car parking capacity within the village centre, but there would be a small percentage increase in spaces at the Western Car Park, so there would be a small increase in visitor capacity as a result of parking changes within Camber.

#### ***Park and Ride***

- 4.1.2 Provision of a Park and Ride facility at East Guldeford at peak times would increase the number of visitors coming into Camber. There are pricing issues to be determined which would make the Park and Ride a more favourable choice than Camber car parks, but it is probable that car park pricing would not be such that the spaces were under-utilised in peak times. The Park and Ride bus would deposit visitors in the western car park (for the dunes and beach) or central Camber (for the beach and village facilities). For the Park and Ride to operate economically, it would have to carry a substantial number of passengers into Camber during the peak season. These visitors would be day visitors, as the vast majority of those staying overnight in the village would expect to park at their accommodation. The number of these visitors is not quantifiable at present.
- 4.1.3 It is considered that the majority of people coming to Camber in this way would stay within the village / dunes / beach, as this is the major attraction of Camber for day visitors and is the likely location for the bus stops.

#### ***Net change of visitors***

- 4.1.4 There would be a small net increase in peak visitors to Camber i.e. at the busiest spring and summer holiday periods, where there is unsatisfied demand to visit Camber. At other times, when current parking is not fully utilised, there would be no change in visitors due to increase in parking spaces or Park and Ride provision. This peak time change is assessed in Section 4.3 below.

### **4.2 Change in resident population and/or holiday accommodation**

- 4.2.1 The proposals include for development of permanent housing or holiday accommodation at
- Lydd Road petrol station site – perhaps 4 dwellings
  - Old Putting Green – perhaps 8 dwellings
  - Central car park – holiday accommodation only, no number of units given but restricted in physical extent.
  - Glamping site – location undetermined
- 4.2.2 The increase in around 12 dwellings plus Central car park holiday accommodation is small in relation to the current number of dwellings. The SPD says that there are 1722 permanent residents, rising to 13,000 residents in the holiday season. The increase of twelve dwellings for permanent residents, some of which may be used for holiday accommodation in any case, is minor in comparison. The increase in holiday accommodation at the Central Car Park is also minor in comparison with existing visitor accommodation. No adverse impacts would occur from this level of proposed housing.
- 4.2.3 No scale is proposed for the glamping site, although these sites tend to be relatively small scale to maintain the 'glamorous' feel to camping. With 13,000 residents in the peak holiday season,

a small glamping site would not result in adverse effects on any European site from an increased number of visitors to Camber.

### 4.3 Change in visitor activity in relation to European sites

- 4.3.1 Sensitivity to visitor activity on European sites relates to, primarily, disturbance of birds on the existing and proposed Dungeness, Romney Marsh and Rye Bay SPA, and trampling of shingle beach vegetation within the Dungeness SAC. Additional features of Ramsar designations include aquatic plants and invertebrates within ditches, which would be unaffected by disturbance or trampling.
- 4.3.2 In the Camber area, habitats sensitive to SPA bird disturbance (see Section 2.1) in summer would include reedbeds (although the dense nature of reed growth is such that disturbance from edges of reedbeds is limited), saltmarsh, islands within lagoons or gravel pits, and undisturbed shingle beaches. Habitats sensitive to SPA bird disturbance in winter would include reedbeds, grazing marsh, and coastal lagoons. Shingle beach vegetation is more sensitive to trampling damage in spring and summer, when flowering plants are at their peak.
- 4.3.3 Sand dunes at Camber are not within a European site, although they are nationally designated as a Site of Special Scientific Interest. There is a relationship between the dunes and the European sites, as intertidal and subtidal sand from the European site is washed up onto the shore and blown onto land to form the dunes. This is thought to be a net movement of sand from the sea to the land, (or a net no change) rather than a net movement of sand from the land to the sea. Erosion of dunes is more related to maintaining condition of the Site of Special Scientific Interest designation, rather than being related to European sites. This assessment, which assesses impacts on European sites only, should not consider dune impacts of visitors more than superficially. Dune impacts are briefly assessed, however, to give a fuller picture of the impacts of the SPD.

#### ***Proposal V1 – Establish three new walking routes around Camber Village***

- 4.3.4 The three walking routes (page 53 of the SPD) use existing rights of way or other established routes. Route 1 passes through the Rye Golf Club on a permissive route to the east side of Rye Harbour, where it uses a public footpath back across the golf course to Camber Road where the route uses the public road back to the village. No sensitive SPA habitats are crossed, although the route is adjacent to the intertidal estuary of Rye Harbour, and passes on a public road near lagoons and grazing marsh at Point Farm. Although the number of walkers using this route in addition to existing users is not known, it is not expected that use of this route would provide any significant disturbance to SPA birds at any time of year.
- 4.3.5 Route 2 uses the beach, the estuary wall at Rye Harbour, a short route through the Rye Golf Course, and a length of public footpath through grazing marshes within the edge of the SPA north-west of Camber. It is possible that wintering birds using this part of the SPA could be disturbed by walkers in winter, although winter use by walkers is predicted to be low and it is a very small peripheral part of the SPA being disturbed. To reduce disturbance to a minimum, it is recommended that promotion of this walk advocates spring to autumn use only, with no promotion of its use during the winter period. Provided that this recommendation is implemented, there would be no adverse affect upon the integrity of the SPA.
- 4.3.6 Route 3 is a circular walk around the SPA north of Camber. The majority of the route is within the Ramsar site, where ditch vegetation and invertebrates would not be harmed by disturbance or trampling. Part of the route is within the proposed SPA, and it is possible that wintering birds using this part of the SPA could be disturbed by walkers in winter, although winter use by walkers is predicted to be low and it is a very small peripheral part of the SPA being disturbed. The 1:25,000 Ordnance Survey map and Google Earth both fail to show physical evidence of a path along part of the right-of-way being utilised, which suggests that promotion of this walk will be difficult, with many visitors finding it hard to follow the route. To reduce disturbance to a minimum, it is recommended that promotion of this walk advocates spring to autumn use only, with no promotion of its use during the winter period. Provided that this recommendation is implemented, there would be no adverse affect upon the integrity of the SPA.

***Proposal V5: Establish a 'glamping' site on the edge of the village***

- 4.3.7 The scale of the proposed glamping site is not defined, such as for example how many units / people would be present at any one time. Activities carried out by glampers would include use of the beach and village facilities, but could also include use of the footpath network within the proposed SPA / Ramsar site, such as the proposed promoted routes. If the glamping site is situated close to the public footpath leading westwards towards Rye along the edge of the potential SPA means that this path is likely to be used proportionally more by glampers than those staying in holiday accommodation further from this point (such as the caravan park).
- 4.3.8 The amount of increased footpath use is unknown, but a small number of glamping units is unlikely to result in a significant increase in path use. The glamping site is less likely to be used in winter, when wintering birds are most abundant, and conditions may be applied to a planning application to prevent use in winter. There would be no adverse affect upon any European site from visitor activity in relation to the proposed glamping site.

