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# Assessment of England Coast Path proposals between **Iwade and Grain** on sites and features of nature conservation concern



## About this document

This document should be read in conjunction with the published Reports for the Iwade to Grain Stretch and the Habitats Regulations Assessment (HRA).

The Coastal Access Reports contain a full description of the access proposals, including any additional mitigation measures that have been included. These Reports can be viewed here:

<https://www.gov.uk/government/publications/england-coast-path-from-iwade-to-grain-comment-on-proposals>

A HRA is required for European sites (SPA and Ramsar site). The HRA can be viewed here:

<https://www.gov.uk/government/publications/england-coast-path-from-iwade-to-grain-comment-on-proposals>

This document, the Nature Conservation Assessment (NCA), covers all other aspects (including SSSIs, MCZs and undesignated but locally important sites and features) **in so far as any HRA does not already address the issue for the sites and feature(s) in question.**

The NCA is arranged site by site. Map A shows designated sites along this stretch of coast.

Evidence is also gathered as appropriate from a range of other sources which can include information and data held locally by external partners or from the experience of local land owners, environmental consultants and occupiers. The approach includes considering any current visitor management practices, either informal or formal. It also involves discussing our emerging conclusions as appropriate with key local interests such as land owners or occupiers, conservation organisations or the local access authority. In these ways, any nature conservation concerns are discussed early and constructive solutions identified as necessary.

The conclusions of our appraisal are certified by both the member of staff responsible for developing the access proposal and the person responsible for considering any environmental impacts. This ensures appropriate separation of duties within Natural England.

See Annex 1 for an index to designated sites and features for this stretch of coast, including features that have been considered within any HRA.

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## Assessment of coastal access proposals on The Swale SSSI<sup>1</sup>

Is this site also part of a European site? Yes

Note that notified features of the SSSI that are also qualifying features of the European site are omitted from this assessment<sup>2</sup>.

Risk				Consideration		Conclusion
Attribute affected	Key areas	Predicted changes in pattern and/or level of use	Possible impact(s)	Existing factors	Relevant features of the access proposals, including any additional mitigation measures	
<b>Lowland ditch systems</b>	Grazing marsh landward of the trail near Ridham Dock.	Negligible change in access to sites landward of the coastal margin.	There will not be any physical changes to the ditches or their support systems.	The ditch systems are generally found landward of the trail.	No additional mitigation has been proposed.	No impact on these features.

<sup>1</sup> This assessment only covers reportable features of the relevant SSSI Units (35, 36, 111) where there could be a pathway of impact from the coastal access proposals.

<sup>2</sup> The invertebrate assemblage associated with these units of the SSSI (open water and disturbed sediments, and saltmarsh transitional brackish marsh) has been assessed as part of the wetland and coastal invertebrate assemblage in the Habitats Regulation Assessment.

Risk				Consideration		Conclusion
Attribute affected	Key areas	Predicted changes in pattern and/or level of use	Possible impact(s)	Existing factors	Relevant features of the access proposals, including any additional mitigation measures	
<b>Vascular plant assemblage<sup>3</sup></b>	The route follows seawalls, paths and roadside verges within the SSSI at: Ridham Marshes, The Swale	Negligible increase in access to the trail	Trampling of these plants  Damage to plants through vegetation clearance	<i>Lactuca saligna</i> , <i>Bupleurum tenuissimum</i> , <i>Hordeum marinum</i> , <i>Parapholis incurva</i> , <i>Puccinellia fasciculata</i> , <i>Puccinellia rupestris</i> , <i>Trifolium ornithopioides</i> are commonly found in bare, trampled and poached substrates and so are unlikely to be effected by a negligible increase in trampling.  The only vegetation clearance will be the removal of dense bramble adjacent to Ridham Dock Road to reinstate the verge. Verge vegetation will be left to regrow with an annual cut.	The trail in this area follows existing public footpaths.  No additional mitigation has been proposed	No impact on these features

<sup>3</sup> Most of the 24 uncommon vascular plant species associated with the SSSI have been assessed as part of the wetland and coastal plant assemblage in the Habitats Regulation Assessment, in particular plants found in saltmarsh and damp grazing marsh habitats. A few species of the assemblage (*Peucedanum officinale*, *Lactuca saligna*, *Bupleurum tenuissimum*, *Hordeum marinum*, *Tetragonolobus maritimus*, *Sonchus palustris*, *Parapholis incurva*, *Puccinellia fasciculata*, *Puccinellia rupestris*, *Trifolium ornithopioides*) may also occur on sea walls, beside rivers, tracks, and roadsides, and so these features have been assessed here.

## Establishment works

Is SSSI assent needed to implement any specific proposals for establishment works? Yes

If yes, describe any special conditions (including those identified in the Habitats Regulation Assessment for the qualifying features of the corresponding Natura 2000 sites) that have been identified concerning how or when the works are to be carried out:

No special conditions have been identified concerning how or when the works are to be carried out.

Where necessary, Kent County Council will instigate the SSSI assent process by writing to us to confirm the timing of works and how operations are to be undertaken in line with these conditions. Natural England will provide further advice as necessary.

