



**Assessment of Coastal Access proposals under
regulation 63 of the
Habitats Regulations 2017 (as amended)
(‘Habitats Regulations Assessment’)**

**Assessment of England Coast Path proposals from Amble
to Bamburgh**

**On Northumbria Coast and Northumberland Marine Special
Protection Areas, Northumbria Coast Ramsar site and
Berwickshire & North Northumberland Coast and North
Northumberland Dunes Special Areas of Conservation**

31 July 2019



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Summary

I) Introduction

This is a record of the Habitats Regulations Assessment ('HRA') undertaken by Natural England (in its role of competent authority) in accordance with the assessment and review provisions of the Conservation of Habitats and Species Regulations 2017 (as amended) ('the Habitats Regulations').

Natural England has a statutory duty under the Marine and Coastal Access Act 2009 to improve access to the English coast. The guidance for Natural England's Coastal Access Approved Scheme 2013 is published at <http://publications.naturalengland.org.uk/publication>

This assessment considers the potential impacts of our detailed proposals for coastal access from Amble to Bamburgh on the following sites of international importance for wildlife:

- Northumbria Coast Special Protection Area (SPA)
- Northumbria Coast Ramsar site
- Northumberland Marine SPA
- Berwickshire & North Northumberland Coast Special Area of Conservation (SAC)
- North Northumberland Dunes SAC

This assessment should be read alongside Natural England's related Coastal Access Reports which between them fully describe and explain its access proposals for the stretch as a whole. The Overview explains common principles and background and the reports explain how we propose to implement coastal access along each of the constituent lengths within the stretch.

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

II) Background

The main wildlife interests for this stretch of coast are summarised in Table 1 (see section B1 for a full list of qualifying features).

Table 1) Summary of the main wildlife interest

Interest	Description
Overwintering waders	A key feature of the Northumberland coast is that in winter it supports a wide range of waders, which are present in internationally and nationally important numbers. Purple sandpiper and turnstone are qualifying features of the Northumbria Coast SPA and Ramsar site. Amble to Bamburgh has an open, windswept coastline with a series of contrasting rocky headlands and sandy bays backed by sand dunes, along



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	with extensive areas of inter-tidal rock platforms, which are favoured foraging areas for purple sandpiper and turnstone.
Breeding seabirds	Breeding seabirds, as the qualifying features for the Northumbria Coast SPA and Ramsar site and the Northumberland Marine SPA, nest on Coquet Island and the Farne Islands, as well as on cliff faces on the mainland. The main concern here is the Arctic and little tern nesting site at Long Nanny Burn in Beadnell Bay.
Intertidal habitats	The coastline from Amble to Bamburgh has extensive ranges of rock platforms and rocky headlands forming sea caves, reefs and large shallow inlets and bays. There are small sheltered areas of discrete saltmarsh and mudflat in the estuarial waters of the Rivers Coquet and Aln.
Sand dunes	The sand dunes from Amble to Bamburgh give contrast to the rocky headlands and provide a dramatic back drop to the well renowned beaches. The sand dunes contain a number of habitats from embryonic, shifting sands through to fixed dunes with herbaceous vegetation. The dunes are used for access, including the Northumberland Coast Path.

III) Our approach

Natural England's approach to ensuring the protection of sensitive nature conservation features under the Coastal Access Programme is set out in section 4.9 Coastal Access: Natural England's Approved Scheme 2013.

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 proposal is 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, environmental consultants 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.



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IV) Aim and objectives for the design of our proposals

The new national arrangements for coastal access will establish a continuous well-maintained walking route around the coast and clarify where people can access the foreshore and other parts of the coastal margin. These changes will influence how people use the coast for recreation and our aim in designing our detailed proposals has been to secure and enhance opportunities for people to enjoy their visit whilst ensuring appropriate protection for affected European sites.

A key consideration in developing coastal access proposals for Amble to Bamburgh, has been the possible impact of disturbance to overwintering purple sandpiper and turnstone and breeding Arctic and little terns, as well as minimising the risk of spreading invasive non-native species (pirri-pirri burr), as a result of recreational activities.

Objectives for the design of our detailed local proposals have been to:

- avoid exacerbating issues at sensitive locations by making use of established coastal paths
- where there is no suitable established and regularly used coastal route, develop proposals that take account of risks to sensitive nature conservation features and incorporate mitigation as necessary in our proposals
- clarify when, where and how people may access the foreshore and other parts of the coastal margin on foot for recreational purposes
- work with local partners to design detailed proposals that take account of and complement efforts to manage access in sensitive locations
- where practical, incorporate opportunities to raise awareness of the importance of this stretch of coast for wildlife and how people can help efforts to protect it.

V) Conclusion

We have considered whether our detailed proposals for coastal access from Amble to Bamburgh might have an impact on the following sites of international importance for wildlife:

- Northumberland Marine SPA
- North Northumberland Dunes SAC
- Northumbria Coast SPA
- Northumbria Coast Ramsar site
- Berwickshire & North Northumberland Coast SAC

In Part C of this assessment we identify some possible risks to the relevant qualifying features and conclude that proposals for coastal access, without incorporated mitigation, may have a significant effect on these sites. In Part D we consider these risks in more detail, taking account of avoidance and mitigation measures incorporated into our access proposal, and conclude that there will not be an adverse effect on the integrity of the sites. These measures are summarised in Table 2 below.

Table 2) Summary of risks and consequent mitigation built in to our proposals

Risk to conservation objectives	Relevant design features of the access proposal
<p>Increased disturbance to breeding Arctic and little terns following changes in recreational activities as a result of the access proposal leads to reduced breeding success and reduction in population and/or contraction in the distribution of qualifying features within the site.</p>	<ul style="list-style-type: none"> • An inland alignment on the public right of way for the proposed England Coast Path avoiding sensitive areas. • Removal of CRoW access rights to the public where Arctic and little terns nest from 1st April to 31st August each year for nature conservation. • Existing key access point notices will be upgraded to indicate where this restriction is applied and will be maintained.
<p>Increased disturbance to overwintering purple sandpiper and turnstone following changes in recreational activities as a result of the access proposal leads to reduced fitness and reduction in population and/or contraction in the distribution of qualifying features within the site.</p>	<ul style="list-style-type: none"> • The trail proposal follows way-marked public rights of way or existing walked routes and doesn't cross any rocky foreshore - the preferred habitat for purple sandpiper and turnstone. • Clear way-marking to guide people along the coast to minimise the spread of current impacts. • There is a natural segregation in the coastal access margin as the majority of the extensive rocky foreshore is unfavourable for walking, with the majority of walkers preferring the sandy beach. • Signs to promote responsible dog walking by putting dogs on leads during the most sensitive times at the entry/exit points of two discrete trail sections ABB-2-S031 and ABB-3-S017 (reports ABB 2 and ABB 3) to be installed, where the proposal deviates away from the Northumberland Coast Path and moves closer to the shore on an existing walked route. • A Northumberland County Council Public Spaces Protection Order exists to put and keep dogs on leads, if such a restraint is necessary to prevent the worrying of any



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	<p>animal or bird in open spaces throughout the county to support compliance of the signs.</p>
<p>More frequent access in areas of sand dunes following changes in recreational activities as a result of the access proposal leads to the spread of invasive species (pirri-pirri burr) and reduces the structure and function (including its typical species) of the qualifying features within the site.</p>	<ul style="list-style-type: none"> • The trail proposal follows way-marked public rights of way or existing walked routes mainly over firm grassed surfaces where the habitat is more resilient to pirri-pirri burr establishment. • Prior to opening the route, where the trail proposal deviates from the monitored Northumberland Coast Path, a 4m cross section of the route will be surveyed across the dunes. Any pirri-pirri plants found will be removed before the path is opened to minimise the risk of spread and so that cover and frequency of pirri-pirri burr are within levels as stated in the supplementary advice for the conservation objectives. • Long-term monitoring and control of pirri-pirri burr will continue with the Northumberland County Council strategic mitigation service.

VI) Implementation

Once a route for the trail has been confirmed by the Secretary of State, we will work with Northumberland County Council to ensure any works on the ground are carried out with due regard to the conclusions of this assessment and relevant statutory requirements.

VII) Thanks

The development of our proposals has been informed by input from people with relevant expertise within Natural England and other key organisations. The proposals have been thoroughly considered before being finalised and our initial ideas were modified during an iterative design process. We are particularly grateful to Northumberland Coast AONB Partnership, Northumberland County Council, RSPB, National Trust and to other organisations and local experts whose contributions and advice have helped to inform development of our proposals.

Special thanks are due to Tom Cadwallender, for their generous contribution of time and invaluable knowledge of the dynamics of local bird populations.



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PART A: Introduction and information about the England Coast Path

A1. Introduction

Natural England has a statutory duty under the Marine and Coastal Access Act 2009 to improve access to the English coast. The duty is in two parts: one relating to securing a long-distance walking route around the whole coast: we call this the England Coast Path; the other relating to a margin of coastal land associated with the route where in appropriate places people will be able to spread out and explore, rest or picnic.

To secure these objectives, we must submit reports to the Secretary of State for Environment, Food and Rural Affairs recommending where the route should be and identifying the associated coastal margin. The reports must follow the approach set out in our methodology (the [Coastal Access Scheme](#)), which – as the legislation requires – has been approved by the Secretary of State for this purpose.