***Proposal V9: Establish a series of beach huts for retail and storage***

- 4.3.9 This is assessed within 'Proposal T4 (Broomhill car park)' and 'Central Car Park development brief' below.

***Proposal V10: Establish a clear 'extreme sports' area to the beach with amenities***

- 4.3.10 The area is to be established for extreme sports such as kite surfing, by improving the car park and providing beach huts for equipment storage and retail such as fast food. This is assessed within Proposals T4 (Broomhill car park).

***Proposal V12: Establish new quality visitor accommodation at the central car park***

- 4.3.11 The scale of visitor accommodation at the car park would be likely to provide such a small scale of additional visitor activity (see Section 4.2 above) that it would not adversely affect any European sites.

***Proposal T1: Explore potential for a park and ride service at East Guldeford junction***

- 4.3.12 The Park and Ride would operate at peak season, primarily the Spring bank holidays, and in the summer. At other times, when visitor numbers are lower, there would be sufficient parking capacity within Camber to not require a Park and Ride service. Consequently, the service would not operate in the winter and there would be no disturbance to SPA birds in the vicinity of the car park. The exploration of potential would include consideration of impacts on European sites, and the SPD would not directly cause or permit the Park and Ride. This element of the SPD would not adversely affect any European site.

***Proposal T4: Improve Broomhill car park and introduce a small charge for this***

- 4.3.13 Improvements to the car park include improved surfacing, advertising, provision of beach huts (proposal V9) and promoting use for extreme sports such as kite surfing (proposal V10). The SPA and Ramsar site at this point comprises a narrow shingle ridge, which is regularly bulldozed into shape to provide a flood defence, and a wide intertidal sand flat.
- 4.3.14 It is considered that the regular reshaping of the ridge to provide a flood defence is likely to prevent shingle vegetation from developing, and the area is not within Dungeness SAC. The current car park, although with a poor state of surfacing, is several hundred metres long and is considered to attract visitors above the threshold above which would disturb shingle-nesting bird species. Natural England describe the main interest feature for Dungeness, Romney Marsh and Rye Bay SSSI at this point (unit 184) as being Earth Heritage, rather than a biological interest features, further suggesting that there may be no shingle-nesting bird species or shingle vegetation.
- 4.3.15 It is considered that the Broomhill car park proposals would attract a greater number of visitors than at present, although there is no quantitative estimate of numbers. Visitors are likely to concentrate on the beach, with no SPA birds or Ramsar features present, although some may use the car park as a start point for the proposed walking route 3 (proposal V1, see above).

4.3.16 This group of proposals would not adversely affect any European sites.

***Proposal P11: Establish a pedestrian crossing and defence wall steps at the entrance to the public right of way***

4.3.17 Proposal P11 proposes a set of steps on the eastern edge of Camber, to join the public footpath on the eastern edge of the caravan park to the beach, making it easier for people using Walking Route 3, for example, to join and leave the beach. The steps may encourage a slightly larger number of people to use walking Route 3, and the assessment of Proposal V1 (above) includes this potential increase in use.

4.3.18 This element of the SPD would not adversely affect any European site.

***Western car park – increase in car parking spaces***

4.3.19 An increase of around 100 – 200 car parking spaces is proposed. Currently there are 1800 car park spaces at the western car park. This would potentially increase visitor pressure on the adjacent dunes and beach, although land train proposals (T15) may transport some people to the Central Car Park development. It is anticipated that the visitor pressure may increase on the dunes by up to 11%.

4.3.20 There is significant recreational impact upon dunes close to the central car park, adjacent to paths across dunes from Old Lydd Road and the western car park, and along the entire beach / dune frontage. The primary impact is vegetation erosion, with secondary issues of excess sand mobility and erosion of dunes. Impact is caused by visitors enjoying the topographical variation provided by the dunes compared to the beach with, for example, typical activities such as children's play, people climbing to height for viewpoints, and sunbathing. The impact of each individual person or group is slight, but the cumulative impact of many people over time is significant. Natural England's condition assessment for this part of the Site of Special Scientific Interest (Appendix 3) states that it '*has mobile dunes at an early stage of stabilisation with heavy erosion in places. Marram grass planting is taking place to promote stabilisation. The system at this point is backed by a road, buildings and a stabilising wall in places with willow and sea buckthorn scrub. Due to the effects of erosion the unit is considered to be in unfavourable but recovering condition as efforts are being made to remedy this.*' The efforts made to remedy the erosion are outlined in the Camber Sands Dune Management Plan, but there are doubts whether the efforts will prove to be sufficient.

4.3.21 Moderate or potential impacts on dunes are found on the dunes at further distance from paths, car park access points, and away from the beach / dune frontage. This is due to lower recreational activity with fewer people walking away from the areas of greatest activity, and partly caused by extensive areas of sea buckthorn *Hippophae rhamnoides* scrub deterring visitor activity. If, for example, there were to be further clearance of sea blackthorn adjacent to areas used by visitors, it might result in a spread of erosion-causing activities. Insignificant to no impact from visitors is identified on the beach, which is unvegetated mobile sand with or without visitor activities. Figure 05 shows the areas of damage to dunes.

4.3.22 An increase of up to 11% of people in peak times could potentially increase the erosion of dunes also by 11%, although it is not a simple linear measure. For example, when a piece of dune vegetation is destroyed by trampling, successive people trampling on the same spot will destroy no more vegetation.

4.3.23 There are a significant number of measures within the SPD to prevent further damage to dunes and to reduce current problems. Proposal P4 is to maintain and enhance the dunes and protect from damage, although this is aspirational rather than an implementable scheme. Proposal N8 provides boardwalks from the western car park over the dunes, so that the width of the affected area is reduced, and current wide eroded paths may revegetate. Proposal N8 also includes for managed rotational closures of paths (where no boardwalk is provided) through the dunes, so that trampling damage may revegetate naturally in closed periods. Rotational closures would not apply to those paths over the dunes which are public footpaths, but these would be the specified location for boardwalks.

- 4.3.24 Public Realm Strategies 'Old Lydd Road and dune access routes', and 'Dunes' broadly repeat these proposals.
- 4.3.25 It is recommended that a delivery mechanism for the dune management in proposals N8 and Public Realm Strategy is made into a formal commitment by Rother District Council on adoption of the SPD as there is no delivery mechanism proposed within the SPD itself.
- 4.3.26 The potential for an increased number of people using footpaths in the area, starting walks from the western car park, is implicitly considered in the assessment of proposed walking routes, proposal V1 above.
- 4.3.27 An increase in car parking in the Western car park would not result in an adverse impact on any European site.

