



Access and Sensitive Features Appraisal

Coastal Access Programme

This document records the conclusions of Natural England’s appraisal of any potential for environmental impacts from our proposals to establish the England Coast Path in the light of the requirements of the legislation affecting Natura 2000 sites, SSSIs, NNRs, protected species and Marine Conservation Zones.

Minehead to Combe Martin (MCM)

5th June 2017

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This appraisal should be read alongside Natural England’s related Coastal Access Report in which the access proposal is fully described and explained

www.gov.uk/englandcoastpath

1. Our approach

Natural England's approach to protection of sensitive features under the Coastal Access Programme is set out in section 4.9 Coastal Access: Natural England's Approved Scheme 2013 (5). We call our internal processes to support this approach 'Access and Sensitive Features Appraisal' or ASFA.

Our final published proposal for a stretch of England Coast Path is preceded by detailed local consideration of options for route alignment, the extent of the coastal margin and any requirement for restrictions, exclusions or seasonal alternative routes. The proposals are thoroughly considered before being finalised and initial ideas may be modified or rejected during the iterative design process, drawing on the range of relevant expertise available within Natural England.

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 and occupiers. The approach includes looking at 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 assessment 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.

2. Scope

In this part of the document we define the geographic extent for the appraisal and the features that are included. Note that this appraisal is concerned with ecological, geological and geomorphological features; any other possible sensitivities, including landscape and historic features, are discussed in our coastal access report.

2.1 Geographic extent

This appraisal covers an area of Devon and Somerset from Minehead to Combe Martin. The Report to the Secretary of State that this document accompanies is divided into the following 6 chapters. Section 4 of this document follows this chapter division.

1. Minehead to Hurlstone Combe
2. Hurlstone Combe to Worthy
3. Worthy to The Foreland
4. The Foreland to Lynton
5. Lynton to Woody Bay
6. Woody Bay to Combe Martin

2.2 Designated sites

The following designated sites are present (See Secretary of State Report Map C)

Exmoor Heaths Special Area of Conservation (SAC)

Exmoor and Quantock Oakwoods SAC

Exmoor Coastal Heaths Site of Special Scientific Interest (SSSI)

Porlock Ridge and Saltmarsh SSSI

Glenthorne SSSI

West Exmoor Coast and Woods SSSI

Hele, Samson's and Combe Martin Bays SSSI

Bideford to Foreland Point Marine Conservation Zone (MCZ)

2.3 Context

Not applicable

2.4 Designated features

Features – of the designated sites listed in 2.2. Note: * indicates Priority feature on Annexes I and II of the EC Habitats Directive	Exmoor and Quantock Oakwoods SAC	Exmoor Heaths SAC	Bideford to Foreland Point MCZ	Exmoor Coastal Heaths SSSI	Porlock Ridge and Saltmarsh SSSI	Glenthorne SSSI	West Exmoor Coast and Woods SSSI	Hele, Samson's and Combe Martin Bays SSSI
Geological features								
EC - Marine Devonian							√	
EC - Variscan Structures								√
IA - Coastal Geomorphology					√			
EC - Non-Marine Devonian					√			
IS - Quaternary Of South-West England							√	
Heathland features								
H4030. European dry heaths		√						
H4010. Northern Atlantic wet heaths with <i>Erica tetralix</i> ; Wet heathland with cross-leaved heath		√						
H10 - <i>Calluna vulgaris</i> - <i>Erica cinerea</i> heath				√			√	
H12 - <i>Calluna vulgaris</i> - <i>Vaccinium myrtillus</i> heath				√			√	
H4 - <i>Ulex gallii</i> - <i>Agrostis curtisii</i> heath				√			√	
H8 - <i>Calluna vulgaris</i> - <i>Ulex gallii</i> heath				√			√	
Maritime cliff, slope and grassland Features								
H1230. Vegetated sea cliffs of the Atlantic and Baltic coasts		√						
Maritime cliff and slope				√				
MC12 - <i>Festuca rubra</i> - <i>Hyacinthoides non-scripta</i> maritime bluebell community				√			√	
MC8 - <i>Festuca rubra</i> - <i>Armeria maritima</i> maritime grassland				√	√		√	
U1 b,c,d,f - <i>Festuca ovina</i> - <i>Agrostis capillaris</i> - <i>Rumex acetosella</i> Grassland				√	√			
Miscellaneous Plant Features								
Population of RDB plant - <i>Sorbus subcuneata</i> , Somerset Whitebeam				√				
Population of RDB plant - <i>Sorbus S. vexans</i> , Bloody Whitebeam				√				
U4/20 - U4/20-related species rich bracken				√				
Vascular Plant Assemblage				√				

Features – of the designated sites listed in 2.2	Exmoor and Quantock Oakwoods SAC	Exmoor Heaths SAC	Bideford to Foreland Point MCZ	Exmoor Coastal Heaths SSSI	Porlock Ridge and Saltmarsh SSSI	Glenthorne SSSI	West Exmoor Coast and Woods SSSI	Hele, Samson's and Combe Martin Bays SSSI
Combinations of Species – Lichens							√	
Woodland Features								
H91E0. Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i>); Alder woodland on floodplains*	√							
H91A0. Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles; Western acidic oak woodland	√							
W10 - <i>Quercus robur</i> - <i>Pteridium aquilinum</i> - <i>Rubus fruticosus</i> woodland							√	
W11 - <i>Quercus petraea</i> - <i>Betula pubescens</i> - <i>Oxalis acetosella</i> woodland				√			√	
W16 - <i>Quercus spp.</i> - <i>Betula spp.</i> - <i>Deschampsia flexuosa</i> woodland				√			√	
W17 - <i>Quercus petraea</i> - <i>Betula pubescens</i> - <i>Dicranum majus</i> woodland				√	√			
W23 - <i>Ulex europaeus</i> - <i>Rubus fruticosus</i> scrub				√				
W7 - <i>Alnus glutinosa</i> - <i>Fraxinus excelsior</i> - <i>Lysimachia nemorum</i> woodland				√	√		√	
Wetland features								
H7130. Blanket bogs*		√						
M10 - <i>Carex dioica</i> - <i>Pinguicula vulgaris</i> mire				√				
H7230. Alkaline fens; Calcium-rich springwater-fed fens		√						
M23 - <i>Juncus effusus</i> / <i>acutiflorus</i> - <i>Galium palustre</i> rush pasture				√				
M25 - <i>Molinia caerulea</i> - <i>Potentilla erecta</i> mire				√				
Coastal Shingle and Saltmarsh Features								
SD1 - <i>Rumex crispus</i> - <i>Glaucium flavum</i> shingle community					√			
SM10 - Transitional low marsh vegetation with <i>Puccinellia maritima</i> , annual <i>Salicornia</i> species and <i>Suaeda maritima</i> .					√			
SM11 - <i>Aster tripolium</i> var. <i>discoides</i> – saltmarsh					√			
SM14 - <i>Atriplex portulacoide</i> saltmarsh					√			

Features – of the designated sites listed in 2.2	Exmoor and Quantock Oakwoods SAC	Exmoor Heaths SAC	Bideford to Foreland Point MCZ	Exmoor Coastal Heaths SSSI	Porlock Ridge and Saltmarsh SSSI	Glenthorne SSSI	West Exmoor Coast and Woods SSSI	Hele, Samson's and Combe Martin Bays SSSI
SM8 - Annual <i>Salicornia</i> Saltmarsh					✓			
SM9 - <i>Suaeda maritima</i> Saltmarsh					✓			
SM10 - Transitional low marsh vegetation with <i>Puccinellia maritima</i> , annual <i>salicornia</i> species and <i>Suaeda maritima</i> .					✓			
Insect features: Butterfly								
Population of Nationally rare butterfly species - <i>Argynnis adippe</i> , High Brown Fritillary				✓				
Mammals								
S1308. <i>Barbastella barbastellus</i> ; Barbastelle bat	✓							
S1323. <i>Myotis bechsteinii</i> ; Bechstein's bat	✓							
S1355. <i>Lutra lutra</i> ; Otter	✓							
Bird Features								
Assemblages of breeding birds – Woodland							✓	
Isolated bird colony - Guillemot, <i>Uria aalge</i> and Razorbill, <i>Alca torda</i>							✓	
Broadscale Marine Habitats								
Low energy intertidal rock (A1.3)			✓					
Moderate energy intertidal rock (A1.2)			✓					
High energy intertidal rock (A1.1)			✓					
Intertidal coarse sediment (A2.1)			✓					
Intertidal mixed sediments (A2.4)			✓					
Intertidal sand and muddy sand (A2.2)			✓					
Low energy infralittoral rock (A3.3)			✓					
Moderate energy infralittoral rock (A3.2)			✓					
High energy infralittoral rock (A3.1)			✓					
Moderate energy circalittoral rock (A4.2)			✓					