Where implementation of a Coastal Access Report would be likely to have a significant effect on a site designated for its international importance for wildlife, called a 'European site'¹, the report must be subject to special procedures designed to assess its likely significant effects.

The conclusions of this screening 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.

Natural England's approach to ensuring the protection of sensitive nature conservation features under the Coastal Access Programme is set out in section 4.9 of the Coastal Access Scheme.

A2. Details of the plan or project

This assessment considers Natural England's proposals for coastal access along the stretch of coast from Amble to Bamburgh. Our proposals to the Secretary of State for this stretch of coast are presented in a series of reports that explain how we propose to implement coastal access along each of the constituent lengths within the stretch. Within this assessment we consider each of the relevant reports, both separately and as an overall access proposal for the stretch in question

Our proposals for coastal access have two main components:

- alignment of the England Coast Path; and,
- designation of coastal margin.

¹ Ramsar sites are treated in the same way by UK government policy



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England Coast Path

A continuous walking route around the coast – the England Coast Path National Trail - will be established by joining up existing coastal paths and creating new sections of path where necessary. The route will be established and maintained to National Trail quality standards. The England Coast Path will be able to 'roll back' as cliffs and dunes on this stretch erode or slip, solving long-standing difficulties with maintaining a continuous route on this stretch of coast.

Coastal Access Margin

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

Coastal access 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. 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.

Maintenance of the England Coast Path

The access proposals provide for the permanent establishment of a trail and associated access management infrastructure. The England Coast Path will be part of the National Trails family of routes, for which there are national quality standards. Delivery is through local partnerships and there is regular reporting and scrutiny of key performance indicators, including the condition of the trail.

Responding to future change

The legal framework that underpins coastal access allows for adaptation in light of future change. In such circumstances Natural England has powers to change the route of the trail and limit access rights over the coastal margin in ways that were not originally envisaged. These new powers can be used, as necessary, alongside informal management techniques and other measures to ensure that the integrity of the site is maintained in light of unforeseen future change.



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Establishment of the trail

Establishment works to improve access and guide users will be carried out before the new public rights come into force on this stretch. Particular attention is paid to the location, design and installation of access management infrastructure on sites of conservation value. The approach is to always ensure that any establishment works are undertaken in the way that has least impact on other uses and features of the land in question.

Details of the works to be carried out and the estimated cost are provided in the access proposals. The cost of establishment works will be met by Natural England and completed by Northumberland County Council, subject to any further necessary consents being obtained, including to undertake operations on a SSSI. Natural England will provide further advice to the local authority carrying out the work as necessary.



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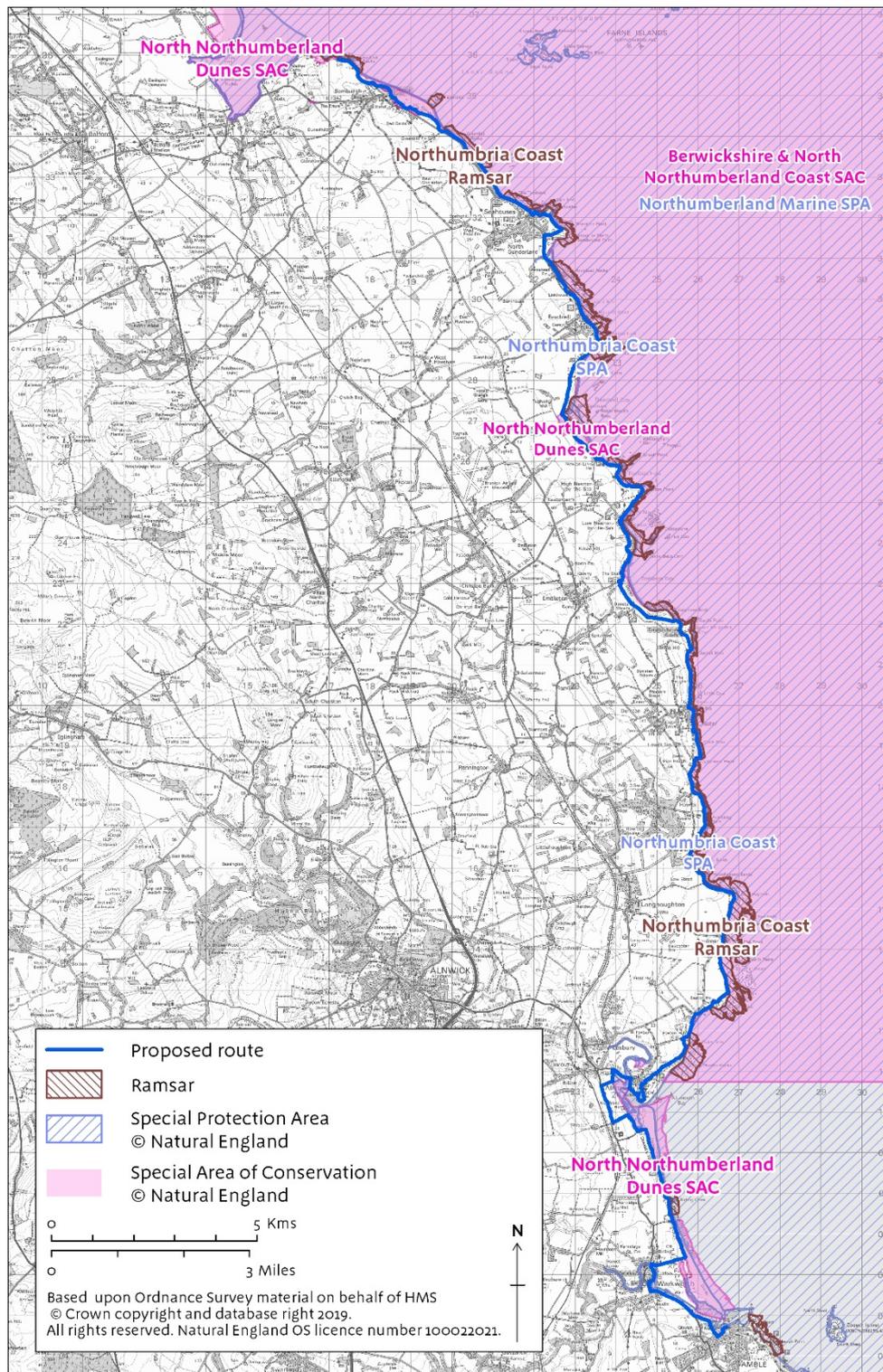
PART B: Information about the European Site(s) which could be affected

Table 3) Geographical Extent of European Designated Sites from Amble to Bamburgh

Proposal Reports	Amble to Alnmouth	Alnmouth to Craster	Craster to Annstead Dunes	Annstead Dunes to Bamburgh
European Designated Site				
Northumberland Marine SPA				
North Northumberland Dunes SAC				
Northumbria Coast SPA				
Northumbria Coast Ramsar site				
Berwickshire & North Northumberland Coast SAC				

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Figure 1) Map of European Designated Sites within the Amble to Bamburgh Coastal Access Proposals





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B1. Brief description of the European Sites(s) and their Qualifying Features

The coast consists of sandy bays separated by rocky headlands backed by dunes or cliffs. There are extensive areas of intertidal rocky reef and long sandy beaches, such as those at Beadnell and Embleton. Discrete areas of intertidal saltmarsh and mudflats are present in the Aln and Coquet estuaries. The open coast habitats extend into the subtidal zone, where large shallow inlets and bays and extensive rocky reefs are present.

- Northumberland Marine Special Protection Area (SPA) was classified on the 29th January 2017 and is the most recent European designation on the Northumberland coast. It supports a wide range of marine habitats and important breeding colonies of seabirds and auks. The surrounding waters are used for foraging and maintenance activities, such as bathing and preening.
- North Northumberland Dunes Special Area of Conservation (SAC) has a range of successional dune stages present from embryonic shifting dunes to fixed dunes with herbaceous vegetation including the rare habitat of dunes with *Salix repens ssp. argentea (Salicion arenariae)*, for which this is the only site in east/northeast England north of the Thames. This site supports a number of specialised rare flora, including petalwort *Petalophyllum ralfsii*.
- The Northumbria Coast SPA & Ramsar site supports internationally important populations of overwintering purple sandpiper and turnstone and breeding colonies of Arctic and little terns.
- The Berwickshire & North Northumberland Coast SAC contains a complex of marine habitat types, associated species and communities which is unusually diverse for the North Sea, in both a UK and European context. The site contributes to an important range of intertidal mudflats and sandflats in the UK as the best example of east coast clean sand and seagrass beds, and of moderately exposed reefs. Intertidal and submerged sea caves also contribute significantly to the site's overall habitat diversity and international importance. The site covers 115 km of coastline and extends out to sea for four nautical miles to encompass 645 square kilometres of shore and sea.