***Central Car Park development brief***

- 4.3.28 The Central Car Park development brief contains proposals to upgrade the built facilities in that location, by construction of quality buildings and an attractive public realm. Buildings may be used for commercial uses (e.g. retail, food), holiday accommodation and visitor information. The brief includes for expansion of the sand dunes at that point, with an accessible path to the beach. Visitor management would be used to reduce existing pressure on dunes. The Central Car Park is currently excluded from the Dungeness, Romney Marsh and Rye Bay SSSI / SPA / Ramsar site; however by extending sand dunes into the car park area the extent of sand dune vegetation would increase and complement the existing dune.
- 4.3.29 The SPD gives examples of layouts for the development, rather than permitting any particular scheme. With the proposals generally in favour of dune formation rather than erosion, the SPD would generally be favourable to nature conservation. Details would need to be carefully considered in a planning application for the development.
- 4.3.30 Visitor activities are likely to remain broadly as at present with respect to habitats, with the greatest focus on the beach and little activity on other parts of European sites.
- 4.3.31 It is considered that the Central Car Park development brief would not result in an adverse impact on any European site.

***Old Putting Green development brief***

- 4.3.32 The scale of accommodation at the car park would be likely to provide such a small scale of additional visitor activity (see Section 4.2 above) that it would not adversely affect any European sites.

## **4.4 Planting non-native invasive species**

- 4.4.1 The SPD Appendix 'Landscape Guidelines' provides lists of trees, shrubs and non-woody plants for use in planting schemes and gardens at Camber. The list includes Hottentot Fig, Holm oak and Sea buckthorn.
- 4.4.2 It is illegal to cause Hottentot Fig, a non-native invasive species, to grow in the wild under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). Planting it in domestic situations is not illegal, however it would be bad practice as seeds or other propagules may spread naturally or by dumping of garden waste.
- 4.4.3 Holm oak is also a non-native invasive species and an aggressive coloniser of natural vegetation, spreading through acorn transport by birds, small mammals or humans. Sea buckthorn is native to some English coasts, but is currently causing damage to dunes and is being actively removed as part of dune management.
- 4.4.4 It is not possible to ascertain that planting these species would not adversely affect European sites and it is recommended that these species are removed from lists of species proposed for planting. If this recommendation is implemented, there would be no adverse impact upon European sites from the Landscape Guidelines.

## 4.5 In-combination effects of proposals

- 4.5.1 In combination effects, particularly the effect of increased recreational pressure from all sites, is considered in this assessment. No further in-combination effects are considered to be significant.

## 4.6 In-combination effects of all development within Rother District

- 4.6.1 Rother's Core Strategy underwent Appropriate Assessment, has undergone Examination in Public. The Camber Supplementary Planning Document adds further detail, but does not increase the amount of development planned for the area. The cumulative affect of all development has already been assessed through the Core Strategy process and does not require further assessment.

## 4.7 Summary of recommendations

Recommendation	Paragraph
Park and Ride. Engineering solutions are needed at planning application stage to prevent oil and other fluid spills from reaching the ditch network	3.2.5
Harbour crossing. Exploration of options would need to include an assessment of any effect upon European sites	3.2.16
Park and Ride. At planning application stage, it would be necessary for a great crested newt survey to have been carried out, and mitigation proposed if necessary.	3.2.19
Glamping site location. It is envisaged that there might be options available which do not adversely affect European sites, and this would need to be addressed at planning application stage	3.2.20
Saline lagoon creation. Detailed design and use provides a saline lagoon for wildlife.	3.2.21
New walking routes are not promoted for use in winter.	4.3.5, 4.3.6
A delivery mechanism for the dune management in proposals N8 and Public Realm Strategy is made into a formal commitment by Rother District Council on adoption of the SPD as there is no delivery mechanism proposed within the SPD itself.	4.2.35
Hottentot Fig, Holm Oak and Sea buckthorn are removed from the list of plant species to be planted in Camber.	4.4.4

## ***Appendix 1***

## Appendix 1 Screening of Strategy proposals

Proposal	Likely to have a significant effect?	Further assessment required?
<i>Economic</i>		
E1: Redevelop the Lydd Road petrol station site with appropriate village uses	Possibly – small scale development	Yes
E2: Develop live-work and employment spaces where possible	No – aspirational	No
E3: Slow traffic through resin-bonded gravel to Lydd Road in the village centre	No	No
E4: Monitor vacant sites in the village and pursue redevelopment of these	No – small scale	No
E5: Review opportunities for further investment in Pontin's facilities and greater integration with Camber village	No	No
E6: Consider shop front improvements scheme for village businesses	No	No
<i>Visitor</i>		
V1: Establish three new walking routes around Camber Village	Possibly – depending on route location and visitor usage	Yes
V2: Improve signage in the village and to the local area	No	No
V3: Improve interpretation and information about the unique area	No – may encourage more sensitive behaviour to visitors and reduce impact	No
V4: Explore potential for an all weather visitor attraction, potentially with a visitor information point	No – may encourage more sensitive behaviour to visitors and reduce impact	No
V5: Establish a 'glamping' site on the edge of the village	Possibly – may be impacts on adjacent designated sites	Yes
V6: Establish new eating venues in the village	No	No
V7: Strengthen links between Pontins and the village	No – attracting day visitors into the Pontins might reduce pressure on European sites	No
V8: Strengthen marketing and management links with Rye and Rye Harbour	No	No
V9: Establish a series of beach huts for retail and storage	Possibly – might change visitor recreation patterns	Yes
V10: Establish a clear 'extreme sports' area to the beach with amenities	Possibly – might have an impact on intertidal areas	Yes
V11: Raise profile of the area as filming location	No – film crews avoid damage to habitats in case scenes need to be re-shot and for continuity	No

<b>Proposal</b>	<b>Likely to have a significant effect?</b>	<b>Further assessment required?</b>
V12: Establish new quality visitor accommodation at the central car park	Possibly – might add a significant increase in tourism impact	Yes
<i>Transport</i>		
T1: Explore potential for a park and ride service at East Guldeford junction	Possibly – impacts on nearby designated site and increased number of visitors to Camber in peak times.	Yes
T2: Establish access from Lydd Road to overflow car park	No	No
T3: Rebalance parking spaces between central car park and the overflow car park	No – no increase in parking spaces is proposed.	No
T4: Improve Broomhill car park and introduce a small charge for this	Possibly – the intention is to increase use of this car park	Yes
T5: Maintain existing overall parking levels	No – there will be no increase in visitors	No
T6: Provide signage to car parks at entrance to the village	No	No
T7: Add resin-bonded gravel to road surface in village centre	No	No
T8: Adjust car speeds in the village	No	No
T9: Strengthen cycle routes between Rye and Camber and within the village	No – uses existing routes	No
T10: Provide cycle parking at central locations	No	No
T11: Improve walking rights of way and signage	No – may encourage some visitors away from dunes	No
T12: Provide a new crossing link to Rye Harbour	Possibly – Rye Harbour is proposed SPA	Yes
T13: A small scale cycle hire scheme in the area	No	No
T14: Increase bus frequencies between Camber and Rye	No	No
T15: Establish land train between western car park and central car park	No – would use existing roads	No
T16: Explore potential for a water-taxi or duck-taxi	No – ‘exploring potential’ would have no impact although the impact would need to be part of the exploration process	No
T17: Wider links to Ashford	No	No
<i>Public Realm</i>		
P1: Re-enforce the character of Camber as a rural coastal village	No	No