Features – of the designated sites listed in 2.2	Exmoor and Quantock Oakwoods	Exmoor Heaths SAC	Bideford to Foreland Point MCZ	Exmoor Coastal Heaths SSSI	Porlock Ridge and Saltmarsh SSSI	Glenthorne SSSI	West Exmoor Coast and Woods SSSI	Hele, Samson's and Combe Martin Bays SSSI
High energy circalittoral rock (A4.1)			√					
Subtidal coarse sediment (A5.1)			√					
Subtidal mixed sediments (A5.4)			√					
Subtidal sand (A5.2)			√					
Marine Habitats of conservation importance								
Fragile sponge & anthozoan communities on subtidal rocky habitats			√					
Honeycomb worm (<i>Sabellaria alveolata</i>) reefs			√					
Intertidal underboulder communities (HOCI 10)			√					
Littoral chalk communities			√					
Marine Species								
Pink sea-fan (<i>Eunicella verrucosa</i>)			√					
Spiny lobster (<i>Palinurus elephas</i>)			√					

2.5 Other features about which concerns have been expressed

Feature	Conservation interest
Exmoor Coastal Woods Local Wildlife Site (LWS)	The 6km unbroken stretch of coastal woodland from Porlock Weir to Glenthorne is not designated as an SSSI but is an important habitat and contains H91A0. Old sessile oak woods with Ilex and Blechnum in the British Isles (Annex 1 Habitat), lichens and some veteran trees probably derived from wood pasture conditions.
Porlock Marsh birds	<p>Porlock Marsh is part of Porlock Ridge and Saltmarsh SSSI.</p> <p>The Marsh has year round bird interest and is considered locally important for conservation (but not a designated feature of the SSSI). The main highlights are: wintering duck (Teal & Wigeon) and waders (Curlew, Lapwing & Redshank); Dunlin, Ringed Plover & Whimbrel on passage later in April; Shelduck, Redshank and Little Egret numbers fairly constant over whole period; Skylark territories in eastern half of site.</p>

<p>Cliff nesting seabirds: Herring Gull <i>Larus argentatus</i> and Fulmar <i>Fulmarus glacialis</i>, with occasional Great and Lesser Black-Backed Gulls <i>Larus marinus</i> and <i>Larus fuscus</i>, Cormorant <i>Phalacrocorax carbo</i> and Shag <i>Phalacrocorax aristotelis</i>.</p>	<p>Some cliffs are not designated as an SSSI for seabirds, but they are a locally important feature, supporting much smaller numbers of seabirds than other designated cliffs.</p>
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3. Baseline conditions and environmental sensitivities

In this part of the document we identify any of the features mentioned above that are potentially sensitive to changes in access, and rule out from further consideration those that are not.

3.1 Geological Features

Composition of feature group
<p>For the purposes of this appraisal the following geological features have been grouped together:</p> <ul style="list-style-type: none">• EC - Marine Devonian• EC - Variscan Structures• IS - Quaternary Of South-West England• EC - Non-Marine Devonian
Current conservation status and use of the site by features
<p>The features included in this group are notified geological features for the following SSSIs (for details see table 2.4):</p> <ul style="list-style-type: none">• Hele, Samson's and Combe Martin Bays SSSI• West Exmoor Coast and Woods SSSI• Glenthorne SSSI <p>Most of these features are coastal, or just inland (a disused quarry), rock exposures. The Quaternary features are either deposits or the essential landforms of the Valley of Rocks, Lee Abbey Gap or associated deposits. The features are all in Favourable condition, except for one very small disused quarry away from the coast at Lee Bay.</p>
Sensitivities to changes in access
<p>None identified as they are rock exposures or deposits not susceptible to existing or increased access. This feature group is therefore not considered sensitive to the proposed changes in access and is not further considered in this appraisal.</p>

3.2 Maritime Cliff and Slope vegetation: Open Habitats

Composition of feature group
<p>For the purposes of this appraisal the following features have been grouped together:</p> <ul style="list-style-type: none">• European dry heaths• Northern Atlantic wet heaths with <i>Erica tetralix</i>• Vegetated sea cliffs of the Atlantic and Baltic coasts• Maritime cliff and slope and associated scrub communities including U1 and U4 grassland, U4/20 bracken and W23 scrub• MC12 & MC8 grassland• H4, H6 H10, H12 heaths• M10, M23 & M25 mires• Elements of the Vascular Plant Assemblage including Rock stonecrop <i>Sedum forsteranum</i>
Current conservation status and use of the site by features
<p>The features included in this group are represented at the following sites (for details see table 2.4):</p> <ul style="list-style-type: none">• Exmoor Heaths SAC• Exmoor Coastal Heaths SSSI• West Exmoor Coast and Woods SSSI <p>These site features are distributed throughout the SAC/SSSI areas, to the seaward and landward side of the South West Coast Path.</p> <p>Exmoor Heaths SAC and Exmoor Coastal Heaths SSSI</p> <p>The condition of these coastal features has been assessed as a mixture of mainly Unfavourable Recovering and a few Favourable units, due mainly to the presence of invasive rhododendron but also a complex of factors including bracken cover, lack of bryophytes and low species diversity in places. Much of the land is recovering due to positive management by landowners including the National Trust and Exmoor National Park Authority. Access has not been identified as a problem to date.</p> <p>Exmoor Heaths SAC and West Exmoor Coast and Woods SSSI</p> <p>These coastal features are a mixture of Favourable and Unfavourable Recovering condition due mainly to the presence of invasive rhododendron, and in one unit also bracken and heath species diversity. Much of the land is recovering due to positive management by landowners including the National Trust. Access has not been identified as a problem to date.</p>
Sensitivities to changes in access
<p>The nature of potential sensitivities are possible localised impacts where we proposed to change the access arrangements or plan to undertake improvement works to the path. The installation of new access infrastructure or its stabilisation, or increased disturbance such as trampling, could:</p> <p>(a) impact natural cliff or slope dynamics (coastal geomorphological processes), preventing them from functioning. This has the potential to change soil conditions, cliff dynamics and affect the nature of the designated vegetation communities;</p> <p>(b) alter the hydrology of the SAC/SSSI. This has the potential to change soil conditions, cliff dynamics and</p>

affect the nature of the designated vegetation communities.

(c) damage vulnerable plant communities by habitat disturbance or destruction. There are possible localised impacts from installation of infrastructure works or trampling, particularly where the path traverses unstable steep slopes, such as at Hurlstone Point. See s4.1. Elsewhere the features are not considered to be vulnerable to the proposed changes and are not further considered in this appraisal.

3.3 Maritime Cliff and Slope vegetation: Woodland Habitats

Composition of feature group

For the purposes of this appraisal the following features have been grouped together:

- H91E0. Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior*
- H91A0. Old sessile oak woods with *Ilex* and *Blechnum*
- W10, W11, W16, W17, W23, W7 Elements of the Vascular Plant Assemblage including the endemic or rare *Sorbus* (Somerset Whitebeam *Sorbus subcuneata* & Bloody Whitebeam *S. vexans* as well as other similar *Sorbus* species).

Current conservation status and use of the site by features

The features included in this group are represented at the following sites (for details see table 2.4):

- Exmoor Heaths SAC
- Exmoor and Quantock Oakwoods SAC
- Exmoor Coastal Heaths SSSI
- West Exmoor Coast and Woods SSSI
- Exmoor Coastal Woods Local Wildlife Site

These site features are distributed throughout the SAC/SSSI areas, both sides of the South West Coast Path.

Exmoor Heaths SAC, Exmoor and Quantock Oakwoods SAC, West Exmoor Coast and Woods SSSI and Exmoor Coastal Heaths SSSI

These woodland features are a mixture of Favourable and Unfavourable Recovering condition due mainly to the presence of invasive rhododendron, the composition being locally affected by beech or sycamore and similar factors affecting the associated lichen feature (see below). Much of the land is recovering due to positive management by landowners including the National Trust.

Exmoor Coastal Woods Local Wildlife Site (LWS)

The condition of this LWS is assessed by Exmoor National Park Authority, who consider it to be in unfavourable recovering condition due to works on invasive species control, and coppicing and thinning to benefit *Sorbus* species, in part funded by woodland grant schemes.

Sensitivities to changes in access

At all of these sites woodland and scrub habitat seaward of the coast path is partly inaccessible as it is associated with the cliff slopes and ravines or impenetrable due to the density of the woodland and the terrain. Other woodland is accessible but there is no evidence to suggest this feature will be sensitive to the types of change in access proposed, and the feature group is not further considered in this appraisal.

3.4 Blanket Bog/ Fen

Composition of feature group
For the purposes of this appraisal the following features have been grouped together: <ul style="list-style-type: none">• H7130. Blanket bogs• H7230. Alkaline fens; Calcium-rich springwater-fed fens
Current conservation status and use of the site by features
The Fen feature included in this group is represented at the following site (for details see table 2.4): <ul style="list-style-type: none">• Exmoor Coastal Heaths SSSI The site features are represented at the Exmoor Heaths SAC but are found inland of the coastal margin in an enclosed field (Alkaline Fen) or well away from the coast on plateau moorland of North Exmoor SSSI (Blanket bog).
Sensitivities to changes in access
These features do not occur in areas that could be affected by our proposals so they are not further considered in this appraisal.