Table 4) Qualifying Features of European Designated Sites from Amble to Bamburgh

European Designated Site	Northumberland Marine SPA	North Northumberland Dunes SAC	Northumbria Coast SPA	Northumbria Coast Ramsar site	Berwickshire & North Northumberland Coast SAC
Qualifying Features					
A169 Turnstone <i>Arenaria interpres</i> (non-breeding)					
A191 Sandwich tern <i>Sterna sandvicensis</i> (breeding)					
A192 Roseate tern <i>Sterna dougallii</i> (breeding)					
A193 Common tern <i>Sterna hirundo</i> (breeding)					
A194 Arctic tern <i>Sterna paradisaea</i> (breeding)					
A195 Little tern <i>Sterna albifrons</i> (breeding)					
A199 Common guillemot <i>Uria aalge</i> (breeding)					
A204 Atlantic puffin <i>Fratercula arctica</i> (breeding)					
A670 Purple sandpiper <i>Calidris maritima</i> (non-breeding)					
H1140 Mudflats and sandflats not covered by seawater at low tide					
H1160 Large shallow inlets and bays					
H1170 Reefs					
H2110 Embryonic shifting dunes					
H2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ('White dunes')					
H2130 Fixed dunes with herbaceous vegetation ('Grey dunes')					
H2170 Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>)					
H2190 Humid dune slacks					
H8330 Submerged or partially submerged sea caves					
S1364 Grey seal <i>Halichoerus grypus</i>					
S1395 Petalwort <i>Petalophyllum ralfsi</i>					



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European Designated Site	Northumberland Marine SPA	North Northumberland Dunes SAC	Northumbria Coast SPA	Northumbria Coast Ramsar site	Berwickshire & North Northumberland Coast SAC
Qualifying Features					
Seabird assemblage					

B2. European Site Conservation Objectives (including supplementary advice)

Natural England provides advice about the Conservation Objectives for European Sites in England in its role as the statutory nature conservation body. These Objectives (including any Supplementary Advice which may be available) are the necessary context for all HRAs.

The overarching Conservation Objectives for every European Site in England are to ensure that the integrity of each site is maintained or restored as appropriate, and that each site contributes to achieving the aims of the Habitats Regulations, by either maintaining or restoring (as appropriate):

- The extent and distribution of their qualifying natural habitats,
- The structure and function (including typical species) of their qualifying natural habitats,
- The supporting processes on which their qualifying natural habitats rely,
- The supporting processes on which the habitats of their qualifying features rely,
- The population of each of their qualifying features, and
- The distribution of their qualifying features within the site.

Where Conservation Objectives Supplementary Advice is available, which provides further detail about the features' structure, function and supporting processes mentioned above, the implications of the plan or project on the specific attributes and targets listed in the advice will be taken into account in this assessment.

In light of the European Sites which could be affected by the plan or project, this assessment will be informed by the following site-specific Conservation Objectives, including any available supplementary advice;

The definitive list of qualifying features for each site (including any priority features) will be included within the relevant European Site Conservation Objectives, which can be found here at - <http://publications.naturalengland.org.uk/category/4698884316069888>



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For Ramsar sites, a decision has been made by Defra and Natural England not to produce Conservation Advice packages, instead focussing on the production of High Level Conservation Objectives. As the provisions of the Habitats Regulations relating to Habitat Regulations Assessments extend to Ramsar sites, Natural England considers the Conservation Advice packages for the overlapping European Marine Site designations to be, in most cases, sufficient to support the management of the Ramsar interests.



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PART C: Screening of the plan or project for appropriate assessment

C1. Is the plan or project either directly connected with or necessary to the (conservation) management (of the European Site's qualifying features)?

The Coastal Access Plan is not directly connected with or necessary to the management of the European or Ramsar sites for nature conservation listed in B1 above.

Conclusion:

As the plan or project is not either directly connected or necessary to the management of all of the European site(s)'s qualifying features, and/or contains non-conservation elements, further Habitats Regulations assessment is required.

C2. Is there a likelihood [or risk] of significant [adverse] effects ('LSE')?

This section details whether those constituent elements of the plan or project which are (a) not directly connected with or necessary to the management of the European Site(s) features and (b) could conceivably adversely affect a European site, would have a **likely significant effect**, either alone or in combination with other plans and projects, upon the European sites and which could undermine the achievement of the site's conservation objectives referred to in section B2.

In accordance with case law, this HRA has considered an effect to be 'likely' if it '*cannot be excluded on the basis of objective information*' and is 'significant' if it '*undermines the conservation objectives*'. In accordance with Defra guidance on the approach to be taken to this decision, in plain English, the test asks whether the plan or project '*may*' have a significant effect (i.e. there is a risk or a possibility of such an effect).

This assessment of risk therefore takes into account the precautionary principle (where there is scientific doubt) and **excludes**, at this stage, any measures proposed in the submitted details of the plan/project that are specifically intended to avoid or reduce harmful effects on the European site(s).

Each of the project elements has been tested in view of the European Site Conservation Objectives and against each of the relevant European site qualifying features. An assessment of potential effects using best available evidence and information has been made.

C2.1 Risk of Significant Effects Alone

The first step is to consider whether any elements of the project are likely to have a significant effect upon a European site ‘alone’ (that is when considered in the context of the prevailing environmental conditions at the site but in isolation of the combined effects of any other ‘plans and projects’). Such effects do not include those deemed to be so insignificant as to be trivial or inconsequential.

In this section, we assess risks to qualifying features, taking account of their sensitivity to coastal walking and other recreational activities associated with coastal access proposals, and in view of each site’s Conservation Objectives.

For the purposes of this assessment, the qualifying features of the European Sites listed in B1 have been grouped as follows:

Table 5) Feature Groups

Feature group	Qualifying feature(s)
Breeding terns	Sandwich tern Roseate tern Common tern Arctic tern Little tern
Breeding seabirds, excluding terns	Common guillemot Atlantic puffin Seabird assemblage
Overwintering waders	Turnstone Purple sandpiper
Seals	Grey seal
Mudflats & sandflats	Mudflats and sandflats not covered by seawater at low tide
Intertidal habitats	Large shallow inlets and bays Reefs Submerged or partially submerged sea caves
Sand dunes	Embryonic shifting dunes Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) Fixed dunes with herbaceous vegetation (grey dunes) Dunes with <i>Salix repens ssp. argentea</i> (<i>Salicion arenariae</i>) Humid dune slacks
Petalwort	Petalwort <i>Petalophyllum ralfsi</i>

Table 6) Assessment of Likely Significant Effects Alone

Feature	Relevant pressure	Sensitivity to coastal access proposals	Assessment of risk to site conservation objectives	LSE alone?
Breeding terns	Disturbance of nesting birds	Highly sensitive to disturbance by recreational activities including walking and walking with a dog.	<p>The little tern and Arctic tern nesting site at Long Nanny Burn would be open to access within the coastal access margin. The nesting area has until recently been protected from disturbance by temporary fencing. An increase in access is likely to reduce the time adults spend on the nest, increase the potential for predation and reduce the success rate of the nests.</p> <p>Sandwich, roseate and common terns only breed on Coquet Island and the Farne Islands, which are not affected by the coastal access proposals, being beyond mean low water.</p>	Yes for breeding Arctic and little terns
Breeding seabirds, excluding terns	Disturbance of nesting birds	<p>Low sensitivity, as Atlantic puffin and common guillemot breed on Coquet Island and the Farne Islands, whilst other seabirds (excluding terns) nest on inaccessible cliffs on the mainland not generally sensitive to walkers & dogs using the coast path.</p> <p>The seabirds forage at sea, outside the scope of the coastal access proposal, but within the Northumberland Marine SPA.</p>	<p>The trail proposal follows promoted public rights of way and existing walked routes on this highly accessed coastline. There is sufficient spatial separation between the England Coast Path (and associated coastal access margin) and the mainland nesting locations to not affect the site’s conservation objectives.</p> <p>Coquet Island, the Farne Islands and the North Sea are not affected by the coastal access proposals, being beyond low mean water.</p>	No

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Feature	Relevant pressure	Sensitivity to coastal access proposals	Assessment of risk to site conservation objectives	LSE alone?
Overwintering waders	Disturbance of foraging and resting waders	Overwintering waders feed on the intertidal habitat within the proposed coastal access margin. The trail proposal sits outside the Northumbria Coast SPA, but flocks of birds may still be disturbed by recreational activities, including walking and walking with a dog.	The Northumberland coast, including the beach, is already highly accessed, peaking in the summer months at the least sensitive time for overwintering waders. The England Coast Path between Amble and Bamburgh makes use of promoted public rights of way and existing walked routes. The proposal moves closer to the shore on existing walked routes at two locations: Longhoughton and Newton Point, which could create more disturbance.	Yes
Seals	Disturbance of resting grey seals in haul out areas	Resting grey seals on the foreshore and intertidal habitat near the England Coast Path (and associated coastal access margin) may be disturbed by recreational activities, including walking and walking with a dog.	There are no known haul out points between Amble and Bamburgh, so England Coast Path proposals for this stretch will not affect this feature.	No
Mudflats and sandflats	Trampling of fragile habitat	Habitat may be damaged by recreational activities, including walking.	Mudflats from Amble to Bamburgh can be found at the Coquet & Aln estuaries, which lie outside the boundary of the Berwickshire and North Northumberland Coast SAC. The mudflats at the Coquet estuary are within the North Northumberland Dunes SAC, but are not a qualifying feature.	No