Proposal	Likely to have a significant effect?	Further assessment required?
P2: Create an improved edge between the village and the marshland	No – the area is not sensitive to disturbance	No
P3: Increase tree cover within the village	No	No
P4: Maintain and enhance the dunes and protect from damage	A significant positive proposal	Yes
P5: Enhance the character and quality of public open spaces	No	No
P6: Increase opportunities for play throughout the village	No – possibly a small reduction in dune usage due to play areas being used.	No
P7: Promote coastal character planting within the village	No	No
P8: Improve the character of Lydd Road	No	No
P9: Create gateway areas at each end of the village	No	No
P10: Improve the public realm at key locations (see landscape strategy)	No	No
P11: Establish a pedestrian crossing and defence wall steps at the entrance to the public right of way	Possibly – a change in visitor usage patterns	Yes
P12: Improve the physical environment within the caravan park	No	No
<i>Public Realm – Nature</i>		
N1: Establish a new lake at the eastern end of the village to support wildlife	A potentially positive proposal – if established appropriately it may be form a 'saline lagoon', thus increasing the amount of this rare habitat	Yes
N2: Clean the waterways running through the caravan	A potentially positive proposal – plant and invertebrate species on nearby designated site may benefit.	Yes
N3: Extend the dune in part at the central car park to replace historic loss	A significant positive proposal	Yes
N4: Encourage a shift to environmental tourism in the area	No – may encourage more sensitive behaviour to visitors and reduce impact	No
N5: Develop and implement a sustainable access management strategy for environmental designated sites	Yes – may mitigate for some current visitor pressure problems	Yes
N6: Undertake flood risk studies as part of planning proposals for development schemes	No	No
N7: Manage the grazing marsh at Johnson's Field to enhance wildlife	No – although generally beneficial will not impact on designated sites	No

Proposal	Likely to have a significant effect?	Further assessment required?
N8: Provide boardwalks and rotate access paths through the dunes to repair trampling damage to the dunes	Yes – may mitigate for some current visitor pressure problems	Yes
<i>Public Realm – special places</i>		
Johnson's Field	No	No
Jubilee Gardens	No	No
Western car park	Possibly – increase in car parking spaces (taking some spaces from central Car park) may increase visitor pressure on dunes	Yes
Pontins Park	No	No
Lydd Road	No	No
Old Lydd Road and dune access routes	Yes – may mitigate for some current visitor pressure problems	Yes
Camber Holiday Park	No	No
Raised concrete walkway	No	No
Dunes	Yes – may mitigate for some current visitor pressure problems and restore some dune vegetation	Yes
<i>Development briefs</i>		
Central car park	Yes – additional visitor development close to dunes, but with dune restoration	Yes
Old Putting green	Possibly – small scale increase in housing	Yes
<i>Appendices</i>		
Landscape Guidance	Yes – some preferred species for planting could easily spread over and damage designated sites.	Yes
Urban design guidance	No	No
Flood risk considerations	No	No
Ecological considerations	Yes – considerations will prevent harm to designated sites	No

## ***Appendix 2***

# APIS



## Air Pollution Information System

### Query by Location - Results

**Habitat:** Coastal and Floodplain Grazing Marsh

**Grid Reference:** TQ950200

**Grid Easting:** 595 to the 5km SW corner ( 595000 nearest km)

**Grid Northing:** 120 to the 5km SW corner ( 120000 nearest km)

**Pollutant:** Nitrogen Oxides



**Critical Level:** 30  $\mu\text{g NO}_x$  (as  $\text{NO}_2$ )  $\text{m}^{-3}$



**Concentration:** 12.96  $\mu\text{g NO}_x$  (as  $\text{NO}_2$ )  $\text{m}^{-3}$

**Exceedance:** -17.04  $\mu\text{g NO}_x$  (as  $\text{NO}_2$ )  $\text{m}^{-3}$

Post published: Thu, 20/01/2011 - 16:13

This page was accessed on Thursday, May 10, 2012 16:51



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## ***Appendix 3***



<a href="#">SSSI home</a>	▶
<a href="#">New notifications</a>	▶
<a href="#">Search for SSSI details</a>	▶
<a href="#">Reports and statistics</a>	▶
<a href="#">SSSI glossary</a>	▶
<a href="#">Known data issues</a>	▶

## Sites of Special Scientific Interest

### SSSI unit information

#### Dungeness, Romney Marsh And Rye Bay - Unit 161

[◀ back](#)

[View Map](#)