3.5 Shingle and saltmarsh vegetation

Composition of feature group
For the purposes of this appraisal the following features have been grouped together: <ul style="list-style-type: none">• MC8 maritime grassland• SD1 shingle & U1 b,c,d,f grassland• SM8, SM9, SM10, SM11, SM14 saltmarsh
Current conservation status and use of the site by features
The features included in this group are represented at the following sites (for details see table 2.4): <ul style="list-style-type: none">• Porlock Ridge and Saltmarsh SSSI Along this stretch of coast, shingle vegetation only occurs along Porlock Bay. These vegetation types are found scattered here in a mosaic almost entirely seaward of the current South West Coast Path line, which runs along the landward side of the Marsh, except between Porlock Weir and Worthy where the path runs along the top of the shingle beach. Saltmarsh vegetation is found close to the England Coast Path from Bossington Porlock Weir, eastward of which a small area of marsh is present landward of the path. The features are mostly in Favourable condition as a result of natural processes operating freely in the main body of the marsh and shingle, except part of the shingle to the west in front of the cottages where locally invasive species occur on the shingle.

Sensitivities to changes in access
<p>Shingle vegetation types may be sensitive to harvesting, trampling and abrasion. However; the margin is already well used, and as little or no damage is apparent in this mobile habitat, they are not considered to be vulnerable to the proposed changes, and are not further considered in this appraisal.</p> <p>Saltmarsh vegetation types may be sensitive to trampling and abrasion and at Porlock Marsh there is a potential for interaction with our proposals, see s4.2.</p>

3.6 Lichens

Composition of feature group
<p>For the purposes of this appraisal the following features have been grouped together:</p> <ul style="list-style-type: none"> • Combinations of Species – Lichens
Current conservation status and use of the site by features
<p>The features included in this group are represented at the following sites (for details see table 2.4):</p> <ul style="list-style-type: none"> • West Exmoor Coast and Woods SSSI <p>At this site, the lichen community associated with woodland habitat is present at Woody Bay and Croscombe Wood and the community associated with rocks at Valley of Rocks. Porlock Ridge and Saltmarsh SSSI also has some lichen interest on the relatively stable pebbles at the Hurlstone Point end but this is not a notified feature of the SSSI.</p>
Sensitivities to changes in access
<p>The saxicolous communities lichen feature of this SSSI has a potential interaction with access through increased visitor access (and abrasion) to rocks above the car park at Valley of Rocks. See 4.5.</p> <p>The interaction with epiphytic lichen communities is only likely if indirectly lichen host trees were at greater risk of felling for safety concerns. Because we propose to adopt the existing South West Coast Path in all locations where the protected lichens occur; there is no change as a result of our proposals and existing arrangements continue.</p>

3.7 Butterfly

Composition of feature group
For the purposes of this appraisal the following features have been grouped together: <ul style="list-style-type: none">• Population of Nationally rare butterfly species - <i>Argynnis adippe</i>, High Brown Fritillary
Current conservation status and use of the site by features
The features included in this group are represented at the following sites (for details see table 2.4): <ul style="list-style-type: none">• West Exmoor Coast and Woods SSSI The condition of these violet-rich bracken slope features has been assessed as either Favourable or Unfavourable recovering, due mainly to low violet density in places. Much of the land is recovering due to positive management by landowners including the National Trust.
Sensitivities to changes in access
Breeding colonies are located in bracken covered slopes, some of which are close to the established South West Coast Path. There is no evidence that the butterflies are sensitive to the presence of the trail and access management arrangements in this area will not be changed by our proposals. Therefore this group of features is not further considered in this appraisal.

3.8 Mammals

Composition of feature group
For the purposes of this appraisal the following features have been grouped together: <ul style="list-style-type: none">• S1308. <i>Barbastella barbastellus</i>; Barbastelle bat• S1323. <i>Myotis bechsteinii</i>; Bechstein's bat• S1355. <i>Lutra lutra</i>; Otter
Current conservation status and use of the site by features
The features included in this group are represented at the following sites (for details see table 2.4): <ul style="list-style-type: none">• Exmoor and Quantock Oakwoods SAC. In the case of the bats, the Bechstein's bat is probably not present within the SAC. The known Barbastelle bat breeding roosts are in mature woodland well inland of the coastal margin in Horner Wood (North Exmoor SSSI) but have been tracked feeding on the eastern end of the saltmarsh (within the Porlock Ridge and Saltmarsh SSSI). Otter is found on the rivers and streams within the SAC and may use Porlock Marsh (within the Porlock Ridge and Saltmarsh SSSI) as a commuter zone, or in associated scrub as a resting area, although records are infrequent.

Sensitivities to changes in access
<p>There is little or no likelihood of any effects of access on the nocturnal foraging of bats or on the mainly nocturnal or sometimes crepuscular activity of otters because the trail avoids breeding sites and the majority use of the trail is in daylight hours. Occasional, low level disturbance has minimal impact on mobile species foraging over a wide area of suitable habitat.</p> <p>Therefore the features are not considered to be vulnerable to the proposed changes and are not further considered in this appraisal.</p>

3.9 Cliff Nesting Seabirds

Composition of feature group - where applicable
<p>For the purposes of this appraisal the following features have been grouped together:</p> <ul style="list-style-type: none"> • Isolated bird colony - Guillemot, <i>Uria aalge</i> • Isolated bird colony - Razorbill, <i>Alca torda</i> • Black-legged Kittiwake <i>Rissa tridactyla</i> also occurs and is locally significant. • Other seabirds breeding on cliffs
Current conservation status and use of the site by features
<p>The features included in this group are represented at the following sites (for details see table 2.4):</p> <ul style="list-style-type: none"> • West Exmoor Coast & Woods SSSI <p>The section Lynton to North Cleave (Elwill Bay) has the largest seabird colony on the North Devon coast (from the Seabird Monitoring Programme 2016 survey(6)) with over 720 Razorbill, 2700 Guillemots and 140 Kittiwakes, together with more than 210 Fulmars. The main densities of auks are at Highveer Point, The Cow and Calf, Wringapeak, Woody Bay and Valley of Rocks. The birds breed on the cliffs but feed in the sea, both close by and at some distance from the cliffs. Numbers of auks (Razorbill, Guillemot) and Kittiwake are better than both the 2005 count (1), and 1992 count (6), and can be considered in Favourable condition.</p>
Sensitivities to changes in access
<p>Activity such as climbing in the vicinity of nesting auks and Kittiwake will cause disturbance. Auks and Kittiwake leave cliffs and nest sites if disturbed which can lead to disruption during the period of site questing potentially dislocating breeding seabirds to other areas discouraging breeding attempts, nest desertion, egg and chick cooling resulting in chick losses. Therefore the feature could be sensitive to changes in access if this led to an expansion of cliff climbing activity to new parts of the coast, where the birds congregate to nest. See sections 4.4, 4.5 and 4.6.</p>

3.10 Birds of Porlock Marsh

Composition of feature group - where applicable
For the purposes of this appraisal the following features have been grouped together: <ul style="list-style-type: none"> • Porlock Marsh Birds (not designated SSSI feature)
Current conservation status and use of the site by features
The features included in this group occur within the following site (for details see table 2.4): <ul style="list-style-type: none"> • Porlock Ridge and Saltmarsh SSSI <p>Birds utilise the areas of sediment along the shore and shallow water, pools, saltmarsh, inundation grassland, vegetated shingle, as well as any adjacent transitional marsh swamp habitat and as supporting habitat, scrub and trees. A recent 2017 survey by Somerset Ecology Services (7), has shown the site supports:</p> <p>(a) overwintering birds including large flocks of Linnet and Goldfinch feeding on saltmarshes in early winter, Jack Snipe recorded in January on edge of pond in western half of site and duck (Teal & Wigeon) and waders (Curlew, Lapwing & Redshank);</p> <p>(b) passage birds including an influx of spring migrants in early April (including numerous Wheatear & Chiffchaff), Dunlin, Ringed Plover & Whimbrel on passage later in April;</p> <p>(c) breeding birds including up to 10 male Skylark territories in the eastern half of site and the all year presence of Shelduck, Redshank and Little Egret numbers fairly constant over whole period.</p>
Sensitivities to changes in access
The consultation over the Porlock Marsh Vision in 2014 & 2015 and subsequent 'A Vision for Porlock Marsh' document (4) identified that increased access to the open coast may be contributing to current bird declines (through disturbance). See s4.2.

3.11 Species of Conservation Importance at Bideford to Foreland Point MCZ

Composition of feature group - where applicable
For the purposes of this appraisal the following marine species of conservation importance have been grouped together within Bideford to Foreland Point MCZ: <ul style="list-style-type: none"> • Pink sea-fan <i>Eunicella verrucosa</i> • Spiny lobster <i>Palinurus elephas</i>.
Current conservation status and use of the site by features
The features included in this group are represented at the following sites (for details see table 2.4):

- Bideford to Foreland Point MCZ

Pink sea-fans are slow-growing coral found on rocky reefs in areas of strong currents. The Pink sea-fan is a ‘Species of Principal Importance/ Priority Species’ as listed under the Natural Environment and Rural Communities (NERC) Act, 2006. It is also protected under Schedule 5 of the Wildlife and Countryside Act, 1981. Pink sea-fans have been recorded off Heddon’s Mouth and within Combe Martin Bay.

