

**Pre-Submission Consultation Draft
Stone Neighbourhood Plan
February 2019**

**Strategic Environmental Assessment
and Habitats Regulations Assessment
Screening Opinion**

April 2019

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1. Introduction

- 1.1 This document sets out the Council's consideration of whether the Pre-Submission Draft Neighbourhood Plan for Stone February 2019¹ requires:
- a Strategic Environmental Assessment (SEA) under Regulation 9 (1) of the Environmental Assessment of Plans and Programmes Regulations 2004; and/or
 - a Habitats Regulations Assessment (HRA) under Regulations 105 and 106 of the Conservation of Habitats and Species Regulations 2017

2. Strategic Environmental Assessment – Legal Requirements

- 2.1 Under the requirements of the European Union Directive 2001/42/EC (Strategic Environmental Assessment (SEA) Directive) and Environmental Assessment of Plans and Programmes Regulations (2004), specific types of plans that set out the framework for future development consent of projects must be subject to an environmental assessment.
- 2.2 There are exceptions to this requirement for plans that determine the use of a small area at a local level and for minor modifications if it has been determined that the plan is unlikely to have significant environmental effects.
- 2.3 In accordance with the provision of the SEA Directive and the Environmental Assessment of Plans and Programmes Regulations (2004) (Regulation 9(1)), the Council must determine if a plan requires an environmental assessment. This has to take into account the criteria specified in Schedule 1 to the Regulations (see figure 2 below) and the results of consultation with the consultation bodies, i.e. Natural England, Historic England and the Environment Agency (see Appendix A for their responses). Where the Council determines that SEA is not required then under Regulation 9(3) the Council must prepare a statement setting out the reasons for this determination.

3. Habitats Regulations Assessment – Legal Requirements

- 3.1 In accordance with the Conservation of Habitats and Species Regulations (2017) Regulations 105 and 106, where a land use plan-
- a. is likely to have a significant effect on a European 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 must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives. The plan-making authority must for the purposes of the assessment consult the appropriate nature conservation body (Natural England) and have regard to any representations made by that body within such reasonable time as the authority specifies (see Appendix A for their response). The plan-making authority must also, if it considers it appropriate, take the opinion of the general public, and if it does so, it must take such steps for that purpose as it considers appropriate.
- 3.2 In the light of the conclusions of the assessment, and subject to regulation 107 (considerations of overriding public interest), the plan-making authority must give

¹ Under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012

effect to the land use plan only after having ascertained that it will not adversely affect the integrity of the European site.

- 3.3 A qualifying body which submits a proposal for a neighbourhood development plan (in this case Stone Parish Council) must provide such information as the competent authority may reasonably require for the purposes of the assessment under regulation 105 or to enable it to determine whether that assessment is required.
- 3.4 The objective of the assessment is to:
- Identify any aspects of the neighbourhood plan (NP) that would cause an adverse effect on the integrity of Natura 2000 sites, otherwise known as European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites²), either in isolation or in combination with other plans and projects; and
 - To advise on appropriate policy mechanisms for delivering mitigation, where such effects are identified.

Section 6 of this report deals with the Screening of Likely Significant Effects.

- 3.5 If the NP cannot be screened out as being unlikely to lead to significant effects, then an Appropriate Assessment (AA) is required in order to devise measures that can be incorporated into the NP which will enable the Council in their role as 'competent authority' to conclude that no adverse effect on the integrity of internationally important wildlife sites will result. In this case, it has been possible to screen out the NP.