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Feature	Relevant pressure	Sensitivity to coastal access proposals	Assessment of risk to site conservation objectives	LSE alone?
			The proposal here would not affect this feature.	
Intertidal habitats	Physical damage or loss	Intertidal habitats may be damaged or removed by recreational activities, including walking.	The intertidal habitats along the Northumberland coast are subject to natural processes and at such a scale that recreational impacts would be negligible. The habitats are already open to access or difficult to reach being subject to tidal influence. It is not foreseen that the England Coast Path will increase walkers on this section of coastline, therefore there is no appreciable risk to the qualifying habitats.	No
Sand dunes	Disturbance of dune habitat through visitor impacts	Possible increase in nutrient enrichment (from dog fouling) and areas of bare ground (from repeated trampling), above the target of 5-20% on fixed dunes, by recreational activities including walking and walking with a dog.	The trail proposal between Amble and Bamburgh on the designated dunes makes use of promoted public rights of way and existing walked routes on fixed dunes, which are more resilient to access erosion. Dogs usually urinate/foul within 400m of setting off for a walk and approximately 1m adjacent to the path. The proposal doesn't alter or add to the existing paths or entry/exit points and the pattern of use in this highly accessed area is unlikely to change with the introduction of the trail.	No
Sand dunes	Spreading invasive non-native species	Pirri-pirri burr in North Northumberland Dunes SAC is subject	Pirri-pirri burr is found within Bamburgh dunes, as well as in locations further north	Yes

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Feature	Relevant pressure	Sensitivity to coastal access proposals	Assessment of risk to site conservation objectives	LSE alone?
	(pirri-pirri burr)	to management and considered a concern, as it forms dense vegetation preventing native plants from establishing, affecting the structure and function (including typical species) of qualifying natural habitats.	and the risk of spread along the trail remains high, especially to areas not currently accessed, as the burrs can travel stuck to clothes and animal fur for distances greater than 5 km.	
Sand dunes	Permanent loss of habitat through installation of access management infrastructure	Habitat may be lost due to the installation of new access management infrastructure at Bamburgh dunes	The installation of 10 new way-marker posts and a set of 60 back-filled steps could lead to the permanent loss of approximately 20 m ² of habitat within the designated site.	Yes
Petalwort	Loss of petalwort plants as a result of visitor impacts	Possible loss of petalwort as a result of recreational activities including walking (tramping) and walking with a dog (nutrient enrichment from dog fouling).	<p>Petalwort has been recorded twice on Bamburgh Dunes in 2001 and 2004 adjacent to a path between the Dunes Car Park and the beach. This plant favours humid dune slack and tolerates only light shading from other plants, a situation which is maintained by low nutrient levels, light trampling and/or intense rabbit grazing.</p> <p>The trail at Bamburgh Dunes makes use of existing walked routes on fixed grassy surfaces and avoids the location where the petalwort was last recorded.</p> <p>The dunes are already highly accessed, so the creation of coastal access margin in this location is predicted to have a neutral impact on the</p>	No

Feature	Relevant pressure	Sensitivity to coastal access proposals	Assessment of risk to site conservation objectives	LSE alone?
			current distribution of the plant.	

Conclusion:

The plan or project alone is likely to have a significant effect on the following qualifying features:

[Go to C.3]

- **Breeding terns** - Arctic tern, little tern
- **Overwintering waders** - purple sandpiper, turnstone
- **Sand dunes** - embryonic shifting dunes, shifting dunes along the shoreline with *Ammophila arenaria* (white dunes), fixed dunes with herbaceous vegetation (grey dunes) dunes with *Salix repens ssp. argentea (Salicion arenariae)*, humid dune slacks - as a result of habitat loss through installation of access management infrastructure and risk of spreading pirri-pirri burr

The plan or project alone is unlikely to have a significant effect on the following qualifying features groups: **[Go to C2.2]**

- **None**

The following qualifying features are not considered sensitive to the coastal access proposal and no further assessment is required: **[Go to C.3]**

- **Breeding terns** - Sandwich tern, roseate tern, common tern,
- **Breeding seabirds, excluding terns** - common guillemot, Atlantic puffin, seabird assemblage
- **Seals** - grey seal
- **Intertidal habitats** - large shallow inlets and bays, reefs, submerged or partially submerged sea caves
- **Mudflats & sandflats** - mudflats and sandflats not covered by seawater at low tide
- **Sand dunes** - embryonic shifting dunes, shifting dunes along the shoreline with *Ammophila arenaria* (white dunes), fixed dunes with herbaceous vegetation (grey dunes) dunes with *Salix repens ssp. argentea (Salicion arenariae)*, humid dune slacks – as a result of disturbance of dune habitat through visitor impacts
- **Petalwort** – petalwort *Petalophyllum ralfsi*

C2.2 Risk of significant effects in-combination with the effects from other plans and projects

The need for further assessment of the risk of in-combination effects is considered here. Natural England considers that it is the appreciable risks of effects (from a proposed plan or project) that are not themselves considered to be significant alone, which must be further assessed to determine



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whether they could have a combined effect significant enough to require an appropriate assessment.

The Amble to Bamburgh coastal access proposals have been assessed as either likely to have a significant effect on qualifying features alone or qualifying features are not considered sensitive to the proposal. No appreciable yet insignificant effects have been identified from the proposal and as such there is no requirement for in-combination assessment at this stage.

C3. Overall Screening Decision for the Plan/Project

On the basis of the details submitted, Natural England has considered the plan or project under Regulation 63(1) (a) of the Habitats Regulations and made an assessment of whether it will have a likely significant effect on a European site, either alone or in combination with other plans and projects.

In light of sections C1 and C2 of this assessment above, Natural England has concluded:

As the plan or project is likely to have significant effects (or *may* have significant effects) on some or all of the Qualifying Features of the European Site(s) 'alone', further appropriate assessment of the project 'alone' is required.

PART D: Appropriate Assessment and Conclusions on Site Integrity

D1. Scope of Appropriate Assessment

In light of the screening decision above in section C3, this section contains the Appropriate Assessment of the implications of the plan or project in view of the Conservation Objectives for the European Site(s) at risk.

The Sites and the Qualifying Feature for which significant effects (whether ‘alone’ or ‘in combination’) are likely or cannot be ruled out and which are initially relevant to this appropriate assessment are:

Table 7) Scope of Appropriate Assessment

Designated site(s)	Qualifying feature(s) affected	Environmental threat	Risk to conservation objectives
Northumbria Coast SPA & Ramsar site, Northumberland Marine SPA	Arctic tern Little tern	Disturbance of nesting birds	Visual disturbance and above water noise from people and people with dogs are risks to the conservation objectives, affecting the population of the qualifying features by reducing the time adults spend on the nest, increasing the risk of predation and reducing the success rate of the nests. The magnitude of the pressure depends on the temporal scale, intensity and proximity of the activity to the feature.
Northumbria Coast SPA & Ramsar site	Purple sandpiper Turnstone	Disturbance of foraging and resting birds	Visual disturbance and above water noise from people and people with dogs are risks to the conservation objectives with repeated disturbance leading to reduced fitness and reduction in population and/or contraction in the distribution of qualifying features within the site. The magnitude of the pressure depends on the temporal scale, intensity and proximity of the activity to the feature.
North Northumberland Dunes SAC	Embryonic shifting dunes Shifting dunes along the	Spreading invasive non-native species (pirri-pirri burr)	Within the SAC pirri-pirri burr is present on Bamburgh dunes, as well as further north. It spreads by burrs attaching to walkers clothing and/or animal fur.

	<p>shoreline with <i>Ammophila arenaria</i> (white dunes) Fixed dunes with herbaceous vegetation (grey dunes) Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>) Humid dune slacks</p>		<p>Once established it forms dense mats of vegetation, which prevent establishment and spread of native species affecting the structure and function (including typical species) of qualifying natural habitats.</p>
<p>North Northumberland Dunes SAC</p>	<p>Embryonic shifting dunes Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) Fixed dunes with herbaceous vegetation (grey dunes) Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>) Humid dune slacks</p>	<p>Permanent loss of habitat through installation of access management infrastructure</p>	<p>The installation of access management infrastructure may lead to a loss of habitat reducing the extent and distribution of the qualifying feature: fixed dunes with herbaceous vegetation (grey dunes).</p>

D2. Contextual statement on the current status, influences, management and condition of the European Site and those qualifying features affected by the plan or project

The coast from Amble to Bamburgh is predominately rural and interspersed with attractive coastal settlements. Along the open, windswept coastline there are a series of contrasting rocky headlands with sandy bays backed by sand dunes, which support a number of protected species and habitats.



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The coastline is renowned for its nature and wildlife, which in itself attracts a large number of visitors, and with the proposed England Coast Path any increase in recreation by foot is taken into consideration for disturbing breeding Arctic and little terns and over-wintering purple sandpiper and turnstone, as well as its risk to sand dunes for spreading invasive non-native species (pirri-pirri burr).

Breeding Arctic & little terns

Arctic terns nest in high density colonies on dunes, shingle spits and ridges and low offshore islands where disturbance is limited. Long Nanny Burn is nationally important, as it is the largest mainland breeding colony in the UK and the only breeding site within the Northumbria Coast SPA. At classification in 2015 there were 1,549 breeding pairs, representing 2.92% of the British population at the time. The SPA population has since increased to 1,773 breeding pairs (5 year peak mean 2013-2017). Arctic terns forage in the Northumberland Marine SPA, which has been classified to protect the foraging areas of tern species and other breeding seabirds.