Spiny lobsters are found near the coast and offshore up to 70m deep. The number of spiny lobsters caught has been falling (in some cases dramatically), the animals that are caught tend to be smaller, and they seem to have disappeared entirely from areas of south-west England in which they were common during the 1970s (2). The Spiny lobster is a UK BAP Priority Species and is a species of principal importance under the Natural Environment and Rural Communities (NERC) Act, 2006. Spiny lobsters have been recorded within Combe Martin Bay.

Pink sea-fan has a General Management Approach (GMA) of maintain in favourable condition whereas for the Spiny lobster the GMA is to recover it to favourable condition.

Sensitivities to changes in access

No ecological sensitivities have been identified as they are subtidal features and marine features that are underwater at all states of the tide and will not be affected by our proposals for coastal access, and therefore are not further considered in this appraisal.

3.12 Habitats of Conservation Importance at Bideford to Foreland Point MCZ

Composition of feature group - where applicable

For the purposes of this appraisal the following habitats of conservation importance within Bideford to Foreland Point MCZ have been grouped together:

- Fragile sponge and anthozoan communities,
- Intertidal underboulder communities,
- Honeycomb worm reefs
- Littoral chalk communities.

Current conservation status and use of the site by features

The features included in this group are represented at the following sites (for details see table 2.4):

- Bideford to Foreland Point MCZ

Fragile sponge and anthozoan communities are large colonies of sponges, anemones and sea-fans growing on rocks in shallow water and they are found on shores which are exposed to moderate or strong wave and tidal currents (2). It is a Habitat of Principal Importance/ Priority Habitat, formerly known as UK BAP Priority Habitats. Fragile sponge and anthozoan communities are found below Mean Low Water (MLW) at Lee Bay and Woody Bay, Ramsey Beach, between Blackstone Point and The Mare and Colt and within Combe Martin Bay.

The current General Management Approach for fragile sponge and anthozoan communities is to maintain in favourable condition.

Intertidal underboulder communities, Honeycomb worm reefs and Littoral chalk communities are not present within or adjacent to this coastal access proposal.

Sensitivities to changes in access

No ecological sensitivities have been identified as they are subtidal features and marine features that are underwater at all states of the tide will not be affected by our proposals for coastal access and they are not further considered in this appraisal.

3.13 Broadscale Habitats at Bideford to Foreland Point MCZ

Composition of feature group - where applicable

For the purposes of this appraisal the following broadscale habitat features within Bideford to Foreland Point MCZ have been grouped together:

- Low energy intertidal rock (A1.3)
- Moderate energy intertidal rock (A1.2)
- High energy intertidal rock (A1.1)
- Intertidal coarse sediment (A2.1)
- Intertidal mixed sediments (A2.4)
- Intertidal sand and muddy sand (A2.2)
- Low energy infralittoral rock (A3.3)
- Moderate energy infralittoral rock (A3.2)
- High energy infralittoral rock (A3.1)
- Moderate energy circalittoral rock (A4.2)
- High energy circalittoral rock (A4.1)
- Subtidal coarse sediment (A5.1)
- Subtidal mixed sediments(A5.4)
- Subtidal sand (A5.2)

Current conservation status and use of the site by the features

The features included in this group are represented at the following sites (for details see table 2.4):

- Bideford to Foreland Point MCZ

The following habitats are located within the intertidal area of Bideford to Foreland Point MCZ:

Moderate energy infralittoral rock and moderate and high energy intertidal rock stretches along the coast between Foreland Point and Combe Martin, with a large presence of intertidal rock at Lynmouth Beach. High energy infralittoral rock has a sporadic presence below and above Mean Low Water (MLW) between Foreland Point and Combe Martin; locations include Lynmouth Beach, Valley of the Rocks, Lee Bay, Woody Bay, Heddon's Mouth, Ramsey Beach and between Blackstone Point and Wild Pear Beach.

Intertidal coarse sediment has a large presence at Sillery Sands, near Lynmouth but is also located at Lee

Bay, Woody Bay, Heddon's Mouth and Combe Martin Bay. The largest presence of intertidal sand and muddy sand is located at Combe Martin Beach and Wild Pear Beach, with some records also being found at Heddon's Mouth.

The habitats listed below are located within the subtidal area of Bideford to Foreland Point MCZ:

Low energy infralittoral rock is present offshore of Blackstone Point. Moderate energy circalittoral rock is present offshore sporadically between Foreland Point and Combe Martin. Subtidal sand has a large presence offshore of Valley of the Rocks and Lynmouth Bay. High energy circalittoral rock and subtidal coarse sediment has a large presence within the entire site offshore.

The current General Management Approach (GMA) for all broadscale habitat features for this site is maintain in favourable condition, except for subtidal sand which is to recover to favourable condition.

Low energy intertidal rock, intertidal mixed sediments and subtidal mixed sediments are not present within or adjacent to this coastal access proposal and are not further considered in this appraisal.

Sensitivities to changes in access

High energy and moderate energy infralittoral rock are not sensitive to any activities that might be generated from a change in access and are not further considered in this appraisal.

Intertidal habitats, including rocky and sandy shores, may be sensitive to activities that cause repeated abrasion or disturbance to the surface of the foreshore, or direct damage through removal or harvesting of species. In sections 4.4, 4.5 and 4.6 we consider whether our proposals might lead to localised changes in how people use the foreshore that might interact with features of the Bideford to Foreland Point MCZ.

4. Potential for interaction

In this part of the document we identify places where sensitive features are present *and* whether there could, or will not, be an interaction with proposed changes in access. Where we conclude there is potential for interaction between sensitive features and our proposals for the England Coast Path at a particular location, we consider the circumstances in more detail in Part 5 of this document. This includes current access provision, how this will be affected by our coastal access proposals, and how use of the site for recreation might change as a consequence.

Our proposals for the England Coast Path have two main components:

- Identification and physical establishment of a trail; and,
- Identification of an associated coastal margin.

Trail

A continuous walking trail – the England Coast Path National Trail - will be established by joining up existing coastal routes and creating new sections of path where necessary.

Along this stretch of coast our proposed alignment for the England Coast Path follows the existing South West Coast Path National Trail. This route is already an international tourist destination and its designation as part of the England Coast Path is expected to make little difference to overall visit numbers along this stretch of the coast.

Coastal Margin

An area of land associated with the proposed trail will become coastal margin, including all land seaward of the trail down to mean low water.

Coastal margin is typically subject to new coastal access rights, though there are some obvious exceptions to this. The nature and limitations of the new rights, and the key types of land excepted from them, are explained in more detail in Chapter 2 of our Coastal Access Scheme (Natural England, 2013). Where there are already public or local rights to do other things, these are normally unaffected and will continue to exist in parallel to the new coastal access rights. The exception to this principle is any pre-existing open access rights under Part 1 of the Countryside and Rights of Way Act 2000 (CROW) over land falling within the coastal margin: the new coastal access rights will apply in place of these.

Where public access on foot already takes place on land within the margin without any legal right for people to use the land in this way, the new coastal access rights will secure this existing use legally. Access secured in this way is subject to various national restrictions. It remains open to the owner of the land, should they wish, to continue tolerating other types of established public use not provided for by coastal access rights.

Natural England has powers that mean that we can, where necessary, impose local restrictions or exclusions on the new coastal access rights on grounds set out in the legislation. Such restrictions or

exclusions do not apply to public rights of way, or to other types of pre-existing access right other than CROW rights (see above).

This stretch picks up from where the previously approved route finishes at Minehead and follows the Exmoor coast west for 35 miles (56km) to Combe Martin. Access along this stretch is generally good, with the South West Coast Path providing a high quality and popular through route with access to the shoreline in some places.

Aligning the trail

The South West Coast Path is well-used by walkers and our default proposed alignment for the England Coast Path is to follow the existing trail. In a few places, our alignment criteria (as described in Chapters 4 and 5 of the Coastal Access Scheme) have led us to propose a different route; to bring the path closer to the sea and for better views. The reasons for proposed changes are set out in more detail in the relevant chapters of the report. These changes are between:

- North Hill and Bossington Hill (the Rugged Path) and at Hurlstone Point – see chapter 1 of the proposals;
- Porlock Weir and Worthy – see chapter 2;
- Sugarloaf Hill and Old Burrow Hill (Glenthorne) – see chapter 3;
- Valley of the Rocks and Lee Bay (Lee Abbey) – see chapter 5; and
- Lester Cliff and Combe Martin – see chapter 6.

Elsewhere along this stretch of coast our proposed alignment for the trail follows the route currently walked and managed as the South West Coast Path. This includes places where the cliffs are actively eroding, causing the path to move inland. This often takes the form of an informal diversion marked out by the regular passage of feet and/or signposted where the managing authority has judged it necessary.

4.1 Minehead to Hurlstone Combe

Outline of changes in access

The Trail

The route of the proposed trail follows the existing South West Coast Path between Minehead and Burgundy Chapel Combe. The route of the proposed trail differs from the existing South West Coast Path between Burgundy Chapel Combe and Bossington Hill, though the new length follows an existing walked route seaward of the existing South West Coast Path, known as the 'Rugged Path' (See Report Maps 1c to 1f).