4. Scope of the Draft Stone Neighbourhood Plan

- 4.1 The whole of Stone Parish was designated as a Neighbourhood Area on 14 October 2016. The Stone Neighbourhood Plan (Stone NP) is being prepared by Stone Parish Council and Stone residents. This is the first screening opinion which has been carried out to assess whether the proposed plan will require a strategic environmental assessment and/or an appropriate assessment under the regulations described in sections 2 and 3 above.
- 4.2 Stone Parish Council is currently carrying out the pre-submission consultation on the draft Stone Neighbourhood Plan under Regulation 14 of The Neighbourhood Planning (General) Regulations 2012, as amended. The link to the Draft Neighbourhood Plan is available at: <http://www.stoneneighbourhoodplan.uk/>. This is taking place from 21 February 2019 to 12 April 2019.
- 4.3 The draft Stone NP includes the following objectives:
- Create a high quality environment through provision of, and access to, good quality open spaces and recreational activities
 - Develop good quality accessible health provision and opportunities for people to live healthier lives and move sustainably around the parish in a cleaner environment
 - Provide opportunities for 'whole-lifetime parish residency' which means choices are available to residents to enable them to continue to live in the parish when their housing needs change
 - Ensure new and existing local infrastructure is of high quality and supports the needs of the existing and future community to prosper

² Wetlands of International Importance designated under the Ramsar Convention 1979

- Support development of Horns Cross as a focus for the neighbourhood providing a wide range of community facilities, local services and additional green space
- Secure the neighbourhood plan's delivery through effective engagement and quality design

4.4 The draft Stone NP contains policies relating to:

Green space and recreation

- GS1 Local Green Space
- GS2 Stone Recreation Ground
- GS3 Atlas Park
- GS4 St Clements Way buffer

Health and wellbeing

- HW1 Trees, shrubs and air quality
- HW2 Travel Plans
- HW3 Walking neighbourhood

Housing

- H1 Range of housing provision
- H2 Local housing

Local infrastructure

- LI1 Stone Crossing Station
- LI2 Stone Castle
- LI3 Digital infrastructure

A new neighbourhood centre

- HC1 Horns Cross Neighbourhood Centre

Delivering the plan

- D1 Planning applications and consultation requirements
- D2 Design and Development briefs

- 4.5 These are generally enabling, development control style policies which seek to support new development that achieves improvements to green spaces, housing choice and infrastructure. None of them specifically allocate any sites for development.

5. Strategic Environmental Assessment (SEA) Screening

Screening Process

- 5.1 The process for determining whether or not a SEA is required is called screening. In order to screen, it is necessary to determine if a plan will have significant environmental effects using the criteria set out in Annex II of the Directive and Schedule I of the Regulations.
- 5.2 Figure 1 shows the process of applying the SEA Directive to plans and programmes.

Figure 2: Assessment of Characteristics of a Neighbourhood Plan

Stage	Y/N	Reasoning
1. Is the plan or programme (PP) subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government?	Y	Neighbourhood Development Plans (NDPs) are prepared by a qualifying body (Parish/ Town Councils) under the Town and Country Planning Act 1990 (as amended). The preparation of NDPs is subject to the Neighbourhood Planning (General) Regulations 2012 and the Neighbourhood Planning (referendums) Regulations 2012. A NDP is subject to independent examination and local referendum and, subject to the outcome of those, will be 'made' by the Council. The process is prescribed by legislation.
2. Is the PP required by legislative, regulatory or administrative provisions?	N	The preparation of a NDP is optional. However, once 'made' it will form part of the statutory Development Plan for the area and be used when making decisions on planning applications in the area it covers.
3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, telecommunications, tourism, town and country planning or land use AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive?	Y	A NDP can include these policy areas and is primarily prepared for the purposes of town and country planning and land use. It sets out a framework for enabling development within the draft Stone NP area including infrastructure projects which may fall under part 10 of Annex II of the EIA Directive.
4. Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive?	?	A NDP could potentially have impacts on sites covered by the Habitats Regulations. However, this requires individual assessment of a NDP (see section 6).
5. Does the PP determine the use of small areas at a local level, OR is it a minor modification of a PP subject to Art. 3.2?	Y	A NDP can determine the use of small areas at a local level.
6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)?	Y	Once 'made' a NDP forms part of the Development Plan and will be used in the decision making process on planning applications. Therefore, it sets the framework for future developments at a local level.
7. Is the PP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7?	N	A NDP does not deal with these issues.
8. Is it likely to have a significant effect on the environment?	?	A NDP could potentially have a significant effect on the environment. However, whether this is the case depends on the proposals within the NDP. This requires detailed assessment (see section 5).