**Staff member responsible for SSSI unit:**

Jo Dear

**Unit ID:**

1029440

**Unit area:**

119 hectares

**Main habitat:**

Supralittoral sediment

**Condition:**

Unfavourable recovering

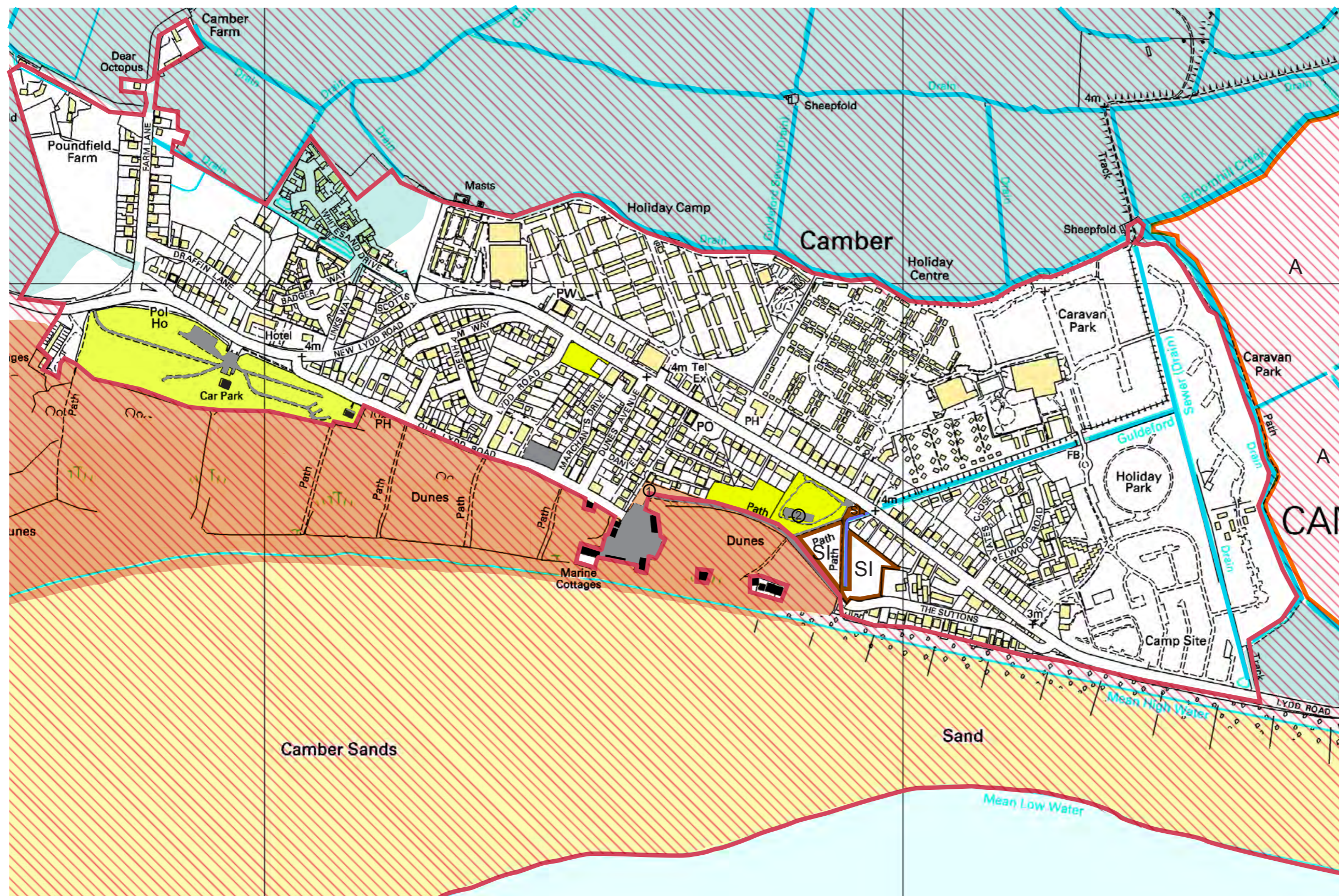
**Latest assessment date:**

25 October 2010

**Condition assessment comment:**

This is a very important area of dune grassland supporting a number of scarce plants. The western end of unit is under golf course management and exhibits a variety of stabilised dune habitats with a high degree of botanic diversity and some extreme terrain. Frequent species include lady's bedstraw, wild carrot and devils-bit scabious occasional, with smaller amounts of autumn hawkbit, hare's-foot clover, orchids, marsh fern, milkwort, sea holly, sea beet and sea kale. In areas of exposed shingle mosses and lichens dominate with mouse-ear hawkweed. Of note is the occurrence of autumn ladies tresses. There are scattered damp hollows and ephemeral ditches with reed and a range of large sedges. Of note in this community is the uncommon marsh mallow. Scrub cover is less than 5%, and includes sea buckthorn, so is within desirable levels. There are no negative indicators in this part of the unit. The eastern end of unit has mobile dunes at an early stage of stabilisation with heavy erosion in places. Marram grass planting is taking place to promote stabilisation. The system at this point is backed by a road, buildings and a stabilising wall in places with willow and sea buckthorn scrub. Due to the effects of erosion the unit is considered to be in unfavourable but recovering condition as efforts are being made to remedy this.

***Figure 01***





Key:

#### Information from survey

-  Sand dune (sensu lato)
-  Amenity grassland
-  Hard standing / bare ground
-  Buildings
-  Standing water, brackish
-  Poor semi-improved grassland
-  Small area of dune on made-up ground
-  Play Area

#### Information from others

-  SSSI (information supplied by Sussex Biological Records Centre/ Natural England)
-  Coastal & Floodplain grazing marsh (information supplied by Sussex Biological Record Centre)

L11 417 Camber SPD

Habitats at Camber

Figure 01

Scale: NTS  
January 2012



***Figure 02***

# Designated Site Map (ESD/11/463):

## Land at Camber village + 1km radius

Prepared for Nick Sibbett (The Landscape Partnership Ltd) - 28/10/2011



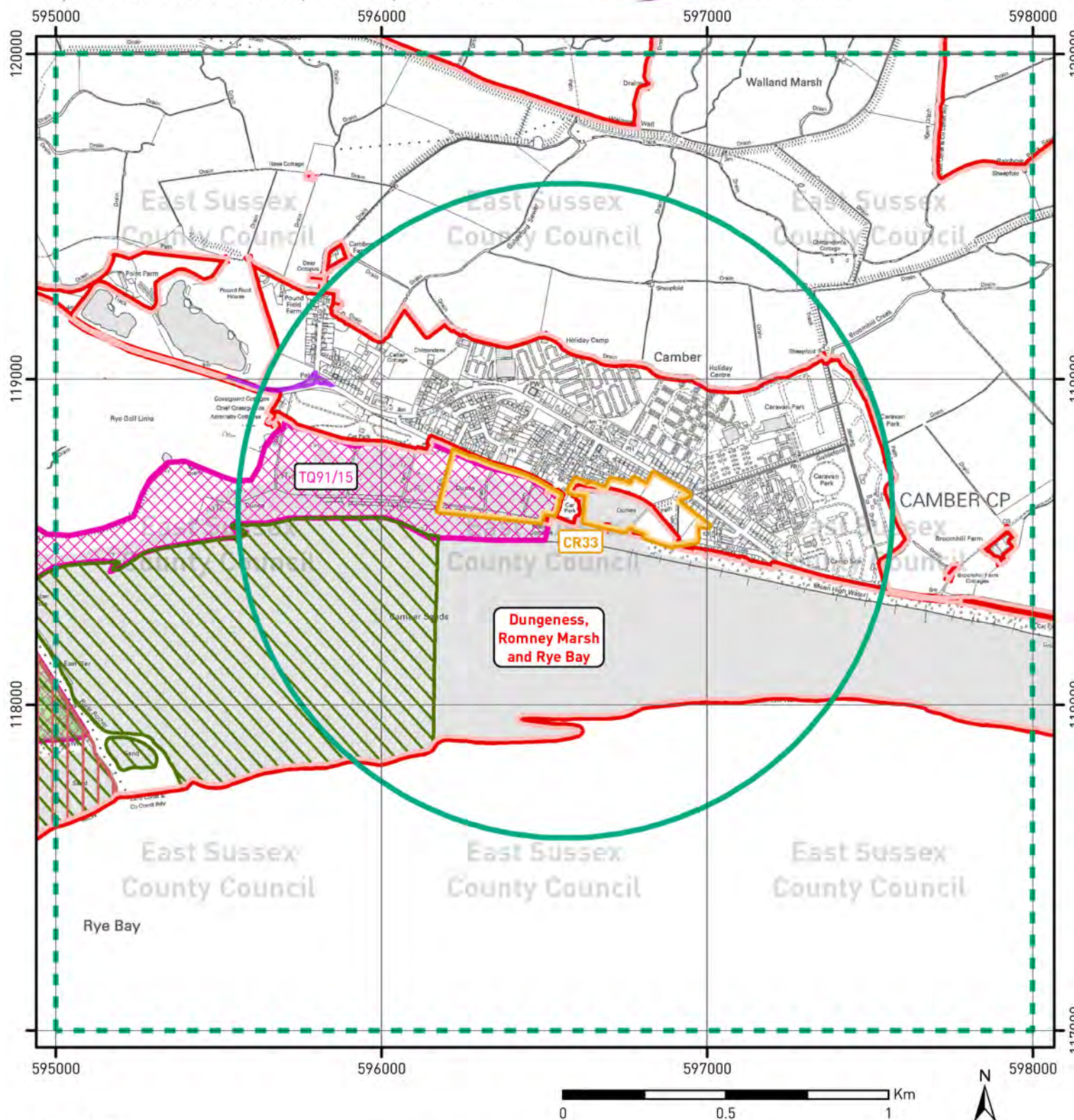
**Sussex  
Biodiversity  
Record Centre**