The route also differs from the existing South West Coast Path along a 1.2km length around Hurlstone Point between Bossington Hill and the base of Hurlstone Combe. This new length follows an existing walked route and public footpaths. (See Report Map 1g).

The route mainly follows the coastline quite closely and maintains good views of the sea.

No improvements to the route are proposed, except the addition of a zig zag path at Henners Combe and a short section of new route is to be cut into the rock to avoid a very steep and rough part along route section MCM-1-S018 at Hurlstone Point (map 1g). Existing signage and waymarking will be retained. Some new plaques will be added to fingerposts at key locations to show that the route is part of the England Coast Path.

Since the South West Coast Path is already an international tourist destination, its inclusion as part of the England Coast Path is expected to make little difference to overall visit numbers along this section of the coast.

Coastal Margin

All land seaward and some land landward of the trail will become coastal margin. The full extent of the proposed landward coastal margin along this section of the route is shown in report maps 1a-1g.

At North Hill and Bossington Hill we have used our discretion to propose the inclusion of additional, more extensive landward areas of Open Access land within the coastal margin, to secure or enhance public enjoyment of this part of the coast.

We do not expect any noticeable change in public use of the land either side of the route as a result of the proposals because it is already accessible. The seaward coastal margin along much of the coast is steep inaccessible cliffs, which means that walkers and other users will normally remain on the established trail. There is no reason to suppose the behaviour of members of the public will change at these locations as a result of our proposals. Because the extent of new access rights is in keeping with already established use we don't expect there to be any noticeable change in access as a result of our proposals.

Potential for interaction (or lack of it)

Of the sensitive features identified in Part 3 of this document the following feature group occurs in areas that would become part of the coastal margin along this section of coast:

- Maritime Cliff and Slope Vegetation: Open habitats (3.2), Acid Grassland (including U1, U4, U4/U20 NVC communities).

Of the sites listed in Part 2 of this document, the following designated sites are present along this stretch:

- Exmoor Coastal Heaths SSSI (Units 18 & 23)
- Exmoor Coastal Heaths SSSI (Units 19, 20, 21, 25, 26)

Exmoor Coastal Heaths SSSI (Unit 23)

The trail passes through areas with potentially sensitive grassland species, however no changes or improvements to the route are proposed and current visitor management will be unaffected. Therefore we have concluded there is no potential for interaction.

Exmoor Coastal Heaths SSSI (Units 18, 19, 20, 21, 25, 26)

Improvements to the proposed route of the trail are proposed at Henners Combe, with the installation of a zig zag path to provide a gradual climb, and at Hurlstone Point, where the track is to be cut into a section of rock in MCM-1-SO18. These new sections of path traverse bracken and gorse and avoid areas of sensitive grassland. Care must be taken whilst works are carried out on site and conditions will be agreed with the local authority prior to this happening - see s6.1.1. In light of this, we have concluded there is no potential for interaction.

Exmoor Coastal Heaths SSSI (Units 20, 21, 25, 26)

These areas of the SSSI do not contain the sensitive features and also there are no improvements to the

route proposed so there is no potential for interaction.

Conclusion

Along this section of coast we do not expect any noticeable change in public use of the trail or land either side of the route as a result of the proposals. Where the route of the proposed trail differs from the existing South West Coast Path we do not expect any interaction with sensitive features. Therefore in light of this we have concluded there is no potential for interaction between the access proposal and the features listed above or in s3.

4.2 Hurlstone Combe to Worthy

Outline of changes in access

The Trail

The route follows the existing South West Coast Path as currently walked and managed between the base of Hurlstone Combe and Porlock Weir.

The route differs from the existing South West Coast Path along a 1km length between Porlock Weir and Worthy (route sections MCM-2-S018 to MCM-2-S028). This new length initially follows the existing bridleway alongside Porlock Dock out towards Gore Point, then runs along the shingle beach, before heading inland through a field to the west of Worthy stream and then climbs through woodland to re-join the existing coast path west of Worthy Toll House. See report map 2d.

No improvements to the route are proposed other than for the new section between Porlock Weir and Worthy where some physical establishment of the trail would be necessary. This includes clearance of the ramp of a limekiln to gain access from the beach, installation of a new path and bund through a field and a graded slope up through woodland.

The route mainly follows the coastline quite closely and maintains good views of the sea. Existing signage and waymarking will be retained. Some new plaques will be added to fingerposts at key locations to show that the route is part of the England Coast Path.

Since the South West Coast Path is already an international tourist destination, its inclusion as part of the England Coast Path is expected to make little difference to overall visit numbers along this section of the coast.

Coastal Margin

All land seaward and some land landward of the trail will become coastal margin. The full extent of the proposed landward coastal margin along this section of the route is shown in report maps 2a-2d.

We do not expect any noticeable change in public use of the land either side of the route as a result of the proposals because it is already accessible. The seaward coastal margin along much of the coast is steep inaccessible cliffs, which means that walkers and other users will normally remain on the established trail. There is no reason to suppose the behaviour of members of the public will change at these locations as a result of our proposals. Because the extent of new access rights is in keeping with already established use

we don't expect there to be any noticeable change in access as a result of our proposals.

Potential for interaction (or lack of it)

Of the sensitive features identified in Part 3 of this document the following feature group occurs in areas that would become part of the coastal margin along this section of coast:

- Shingle and saltmarsh vegetation (3.5)
- Porlock Marsh Birds (3.10)

Of the sites listed in Part 2, the following designated sites are present along this stretch:

- Porlock Ridge and Saltmarsh SSSI

Porlock Ridge and Saltmarsh SSSI (Units 2,6 &9)

The new section of trail between Porlock Weir and Worthy skirts along the southern edge of this SSSI but does not run near any sensitive shingle areas and the margin here is already well used by the public. Therefore it has already been concluded in s3.5 that these features are not sensitive to access, and there will be no interaction with our proposals.

Porlock Ridge and Saltmarsh SSSI (Unit 2, 3, 4, 5, 7)

In relation to the saltmarsh vegetation, at the eastern end of Porlock Ridge and Saltmarsh SSSI (Units 2, 3, 4, 5, 7), the existing South West Coast Path route passes along the landward side of the saltmarsh which is vulnerable to increased erosion from repeated foot traffic where the underlying sediment is mud, or inundated on regular tides (at the lowest elevations). Two boardwalks (including a popular one at the foot of Sparkhayes Lane- see report map 2b) currently run perpendicular from the South West Coast Path to the beach. They create the possibility of a circular walk and help to reduce erosion from foot traffic on the fragile saltmarsh vegetation, as they carry people on top of the sensitive vegetation, and discourage people from spreading out across the marsh.

In relation to the group of bird species 'Birds of Porlock Marsh', within the SSSI the birds using the Marsh are not a notified feature but are important locally. Different birds use the site at different times but there is some bird interest present at all times of year (see s3.10).

'A Vision for Porlock Marsh' (4) reports on the project to develop a future vision for Porlock Marsh and a plan for its development, management and use. It notes that there is already a network of public rights of way and permissive paths across the Marsh, including part of the current South West Coast Path. It notes the area is already currently well used by visitors and locals (with their dogs), on and off rights of way. It includes objectives to create new and improved access routes to the Marsh, investigate car parking options, improve the footpath surfaces, improve access for people of different abilities, and improving seating, signage and information boards across the Marsh.

A Vision for Porlock Marsh (4) also notes that access to the saltmarsh by current access users may be contributing to a limiting in waterbird or other bird use, or even declines due to disturbance, especially where access has increased in the middle section closest to the beach (north of Sparkhayes Lane). It also

identifies objectives to enhance wildlife on the Marsh, including improving information to the public, reducing disturbance from walkers and dogs by raising awareness and guiding them away from sensitive areas, creation of a bird hide/ observation area and more monitoring and research.

We are not proposing any changes to the South West Coast Path along this section and as it is already well used we would not expect any interaction between the trail and this SSSI from our proposals.

As the seaward coastal margin is already well used by people using the public rights or way and permissive paths, two of which run on boardwalks, we do not expect any noticeable change in public use of the land either side of the route as a result of the proposals. We would not expect that our proposals will affect the objectives outlined in the vision for Porlock Marsh to improve access and reduce disturbance and erosion, they should if anything be complementary.

Conclusion

Along this section of coast, and on the above designated site, we do not expect any noticeable change in public use of the land either side of the route as a result of the proposals. Therefore we have concluded there is no potential for interaction between the access proposal and the features listed above or in s3.

4.3 Worthy to The Foreland

Outline of changes in access

The Trail

The route follows the existing South West Coast Path between Worthy and Yenworthy Combe near Glenthorne, and between Handball and The Foreland.

The route differs from the existing South West Coast Path along a 2.7km length at Glenthorne between Yenworthy Combe and Handball. This new section takes the route to the seaward side of Glenthorne House and significantly closer to the sea. See Report map 3d.