- 5.4 The conclusion of the assessment in Figure 2 is that depending on the content of a Neighbourhood Development Plan, a SEA may be required. For this reason, a specific assessment of the draft Stone NP is required to determine the likely significant effects.

Likely Significant Effects

- 5.5 To decide whether a draft Neighbourhood Development Plan might have significant environmental effects, its potential scope should be assessed against the criteria set out in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004. Using the information contained in the draft Stone NP (see section 4 for the broad scope of the draft Stone NP as currently drafted), the assessment has been carried out and the results are set out in Figure 3 below.
- 5.6 The screening assessment concludes that the draft Stone NP is unlikely to have significant environmental effects and a SEA is not required. The consultation bodies (Natural England, Historic England and the Environment Agency) have been consulted on the assessment – see Appendix A for their responses. They agree with the conclusions of the screening assessment.

Figure 3: Assessment of likely significant effects against Schedule 1 criteria

Schedule 1 Criteria	Likely to have significant environmental effects?	Comments
1. The characteristics of plans and programmes, having regard, in particular to:		
a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	No	The draft Stone NP sets out a local policy framework for development proposals but does not specify particular locations for development. It supports the implementation of policies in the adopted Dartford Local Plan (i.e. Dartford Core Strategy 2011 and Dartford Development Policies Plan 2017).
b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy.	No	The Stone NP must be in conformity with the strategic policies in the Dartford Local Plan. It supports the implementation of strategic policies at the local level. Therefore, it is not considered to have significant influence on other plans and programmes or the environment.
c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.	No	Policies set out in the draft Stone NP are planned to have a positive impact and promote sustainable development, e.g. Policies HW1, HW2 and HW3 support additional tree and shrub planting, the use of travel plans, and improved walking and cycling routes respectively. As a result, the likelihood of significant effects on the environment is minimised.
d) environmental problems relevant to the plan or programme:	No	The draft Stone NP seeks to minimise existing environmental problems in the area, e.g. Policy HW1 promotes green corridors in areas of existing poorer air quality. The NP does not allocate sites or propose development that would give rise to environmental problems.
e) the relevance of the plan or programme for the implementation of Community legislation on the	No	The draft Stone NP is not directly relevant to the implementation of Community legislation. It supports

Schedule 1 Criteria	Likely to have significant environmental effects?	Comments
environment (for example, plans and programmes linked to waste management or water protection).		improvements to local infrastructure and community facilities through policies L11 (Stone Crossing Station), L12 (Stone Castle), L13 (Digital Infrastructure) and HC1 (Horns Cross Centre). It does not allocate potentially polluting development.
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular to:		
a) the probability, duration, frequency and reversibility of the effects.	No	It is unlikely that there will be any irreversible damaging environmental impacts associated with the draft Stone NP. Policies seek to protect and improve the environment.
b) the cumulative nature of the effects	No	The cumulative effects of policies within the draft Stone NP are unlikely to result in negative effects, but more likely to have a positive impact.
c) the transboundary nature of the effects	No	The proposals within the draft Stone NP are unlikely to have a significant impact on neighbouring areas.
d) the risks to human health or the environment (for example, due to accidents)	No	No risks to human health or the environment have been identified as a result of draft policies in the draft Stone NP.
e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	No	The draft Stone NP is concerned with development within Stone Parish which has an area of around 675ha and a population of 10,380 in 2016. The extent of any effects is likely to be positive and local to the Parish.
f) the value and vulnerability of the area likely to be affected due to i) special natural characteristics or cultural heritage	No	Within the Neighbourhood Area there are: <ul style="list-style-type: none"> • 4 listed buildings • A Regionally Important Geological Site

