

25 August 2022

Our Ref: Dover Connection Report Aug 2022

The logo for Natural England, featuring the words "NATURAL ENGLAND" in white, uppercase letters on a green rectangular background.

Mail Hub,
Worcester County Hall,
Spetchley Road,
Worcester,
WR5 2NP

By email only: Ashley.Taylor@DOVER.GOV.UK

Dear Mrs Taylor

Re. Impact on Stodmarsh Lakes from development served by Dambridge WwTW – updated hydrological study.

Thank you for your letter of 11th August and accompanying River Stour Connectivity report in which your authority presented evidence to support your assessment that there is no 'likely significant effect' on the Stodmarsh SAC/SPA/Ramsar as a result of nutrient discharge from future development in your local authority area.

Having reviewed the latest connectivity report produced by APEM, Natural England concur with the conclusion that there is extremely limited connectivity between the downstream Waste-water Treatment Works (WwTW) – Dambridge – and Stodmarsh SAC/SPA/Ramsar. We also agree that the use of the sluice gate (at the entrance to Stodmarsh NNR Lake), and Hersden tidal lake are appropriate locations for the APEM work to have considered when determining the extent of any connectivity.

The figures provided by Dover District Council, which are informed by the APEM Report illustrate that the worst case average additional nutrient contribution created by one person equivalent (PE) upstream of Stodmarsh (using Ashford WwTW as a best case) is equivalent to approximately 7.8 million PE (At 2022 permit level for Phosphorus) and 11.3 million PE (At 2040 permit level assuming TAL to 10mg/l is implemented for Nitrogen) connecting to Dambridge WwTW. Given that the planned growth up to 2040 in the area served by Dambridge WwTW is approximately 6200 population, Natural England agree that the figures provided demonstrate that any additional nutrients reaching Stodmarsh SAC/SPA/Ramsar as a result of new connections to Dambridge WwTW would be insignificant alone and in combination.

It should be noted that Natural England have reached the above conclusion based on the nutrient modelling results and calculations supplied by Dover District Council. The Council should be satisfied that these figures are suitably robust prior to using them as the basis for any policy or planning decision making.

Thank you for the detailed consideration your authority has given this matter. We will be revising our advice on the Stour Catchment accordingly in due course.

Yours

Cath Jackson
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