Little terns breed in small colonies nesting on coastal sand or shingle, sometimes only metres from the high-tide mark. Within Northumbria Coast SPA, Long Nanny Burn is a nationally important site with approximately 2% of the British breeding population using the site and foraging within the waters of Beadnell Bay and the Northumberland Marine SPA. Little terns also breed on the nearby Lindisfarne SPA, Farne Islands SPA and Coquet Island SPA.

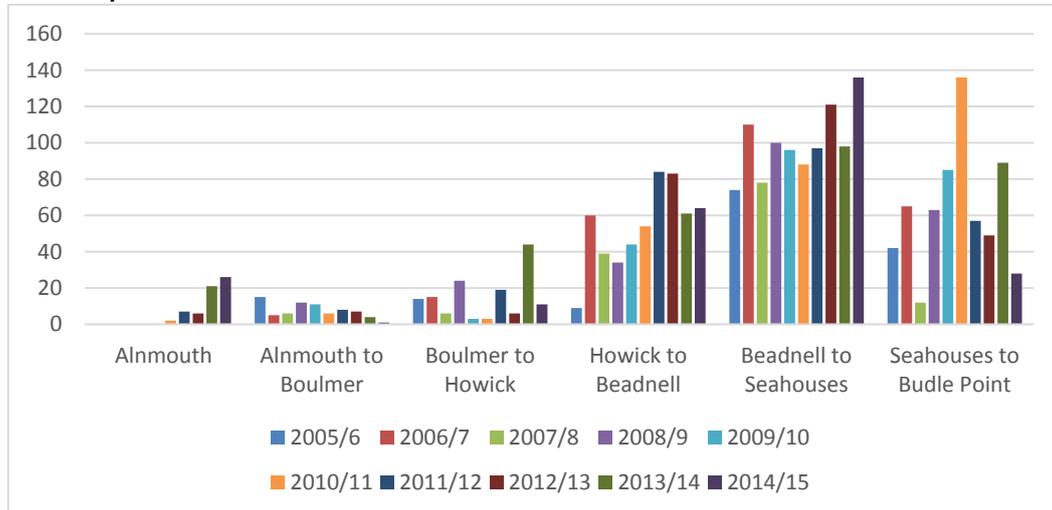
All breeding colonies of terns are sensitive to disturbance in their breeding season (April – August) and links between nesting and offshore foraging areas need to be maintained.

Overwintering purple sandpiper and turnstone

Purple sandpiper are present from October to April and are characteristic of the rocky shore occurring in high numbers on wave-cut platforms. A regular wintering flock of up to 120 birds can be seen at the Harkess Rocks, Bamburgh. This species is also commonly found on the rocks and seaweed in Craster and Seahouses harbours, as well as utilising man-made structures such as Blyth Pier in the south.

WeBS alerts show that numbers of purple sandpiper overwintering on Northumbria Coast SPA have been stable in the short-term having previously declined. The trend on the designated site appears to be tracking the regional and British trends. The increasing proportion of regional numbers supported by this site suggest the environmental conditions remain relatively favourable and also indicates that it is becoming increasingly important on a regional scale for this species.

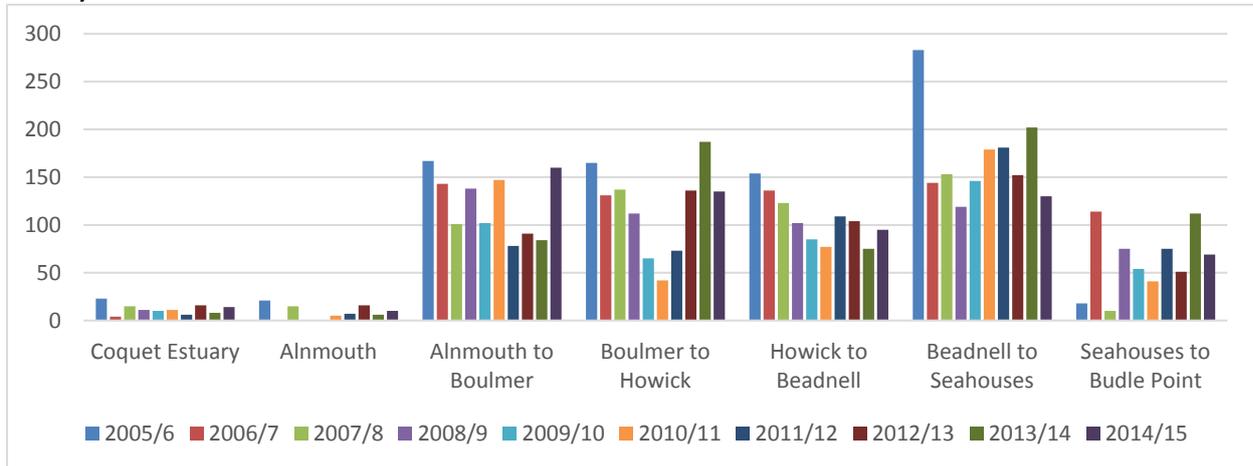
Figure 2) Ten year trend for purple sandpiper in the Amble to Bamburgh Coastal Access Proposal (source: WeBS)



Turnstone are more widely distributed along the whole of the Northumbria Coast SPA than purple sandpiper, using other habitats for feeding, for example man-made seawalls and jetties; strandlines on sandy beaches and muddy shores such as Alnmouth estuary. They are present from August to May.

WeBS alerts show numbers of turnstone over-wintering on Northumbria Coast SPA have been decreasing in the long-term. This appears to be tracking regional and British trends. The increasing proportion of regional numbers supported by this designated site suggest the environmental conditions remain relatively favourable and also indicates that it is becoming increasingly important on a regional scale for this species. In conclusion, the similarity between the declining site trend and the regional and British trends suggests that the declining numbers underpinning the alert result from broad-scale population trends.

Figure 3) Ten year trend for turnstone in the Amble to Bamburgh Coastal Access Proposal (source WeBS)



Sand dunes

The coastal access proposal from Amble to Bamburgh in the North Northumberland Dunes SAC affects Warkworth Dunes, Birling Links, Buston Links, Newton Links and Bamburgh Dunes. Warkworth Dunes are affected by the coastal access margin only, whereas with the others the England Coast Path is proposed to cross them on public rights of way or an existing walked route in the case of Bamburgh Dunes. The condition assessment for the SAC at Warkworth Dunes, Birling Links, Buston Links has not been recorded, whilst Newton Links and Bamburgh Dunes are unfavourable recovering due to either ragwort or scrub cover. The dunes are in a mix of ownership, with the fixed dune system of Newton Links and Bamburgh Dunes being conservation grazed during the winter.

For the most part the proposed trail follows the more resilient firm grassy surfaces of fixed dunes for ease of onward travel. All dunes are currently accessed by walkers, walkers with dogs and tourists to reach the beach beyond, as well as following the route of the Northumberland Coast Path and desire lines through the dunes to complete a circuit. The access assessment for Amble to Bamburgh predicts the England Coast Path proposals would not significantly increase or change the pattern of use from the current highly accessed status.

The trail proposal also crosses dunes not contained within the SAC designations.

Pirri-pirri burr

This invasive non-native species is found throughout rural Northumberland with hotspots in semi-natural habitats within the uplands, as well as on the coast at Lindisfarne NNR and Bamburgh Dunes, both highly visited places. The infestations centre on tourist spots where people move between locations to experience Northumberland spreading the spiked burrs, which attach to their clothing or their pet's fur. The conservation objectives look to maintain or reduce the frequency and cover of the burr prevent changes in surface condition, soils, nutrient levels or hydrology, which may



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encourage their spread. The attribute is periodically monitored as part of Natural England's site condition assessments.

New access management infrastructure and loss of qualifying habitat

To improve access and visitor's confidence that they are following the correct route; consideration has been given to the installation of access management infrastructure on designated sites. The approach is to always ensure that any establishment works, where necessary, are undertaken in the way that has least impact on qualifying features.

Our proposals for this stretch will see the installation of 60 new back-filled steps and 10 new way-marker posts in the North Northumberland Dunes SAC at Bamburgh Dunes. The infrastructure is located both directly adjacent to the trail and in the qualifying habitat of fixed dunes with herbaceous vegetation (grey dunes). The supplementary advice on the conservation objectives have set a target to maintain the extent and distribution of fixed dunes at 600 ha and bare ground interspersed with vegetation within the fixed dunes at 5-20% across the designated site.

Current Access

Tourism is one of the major contributors to the economy for the area, with this stretch of the Northumberland coast drawing large numbers of visitors every year. They are attracted by the natural and historic environment and recreational opportunities including golf, water sports, angling, bird and wildlife watching, walking and cycling. There are a number of promoted well-established long-distance walks and cycleways, such as the Northumberland Coast Path, St Oswald's Way and the Coast and Castles cycleway.

There are several coastal towns and picturesque villages on this stretch of coastline, which by their nature attract visitors. In the north of the stretch Bamburgh Castle attracts 150,000 visitors annually, some 50,000 visitors use Seahouses harbour between March and October to visit the Farne Islands NNR and Craster receives 240,000 visitors, many of which walk to Dunstanburgh Castle in the north or Howick in the south, following the Northumberland Coast Path.