Schedule 1 Criteria	Likely to have significant environmental effects?	Comments
<p>ii) exceeded environmental quality standards or limit values; or iii) intensive land-use.</p>		<ul style="list-style-type: none"> • Areas of Archaeological Potential • Flood Zones 3 and 2 • An Air Quality Management Area • Former landfill sites which are contaminated • Groundwater Source Protection Zones and groundwater aquifers <p>The Neighbourhood Area does not contain:</p> <ul style="list-style-type: none"> • Conservation Areas • Scheduled Monuments • Historic Parks and Gardens • Special Areas of Conservation, Special Protection Areas or Sites of Special Scientific Interest, Ancient Woodland or Local Wildlife Sites – the Darenth Wood SSSI lies adjacent to the southern boundary of the parish <p>The draft Stone NP is not allocating sites for development and policies must be generally aligned with strategic policies such as the Dartford Local Plan and national policies. As such, the draft Stone NP is unlikely to adversely affect the value and vulnerability of the area in relation to its natural characteristics; exceeded environmental quality standards or limit values; or intensive land use.</p> <p>The draft Stone NP provides the opportunity to give greater support for some of its assets to be enhanced through policies GS1 (Local Green Spaces), GS2 (Stone Recreation Ground), GS3 (Atlas Park) and GS4 (St Clements Way buffer). It also seeks to improve air quality through policies HW1 (Trees,</p>

Schedule 1 Criteria	Likely to have significant environmental effects?	Comments
		<p>shrubs and air quality) and HW2 (Travel plans).</p> <p>The draft Stone NP contains a number and range of policies, including: enabling the provision of a range of housing (policy H1) and affordable homes for local people (policy H2); and supporting the provision of improved infrastructure/ community uses (policies HW3, LI1, LI2, LI3 and HC1).</p> <p>These policies are intended to influence developments that come forward (through planning applications or allocations within the Local Plan), rather than proposing sites for development.</p> <p>Overall, policies within the plan would be intended to manage the potential effects of developments on the natural environment.</p>
g) the effects on areas of landscapes which have a recognised national, community or international protection status.	No	There a no landscapes with national, community or international protection status within Stone Parish or in close proximity to it. Policies seek to protect and enhance green spaces.

6. Habitats Regulations Assessment (HRA) Screening

- 6.1 The draft Stone NP is a plan which is not directly connected with or necessary to the management of a European Site.
- 6.2 There are no Natura 2000 sites located within Dartford Borough or the draft Stone NP area. However, parts of the Borough are within 10km of the Thames Estuary and Marshes Ramsar site and Special Protection Area (SPA) which is internationally important for nature conservation as the area is wetland and supports important numbers of wintering waterbirds and migrating birds. Appendix B contains detailed descriptions of these sites. The 10km zone includes the eastern part of the Stone NP area. The Dartford Development Policies Plan³ and the Dartford Borough

³ https://windmz.dartford.gov.uk/media/DP_Plan_Final_Version_for_Adoption_for_web.pdf#page=115

Council website⁴ set out the approach to development in this area in relation to the Habitats Regulations. Within this area, there is the potential for large residential development to have an adverse impact on the nature conservation interest of the Ramsar site and SPA. This is because it has the potential to exacerbate the pressure on bird species from disturbance due to human recreation. There is a need for screening assessments for large residential development (of 15 dwellings or more) and two potential approaches to mitigation are set out.

- 6.3 The draft Stone NP does not specifically allocate any sites for development, and does not refer to additional large scale residential development. A number of the policies support planning applications for development in certain circumstances where they would result in certain community benefits. In view of this, the draft Stone NP is unlikely to lead directly to a net increase in dwellings.
- 6.4 Existing plans and proposals must be considered when assessing new plans or programmes for likely significant effects as they may create in-combination effects. As the draft Stone NP is not proposing to allocate sites, does not contain policies which would lead to development and will be required to be in general conformity with existing policies in the Dartford Local Plan which have been assessed at a higher level to determine possible in-combination effects, it is concluded that no significant in-combination likely effects will occur due to its implementation.
- 6.5 Based on the information contained in the draft Stone NP and Appendix B, the Council can therefore rule out likely significant effects on the Ramsar site and SPA (alone or in combination with other plans or projects) because the proposal does not undermine the conservation objectives of these sites. The relevant consultation body (Natural England) has been consulted on the assessment – see Appendix A for its response. Natural England agrees with the conclusion of no likely significant effect upon the Thames Estuary and Marshes Ramsar site and SPA.
- 6.6 As the likely significant effects can be ruled out at this stage, it can be concluded that an Appropriate Assessment is not required to be undertaken.