## Assessment of coastal access proposals on The Swale MCZ

Is this site also part of a European site? Yes

Risk				Consideration		Conclusion
Attribute affected	Key Area	Predicted changes in pattern and/or level of use	Possible impact(s)	Existing factors	Relevant features of the access proposals, including any additional mitigation measures	
<b>Estuarine rocky habitats and intertidal rock; intertidal coarse and mixed sediments, sand and muddy sand; subtidal sediment, mud and sand.</b>	Intertidal and subtidal habitats	Negligible increase in access to coastal margin.	Intertidal habitats are not sensitive to being walked on occasionally. The subtidal habitats are below the low tide mark so coastal access rights will not apply here.	N/A	<p>The foreshore of the Swale Estuary between Ridham Dock and Chetney Marshes (mudflats and saltmarsh) is unsuitable for public access and will be excluded by direction.</p> <p>No additional mitigation has been proposed.</p>	No impact on these features.

## Assessment of coastal access proposals on Medway Estuary and Marshes SSSI

Is this site also part of a European site? Yes

Note that notified features of the SSSI that are also qualifying features of the European site are omitted from this assessment.

Risk				Consideration		Conclusion
Attribute affected	Key Area	Predicted changes in pattern and/or level of use	Possible impact(s)	Existing factors	Relevant features of the access proposals, including any additional mitigation measures	
<b>Vascular plant assemblage</b> <sup>4</sup>	The route follows seawalls and tracks within the SSSI at: Chetney Marshes, Motney Hill, some sections of Riverside Country Park, Hoo Marsh, Stoke Marshes and Grain	Negligible to small increase in access to the trail	Trampling of these plants	<i>Bupleurum tenuissimum</i> , <i>Hordeum marinum</i> , <i>Puccinellia rupestris</i> are commonly found in bare, trampled and poached substrates and so are unlikely to be effected by a small increase in trampling.	The trail in these areas follows existing public footpaths  No additional mitigation has been proposed	No impact on these features

<sup>4</sup> Most of the 15 uncommon vascular plant species associated with the SSSI have been assessed as part of the wetland and coastal plant assemblage in the Habitats Regulation Assessment, in particular plants found in saltmarsh and damp grazing marsh habitats. A few species of the assemblage (*Bupleurum tenuissimum*, *Hordeum marinum*, *Puccinellia rupestris*) may also occur on sea walls and tracks, and so these features have been assessed here.

Risk				Consideration		Conclusion
Attribute affected	Key Area	Predicted changes in pattern and/or level of use	Possible impact(s)	Existing factors	Relevant features of the access proposals, including any additional mitigation measures	
<b>Lowland ditch systems</b>	Grazing marsh near Ridham Dock, Chetney Marshes, Barksore Marshes, Bayford Marsh, Horsham Marsh, Motney Hill, Abbots Court, Kingsnorth Grazing Marsh, Stoke Marshes, Smithfield Marsh	Negligible change in access to sites <i>landward</i> of the trail.  Possible increase in access to <i>seaward</i> coastal margin;	There will not be any physical changes to the ditches within the SSSI or their support systems.	N/A	No additional mitigation has been proposed	No impact on these features
<b>Zostera (seagrass) communities</b>	Hoo Flats	No change in access to the coastal margin.	Intertidal seagrass beds are sensitive to	N/A	The trail follows an existing public footpath along the coast at Hoo Flats that is clearly defined.  The foreshore at Hoo Flats (including the mudflats where there are seagrass beds) is	No impact on these features.

Risk				Consideration		Conclusion
Attribute affected	Key Area	Predicted changes in pattern and/or level of use	Possible impact(s)	Existing factors	Relevant features of the access proposals, including any additional mitigation measures	
			human trampling.		unsuitable for public access and will be excluded by direction.  No additional mitigation has been proposed.	

## Establishment works

Is SSSI assent needed to implement any specific proposals for establishment works? Yes

If yes, describe any special conditions (including those identified in the Habitats Regulation Assessment for the qualifying features of the corresponding Natura 2000 sites) that have been identified concerning how or when the works are to be carried out:

The timing of the tree clearance at Raspberry Hill old orchard should be undertaken outside of the greenshank moulting season (July to September).

The vegetation clearance along Raspberry Hill Lane should be undertaken outside of the greenshank and redshank moulting season (July to September).

Where necessary, Kent County Council and Medway Council will instigate the SSSI assent process by writing to us to confirm the timing of works and how operations are to be undertaken in line with these conditions. Natural England will provide further advice as necessary.

## Assessment of coastal access proposals on Medway Estuary MCZ

Is this site also part of a European site? Yes

Risk				Consideration		Conclusion
Attribute affected	Key Area	Predicted changes in pattern and/or level of use	Possible impact(s)	Existing factors	Relevant features of the access proposals, including any additional mitigation measures	
<b>Estuarine rocky habitats and intertidal rock; intertidal coarse and mixed sediments, sand and muddy sand; subtidal sediment, mud and sand</b>	Intertidal and subtidal habitats	Negligible increase in access to coastal margin.	Intertidal habitats are not sensitive to being walked on occasionally. The subtidal habitats are below the low tide mark so coastal access rights will not apply here.	N/A	The foreshore of Medway Estuary (mudflats and saltmarsh) is unsuitable for public access and will be excluded by direction.  No additional mitigation has been proposed.	No impact on these features.
<b>Peat and clay exposures</b>	Intertidal habitats to the north and west of	Negligible increase in access to coastal margin.	The peat and clay exposures are not sensitive to being	N/A	The foreshore of Medway Estuary is unsuitable for public access and will be excluded by direction, including at Chetney Marshes and Grain.	No impact on these features.