A Northumberland County Council Public Spaces Protection Order exists throughout the county to put and keep dogs on leads if such a restraint is necessary to prevent the worrying of any animal or bird in open spaces.

Table 8) Breakdown of Proposed Coastal Access from Amble to Bamburgh

Proposed Coastal Access from Amble to Bamburgh	Length (km)	Percentage of total length (%)
England Coast Path - Amble to Bamburgh	48.10	100.0
Type of route		



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On road	11.30	23.4
Off road	36.80	76.5
Public right of way	23.72	49.3
Northumberland Coast Path and/or St Oswald's Way	29.55	61.5
Existing walked routes	22.65	47.1
Proposed new access	1.72	3.6

D3. Assessment of potential adverse effects considering the plan or project 'alone'

This section considers the risks identified at the screening stage in section C and assesses whether adverse effects arising from these risks can be ruled out, having regard to the detailed design of proposals for coastal access.

In reviewing the ability of any incorporated measures to avoid harmful effects, Natural England has considered their likely effectiveness, reliability, timeliness, certainty and duration over the full lifetime of the plan or project. A precautionary view has been taken where there is doubt or uncertainty regarding these measures.

D3.1 Design of the access proposal to address possible risks – at a stretch level

The key nature conservation issues for the Amble to Bamburgh coastal access proposals are:

- protection of breeding Arctic and little terns, which only occur at Long Nanny Burn in Beadnell Bay
- disturbance of overwintering purple sandpiper and turnstone, whilst foraging and resting on the rocky outcrops along the foreshore
- protection of the dune systems against the further spread of pirri-pirri burr and permanent loss of fixed dune habitat

In this section of the assessment we describe our overall approach to the issues and the main mitigation measures proposed to address the impacts and risks.

To inform our risk assessment, we have reviewed how the coast is currently used for recreation and how the established patterns and levels of access might be affected by the proposed improvement to access. The predictions made from this work are informed by available information, including:

- Strava on-line data, which shows aggregated public recreational activities (walking and running) over the past 2 years. It can be viewed on the [Strava](#) global heatmap website.



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- aerial photography
- travel and visitor information
- site visits
- input from local stakeholders including the Northumberland County Council Access Team, Northumberland Coast AONB Partnership and Natural England access colleagues.

The findings of this work are incorporated into the assessments below, where reference is made to the access assessment.

We also met with key stakeholders from Natural England, National Trust, RSPB, BTO, Northumberland County Council and Northumberland Coast AONB Partnership to highlight sensitive locations, scope out an acceptable access alignment with appropriate access infrastructure and to see whether any mitigation infrastructure was required in the design.

It is understood that the coast, including foreshore, is currently highly accessed all year round, although levels of use unsurprisingly peak during summer months. In striking a balance between access and nature conservation it was agreed to follow existing public rights of way or walked routes in the most sensitive locations and to consider limiting access at the most sensitive times, if an alternative route couldn't be found.

D3.2 Design of the access proposal to address possible risks – at a local level

In this part of the assessment we consider key locations along the coast between Amble and Bamburgh where establishing the England Coast Path and associated coastal access rights may impact on qualifying features of a European site. We explain how the detailed design of our proposals at these locations take account of possible risks.

The features occurring at each of these key locations are shown in the table below to make it easier to cross-reference between this assessment and the corresponding coastal access reports in which access proposals are made.

Table 9) Summary of Key Locations

Location	Coastal access report reference	Disturbance of breeding Arctic and little terns	Disturbance of overwintering purple sandpiper and turnstone	Risk of spreading pirri-pirri burr	Habitat loss from installing of new access infrastructure
Long Nanny Burn	ABB 3: Craster to Linkhouse, Beadnell				
Rocky outcrops on the foreshore	ABB 1: Amble to Alnmouth, ABB 2: Alnmouth to Craster, ABB 3: Craster to Linkhouse, Beadnell, ABB 4: Annstead Dunes to Bamburgh				
Warkworth Dunes, Birling Links, Buston Links, Newton Links, Bamburgh Dunes	ABB 1: Amble to Alnmouth, ABB 3: Craster to Linkhouse, Beadnell, ABB 4: Annstead Dunes to Bamburgh				
Bamburgh Dunes	ABB 4: Annstead Dunes to Bamburgh				

D3.2A Long Nanny Burn – disturbance of breeding Arctic and little terns

I) Current situation

Beadnell Bay and the surrounding links of Newton and Tughall are owned by the National Trust and they have managed the nesting site since 1977. This management has also seen the increase of nesting Arctic terns, which are now included as a qualifying feature of the Northumbria Coast SPA. Until recently Long Nanny Burn received LIFE funding to protect nesting little terns by temporarily roping off the area and wardening. This funding has now ceased, however, partnership working between the National Trust, Northumberland Coast AONB and Natural England has ensured that these arrangements remain in place for 2019. The Northumberland Coast Path travels along a public right of way to the west of the nesting site on a stable grassy surface providing good onward travel.

During nesting the National Trust wardens welcome visitors to the site to observe the terns from a hide. In 2017 it received 3010 visitors. Beadnell close by is a holiday destination with two static caravan parks, making the foreshore and paths around Beadnell Bay popular with holiday makers



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wanting short circular routes, as well as long distance walkers. The bay is also used for other recreational activities, such as horse riding, jet-skiing and kite surfing.

II) Detailed design features of the access proposal

The proposal is to follow the public right of way and the promoted Northumberland Coast Path approximately 300 metres west of nesting site. This route is sheltered from the nesting site being behind the dune ridge for the most part and out of view when crossing the burn. The path provides an easy to walk and way-marked route. With this alignment Newton and Tughall Links and the foreshore to mean low water will be in the coastal access margin.

III) Consideration of possible risks to qualifying features at this location in light of the access proposal

Walkers are separated from the nesting site through a voluntary wardening scheme. The path itself is sufficiently separated from the nesting site, being behind the dune ridge for the most part and out of view when crossing the burn, however the presence of the nesting site within the coastal margin remains a concern. To mitigate against the sensitivity to disturbance from walkers the CRoW access rights will be restricted for no public access within the nesting area during the breeding season from 1st April to 31st August every year. Existing National Trust notice boards at key access points will show the information to indicate where and when this restriction applies.

A map of the restriction can be seen in the England Coast Path Amble to Bamburgh Overview.

Conclusion

Natural England has considered the possible risks to qualifying features at this location, and given the avoidance and mitigation measures detailed above, consider that no new significant disturbance will be caused. The proposals will therefore not adversely affect the achievement of the conservation objectives in this location. Establishing a well maintained and easy to follow coast path along the alignment proposed will also help with the long-term management of visitors.

D3.2B Rocky foreshore on Northumberland Coast SPA & Ramsar site - Disturbance of overwintering purple sandpiper and turnstone

I) Current situation

All the rocky outcrops from Amble to Bamburgh are designated as part of the Northumbria Coast SPA and Ramsar site and all are currently easily accessed as part of the foreshore for recreation, including by walkers and walkers with dogs. Strava global heatmaps show walking is focussed on the sandy beaches and marked routes, with few straying on to the rocky outcrops. The current level of access is high and increases during the summer months, with an influx of tourists. Walking and walking with dogs along the beach and proposed route have been observed to continue during the winter months when mapping the route.

Due to the changes in the coastal landscape some areas of rocky shore beside the proposed route are more at risk from disturbance by walkers and walkers with dogs. These are areas where the coast meets the low lying intertidal rock platform, such as at Longhoughton Steel, Cullernose Point



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to Dunstanburgh Castle and Newton Point. These routes mainly follow the Northumberland Coast Path on public rights of way or existing walked routes.

Other discrete rocky areas can be accessed from the beach, such as Birling Carrs near Warkworth and rocks between Seahouses and Bamburgh.

WeBs data alerts have been triggered for both of the species assessed for the Northumbria Coast SPA and Ramsar site and the conservation targets have been set as restore to the figures at designation, whilst avoiding deterioration from its current level as indicated by the latest mean peak count or equivalent.

II) Detailed design features of the access proposal

The England Coast Path does not cross any areas of rocky outcrop and sits outside the boundary of the Northumbria Coast SPA and Ramsar site, meaning that these areas are only subject to the coastal access margin. The proposed path follows well-defined and way-marked routes with a suitable surface for easy onward travel either on public rights of way or existing walked routes, which are promoted as the Northumberland Coast Path. The proposal deviates away from the Northumberland Coast Path to follow the coastline at Longhoughton Steel, on an existing walked route and Newton Point, where it follows a clear existing walked path on National Trust owned land.

III) Consideration of possible risks to qualifying features at this location in light of the access proposal

The access assessment for Amble to Bamburgh predicts the England Coast Path proposal would not significantly increase or change the pattern of use from the current highly accessed status. It is known that people generally prefer to follow a clearly defined and well maintained route, as the England Coast Path would be. The coastal access proposals will help maintain the paths and improve way-marking. This will allow walkers to continue on the path and encourage them not to linger in sensitive areas. For the foreshore in the coastal margin, most walkers will avoid the rocks and rocky shore, as evidenced by Strava global heatmaps and the Northumberland Coast AONB coastal dog-walker survey where 75% of respondents didn't walk on the rocky shore, citing it as too dangerous, slippery or uneven and stating that they preferred the easier walking on the sandy beach.