Woods Mill, Henfield, W Sussex BN5 9SD

Tel: 01273 497 558/557

Email: [sxbrc@sussexwt.org.uk](mailto:sxbrc@sussexwt.org.uk)

Website: [www.sxbrc.org.uk](http://www.sxbrc.org.uk)



### Key to Map:

- Enquiry area
- Species search area
- SSSI
- SNCI
- SAC
- SPA
- LNR
- RIGS
- Notable road verge

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Figure 02

***Figure 03***



Potential Special Protection Area  
**Dungeness, Romney Marsh and Rye Bay**  
East Sussex, Kent

Figure 03

Potential Special Protection Area  
4048.63 Hectares

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Latitude:  
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Projection:  
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4048.63 Hectares

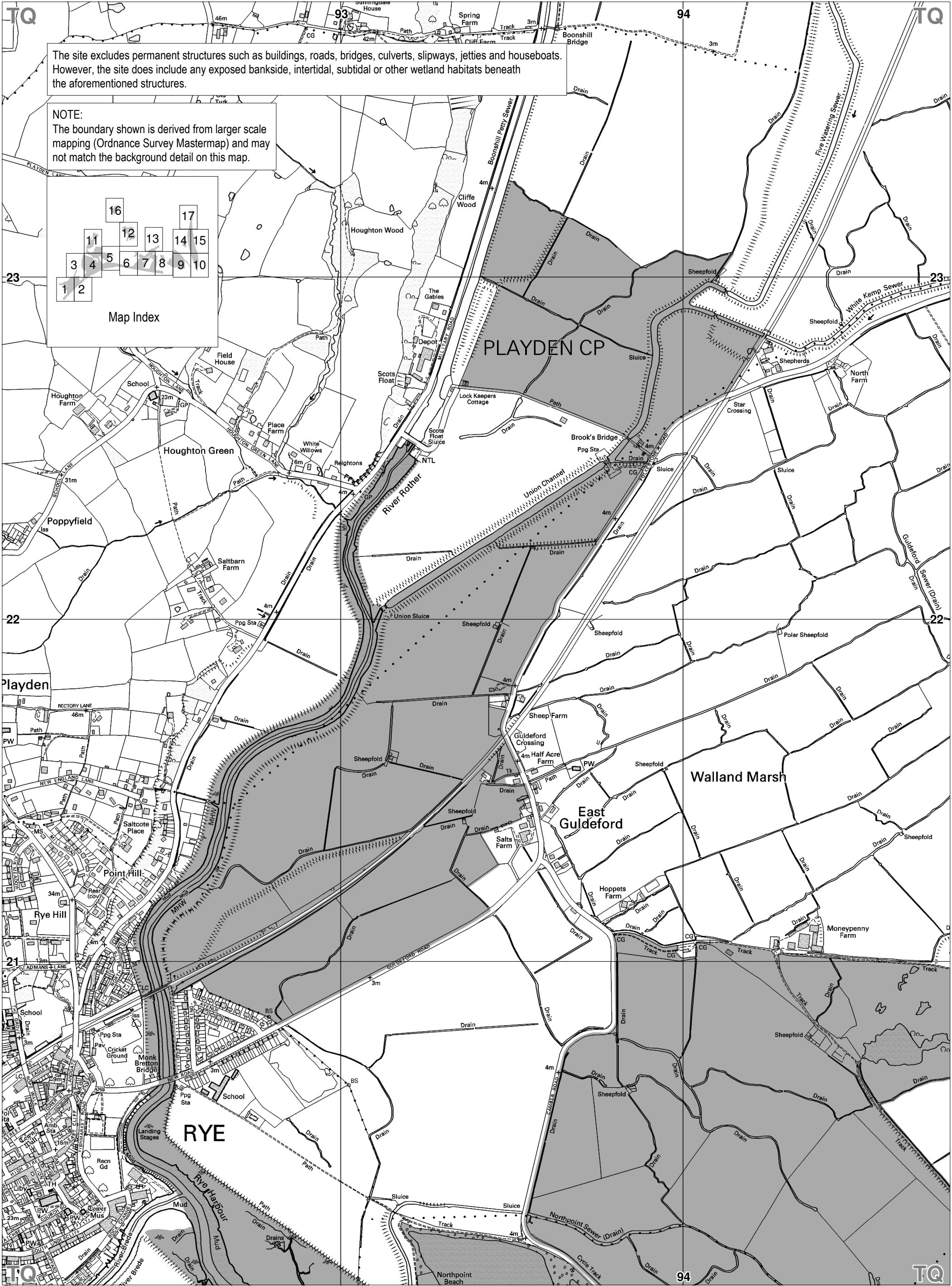
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Map 5 of 17

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Potential Special Protection Area  
**Dungeness, Romney Marsh and Rye Bay**  
East Sussex, Kent

Potential Special Protection Area  
4048.63 Hectares

EU Site Code:  
UK1111111  
Version Number:  
1  
Longitude:  
00:47:50E  
Latitude:  
50:55:40N  
Projection:  
British National Grid  
Area of SPA:  
4048.63 Hectares