Risk				Consideration		Conclusion
Attribute affected	Key Area	Predicted changes in pattern and/or level of use	Possible impact(s)	Existing factors	Relevant features of the access proposals, including any additional mitigation measures	
	Chetney Marshes, particularly at Deadman's Island, and near Grain.		walked on occasionally.		No additional mitigation has been proposed.	
<b>Smelt</b>	Subtidal habitats at Upchurch; Chatham; Upper Upnor; Lower Upnor; Hoo and Grain.	No change in access as the key habitats are below the low tide mark so coastal access rights will not apply here.	None	N/A	No additional mitigation has been proposed.	No impact on these features.
<b>Tentacled lagoon worn</b>	Shallow subtidal and low intertidal habitat at Rochester and Chatham.	No change in access as the key habitats are below or near to the low tide mark.	None	Coastal access rights will not apply below the low tide mark.	The foreshore of Medway Estuary (mudflats and saltmarsh) is unsuitable for public access and will be excluded by direction, including at Rochester and Chatham.  No additional mitigation has been proposed.	No impact on these features.

## Assessment of coastal access proposals on Tower Hill to Cockham Wood SSSI<sup>5</sup>

Is this site or feature also part of a European site? No

Risk				Consideration		Conclusion
Attribute affected	Key Area	Predicted changes in pattern and/or level of use	Possible impact(s)	Existing factors	Relevant features of the access proposals, including any additional mitigation measures	
<b>Lowland mixed deciduous woodland</b>	Whole SSSI	Negligible change in access to sites landward of the trail.  Small increase in access to the trail at Lower Upnor.	Ground flora and woodland soils may be sensitive to repeated trampling.  Loss of habitat through the installation of access infrastructure.	Walkers using the foreshore footpath (south of the SSSI) can be caught out by the rising tide which has led to the trampling of SSSI woodland habitat above the tideline.	The trail follows existing public footpaths  An optional alternative route will be proposed that can be used by walkers at high tide. This route will follow an existing public footpath.  Information signs will be installed to advise walkers to check the tide times before walking the trail between Lower Upnor and Hoo Marina, to reduce the risk of being caught out by the tide.  The proposals will minimise the installation of new access management infrastructure that would result in a loss of SSSI habitat. No new surfacing will be carried out.	No impact on these features.

<sup>5</sup> This assessment only covers reportable features of the relevant SSSI Units (3, 4) where there could be a pathway of impact from the coastal access proposals.

Risk				Consideration		Conclusion
Attribute affected	Key Area	Predicted changes in pattern and/or level of use	Possible impact(s)	Existing factors	Relevant features of the access proposals, including any additional mitigation measures	
					No additional mitigation has been proposed.	
<b>Invertebrate assemblage</b>	Whole SSSI	Negligible change in access to sites landward of the coastal margin.  Small increase in access to the trail.	The invertebrate assemblage at Tower Hill and Cockham Wood is vulnerable to loss of habitat through trail improvements.	N/A	The trail follows an existing public footpath that is well defined.  The proposals will minimise the installation of new access management infrastructure that would result in a loss of habitat for the invertebrate assemblage. No new surfacing will be carried out.	No impact on these features.

### Establishment works

Is SSSI assent needed to implement any specific proposals for establishment works? Yes

No special conditions have been identified concerning how or when the works are to be carried out.

Where necessary, Medway Council will instigate the SSSI assent process by writing to us to confirm the timing of works and how operations are to be undertaken. Natural England will provide further advice as necessary.

## Assessment of coastal access proposals on Thames Estuary and Marshes SSSI<sup>6</sup>

Is this site also part of a European site? Yes

Note that notified features of the SSSI that are also qualifying features of the European site are omitted from this assessment.

There are no reportable features of the relevant SSSI Units where there could be a pathway of impact from the coastal access proposals. Please refer to the Grain to Woolwich England Coast Path Report GWO 1 and the associated Nature Conservation Assessment, published on 5 June 2019.

### Establishment works

Is SSSI assent needed to implement any specific proposals for establishment works? Yes

No special conditions have been identified concerning how or when the works are to be carried out.

Where necessary, Medway Council will instigate the SSSI assent process by writing to us to confirm the timing of works and how operations are to be undertaken. Natural England will provide further advice as necessary.

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<sup>6</sup> This assessment only covers reportable features of the relevant SSSI Units (103) where there could be a pathway of impact from the coastal access proposals.

## Assessment of coastal access proposals on other features about which concerns have been expressed<sup>7</sup>

Risk				Consideration		Conclusion
Attribute affected	Site	Predicted changes in pattern and/or level of use	Possible impact(s)	Existing factors	Relevant features of the access proposals, including any additional mitigation measures	
<b>Ground nesting birds</b>	On the Mid-Tier Scheme site (GS2) at Great Barksore Farm	Medium increase in access to trail.	Ground nesting birds are sensitive to disturbance between April and July.	The permanent grassland (GS2) where the trail is aligned (a narrow fenced strip of land), is unlikely to support ground nesting birds.	No additional mitigation has been proposed.	No impact on these features.
<b>Bats</b>	Raspberry Hill Lane, Barksore	2m of vegetation will be cleared at either side of Raspberry Hill Lane to provide	Reduction of foraging and	The nearest known bat roost <sup>8</sup> is in Lower	No additional mitigation has been proposed because the small gap (2m) in this hedgerow will not lead to	No impact on these features.

<sup>7</sup> The features considered below have not already been covered in the Habitats Regulation Assessment or elsewhere in the Nature Conservation Assessment. Under the Wildlife and Countryside Act 1981 (as amended), all birds' nests and eggs are protected and it is an offence to intentionally damage or destroy the nest of any wild bird. Therefore, any works involving vegetation clearance that may be used as nesting habitat, will be carried out outside of the bird breeding season (April to July inclusive).