The South West Coast Path generally follows the coast quite closely over this length apart from at Glenthorne where it currently goes inland for some distance. For the most part we propose adopting this route as the line of the England Coast Path.

No improvements are proposed where the trail follows the existing South West Coast Path. Existing signage and waymarking will be retained. Some new plaques will be added to fingerposts at key locations to show that the route is part of the England Coast Path.

For the new section at Glenthorne some physical establishment of the trail would be necessary including

- New steps up from the beach
- New steps and railings leading up from beach steps
- New sections of path at Garden Cottage
- New revetment works
- Scrub clearance

An optional alternative route would operate at times when the beach route in front of Glenthorne house is unavailable due to high tides. This follows the existing public footpath currently used as the route of the South West Coast Path. This does not have the effect of creating any additional spreading room on either its seaward or landward side.

Since the South West Coast Path is already an international tourist destination, its inclusion as part of the England Coast Path is expected to make little difference to overall visit numbers along this section of the coast.

Coastal Margin

All land seaward and some land landward of the trail will become coastal margin. The full extent of the proposed landward coastal margin along this section of the route is shown in report maps 3a-3f.

We do not expect any noticeable change in public use of the land either side of the route as a result of the proposals because it is already accessible. The seaward coastal margin along much of the coast is steep inaccessible cliffs, and the landward margin usually steep ground, which means that walkers and other users will normally remain on the established trail. There is no reason to suppose the behaviour of members of the public will change at these locations as a result of our proposals. Because the extent of new access rights is in keeping with already established use we don't expect there to be any noticeable change in access as a result of our proposals.

Potential for interaction (or lack of it)

None of the potentially sensitive features identified in Part 3 of this document occur in areas that would become part of the coastal margin along this section of coast.

Of the sites listed in s2, the following sites are present along this stretch:

- Glenthorne SSSI
- Exmoor Coastal Heaths SSSI
- Exmoor Coastal Woods LWS

Glenthorne SSSI

This is a site noted for its geological interest and it has already been determined in 3.1. that this group of features is not sensitive to access therefore there will be no interaction with our proposals.

Exmoor Coastal Heaths SSSI (Units 9, 10, 27, 28, 29)

The woodland, heathland and other potentially sensitive features in this SSSI have been found to not be sensitive to access in s3, therefore there will be no interaction with our proposals.

Exmoor Coastal Woods LWS

The woodland features in this SSSI have been found to not be sensitive to access in s3, therefore there will be no interaction with our proposals.

Conclusion

Along this section of coast we do not expect any noticeable change in public use of the trail or land either side of it as a result of the proposals. Where the trail is realigned closer to the sea at Glenthorne House the new route and associated infrastructure is being created through a geological SSSI not sensitive to access. Therefore we have concluded there is no potential for interaction between the access proposal and the features listed above or in s3.

4.4 The Foreland to Lynton

Outline of changes in access

The Trail

The route of the proposed trail follows the existing South West Coast Path between the Foreland and North Walk on the western side of Lynton.

The route mainly follows the coastline quite closely (apart from at the Foreland where the trail goes slightly inland rather than out towards Foreland Point) and maintains good views of the sea.

No improvements to the route are proposed. Existing signage and waymarking will be retained. Some new plaques will be added to fingerposts at key locations to show that the route is part of the England Coast Path.

Since the South West Coast Path is already an international tourist destination, its inclusion as part of the England Coast Path is expected to make little difference to overall visit numbers along this section of the coast.

Coastal Margin

All land seaward and some land landward of the trail will become coastal margin. Most of the seaward part of the route is very high inaccessible cliffs. The rest is already open access land under CROW except for the foreshore, some of which is available for access at Sillery Sands via a steep path and Lynmouth from the Town Green. The full extent of the proposed landward coastal margin along this section of the route is shown in report maps 4a-4c.

We do not expect any noticeable change in public use of the land either side of the route as a result of the proposals because it is already accessible. The seaward coastal margin along much of the coast is steep physically inaccessible cliffs, which means that walkers and other users will normally remain on the established trail. There is no reason to suppose the behaviour of members of the public will change at these locations as a result of our proposals. Because the extent of new access rights is in keeping with already established use we don't expect there to be any noticeable change in access as a result of our proposals.

Potential for interaction (or lack of it)

Some of the potentially sensitive features identified in Part 3 of this document occur in areas that would become part of the coastal margin along this section of coast. They are

- Maritime Cliff and Slope Vegetation: Open habitats (3.2)
- Cliff Nesting Seabirds (3.9)
- MCZ Broadscale habitats (3.13)

Of the sites listed in s2, the following designated sites are present along this stretch:

- Exmoor Coastal Heaths SSSI
- Exmoor Heaths SAC
- Bideford to Foreland Point MCZ

Seabirds breeding on cliffs in Unit 7 of Exmoor Coastal Heaths SSSI (un-notified feature)

There are limited numbers of seabirds breeding on the cliffs to the east of Foreland Point. They are not a notified feature of Exmoor Coastal Heaths SSSI (Unit 7). The species are mainly Herring Gull and Fulmar with occasional Lesser Black-Backed Gull, which are potentially susceptible to disturbance from climbing

but they do not form colonies and nests are scattered thinly. The nature of the seaward coastal margin along this section of the coast - steep cliffs and already well accessed heathland – means that walkers and other users are likely to remain on the established trail or well used areas and there will not be any potential for interaction with our proposals.

Exmoor Coastal Heaths SSSI (Units 7, 8) and Exmoor Heaths SAC

The woodland, heathland and other potentially sensitive features in this SSSI have been found to be not sensitive to access in s3, therefore there will be no interaction with our proposals.

Bideford to Foreland Point MCZ

The broadscale marine habitats noted as being potentially sensitive to access in s3.13 are

- High energy and moderate energy intertidal rock (A1.1) (A1.2) and
- intertidal sand and muddy sand (A2.2).

Along this section of the coast, our proposed route for the England Coast Path avoids intertidal areas and so there is no possible interaction in this respect.

In s3.13 we noted that intertidal habitats may be sensitive to changes in how people use the foreshore. By default under our proposals, the foreshore between Foreland Point and Lynton will be included in the coastal margin. We have assessed if our proposals will create any new opportunities for access to the foreshore along this section of the coast. Current use is most intense at popular visitor destinations like Lymouth Bay. Further from the main access points, the level of use is lower, however; at all locations, use of the foreshore by the public it is taken for granted. We see no reason to believe that the technical change of securing use of the foreshore by the public under coastal access rights will make a noticeable difference to the established levels and patterns of recreational use.

In respect of the removal or harvesting of species, our proposals will not create new rights and neither will these activities be condoned or encouraged. Our proposals are neutral in this respect, and would not interfere should it be decided necessary to introduce new measures to manage these activities.

For these reasons we have discounted that there could be a negative interaction with intertidal habitats as a result of our proposals.

Conclusion

Along this section of coast, and on the above designated sites, we do not expect any noticeable change in public use of the land either side of the route as a result of the proposals. Therefore we have concluded there is no potential for interaction between the access proposal and the features listed above or in s3.

4.5 Lynton to Woody Bay

Outline of changes in access

The Trail

The route of the proposed trail follows the existing South West Coast Path between North Walk, Lynton and Lee Abbey, along the road adjacent to Lee Abbey, and between Lee Bay and Woody Bay.

The route of the proposed trail differs from the existing South West Coast Path along a 190m length to the east of Lee Abbey and along a 250m length by Lee Bay. Both these new sections take the route closer to the sea and away from the road.

The route mainly follows the coastline quite closely and maintains good views of the sea. No improvements to the route are proposed apart from on the realigned sections at Lee Abbey and Lee Bay. Existing signage and waymarking will be retained. Some new plaques will be added to fingerposts at key locations to show that the route is part of the England Coast Path. Since the South West Coast Path is already an international tourist destination, its inclusion as part of the England Coast Path is expected to make little difference to overall visit numbers along this section of the coast.

Coastal Margin

All land seaward and some land landward of the trail will become coastal margin. The full extent of the proposed landward coastal margin along this section of the route is shown in report maps 5a-5c.

We do not expect any noticeable change in public use of the land either side of the route as a result of the proposals because it is already accessible. The seaward coastal margin along much of the coast is steep physically inaccessible cliffs, which means that walkers and other users will normally remain on the established trail. There is no reason to suppose the behaviour of members of the public will change at these locations as a result of our proposals. Because the extent of new access rights is in keeping with already established use we don't expect there to be any noticeable change in access as a result of our proposals.

Restrictions

There are two land management restrictions at Lee Abbey, see Map D and Map E in the Report Overview for details.

Potential for interaction (or lack of it)

Some of the potentially sensitive features identified in Part 3 of this document occur in areas that would become part of the coastal margin along this section of coast. They are

- Combinations of Species – Lichens (3.6)
- Cliff Nesting Seabirds (3.9)
- MCZ Broadscale habitats (3.13)

Of the sites listed in s2, the following designated sites are present along this stretch:

- West Exmoor Coast and Woods SSSI
- Bideford to Foreland Point MCZ

West Exmoor Coast and Woods SSSI (Seabird breeding cliffs within Units 14, 17, 19, 20)

The cliffs particularly from Lynton to Woody Bay are of concern as coastal access will allow (though not promote or encourage) the use of cliffs for climbing, and potentially cause bird disturbance during the breeding season, particularly for the stretch at Lynton. These bird populations are thought to extend from The Mare and Colt to Lynton and to be part of the same population of breeding auks (Common Guillemot & Razorbill) and Black-legged Kittiwakes described in s4.6, and are all potentially vulnerable.