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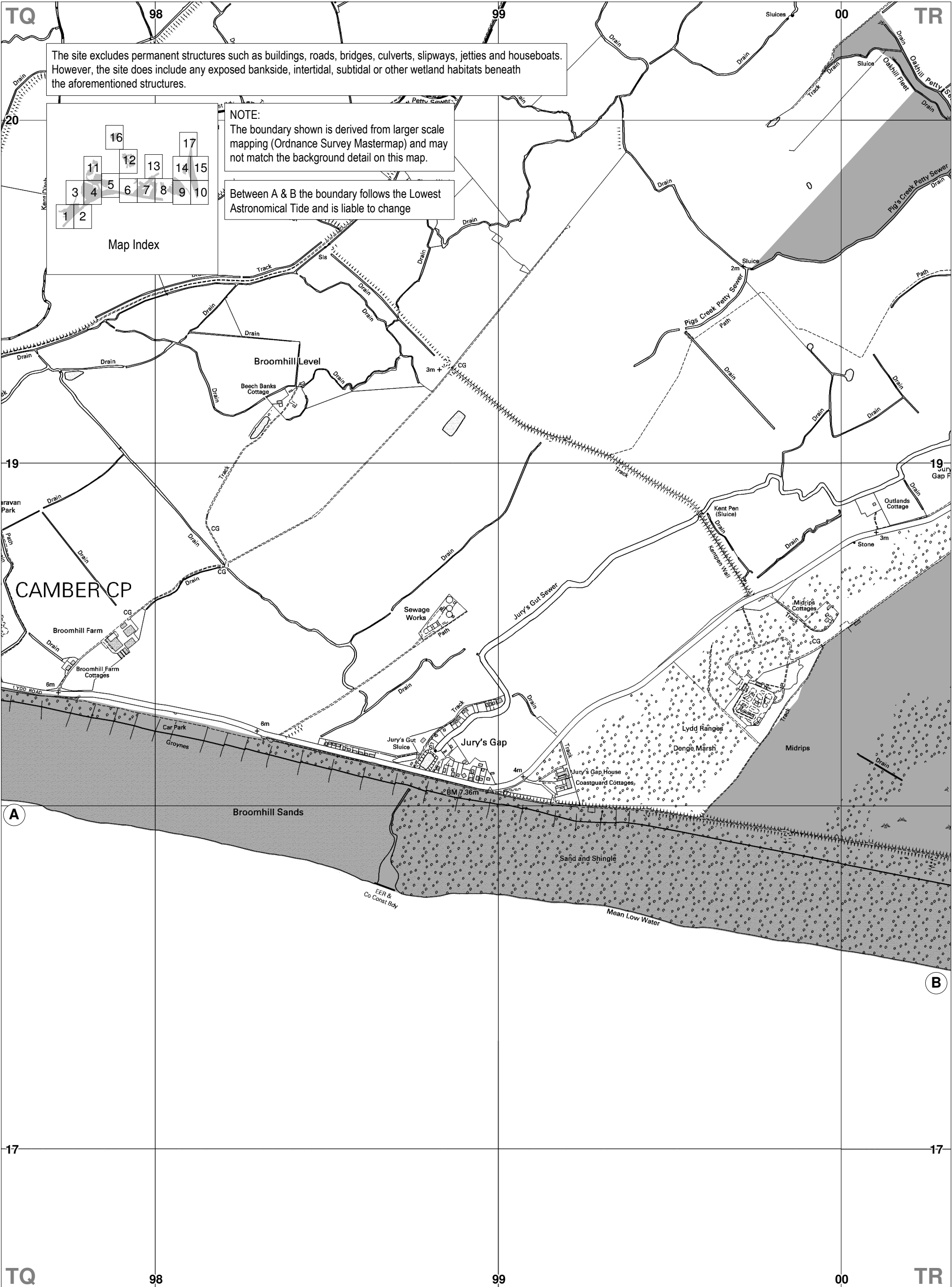
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Map 11 of 17  
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0 500 1000 1500ft.

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Potential Special Protection Area  
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East Sussex, Kent

Potential Special Protection Area  
4048.63 Hectares

EU Site Code:  
UK11111111

Version Number:  
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Latitude:  
50:55:40N

Projection:  
British National Grid

Area of SPA:  
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Grid Ref:  
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Version:  
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Plotted:  
30/04/2010

PlotID:  
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Map 6 of 17

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0 500 1000 1500ft.

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***Figure 04***



NOTE:  
The boundary shown is derived from larger scale mapping (Ordnance Survey Mastermap) and may not match the background detail on this map.

Between A-B & C-D the boundary follows the Lowest Astronomical Tide and is liable to change

The site excludes permanent structures such as buildings, roads, bridges, culverts, slipways, jetties and houseboats. However, the site does include any exposed bankside, intertidal, subtidal or other wetland habitats beneath the aforementioned structures.

Proposed Ramsar Site  
**Dungeness, Romney Marsh and Rye Bay**  
East Sussex, Kent

Figure 04

Proposed Ramsar Site  
6416.15 Hectares

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Version Number:  
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Area of Ramsar:  
6416.15 Hectares

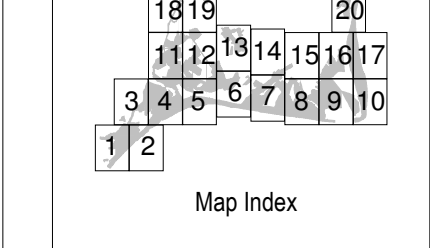
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Scale 1:10000 at A3