<sup>8</sup> Data provided by Kent and Medway Biological Records Centre

Risk				Consideration		Conclusion
Attribute affected	Site	Predicted changes in pattern and/or level of use	Possible impact(s)	Existing factors	Relevant features of the access proposals, including any additional mitigation measures	
		space for the trail to cross the road.	commuting habitat.	Halstow village in a building.	disruption of flight lines, as the adjacent trees will be left in situ.	
<b>Common dormice</b>	Raspberry Hill Lane, Barksore	2m of vegetation will be cleared at either side of Raspberry Hill Lane to provide space for the trail to cross the road	Disruption to dispersal along a potential habitat corridor	The closest records <sup>9</sup> of common dormice are 4km away at Hartlip.	The small gap (2m) in this hedgerow is unlikely to lead to a complete disruption in dispersal (if dormice were present) as the adjacent trees will be left in situ. As existing records are more than 4km away it is unlikely that dormice are present in this area, however a visual inspection will be carried out by a suitably qualified ecologist prior to works.	No impact on these features.
<b>Harvest mice</b>	Great Barksore Farm	Creation of new c1km route on the farm with a corresponding medium increase in access to trail.	Loss of suitable nesting habitat due to trampling of grassland on the trail and removal of 2m of bramble hedge	There are records of four harvest mice nests near the proposed route.	The proposals may make the grassland near the route less suitable for nesting harvest mice. However, the proposals make up a very small area of the total farm area and there is alternative habitat suitable for nesting in the wider farm. Harvest mice	No significant impact on these features if mitigation measures are adhered to.

<sup>9</sup> Data provided by Kent and Medway Biological Records Centre

Risk				Consideration		Conclusion
Attribute affected	Site	Predicted changes in pattern and/or level of use	Possible impact(s)	Existing factors	Relevant features of the access proposals, including any additional mitigation measures	
				At least 14ha of land is covered by permanent grassland at Great Barksore Farm.	populations fluctuate markedly from year to year and place to place.  As mitigation, removal of 2m of the hedge, will be carried out during winter months.	
<b>Breeding Nightingale</b>	Lower Halstow seawall	Medium increase in access to the trail.  Minor scrub clearance adjacent to an 80m long section of path at IGR-4-S019 to make the path 0.5m wider.	Loss of nesting habitat	There are records <sup>10</sup> of up to 4 breeding pairs (in a 1km square) in the vicinity of Lower Halstow	It is unlikely that the minor scrub clearance proposed directly adjacent to a well-used path will be detrimental to breeding nightingales.  All scrub clearance works will be carried out outside of the breeding bird season.	No impact on these features if mitigation measures are adhered to.
<b>Water vole</b>	Horsham Farm	A new small footbridge will be installed across a	Damage or obstruction to water vole burrows; killing or	There are records <sup>11</sup> of water voles in the area.	Planning permission will be required for the installation of the footbridge.  As part of the permission, a Construction Environmental	No impact on these features providing the

<sup>10</sup> Data provided by Kent and Medway Biological Records Centre

<sup>11</sup> Data provided by Kent and Medway Biological Records Centre

Risk				Consideration		Conclusion
Attribute affected	Site	Predicted changes in pattern and/or level of use	Possible impact(s)	Existing factors	Relevant features of the access proposals, including any additional mitigation measures	
		ditch at Horsham Farm.	injuring water voles		<p>Management Plan will be required to ensure pollution control measures have been put in place to safeguard the reedbed habitat.</p> <p>A water vole survey will be carried out by a suitably qualified ecologist (between March and September) to determine whether water voles are present in the vicinity where works are proposed as part of the planning application.</p> <p>If water voles are found to be present, advice will be taken from the ecologist on acceptable avoidance and mitigation measures. Measures may include:</p> <ul style="list-style-type: none"> <li>■ Avoid positioning the footbridge near water vole burrows or apply for a water vole license</li> <li>■ Clearing the vegetation in the vicinity of the bridge to encourage water voles to utilise adjacent</li> </ul>	ecologist's advice and mitigation requirements are adhered to.

Risk				Consideration		Conclusion
Attribute affected	Site	Predicted changes in pattern and/or level of use	Possible impact(s)	Existing factors	Relevant features of the access proposals, including any additional mitigation measures	
					habitat. This will be supervised by a qualified ecologist.	
<b>Great crested newt</b>	Horsham Farm	A new footbridge will be installed across a ditch at Horsham Farm.	Damage or obstruction to great crested newt habitat; killing or injuring great crested newts.	There are records <sup>12</sup> of great crested newts in the area.	<p>Planning permission will be required for the installation of the footbridge.</p> <p>As part of the permission, a Construction Environmental Management Plan will be required to ensure pollution control measures have been put in place to safeguard the reedbed habitat.</p> <p>A great crested newt survey will be carried out by a suitably qualified ecologist (between mid-April and mid-June) to determine whether great crested newts are present in the vicinity of the proposed works, as part of the planning application.</p> <p>If great crested newts are found to be present, advice will be taken from the qualified ecologist on acceptable</p>	No impact on these features providing the ecologist's advice and mitigation requirements are adhered to.