We are not proposing any changes to the South West Coast Path along this section and as it is already well used we would not expect any interaction between the trail and this SSSI from our proposals.

The nature of the seaward coastal margin along this section of the coast - steep cliffs and already well accessed heathland – means that walkers and most other users are likely to remain on the established trail. There is already some low key climbing on the cliffs and as climbing is of a specialised nature it is not

thought the implementation of coastal access will cause an increase in the levels of climbing occurring. Therefore it is not thought there will be any additional pressure on these breeding colonies as a result of the coastal access proposals.

West Exmoor Coast and Woods SSSI (Unit 19)

Saxicolous lichen communities found on rocks just above the Valley of the Rocks car park could be sensitive to increased levels of access and therefore increased abrasion. However as we are not proposing any changes to the South West Coast Path at this location and the margin is already well used Open Access land, we do not expect there to be a noticeable difference to the established levels and patterns of recreational use and therefore we do not expect any interaction with our proposals.

West Exmoor Coast and Woods SSSI (Unit 22)

Changes to the trail immediately east and west of Lee Abbey are on farmland included in the Quaternary geomorphological interest feature of the West Exmoor Coast and Woods SSSI. This feature is not sensitive to a small scale rerouting of the path, or the installation of any access furniture or steps which will be required, because they will not obscure the geomorphological features of the valley.

West Exmoor Coast and Woods SSSI (Units 14, 16, 18, 19)

The woodland and other potentially sensitive features in this SSSI have been found to not be sensitive to access in s3, therefore there will be no interaction with our proposals.

Bideford to Foreland Point MCZ

The broadscale marine habitats noted as being potentially sensitive to access in s3.13 are

- high energy intertidal rock (A1.1)
- moderate energy intertidal rock (A1.2)
- intertidal sand and muddy sand (A2.2)
- moderate energy intertidal rock (A1.2)

In 3.13 we noted that intertidal habitats may be sensitive to changes in how people use the foreshore. By default under our proposals, the foreshore between Lynton and Woody Bay will be included in the coastal margin. We have assessed if our proposals will create any new opportunities for access to the foreshore along this section of the coast. Current use is most intense at popular visitor destinations like Lee Abbey Beach, Lee Bay and Wringcliff beach. Further from the main access points, the level of use is lower, however; at all locations, use of the foreshore by the public is taken for granted. We see no reason to believe that the technical change of securing use of the foreshore by the public under coastal access rights will make a noticeable difference to the established levels and patterns of recreational use.

In respect of the removal or harvesting of species, our proposals will not create new rights and neither will these activities be condoned or encouraged. Our proposals are neutral in this respect, and would not interfere should it be decided necessary to introduce new measures to manage these activities.

For these reasons we have discounted that there could be a negative interaction with intertidal habitats as a result of our proposals.

Conclusion

Along this section of coast, and on the above designated sites, we do not expect any noticeable change in

public use of the land either side of the route as a result of the proposals. Where the route of the proposed trail differs from the existing South West Coast Path either side of Lee Abbey the SSSI features are not sensitive to access or the required infrastructure improvements. Therefore we have concluded there is no potential for interaction between the access proposal and the features listed above or in s3.

4.6 Woody Bay to Combe Martin

Outline of changes in access

The Trail

The route of the proposed trail follows the existing South West Coast Path between Woody Bay and Lester Cliff, Combe Martin.

The route of the proposed trail differs from the existing South West Coast Path between Lester Cliff and Cobblers Park at Combe Martin.

The route mainly follows the coastline quite closely and maintains good views of the sea.

No improvements to the route are proposed except on the re-aligned section at Combe Martin, where some physical establishment of the trail would be necessary. This would include grading and surfacing of the new path. Existing signage and waymarking will be retained. Some new plaques will be added to fingerposts at key locations to show that the route is part of the England Coast Path.

Since the South West Coast Path is already an international tourist destination, its inclusion as part of the England Coast Path is expected to make little difference to overall visit numbers along this section of the coast.

Coastal Margin

All land seaward and some land landward of the trail will become coastal margin. The full extent of the proposed landward coastal margin along this section of the route is shown in report maps 6a-6g.

We do not expect any noticeable change in public use of the land either side of the route as a result of the proposals because it is already accessible. The seaward coastal margin along much of the coast is steep physically inaccessible cliffs, which means that walkers and other users will normally remain on the established trail. There is no reason to suppose the behaviour of members of the public will change at these locations as a result of our proposals. Because the extent of new access rights is in keeping with already established use we don't expect there to be any noticeable change in access as a result of our proposals.

Potential for interaction (or lack of it)

Some of the potentially sensitive features identified in Part 3 of this document occur in areas that would become part of the coastal margin along this section of coast. They are

- Maritime Cliff and Slope Vegetation: Open habitats (3.2)
- Cliff Nesting Seabirds (3.9)
- MCZ Broadscale habitats (3.13)

Of the sites listed in s2, the following designated sites are present along this stretch:

- Hele, Samson's and Combe Martin Bays SSSI
- Exmoor Coastal Heaths SSSI

- West Exmoor Coast and Woods SSSI

Hele, Samson's and Combe Martin Bays SSSI (Unit 4)

This is a site noted for its geological interest and it has already been determined in s3.1. that this group of features is not sensitive to access therefore there will be no interaction with our proposals.

Exmoor Coastal Heaths SSSI (Unit 1, 2, 3, 5, 6) and West Exmoor Coast and Woods SSSI (Units 4, 5, 13, 20)

The grassland, heathland and other potentially sensitive features in this SSSI have been found to not be sensitive to access in s3, therefore there will be no interaction with our proposals.

West Exmoor Coast and Woods SSSI (Seabird breeding cliffs within Units 14, 17, 19, 20)

The cliffs particularly from Woody Bay to The Mare and Colt are of concern as coastal access will allow the use of the cliffs for climbing and potentially cause bird disturbance during the breeding season. These bird populations are thought to be part of the same population of breeding auks (Common Guillemot & Razorbill) and Black-legged Kittiwakes described in s4.5, and also potentially vulnerable.

We are not proposing any changes to the South West Coast Path along this section and as it is already well used we would not expect any interaction between the trail and this SSSI from our proposals.

The nature of the seaward coastal margin along this section of the coast - steep cliffs and already well accessed heathland – means that walkers and most other users are likely to remain on the established trail. There is already some low key climbing on the cliffs and as climbing is of a specialised nature it is not thought the implementation of coastal access will cause an increase in the levels of climbing occurring. Therefore it is not thought there will be any additional pressure on these breeding colonies as a result of the coastal access proposals.

Bideford to Foreland Point MCZ

The broadscale marine habitats noted as being potentially sensitive to access in s3.13 are:

- high energy intertidal rock (A1.1)
- moderate energy intertidal rock (A1.2)
- intertidal sand and muddy sand (A2.2)

In s3.13 we noted that intertidal habitats may be sensitive to changes in how people use the foreshore. By default under our proposals, the foreshore between Lynton and Woody Bay will be included in the coastal margin. We have assessed if our proposals will create any new opportunities for access to the foreshore along this section of the coast. Current use is most intense at popular visitor destinations like Heddon's Mouth, Wild Pear Beach and Combe Martin Beach. Further from the main access points, the level of use is lower, however; at all locations, use of the foreshore by the public it is taken for granted. We see no reason to believe that the technical change of securing use of the foreshore by the public under coastal access rights will make a noticeable difference to the established levels and patterns of recreational use.

In respect of the removal or harvesting of species, our proposals will not create new rights and neither will these activities be condoned or encouraged. Our proposals are neutral in this respect, and would not interfere should it be decided necessary to introduce new measures to manage these activities.

For these reasons we have discounted that there could be a negative interaction with intertidal habitats as a result of our proposals.

Conclusion

Along this section of coast, and on the above designated sites, we do not expect any noticeable change in public use of the land either side of the route as a result of the proposals. Where the route of the proposed trail differs from the existing South West Coast Path at Combe Martin it is outside any designated site. Therefore we have concluded there is no potential for interaction between the access proposal and the features listed above or in s3.

5. Assessment of any possible adverse impacts and mitigation measures

In this part of the document we look in more detail at sections of coast where there could be an interaction between the access proposal and sensitive features. We discuss possible risks to sensitive features and explain how these have shaped the design of our proposals and/or led to the inclusion of specific mitigation measures.

NOT APPLICABLE

6. Establishing and maintaining the England Coast Path

In this part of the document we describe how the access proposal would be implemented and arrangements for ongoing management and maintenance once coastal access rights are in place.

Note that before the access proposal can be taken forward, the coastal access report must first be considered by the Secretary of State in light of any representations, any objections from affected owners or occupiers and the Appointed Person's recommendations as to how any objections should be determined.