Map 5 of 23

Wetland of International Importance, Ramsar Convention  
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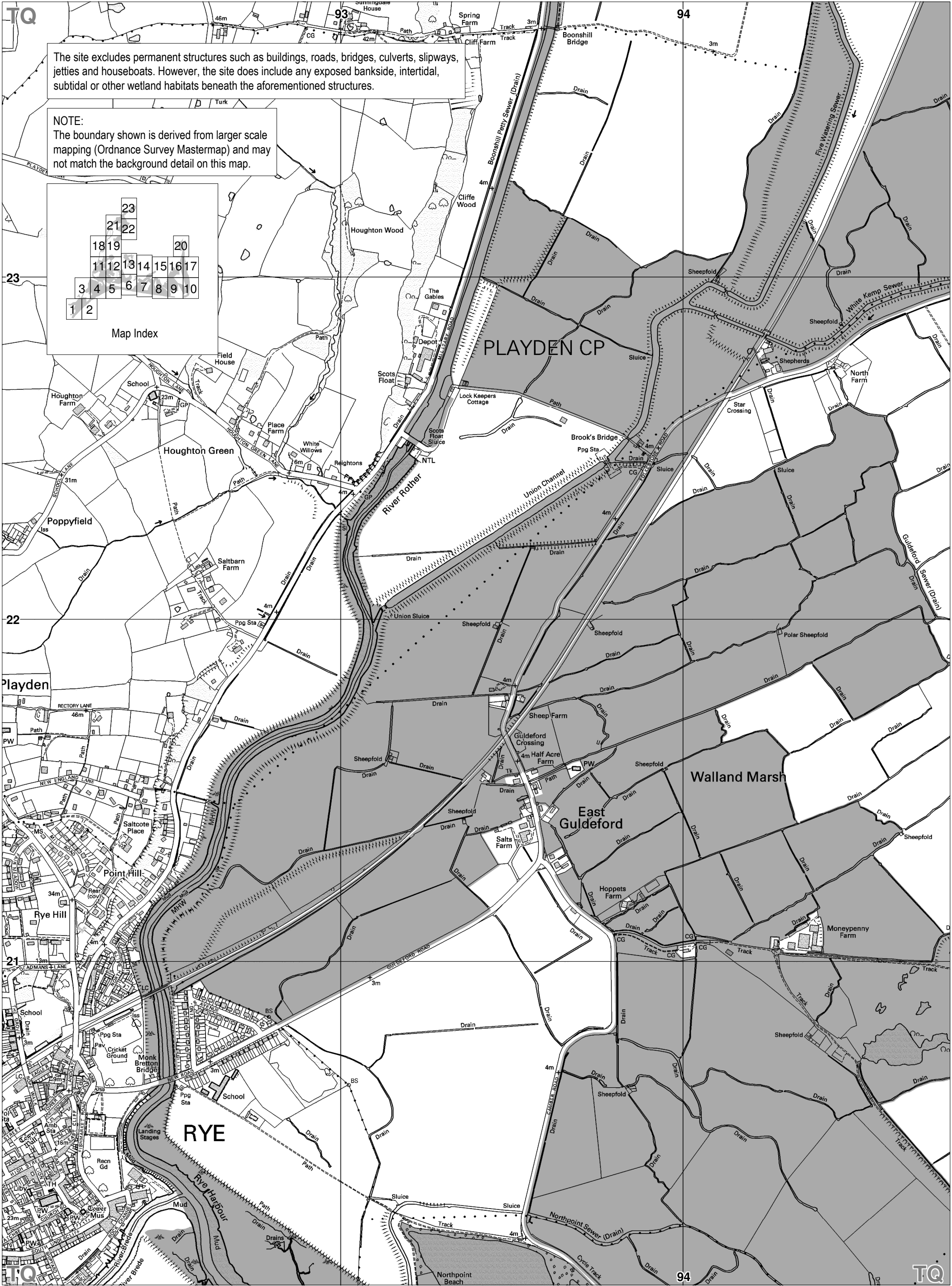




NOTE:  
The boundary shown is derived from larger scale mapping (Ordnance Survey Mastermap) and may not match the background detail on this map.

Between A & B the boundary follows the Lowest Astronomical Tide and is liable to change

The site excludes permanent structures such as buildings, roads, bridges, culverts, slipways, jetties and houseboats. However, the site does include any exposed bankside, intertidal, subtidal or other wetland habitats beneath the aforementioned structures.



Proposed Ramsar Site  
**Dungeness, Romney Marsh and Rye Bay**  
East Sussex, Kent

Proposed Ramsar Site  
6416.15 Hectares

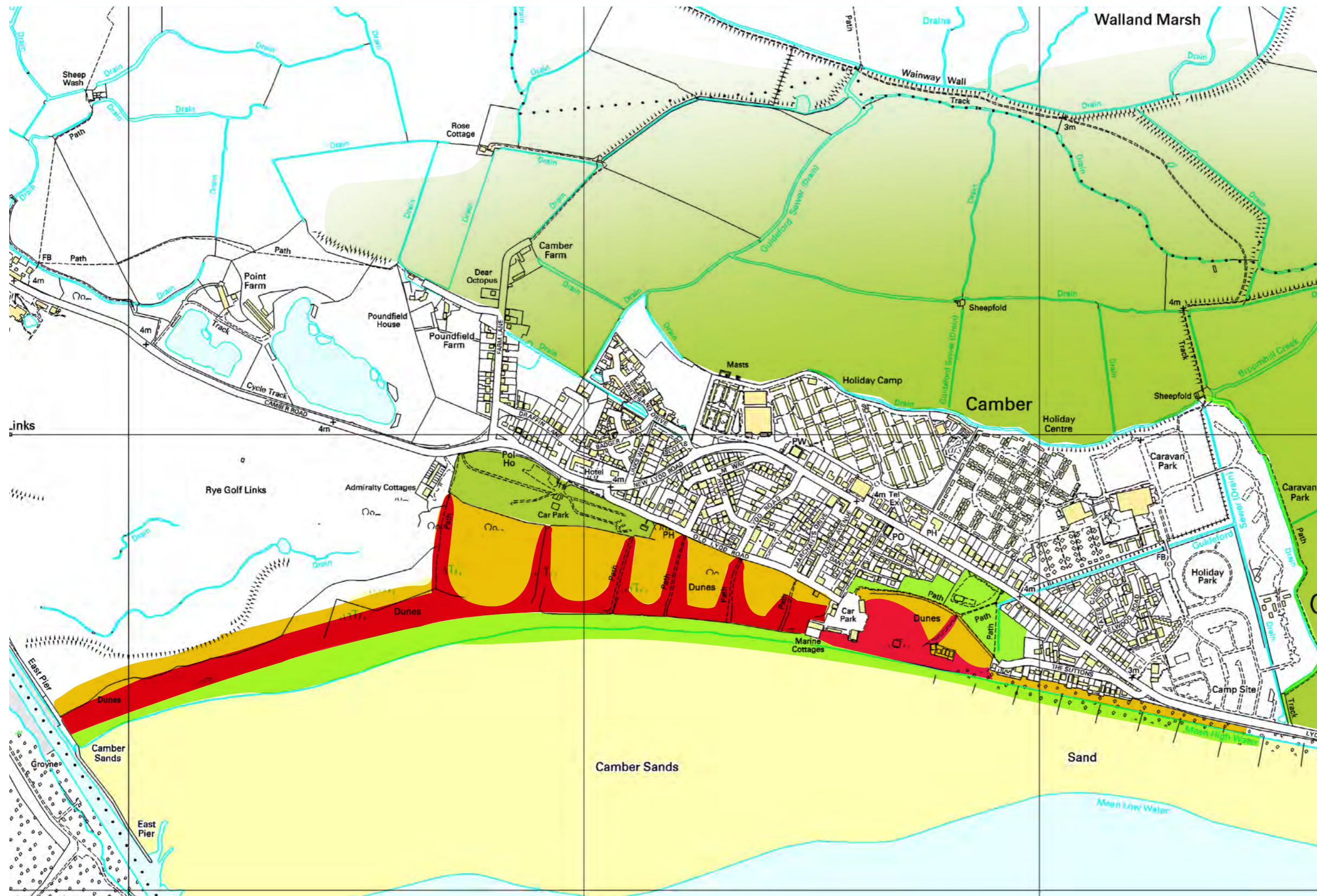
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British National Grid  
Area of Ramsar:  
6416.15 Hectares

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30/04/2010  
PlotID:  
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***Figure 05***



Key:

- Significant impact on ecological features
- Moderate or potential impact on ecological features
- No identified impact on ecological features

#### L11 417 Camber SPD

Current impacts on ecological features caused by recreational activities

Figure 08

Scale: NTS  
January 2012