<sup>12</sup> Data provided by Kent and Medway Biological Records Centre

Risk				Consideration		Conclusion
Attribute affected	Site	Predicted changes in pattern and/or level of use	Possible impact(s)	Existing factors	Relevant features of the access proposals, including any additional mitigation measures	
					<p>avoidance and mitigation measures. Measures may include:</p> <ul style="list-style-type: none"> <li>■ Install the footbridge during winter (October and February)</li> <li>■ Under the guidance of an ecologist, prior to installation, carry out a destructive search (which involves the dismantling of structures or excavation of substrates to reveal sheltering newts which can then be removed by hand)</li> <li>■ Ensure that there is a suitable ecologist present during the installation to provide a watching brief</li> </ul>	
<b>Bats</b>	Field near Horsham Farm	Two mature conifer trees (out of a 180m conifer tree line) will be removed to install a kissing gate in the tree/fence line	Damage to roost sites and reduction of foraging and commuting habitat.	There are no records <sup>13</sup> of bat roosts in this 180m tree line, however	<p>The removal of two trees out of this densely planted conifer tree line is unlikely to be detrimental to foraging bats.</p> <p>A bat inspection survey of the tree line will be carried out by a suitably</p>	No impact on these features providing the ecologist's advice and

<sup>13</sup> Data provided by Kent and Medway Biological Records Centre

Risk				Consideration		Conclusion
Attribute affected	Site	Predicted changes in pattern and/or level of use	Possible impact(s)	Existing factors	Relevant features of the access proposals, including any additional mitigation measures	
				<p>there is a pipistrelle maternity roost in a building 300m away.</p> <p>Conifer trees are generally less likely to have splits, cracks or holes for bats to roost in.</p> <p>The conifer trees in this tree line are planted very closely together.</p>	<p>qualified ecologist to determine whether there are signs of bats. Further bat activity surveys may be carried out between May and September if advised by the bat inspection survey.</p> <p>If bat roosts are found to be present, advice will be taken from the ecologist on acceptable avoidance and mitigation measures. Measures may include:</p> <ul style="list-style-type: none"> <li>■ Avoid the removal of trees with confirmed bat roosts through minor adjustment to the route alignment, or apply for a bat license</li> </ul>	mitigation requirements are adhered to.
<b>Grey Partridge (released by</b>	Horsham Marsh and Admiralty Tip	Possible increase in access to coastal margin.	Disturbance to grey partridge.	Grey partridge are being bred in pens at	<p>Provide clear waymarking to ensure that visitors stay on the marked route.</p> <p>Access will be restricted at Horsham Marsh and Admiralty Tip as described</p>	No impact on these features.

Risk				Consideration		Conclusion
Attribute affected	Site	Predicted changes in pattern and/or level of use	Possible impact(s)	Existing factors	Relevant features of the access proposals, including any additional mitigation measures	
<b>captive breeding)</b>				Horsham Marsh and Admiralty Tip and then released.	in the Habitats Regulations Assessment.  No additional mitigation has been proposed.	
<b>Water Vole</b>	Ditch adjacent to A228, Grain Road.	A new footway will be built adjacent to and partially on a ditch.	Killing or injuring water voles; damage or obstruction to water vole burrows.	Water vole surveys carried out in April 2019 found no signs of water voles where the works are proposed. N.B. water voles were present in a pond 180m to the west of the site.	The trees and reed vegetation adjacent to the ditch will be cut back outside the bird nesting season (March – August). Following this, a further water vole survey will be conducted by a suitably qualified ecologist (during March to September) to determine whether water voles are still absent from the ditch where works are proposed. If there are signs of water voles, a protected species license will be applied for.  No additional mitigation has been proposed.	No impact on these features providing the ecologist's advice and mitigation requirements are adhered to.
<b>Common lizard</b>	Ditch adjacent to A228, Grain Road	A new footway will be built adjacent to	Killing or injuring common lizards.	Common lizards are present throughout	Reptile fencing will be installed and reptile trapping or a destructive search (which involves the dismantling of structures or excavation of substrates	No impact on these features providing the

Risk				Consideration		Conclusion
Attribute affected	Site	Predicted changes in pattern and/or level of use	Possible impact(s)	Existing factors	Relevant features of the access proposals, including any additional mitigation measures	
		and partially on a ditch.	Loss of common lizard habitat.	the proposed new footway area.	to reveal sheltering reptiles which can then be removed by hand) will take place in line with guidance from ecologist.  To minimise the loss of habitat the new footway will aim to use footway finishing materials which provide alternative reptile habitat such as seeded topsoil, gravel turf, or crushed stone.	ecologist's advice and mitigation requirements are adhered to.
<b>Harbour seals<sup>14</sup></b>	There are large colonies of seals hauling out on intertidal mudflats throughout the year at Greenborough Marshes and Stoke	The seals in this area are hauling out on intertidal mudflats that are not near the proposed trail.	Disturbance to resting seals	There are no breeding grounds within the Iwade to Grain stretch, where seals would haul out above the high tide.	The foreshore of the Swale Estuary between Ridham Dock and Chetney Marshes (mudflats and saltmarsh) and Medway Estuary is unsuitable for public access and will be excluded by direction.  No additional mitigation has been proposed.	No impact on these features.