6.1 Establishment

6.1.1 Works on the ground

Once approval for a coastal access report is received from the Secretary of State, any necessary works can be carried out on the ground to make the trail fit for use and prepare for opening. In this case, works on the ground would be carried out by Exmoor National Park Authority.

An estimate of the total cost of works needed to establish the trail is given in our coastal access report for the stretch. The cost of establishment works will be met by Natural England.

Exmoor National Park Authority are responsible for ensuring they take appropriate steps to protect sensitive features whilst works on the ground are carried out, in line with any recommendations or conditions agreed in advance.

We have held preliminary discussions with Exmoor National Park Authority about the works required and believe that it is feasible for them to be carried out without adverse effect on the designated sites considered in this appraisal. This is on the basis that the following special conditions are observed during the creation of the Zig Zag route at Henners Combe and where a new route is to be cut into the rock along route section MCM-1-S018 at Hurlstone Point (map 1g):

- The precise line to be improved will avoid any existing colonies of Rock Stonecrop revealed by survey and will generally follow the line of current disturbance to the soil/slope.
- Working methods will ensure as little disturbance as possible and work will be done in dry conditions to avoid excessive ground disturbance.
- Any cut material will not be tipped downhill where it is likely to accumulate and compromise or change sward composition or structure by smothering or adding nutrients.
- material will have to be brought to the site from above by hand.
- all work will be done manually at Hurlstone Point.

Exmoor National Park Authority will instigate the SSSI assent process by writing to us to confirm the timing of works and how operations to be undertaken in line with these conditions. Natural England will provide further advice as necessary.

6.1.2 Implementation of mitigation measures

There are no special mitigation measures to be implemented.

6.1.3 Local restrictions or exclusions

Where specific restrictions or exclusions have been included in the proposal and are approved by the Secretary of State, Natural England will give the necessary directions before public rights come into force to make the rights subject to those restrictions or exclusions.

6.2 Maintenance

Where there is a need for ongoing maintenance of any special measures proposed, this will become part of longer term arrangements for upkeep of the trail. An overall estimate of the ongoing cost of maintaining stretches of the England Coast Path is given in the relevant part of our report for the stretch.

6.3 Monitoring

Monitoring of the protected site will continue through established programmes including our common standards monitoring protocols. The access authority will be responsible for ongoing monitoring of trail condition. Natural England will be tracking general trends, including in the number of people using the path, as part of our evaluation of the coastal access programme nationally.

6.4 Future changes

The access proposals in this document are designed to ensure appropriate protection of sensitive features, taking account of any mitigation measures that are included. The coast is a dynamic environment and in designing the access proposals we have taken account of any changes predicted by the Environment Agency as a result of coastal erosion or other geomorphological processes. Should it be necessary in the future to identify a new alignment for the trail in line with 'roll back' proposals in the stretch report, due care will be taken at that stage to minimise any potential impacts of this change on sensitive features. The same will be true if any unforeseen other changes arise in the future that may require us to propose a variation of the access arrangements described in these proposals, following due procedures.

7. Conclusions

7.1 Overall conclusion – Natura 2000/Ramsar sites

7.1.1 Population level effects

Exmoor Heaths SAC

Feature - or feature group	Conclusion
H91A0. Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles; Western acidic oak woodland	No possible adverse effects from the access proposal have been identified.
H7130. Blanket bogs*	No possible adverse effects from the access proposal have been identified.
H7230. Alkaline fens; Calcium-rich springwater-fed fens	No possible adverse effects from the access proposal have been identified.
H4030. European dry heaths	No possible adverse effects from the access proposal have been identified.
H4010. Northern Atlantic wet heaths with <i>Erica tetralix</i> ; Wet heathland with cross-leaved heath	No possible adverse effects from the access proposal have been identified.
H1230. Vegetated sea cliffs of the Atlantic and Baltic coasts	No possible adverse effects from the access proposal have been identified.

Exmoor and Quantock Oakwoods SAC

Feature - or feature group	Conclusion
H91E0. Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i>); Alder woodland on floodplains	No possible adverse effects from the access proposal have been identified.
H91A0. Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles; Western acidic oak woodland	No possible adverse effects from the access proposal have been identified.
S1308. <i>Barbastella barbastellus</i> ; Barbastelle bat	No possible adverse effects from the access proposal have been identified.
S1323. <i>Myotis bechsteinii</i> ; Bechstein's bat	No possible adverse effects from the access proposal have been identified.
S1355. <i>Lutra lutra</i> ; Otter	No possible adverse effects from the access proposal have been identified.

7.1.2 In combination assessment

Not applicable

7.1.3 Overall screening decision

In the light of this appraisal, Natural England has reached this conclusion about the new access proposal:
(Mark one box only with an X as appropriate)

X

No likely significant effect - as the new access proposal is unlikely to have a significant effect on Exmoor Heath SAC, Exmoor and Quantock Oakwoods SAC, either alone or in combination with other plans or projects, (taking into account any proposed mitigation measures) no further Habitats Regulations assessment is required;

OR

Likely significant effect - as the new access proposal is likely to have a significant effect Exmoor Heath SAC, Exmoor and Quantock Oakwoods SAC, either alone or in combination with other plans or projects (despite any proposed mitigation measures), appropriate assessment is required to consider whether the new access proposal may proceed.

7.2 Overall conclusion - SSSI

In the light of this appraisal, Natural England has concluded that the new access proposal:
(Mark one box only with an X below)

X

complies with Natural England's duty to further the conservation and enhancement of the notified features of the SSSI, consistent with the proper exercise of its functions¹ - and accordingly the new access proposal may proceed as finally specified in this template

OR

would not comply with the duty referred to in (a) – and accordingly permission/ authorisation/ assent should not be given for the new access proposal in the form finally specified in this template, for the following reasons:

Reasons (where second box is ticked):

¹ The reference in 7.2 above to 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.

7.3 Overall conclusion: Marine Conservation Zone

In respect of any duties that may arise under section 125 of the Marine and Coastal Access Act 2009, Natural England has concluded for Bideford to Foreland Point MCZ that:

(Mark one box only with an X below)

X	The access proposal (including any special measures specified in this appraisal) is the 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
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OR

	The above test is not met, and accordingly the access proposal should not be taken forward in this form, for the following reasons:
--	---

Reasons (where second box is ticked):

7.4 Overall conclusion - National Nature Reserve

In the light of this appraisal, Natural England has concluded that the new access proposal:

(Mark one box only with an X below)

	will not compromise the management of the National Nature Reserve for its conservation purpose of preserving features of special interest in the area
--	--

OR

	would compromise the management of the National Nature Reserve for its conservation purpose of preserving features of special interest in the area - and accordingly the new access proposal should not proceed in the form finally specified in this template, for the following reasons:
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Reasons (where second box is ticked):

7.5 Other features about which concerns have been expressed

In the light of this appraisal, Natural England has concluded that:

(Mark one box only with an X below)

the appropriate balance has been struck by the new access proposal between NE's conservation and access objectives, duties and purposes - and accordingly the new access proposal should proceed as finally specified in this template

OR

the appropriate balance referred to above has not been struck – and accordingly the new access proposal should not proceed in the form finally specified in this template, for the following reasons:

Reasons (where second box is ticked):

8. Certification

8.1 Certification – access proposal

I agree with the conclusions of this appraisal and am satisfied that the final access proposal, incorporating any special measures, is the least restrictive option necessary to ensure appropriate protection of sensitive features.

Signed:



Name:

Richard Thomas

Date:

15th May 2017

8.2 Certification – environmental impacts

I agree with the conclusions of this appraisal and am satisfied that potential environmental impacts of the access proposal Exmoor Coastal Heaths SSSI, Porlock Ridge and Saltmarsh SSSI, Glenthorne SSSI, West Exmoor Coast and Woods SSSI, Hele, Samson's and Combe Martin Bays SSSI have been fully addressed.

Signed:



Name:

Flemming Ulf-Hansen

Date:

16 May 2017

9. References

1. Brian Pearce seabird count available from Exmoor National Park Authority. (2005).
2. Joint Nature Conservation Committee (JNCC). 2014. *MCZ features: Fragile sponges and anthozoan communities on subtidal rocky habitats*. Available [website]: <http://jncc.defra.gov.uk/page-6018> .
3. Joint Nature Conservation Committee (JNCC). 2014. *MCZ features: Spiny Lobster*. Available [website]: <http://jncc.defra.gov.uk/page-5539> .
4. http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0011/760565/Vision-Document.pdf
5. NATURAL ENGLAND. 2013. Coastal Access Natural England's Approved Scheme 2013. Published by Natural England Catalogue Code: NE446
<http://publications.naturalengland.org.uk/publication/5327964912746496?category=50007>
6. Seabird Monitoring Programme Online Database <http://jncc.defra.gov.uk/smp/>
7. Somerset Ecology Services (2017), Porlock Marsh, Somerset. Bird Survey 2016. Draft report dated May 2017. Report prepared for Porlock Marsh Vision Steering Group (ENPA, NT, NE, PME, PPC)