At Longhoughton Steel (trail section ABB-2-S031) the path moves closer to the shoreline following an existing walked route through a flat grass field slightly elevated above the shore. The shoreline contains a thin strip of sand before an extensive range of rocky intertidal habitat. A risk identified here is walkers allowing dogs to roam on the intertidal habitat disturbing overwintering purple sandpiper and turnstone.

At Newton Point (trail section ABB-3-S017) the existing walked route and proposal sits close to the coastline with a long slope of grassland rising above. This extensive range of rocky intertidal habitat is difficult to walk across, with visitors and walkers preferring to stay on the path or use the sandy beach for recreation at Low Newton-by-the-Sea. From Low Newton-by-the-Sea for approximately 300m north the path is fenced for stock grazing, so preventing access to the rocky shore. From then on the route is open to the shore. A risk identified here is walkers allowing dogs to roam on the intertidal habitat disturbing overwintering purple sandpiper and turnstone.



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North of Newton Point the ground changes to dunes and rises above the rocky shore creating separation between the shore and the existing walked route and proposal. Football Hole beach sits between the two rocky outcrops and again walkers and visitors favour the path or beach with this path the only access to the beach.

To minimise the risk of disturbance and to contribute to the restoration target for purple sandpiper and turnstone in the coastal access margin signs to promote responsible dog walking by putting dogs on leads during the most sensitive times will be added at Longhoughton Steel and Newton Point.

Following guidance from Stephen Jenkinson (a specialist in managing dogs in the outdoors) a higher degree of compliance to signs at these sections is predicted, as they are short (approximately 500m and 800m), discrete, easily defined with gates at each end and there are areas close by where dogs can be off the lead. Explaining the reasoning and promoting wanted behaviours in the signs increases the effectiveness of compliance further, which will be done in collaboration with the access authority. This is further supported by information produced in visitor guides and leaflets promoting responsible dog-ownership on the Northumberland Coast, as well as the possible use of the Public Spaces Protection Order for non-compliance, which states that authorised officers or agents of the Council or police officers can order a dog to be put and kept on a lead no longer than 1.5m to prevent the worrying of any animal or bird in any open space within the County.

Conclusion

Natural England has considered the possible risks to qualifying features at this location, and given the mitigation measures detailed above, consider that no new significant disturbance will be caused. The proposals will therefore not adversely affect the achievement of the conservation objectives in this location.

D3.2C Warkworth Dunes, Birling Links, Buston Links, Newton Links, Bamburgh Dunes - risk of spreading of pirri-pirri burr

I) Current situation

As seen from Strava global heatmap, all the dune systems from Amble to Bamburgh both in and outside the North Northumberland Dunes SAC are highly accessed on foot to reach the beach, as well as following the route of the Northumberland Coast Path and desire lines through the dunes to complete a circuit. Between Amble and Bamburgh pirri-pirri burr has been recorded on the highly accessed Bamburgh Dunes

The trail proposal also crosses dunes not contained within the SAC designation; these will be covered in the Nature Conservation Assessment (NCA).

II) Detailed design features of the access proposal

In the North Northumberland Dunes SAC, it is proposed that the England Coast Path will cross Birling Links, Buston Links and Newton Links on public rights of way following the established



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Northumberland Coast Path. Here the trail is on a stable grassy surface, which is more resilient to trampling and changes in surface condition. It deviates from this at Bamburgh dunes where the proposal follows a more seaward route on an existing walked route.

The trail will replace and install new way-markers and infrastructure providing a clearly defined, easy to use path to guide walkers and reduce the current spread of impacts.

III) Consideration of possible risks to qualifying features at this location in light of the access proposal

Current dune management and evidence encourages light trampling to benefit species that depend on areas of open ground and bare sand; this also increases the risk of spread for pirri-pirri burr. Where possible the trail is routed across fixed dunes with a stable grassy surface, which is more resilient to trampling and changes in surface condition to help reduce the spread of pirri-pirri burr.

To evaluate and reduce risk it has been agreed to work with the Northumberland Coast AONB Partnership to survey a 4m corridor of the proposed trail, where it deviates from the monitored Northumberland Coast Path both within and outwith the SAC boundary prior to opening the route. Any pirri-pirri plants found will be removed to reduce the risk of spread.

With currently well accessed dunes and paths, the access assessment predicts the uplift in visitor numbers to be negligible from the England Coast Path, however the survey and any subsequent removal of pirri-pirri burr from the trail, reduces the potential spread onto dunes with lower levels of access further north in the SAC. The Northumberland Country Council strategic mitigation service, who will have responsibility for invasive species on protected sites within the AONB amongst other duties, will continue the long-term monitoring and control of pirri-pirri burr.

Conclusion

Natural England has considered the possible risks to qualifying features at this location, and given the mitigation measures detailed above, consider that no new significant disturbance will be caused. The proposals will therefore not adversely affect the achievement of the conservation objectives in this location.

D3.2D Bamburgh Dunes - habitat loss from installing of new access management infrastructure

I) Current situation

The access proposals across Bamburgh Dunes follows an existing walked route, through currently managed access points to allow for grazing. The existing path has a short steep incline, which is on bare ground and subject to access erosion. This dune system is expansive with a range of habitats from embryonic shifting dunes on the shoreline through to fixed dune where the route travels. A number of paths criss-cross the dunes, which have high levels of accepted access.



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II) Detailed design features of the access proposal

The proposed England Coast Path, close to Bamburgh Castle, moves from one level to another on the dune system to provide the trail with a more direct, convenient route and stable surface. To improve the access up the short incline 60 back-filled steps are proposed along with 10 new way-marker posts to help guide walkers through the dunes.

III) Consideration of possible risks to qualifying features at this location in light of the access proposal

The conservation target is to maintain the extent and distribution of fixed dunes with herbaceous vegetation (grey dunes) at approximately 600ha throughout the North Northumberland Dunes SAC, as well as maintaining or, as necessary, restoring bare ground or sand at 5-20% in a mosaic with vegetated surfaces to support the structure and function of the designated site.

The installation of the 60 back-filled steps and 10 way-marker posts equates to approximately 20m² (0.0003%) of fixed dune habitat loss or 0.00017% of the overall SAC.

The location of the steps is on an incline and follows a clearly defined route on bare soil. This can be seen from aerial photography and was noted on a site visit, which also found evidence of further erosion where a number of smaller routes were starting to develop across the incline. Formalising and improving the access, so encouraging walkers to use this route, will protect against future habitat loss in other areas.

The 10 new way-marker posts will guide walkers at entry/exit points to the dunes and will be installed along existing, mainly on bare ground tracks and paths in fixed dune habitat, which are distant from the known locations of petalwort. These existing routes are low in species diversity being well walked and linking two busy car parks at either end of the dune.

The installation of access management infrastructure will not reduce the conservation objectives thresholds for the extent and distribution of habitat and bare ground nor limit the structure and function of the dune.

Conclusion

Natural England have considered possible risks to qualifying features at these locations and consider that the scale of loss can be regarded as 'inconsequential' in the context of the conservation objectives for the feature, and the nature of the works will not adversely affect the continuity and functioning of the habitat as a whole. The location of waymarker posts and installation methods of the post and steps will be finalised at the establishment stage. Assessment of possible impacts on the European site will need to be checked and confirmed as part of the SSSI assenting process prior to works being carried out.

D3.3 Assessment of potentially adverse effects on site integrity (taking account of any additional mitigation measures incorporated into the design of the access proposal) alone

Table 10) Assessment of Adverse Effect on Site Integrity Alone

Risk to conservation objectives	Relevant design features of the access proposal	Can ‘no adverse effect’ on site integrity be ascertained? (Yes/No) Give reasons.	Residual effects?
Disturbance to breeding Arctic and little terns, following changes in recreational activities as a result of the access proposal, leads to reduced breeding success and reduction in population and/or contraction in the distribution of qualifying features within the site.	<ul style="list-style-type: none"> An inland alignment along public rights of way for the England Coast Path proposals avoiding the sensitive areas CRoW access rights will be restricted for no public access within the nesting area during the breeding season from 1st April to 31st August every year Existing notices at key access points will be updated to indicate where this restriction applies 	<p>Yes – no adverse effect.</p> <p>Breeding success of the colonies at Long Nanny Burn relies on intervention to reduce disturbance and predation. The nesting site is separated from the trail proposal by the nature of the landscape with the path sitting on a well-defined public right of way behind the dune ridge and below the sight lines of the birds.</p> <p>The restriction offers protection to the nesting terns in the coastal access margin during breeding season.</p>	No
Disturbance to overwintering purple sandpiper and turnstone, following changes in recreational activities as a result of the access proposal, leads to reduced fitness and reduction in population	<ul style="list-style-type: none"> Alignment of the trail is on highly accessed public rights of ways or walked routes, including the promoted Northumberland Coast Path Clear way marking to guide people along the coast and help reduce the spread of current impacts Include signs to promote responsible dog walking by putting dogs on leads during the most sensitive 	<p>Yes – no adverse effect.</p> <p>SPA birds move around the Northumberland coastline to utilise feeding opportunities. People also use the area for outdoor recreation and there is current interaction with overwintering purple sandpiper and turnstone on this well used coastline.</p> <p>There is no significant change predicted in the use and pattern of access from the proposals. In practice, there is a natural segregation since the majority of the rocky foreshore where purple sandpiper and turnstone prefer</p>	Yes

