



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

**Assessment of England Coast Path proposals
between Combe Martin and Marsland Mouth**

**On Tintagel-Marsland-Clovelly Coast Special Area of
Conservation, (SAC), Bristol Channel Approaches SAC and
Braunton Burrows SAC**

15th January 2020

Contents:

Summary	3
PART A: Introduction and information about the England Coast Path	7
PART B: Information about the European Sites which could be affected.....	11
PART C: Screening of the plan or project for appropriate assessment	14
PART D: Appropriate Assessment and Conclusions on Site Integrity	19
PART E: Permission decision with respect to European Sites	33
References to evidence.....	34
Map - Location of European Sites from Combe Martin to Marsland Mouth	35
Map - Bristol Chanel Approaches SAC	36
Map - Tintagel Marsland Clovelly Coast SAC	37
Map - Braunton Burrows SAC	38
Map - Petalwort at Braunton Burrows SAC	39

Summary

1) 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').

- Tintagel-Marsland-Clovelly Coast SAC
- Bristol Channel Approaches SAC
- Braunton Burrows SAC

Natural England has a statutory duty under the Marine and Coastal Access Act 2009 to improve access to the English coast. This assessment considers the potential impacts of our detailed proposals for coastal access from Combe Martin to Marsland Mouth on the following sites of international importance for wildlife¹:

It should be noted that separate assessments have also been completed that considers Tintagel-Marsland-Clovelly Coast SAC and Bristol Channel Approaches SAC in relation to our coastal access proposals for the Marsland Mouth to Newquay stretch, due to site overlaps along the coast in this location. The HRA for the Marsland Mouth to Newquay stretch can be found by following the link below:

<https://www.gov.uk/government/publications/coastal-access-in-cornwall-from-marsland-mouth-to-newquay-comment-on-proposals>

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-combe-martin-to-marsland-mouth-comment-on-proposals>

¹ Linked assessments have been prepared for other European sites potentially affected by the access proposals for this stretch. These assessments are published as separate documents.

II) Background

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

Table 1 Summary of main wildlife interest

Interest	Description
Open coastal habitats	The Tintagel-Marsland-Clovelly Coast SAC includes cliff habitats within its designated features. The majority of these grassland and heathland habitats are west facing and so fully exposed to Atlantic storms therefore ensuring these habitats are strongly maritime in character.
Coastal woodland	Secondary woodland and ancient oak woodland occur within the sheltered narrow valleys of the Tintagel-Marsland-Clovelly Coast SAC that run at right angles to the coast. In addition, a stunted Oak woodland is located at The Dizzard growing on the exposed, north-westerly facing coastal slopes.
Harbour porpoise <i>Phocoena phocoena</i>	Harbour porpoise <i>Phocoena phocoena</i> is a feature of the Bristol Channel Approaches SAC. The site contains particularly high densities of porpoise, supporting some 4.7% of the UK Celtic and Irish Sea Management Unit population. The species use the site year round.
Sand dune habitats	Braunton Burrows SAC includes one of the largest areas of fixed and mobile dunes in the country. The dune feature also incorporates a significant area of humid dune slacks.

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 <http://publications.naturalengland.org.uk/publication/5327964912746496>

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.

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.

V) Conclusion

We have considered whether our detailed proposals for coastal access between Combe Martin to Marsland Mouth might have an impact on the Tintagel-Marsland-Clovelly Coast SAC, Braunton Burrows SAC and Bristol Channel Approaches 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 some of 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 any of these sites.

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

Risk to conservation objectives	Relevant design features of the access proposal
Realignment of the path might be detrimental to SAC features	<p>Identification of a route on the ground that is easy to use and follow and can be sustainably maintained.</p> <p>Where new sections of trail are created, avoiding sensitive areas that might be damaged by trampling and clearing scrub where this will benefit SAC features.</p> <p>Realignment at Braunton Burrows not assessed as detrimental to the sand dune habitat or lower plant species due to use of an existing walked route that is away from known Petalwort locations.</p>
Temporary damage to SAC features whilst works are carried out.	<p>Materials will be transported to site by hand. Existing tracks and/or adjoining agricultural land will be used to transport materials to the vicinity of the work site.</p> <p>Work on site to be carried out by hand.</p> <p>Works to be carried out when conditions are dry to avoid poaching of the ground.</p>

VI) Implementation

Once a route for the trail has been confirmed by the Secretary of State, we will work with Devon County Council to ensure any works on the ground are carried out with due regard to the conclusions of this appraisal 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 Devon County Council and to other organisations and local experts whose contributions and advice have helped to inform development of our proposals.

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.

The 2009 Legislation refers to the continuous trail with its associated margin and other access rights as being the England Coast Path. Where appropriate we have used existing established coastal trail routes and these will already be known by different local and regional names, such as the South West Coast Path. However there will be places where the established trail and the proposed new Coast Path route diverge. So to avoid confusion as to which route is being proposed under the 2009 Legislation in this report, it is intended to remain with the terminology used in the Act namely the England Coast Path. It is recognised and welcomed that other local established route names will continue to be used on the ground.

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 could impact on a site designated for its international importance for wildlife, called a ‘European site²’, a Habitats Regulations Assessment must be carried out.