<sup>14</sup> Survey data (2013 and 2014) is available from Zoological Society of London: [https://www.zsl.org/sites/default/files/media/2015-07/2015\\_July\\_Greater%20Thames%20Estuary%20Seal%20Survey%20Report.pdf](https://www.zsl.org/sites/default/files/media/2015-07/2015_July_Greater%20Thames%20Estuary%20Seal%20Survey%20Report.pdf)

Risk				Consideration		Conclusion
Attribute affected	Site	Predicted changes in pattern and/or level of use	Possible impact(s)	Existing factors	Relevant features of the access proposals, including any additional mitigation measures	
	Marshes. Smaller intertidal haul out sites are: Burntwick Island, Bishop Ooze, the dock at Ridham, Nor Marsh, Hoo Island, Rushenden Pier near Chetney Marshes.					

## Conclusion

We, Natural England, are satisfied that our proposals to improve access to the English coast between Iwade and Grain are fully compatible with our duty to further the conservation and enhancement of the notified features of The Swale SSSI, Medway Estuary and Marshes SSSI, Tower Hill to Cockham Wood SSSI and South Thames Estuary and Marshes SSSI, consistent with the proper exercise of our functions<sup>15</sup>.

In respect of any duties that may arise under section 125 of the Marine and Coastal Access Act 2009, Natural England has concluded for The Swale MCZ and Medway Estuary MCZ that the access proposal (including any mitigation measures specified) is one that, consistently with the proper exercise of its functions under section 296 of the same Act, is least likely to hinder the achievement of the conservation objectives for the Marine Conservation Zone - and accordingly may proceed.

In respect of important features at Great Barksore Farm, Horsham Marsh and Admiralty Tip, Horsham Farm and at the A228 (Grain Road), we are satisfied that in developing the new access proposals the appropriate balance has been struck between Natural England's conservation and access objectives, duties and purposes.

See also, where relevant, the conclusions of the separate HRA relating to common features.

The conclusions of this assessment have been checked by:

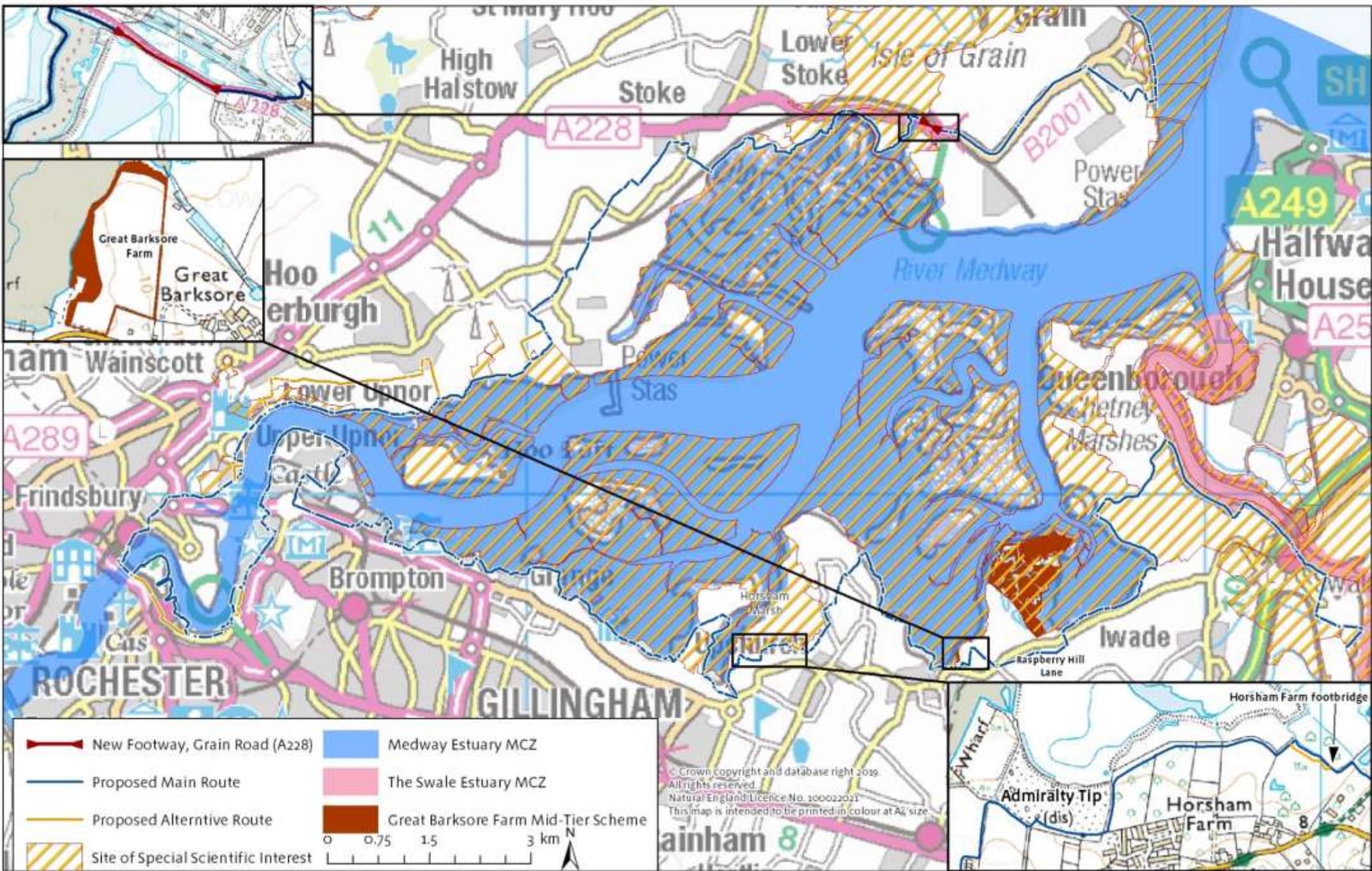
Jenny Bowen	17 December 2019	On behalf of the Coastal Access Programme Team
Kristoffer Hewitt	17 December 2019	Senior Officer with responsibility for protected sites
Francesca Sanchez	17 December 2019	Lead Adviser for England Coast Path stretch

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<sup>15</sup> Natural England's functions includes its balanced general purposes for access, nature conservation and landscape under the NERC Act 2006, any specific statutory duties it may have to deliver specific improvements to public access, and the access-related policies and priorities it periodically agrees with Defra.