⁴ <https://www.dartford.gov.uk/by-category/environment-and-planning2/new-planning-homepage/planning-policy/adopted-plans>

Date: 27 March 2019
Our ref: 276900
Your ref: Stone Neighbourhood Plan



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BY EMAIL ONLY

Dear Ms Wright,

Stone Neighbourhood Plan - Draft SEA and HRA Screening Opinion

Thank you for your consultation on the above dated 6th March 2019 which was received by Natural England on the same day.

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.

Strategic Environmental Assessment Screening

We welcome the production of this SEA Screening report. Natural England notes and concurs with the screening outcome i.e. that 'policies do not have significant environmental effects'.

Further guidance on deciding whether the proposals are likely to have significant environmental effects and the requirements for consulting Natural England on SEA are set out in the [National Planning Practice Guidance](#).

Habitats Regulations Assessment Screening

Natural England notes the screening process applied to this Neighbourhood plan. We agree with the conclusion of the report of no likely significant effect upon the named European designated site:

- Thames Estuary and Marshes Ramsar site and Special Protection Area (SPA) - located approximately 10km away.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk

Historic England

From:

Sent: 26 March 2019 12:09

To: Andrea Wright

Subject: RE: Draft SEA and HRA Screening Opinion - Draft Stone Neighbourhood Plan

Dear Andrea,

Thank you for consulting Historic England on the draft screening opinion for SEA of the Stone Neighbourhood Plan. I am happy to confirm that, within the areas of concern to Historic England, we do not feel that plan would have likely significant environmental effects. As such, we agree that it should not require Strategic Environmental Assessment. We would be pleased to review this opinion should the scope of the plan change in future.

Yours sincerely

Environment Agency

From: KSLPlanning

Sent: 20 March 2019 16:42

To: Andrea Wright

Subject: RE: Draft SEA and HRA Screening Opinion - Draft Stone Neighbourhood Plan

Hi Andrea,

We have received the below email, and will be commenting on the draft Neighbourhood Plan in due course. We normally do not comment on screening opinions.

Kind regards,

Appendix B: Thames Estuary and Marshes Ramsar and SPA Site Description and Qualifying Information

Introduction

The Thames Estuary and Marshes Ramsar and SPA site is located along the North Kent Coast within the Thames Estuary, 6.3km east of the Dartford Borough boundary, whilst the SPA is located 7.2km east of the Dartford Borough Boundary. It is located both within Kent, with approximately 10% within Essex, north of the River Thames.

Ramsar Site Overview and Criteria⁵

General Overview of the Site

A complex of brackish, floodplain grazing marsh ditches, saline lagoons and intertidal saltmarsh and mudflat. These habitats together support internationally important numbers of wintering waterfowl. The saltmarsh and grazing marsh are of international importance for their diverse assemblages of wetland plants and invertebrates.

Ramsar Criterion 2:

The site supports one endangered plant species and at least 14 nationally scarce plants of wetland habitats. The site also supports more than 20 British Red Data Book invertebrates.

Ramsar Criterion 5:

The site supports assemblages of international importance with species with the following peak counts in winter: 45,118 waterfowl (5 year peak mean 1998/99-2002/2003).

Ramsar Criterion 6:

Species occurring at levels of international importance.

Species with peak counts in spring/autumn:

- Ringed plover, *Charadrius hiaticula*, Europe/Northwest Africa – 595 individuals representing an average of 1.8% of the GB population (5 year peak mean 1998/9-2002/3)
- Black-tailed godwit, *Limosa limosa islandica*, Iceland/W Europe – 1,640 individuals, representing an average of 4.5% of the population (5 year peak mean 1998/9-2002/3).