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<p>and/or contraction in the distribution of qualifying features within the site.</p>	<p>times at the entry/exit points at trail sections ABB-2-S031 and ABB-3-S017 (approximately 800m and 500m across 47km of proposed trail), where the proposal deviates away from the Northumberland Coast Path and is closer to the coastline.</p>	<p>to forage is difficult terrain and unfavourable for walking, with walkers sticking to the path or the sandy beach.</p> <p>Additional measures are included in our proposals to encourage walkers to stick to the path and keep their dog with them at sensitive times where the route deviates from the Northumberland Coast Path and passes closer to the coastline at Longhoughton Steel and Newton Point.</p>	
<p>More frequent access in areas of sand dune, following changes in recreational activities as a result of the access proposal, leads to the spread of invasive species (pirri-pirri burr) reducing the structure and function (including its typical species) of the qualifying features within the site.</p>	<ul style="list-style-type: none"> • Alignment of the trail is on highly accessed public rights of ways or walked routes, including the promoted Northumberland Coast Path • The trail is mainly over firm grassed surfaces, where the habitat is more resilient to pirri-pirri burr establishment. • Coastal access margin is already accessible. • Prior to opening the route, where the trail proposal deviates from the monitored Northumberland Coast Path a 4m corridor of the route will be surveyed across the dunes for pirri-pirri burr. Any plants found will be removed to minimise the risk of spread and so reduce the cover and frequency of pirri-pirri burr. • Long term monitoring of protected sites for invasive species through the strategic mitigation wardening service. 	<p>Yes – no adverse effect</p> <p>There is no predicted change in the access use from the proposals, however pirri-pirri burr is known to occur in Bamburgh Dunes and northwards within the SAC, where there is potential for new access. The partnership survey and pirri-pirri burr removal will limit the spread to other dunes within the SAC and potentially reduce the frequency of the plant below current levels with the on-going efforts of the strategic mitigation service.</p>	<p>Yes</p>

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<p>Loss of extent and distribution of fixed dune habitat and the structure and function of bare ground due to installation of new access management infrastructure</p>	<ul style="list-style-type: none"> • Alignment of the trail is on a highly accessed walked route through Bamburgh dunes and links two car parks. • The trail at Bamburgh dunes mainly follows bare ground or firm grassy paths. • The incline suffers from access erosion. • The existing walked route through Bamburgh dunes is distant from petalwort locations and has low species diversity. • Dunes by their nature are dynamic and subject to natural change. • Installation of 60 new back-filled steps on a short incline and 10 new way-marking posts to improve access and guide walkers from entry/exit points. 	<p>Yes – no adverse effect.</p> <p>The dune is already highly accessed and there is no predicted change in the use. The installation of access management infrastructure is placed on bare ground access routes and low sensitivity habitat. Formalising and improving the access by installing the steps and way-markers, so encouraging walkers to use this route, will protect against future habitat loss and restore habitat by allowing eroded areas on the incline to re-vegetate.</p> <p>The installation of access management infrastructure can be regarded as 'inconsequential' in the context of the conservation objectives for the feature, and the nature of the works will not adversely affect the continuity and functioning of the habitat as a whole.</p>	<p>No</p>
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Conclusion:

The following risks to conservation objectives identified in D1 are effectively addressed by the proposals and no adverse effect on site integrity (taking into account any incorporated mitigation measures) can be concluded for:

- Disturbance to breeding Arctic and little terns
- Loss of extent and distribution of fixed dune habitat and the structure and function of bare ground due to installation of new access management infrastructure

The following risks to achieving the conservation objectives identified in D1 are effectively addressed by the proposals and no adverse effect on site integrity (taking into account any incorporated mitigation measures) can be concluded, although there is some residual risk of insignificant impacts:

- Disturbance to over-wintering purple sandpiper and turnstone
- Spread of invasive non-native species (pirri-pirri burr)

D4 Assessment of potentially adverse effects on site integrity considering the project ‘in-combination’ with other plans and projects

The need for further assessment of the risk of in-combination effects is considered here.

Natural England considers that it is the appreciable effects (from a proposed plan or project) that are not themselves considered to be adverse alone which must be further assessed to determine whether they could have a combined effect significant enough to result in an adverse effect on site integrity.

Step 1 – Are there any appreciable risks from the access proposals that have been identified in D3.3 as not themselves considered to be adverse alone?

Natural England considers that in this case the potential for adverse effects from the plan or project has not been wholly avoided by the incorporated or additional mitigation measures outlined in section D3. It is therefore considered that there are residual and appreciable effects likely to arise from this project which have the potential to act in-combination with those from other proposed plan or projects. There are:

- Disturbance to over-wintering purple sandpiper and turnstone
- Spread of invasive non-native species (pirri-pirri burr)

Step 2 – Have any combinable risks been identified for other live plans or projects?

Table 11) Review of Other Live Plans and Projects

Competent Authority	Plan or project	Have any insignificant and combinable effects been identified?
Natural England	England Coast Path – Bamburgh to the Scottish Border, including Holy Island	This plan is in preparation and considers the risk of disturbance to over-wintering waders, light bellied Brent geese with functionally-linked land, breeding little tern, grey seals and on sand dunes; the spread of invasive non-native species (pirri-pirri burr). All are considered significant effects alone.
Northumberland Coast AONB Partnership	Northumberland Coast AONB Management Plan 2014-2019	No. This management plan is currently being reviewed. The 2014 -2019 Management Plan complements the mitigation measures set out in this appropriate assessment by putting in place policy and actions to: <ul style="list-style-type: none"> • Seek appropriate management and raise awareness of important breeding, feeding and

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		<p>roosting areas for shorebirds using the results of the wading bird disturbance project, including raising awareness of sites with recreational users through codes of conduct and 'taking your dog' campaign.</p> <ul style="list-style-type: none"> • Assess and map invasive species and put a plan in place to deal with them. • In general promote responsible dog ownership on beaches and in the countryside by continuing to produce and distribute 'taking your dog to the coast' leaflet.
Environment Agency	Northumberland and North Tyneside Shoreline Management Plan 2 Scottish Border to River Tyne May 2009	No adverse effects on the integrity of the sites from the implementation of the policies in the Shoreline Management Plan.
	Lindisfarne NNR Management Plan	No. The Management Plan complements the mitigation measures set out in this appropriate assessment by putting in place management to reduce the impacts of pirri-pirri burr on the NRR, as well as engaging with and managing access within the reserve to protect sensitive features.
Northumberland County Council	Northumberland Local Draft Plan for Regulation 18 Consultation (July 2018)	No, as to address development and increased population the Council has introduced a Strategic Coastal Mitigation Service. Developers will make a financial contribution to a strategic mitigation wardening service that will manage disturbances and implement positive measures to control any unwanted effects, where adverse impacts cannot be avoided.

In light of this review, we have not identified any significant and combinable effects that are likely to arise from other plans or projects.

Step 3 – Would the combined effect of risks identified at Steps 1 and 2 be likely to have an adverse effect on site integrity?

In light of the conclusions of steps 1 and 2, no further in-combination assessment is required.



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D5. Conclusions on Site Integrity

Because the plan/project is not wholly directly connected with or necessary to the management of the European site and is likely to have a significant effect on that site (either alone or in combination with other plans or projects), Natural England carried out an Appropriate Assessment as required under Regulation 63 of the Habitats Regulations to ascertain whether or not it is possible to conclude that there would be no adverse effect on the integrity of a European Site(s).

Natural England has concluded that:

It can be ascertained, in view of site conservation objectives, that the access proposal (taking into account any incorporated avoidance and mitigation measures) will not have an adverse effect on the integrity of:

- Northumberland Marine SPA
- North Northumberland Dunes SAC
- Northumbria Coast SPA
- Northumbria Coast Ramsar site
- Berwickshire & North Northumberland Coast SAC

either alone or in combination with other plans and projects.



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PART E: Permission decision with respect to European Sites

Natural England has a statutory duty under section 296 of the Marine and Coastal Access Act 2009 to improve access to the English coast. To fulfil this duty, Natural England is required to make proposals to the Secretary of State under section 51 of the National Parks and Access to the Countryside Act 1949. In making proposals, Natural England, as the relevant competent authority, is required to carry out a HRA under Regulation 63 of the Habitats Regulations.

We, Natural England, are satisfied that our proposals to improve access to the English coast between Amble and Bamburgh are fully compatible with the relevant European site conservation objectives.

It is open to the Secretary of State to consider these proposals and make a decision about whether to approve them, with or without modifications. If the Secretary of State is minded to modify our proposals, further assessment under the Habitats Regulations may be needed before approval is given.

Certification

Assessment prepared and completed by:	Rachel Webster	On behalf of the Coastal Access Programme Team
Date	13 th June 2019	
HRA approved:	Stephanie Bird-Halton	On behalf of Natural England: Northumbria Area Team
Date	13 th June 2019	



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(‘Habitats Regulations Assessment’)**

The British Trust for Ornithology. Wetland Bird Survey
<https://app.bto.org/webs-reporting/>