# Nature Conservation Assessment Sites



## Annex 1. Index to designated sites and features

Qualifying feature	Medway Estuary & Marshes SPA	Medway Estuary & Marshes Ramsar	Medway Estuary & Marshes SSSI	Medway Estuary MCZ	The Swale SPA	The Swale Ramsar	The Swale SSSI (Units 34, 36 & 111)	The Swale MCZ	Thames Estuary & Marshes SPA	Thames Estuary & Marshes Ramsar	South Thames Estuary & Marshes SSSI (Unit 103)	Tower Hill to Cockham Wood SSSI (Units 3 & 4)
<i>Panurus biarmicus</i> ; bearded tit (breeding)											✓	
A046a <i>Branta bernicla bernicla</i> dark-bellied brent goose (non-breeding)	✓	✓	✓		✓	✓	✓					
A048 <i>Tadorna tadorna</i> common shelduck (non-breeding)	✓	✓	✓			✓	✓				✓	
A054 <i>Anas acuta</i> northern pintail (non-breeding)	✓	✓	✓				✓				✓	
A132 <i>Recurvirostra avosetta</i> ; avocet (Breeding)	✓		✓				✓					
A132 <i>Recurvirostra avosetta</i> ; avocet (non-breeding)	✓		✓						✓		✓	
A137 <i>Charadrius hiaticula</i> ; ringed plover (non-breeding)	✓	✓	✓			✓	✓		✓	✓	✓	
<i>Anas strepera</i> ; gadwall (non-breeding)											✓	

Qualifying feature	Medway Estuary & Marshes SPA	Medway Estuary & Marshes Ramsar	Medway Estuary & Marshes SSSI	Medway Estuary MCZ	The Swale SPA	The Swale Ramsar	The Swale SSSI (Units 34, 36 & 111)	The Swale MCZ	Thames Estuary & Marshes SPA	Thames Estuary & Marshes Ramsar	South Thames Estuary & Marshes SSSI (Unit 103)	Tower Hill to Cockham Wood SSSI (Units 3 & 4)
<i>Anas querquedula</i> ; garganey (breeding)											✓	
A141 <i>Pluvialis squatarola</i> ; grey plover (non-breeding)	✓	✓	✓			✓	✓		✓	✓	✓	
A143 <i>Calidris canutus</i> ; red knot (non-breeding)	✓	✓					✓		✓	✓	✓	
A149 <i>Calidris alpina alpina</i> ; dunlin (non-breeding)	✓	✓	✓		✓	✓	✓		✓	✓	✓	
A162 <i>Tringa totanus</i> ; common redshank (non-breeding)	✓	✓	✓			✓	✓		✓	✓	✓	
A195 <i>Sterna albifrons</i> ; little tern (breeding)	✓		✓									
A156 <i>Limosa limosa islandica</i> black-tailed godwit (non-breeding)		✓	✓				✓		✓	✓	✓	
A082 <i>Circus cyaneus</i> ; hen harrier (non-breeding)									✓		✓	

Qualifying feature	Medway Estuary & Marshes SPA	Medway Estuary & Marshes Ramsar	Medway Estuary & Marshes SSSI	Medway Estuary MCZ	The Swale SPA	The Swale Ramsar	The Swale SSSI (Units 34, 36 & 111)	The Swale MCZ	Thames Estuary & Marshes SPA	Thames Estuary & Marshes Ramsar	South Thames Estuary & Marshes SSSI (Unit 103)	Tower Hill to Cockham Wood SSSI (Units 3 & 4)
A160 <i>Numenius arquata</i> ; curlew (non-breeding)		✓	✓			✓	✓				✓	
<i>Podiceps cristatus</i> ; great-crested grebe (non-breeding)		✓	✓									
<i>Tringa nebularia</i> ; greenshank (non-breeding)		✓									✓	
A130 <i>Haematopus ostralegus</i> ; oystercatcher (non-breeding)		✓				✓	✓					
<i>Anas clypeata</i> ; shoveler (breeding)											✓	
A056 <i>Anas clypeata</i> ; shoveler (non-breeding)		✓	✓				✓				✓	
<i>Tringa erythropus</i> ; spotted redshank (non-breeding)		✓					✓					
A704 <i>Anas crecca</i> ; teal (non-breeding)		✓	✓			✓	✓				✓	

Qualifying feature	Medway Estuary & Marshes SPA	Medway Estuary & Marshes Ramsar	Medway Estuary & Marshes SSSI	Medway Estuary MCZ	The Swale SPA	The Swale Ramsar	The Swale SSSI (Units 34, 36 & 111)	The Swale MCZ	Thames Estuary & Marshes SPA	Thames Estuary & Marshes Ramsar	South Thames Estuary & Marshes SSSI (Unit 103)	Tower Hill to Cockham Wood SSSI (Units 3 & 4)
A169 <i>Arenaria interpres</i> ; ruddy turnstone (non-breeding)		✓	✓									
<i>Anser albifrons albifrons</i> ; white-fronted goose (non-breeding)			✓				✓				✓	
A050 <i>Anas penelope</i> ; wigeon (non-breeding)		✓	✓			✓	✓					
Waterbird assemblage (non-breeding) <sup>16</sup>	✓	✓			✓	✓			✓	✓		
Breeding bird assemblage	✓				✓							
Wetland plant assemblage		✓				✓				✓		
Wetland invertebrate assemblage		✓				✓				✓		