Species with peak counts in winter:

- Grey plover, *Pluvialis squatarola*, E Atlantic/W Africa – wintering – 1643 individuals, representing an average of 3.1% of the GB population (5 year peak mean 1998/9-2002/3)
- Red knot, *Calidris canutus islandica*, W & Southern Africa (wintering) – 7279 individuals, representing an average of 1.6% of the population (5 year peak mean 1998/9-2002/3)
- Dunlin, *Calidris alpina alpina*, W Siberia/W Europe – 15171 individuals, representing an average of 1.1% of the population (5 year peak mean 1998/9-2002/3)

⁵ <http://jncc.defra.gov.uk/pdf/RIS/UK11069.pdf>

- Common redshank , *Tringa totanus tetanus* – 1178 individuals, representing an average of 1% of the GB population (5 year peak mean 1998/9-2002/3)

SPA Site Description and Qualifying Species⁶

Description

The Thames Estuary and Marshes SPA is located on the south side of the Thames Estuary in southern England. The marshes extend for about 15 km along the south side of the estuary and also include intertidal areas on the north side of the estuary. To the south of the river, much of the area is brackish grazing marsh, although some of this has been converted to arable use. At Cliffe, there are flooded clay and chalk pits, some of which have been infilled with dredgings. Outside the sea wall, there is a small extent of saltmarsh and broad intertidal mud-flats. The estuary and adjacent grazing marsh areas support an important assemblage of wintering waterbirds including grebes, geese, ducks and waders. The site is also important in spring and autumn migration periods.

Qualifying Species

Avocet *Recurvirostra avosetta*, 283 wintering individuals representing 28.3% of the GB population (5 year peak mean 1993/4 - 1997/8)

Hen Harrier *Circus cyaneus*, 7 wintering individuals representing 1% of the GB population (5 year peak mean 1993/4 - 1997/8)

Ringed Plover *Charadrius hiaticula*, 1,324 passage individuals representing 2.6% of the Europe/Northern Africa wintering population (5 year peak mean 1993/4 - 1997/8)

Grey Plover *Pluvialis squatarola*, 2,593 wintering individuals representing 1.7% of the Eastern Atlantic wintering population (5 year peak mean 1993/4 - 1997/8)

Dunlin *Calidris alpina alpina*, 29,646 wintering individuals representing 2.1% of the N Siberia/ Europe/ W Africa population (5 year peak mean 1993/4 - 1997/8)

Knot *Calidris canutus islandica*, 4,848 wintering individuals representing 1.4% of the NE Can/ Gr/ Iceland/ NW Eur population (5 year peak mean 1993/4 - 1997/8)

Black-tailed Godwit *Limosa limosa islandica*, 1,699 wintering individuals representing 2.4% of the Iceland breeding population (5 year peak mean 1993/4 - 1997/8)

Redshank *Tringa tetanus tetanus*, 3,251 wintering individuals representing 2.2% of the Eastern Atlantic wintering population (5 year peak mean 1993/4 - 1997/8)

Qualifying Assemblage

The site also qualifies as it is used regularly by over 20,000 waterfowl in any season. During the period 1993/94 – 1997/98, the wintering population was 75,019.

Conservation Objectives

⁶ <http://publications.naturalengland.org.uk/publication/4698344811134976>

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

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

The HRA Screening carried out for the Dartford Local Plan Development Policies Document Publication Version⁷ identified the following environmental pressures for the SPA:

- Coastal squeeze and erosion of intertidal habitat within the site
- The intertidal area is vulnerable to disturbance from water borne recreation. This is being addressed by information dissemination as part of an estuary management plan.
- Changing grazing regimes
- Water supply to grazing marsh has decreased. Direct land take from the site and indirect disturbance
- Hydrological effects of development
- Eutrophication

⁷ https://www.dartford.gov.uk/data/assets/pdf_file/0007/232567/006-Dartford-HRA-Report-DBC-June2016as.pdf