<sup>16</sup> A waterbird assemblage is a qualifying feature of both the SPA and Ramsar sites. When classifying a waterbird assemblage as an SPA qualifying feature, the Ramsar Conventions Strategic Framework definition of 'waterbird' is used and as such we consider the two qualifying features synonymous. Current abundance and composition of the assemblage feature is taken into account in our assessment.

Qualifying feature	Medway Estuary & Marshes SPA	Medway Estuary & Marshes Ramsar	Medway Estuary & Marshes SSSI	Medway Estuary MCZ	The Swale SPA	The Swale Ramsar	The Swale SSSI (Units 34, 36 & 111)	The Swale MCZ	Thames Estuary & Marshes SPA	Thames Estuary & Marshes Ramsar	South Thames Estuary & Marshes SSSI (Unit 103)	Tower Hill to Cockham Wood SSSI (Units 3 & 4)
Invertebrate assemblage							✓				✓	✓
Aggregations of non-breeding birds – variety of passage and wintering species							✓					
>20,000 Non-breeding water birds			✓									
Assemblages of breeding birds – lowland damp grasslands			✓									
Assemblages of breeding birds - sand-dunes and saltmarshes											✓	
Lowland ditch systems			✓				✓					
Coastal vegetated shingle (SD1-3)											✓	
SM1 – Zostera communities			✓									

Qualifying feature	Medway Estuary & Marshes SPA	Medway Estuary & Marshes Ramsar	Medway Estuary & Marshes SSSI	Medway Estuary MCZ	The Swale SPA	The Swale Ramsar	The Swale SSSI (Units 34, 36 & 111)	The Swale MCZ	Thames Estuary & Marshes SPA	Thames Estuary & Marshes Ramsar	South Thames Estuary & Marshes SSSI (Unit 103)	Tower Hill to Cockham Wood SSSI (Units 3 & 4)
SM10 – Transitional low marsh vegetation with <i>Puccinellia maritima</i> , annual <i>Salicornia</i> species and <i>Suaeda maritima</i>			✓									
SM12 - Rayed aster <i>tripolium</i> on saltmarsh			✓									
SM13a - <i>Puccinellia maritima</i> saltmarsh, <i>Puccinellia maritima</i> dominant sub-community			✓									
SM14 - <i>Atriplex portulacoides</i> saltmarsh			✓									
SM4-28 – Saltmarsh							✓					
SM26 - <i>Inula crithmoides</i> stands			✓									
SM6 - <i>Spartina anglica</i> saltmarsh			✓									

Qualifying feature	Medway Estuary & Marshes SPA	Medway Estuary & Marshes Ramsar	Medway Estuary & Marshes SSSI	Medway Estuary MCZ	The Swale SPA	The Swale Ramsar	The Swale SSSI (Units 34, 36 & 111)	The Swale MCZ	Thames Estuary & Marshes SPA	Thames Estuary & Marshes Ramsar	South Thames Estuary & Marshes SSSI (Unit 103)	Tower Hill to Cockham Wood SSSI (Units 3 & 4)
SM7 - <i>Sarcocornia perennis</i>			✓									
SM8 - <i>Annual Salicornia</i> saltmarsh			✓									
SM9 - <i>Suaeda maritima</i> saltmarsh			✓									
Vascular plant assemblage			✓				✓					
Estuarine rocky habitats				✓				✓				
Intertidal coarse sediment								✓				
Intertidal mixed sediments				✓				✓				
Intertidal sand and muddy sand				✓				✓				
Low energy intertidal rock				✓				✓				

Qualifying feature	Medway Estuary & Marshes SPA	Medway Estuary & Marshes Ramsar	Medway Estuary & Marshes SSSI	Medway Estuary MCZ	The Swale SPA	The Swale Ramsar	The Swale SSSI (Units 34, 36 & 111)	The Swale MCZ	Thames Estuary & Marshes SPA	Thames Estuary & Marshes Ramsar	South Thames Estuary & Marshes SSSI (Unit 103)	Tower Hill to Cockham Wood SSSI (Units 3 & 4)
Peat and clay exposures				✓								
<i>Osmerus eperlanus</i> ; Smelt				✓								
Subtidal coarse sediment				✓				✓				
Subtidal mud				✓				✓				
Subtidal sand				✓				✓				
Subtidal mixed sediments								✓				
<i>Alkmaria romijni</i> ; Tentacled lagoon-worm				✓								
W8 - <i>Fraxinus excelsior</i> - <i>Acer campestre</i> - <i>Mercurialis perennis</i> woodland; mixed deciduous woodland												✓

Front cover photo: Lower Upnor, Medway  
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**Enquiries about the proposals should be addressed to:**

Coastal Access Delivery Team – South East

**Natural England**

International House

Floor 9

Dover Place

Ashford

Kent

TN23 1HU

Telephone: 0208 026 8045

Email: [southeastcoastalaccess@naturalengland.org.uk](mailto:southeastcoastalaccess@naturalengland.org.uk)

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