The conclusions of this assessment are approved by a member of Natural England staff who is not a member of coastal access programme team and who has responsibility for protected sites. 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 <http://publications.naturalengland.org.uk/publication/5327964912746496>

A2. Details of the plan or project

This assessment considers Natural England’s proposals for coastal access along the stretch of coast between Combe Martin and Marsland Mouth on the Tintagel-Marsland-Clovelly Coast SAC, Braunton

² Ramsar sites and proposed Ramsar sites; potential Special Protection Areas (pSPA); candidate Special Areas of Conservation (cSAC); and sites identified, or required, as compensatory measures for adverse effects on European sites are treated in the same way by UK government policy

Burrows SAC and Bristol Channel Approaches SAC³. 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.

Our proposals for coastal access have two main components:

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

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 coastal path will be able to ‘roll back’ as the occasional cliffs on this stretch erode or slip and so maintaining a continuous route on this stretch of coast.

Of particular relevance to this assessment is that the proposed route within the Tintagel-Marsland-Clovelly Coast SAC follows the well-established walked route of the South West Coast Path (SWCP), and is referred to as such below with only occasional deviations from the existing route within the site. It is not anticipated there will be any significant changes to current levels or patterns of usage of either the path or land that falls within the proposed margin (much of which is already designated as Open Access). The SWCP is already a National Trail and is a high quality, walking route with a strong, internationally recognised identity, and its inclusion as part of the England Coast Path is not expected to significantly change how this stretch of coast is used for recreation.

Coastal Margin

An area of land associated with the proposed trail will become coastal margin, including all land seawards 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 <http://publications.naturalengland.org.uk/publication/5327964912746496>

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.

Promotion of the England Coast Path

³ Linked assessments have been prepared for other European sites potentially affected by the access proposals for this stretch. These assessments are published as separate documents.

The Coast Path will be promoted as part of the family of National Trails. On the ground, the path will be easy to follow, with distinctive signposting at key intersections and places people can join the route. Directional way markers incorporating the National Trail acorn symbol will be used to guide people along the route. The coastal margin will not normally be marked on the ground, except where signage is necessary to highlight dangers that might not be obvious to visitors, or clarify to the scope and/or extent of coastal access rights.

Information about the Coast Path will be available on-line, including via the established National Trails website that has a range of useful information, including things for users to be aware of, such as temporary closures and diversions. The route is depicted on Ordnance Survey maps using the acorn symbol. The extent of the coastal margin is also depicted, together with an explanation about coastal access, where they do and don't apply and how to find out about local restrictions or exclusions.

Maintenance of the England Coast Path

The access proposals provide for the permanent establishment of a path and associated infrastructure. The England Coast Path will be part of the National Trails family of routes, for which there are national quality standards. Delivery is by 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.

Establishment of the trail

Establishment works to make the trail fit for use and prepare for opening will be carried out before the new public rights come into force on this stretch. 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. Works on the ground to implement the proposals will be carried out by Cornwall 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.

Local context

The 2009 Legislation refers to the continuous trail with its associated margin and other access rights as being the England Coast Path. Where appropriate we have used existing established coastal trail routes and these will already be known by different local and regional names, such as the South West Coast Path (SWCP). However there will be places where the established trail and the proposed new Coast Path route diverge. So to avoid confusion as to which route is being proposed under the 2009 Legislation in this report, it is intended to remain with the terminology used in the Act namely the

England Coast Path. It is recognised and welcomed that other local established route names will continue to be used on the ground in preference to the England Coast Path.

The proposed route between Combe Martin and Marsland Mouth follows the well-established SWCP with only occasional route deviations. It is not anticipated there will be any significant changes to current levels or patterns of usage of either the path or land that falls within the proposed margin (much of which is already designated as Open Access). The SWCP is already a National Trail and is a high quality, well maintained walking route with a strong, internationally recognised identity, and its inclusion as part of the England Coast Path is not expected to significantly change how this stretch of coast is used for recreation.

PART B: Information about the European Sites which could be affected

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

Bristol Channel Approaches SAC

The Bristol Channel Approaches SAC lies along the south west coasts of Wales and England. This site straddles the Bristol Channel from Carmarthen Bay in the north to the northern coasts of Devon and Cornwall in the south. Designated for the protection of harbour porpoise *Phocoena phocoena*. This site supports an estimated 4.7% of the UK Celtic and Irish Sea (CIS) Management Unit population. This site is recognised as important for porpoises particularly during the winter when high densities persistently occur throughout the site.

Tintagel- Marsland – Clovelly Coast SAC

This site comprises an extensive length of largely hard coastal cliff, with a range of maritime influences and vegetation developed on hard neutral to acidic sedimentary rocks. It contains a range of vertical or near-vertical cliffs with intervening slumped sections. The greater part of this very long site, totalling approximately 60 km, is west-facing, fully exposed to Atlantic storms and therefore strongly maritime in character. The section east of Hartland Point faces north and north-east and is relatively sheltered.

Braunton Burrows SAC

Braunton Burrows SAC is one of the largest dune systems in Britain, about 5km long north-south and 1km wide, with lime-rich dunes up to 30 m high, and an extensive system of variably-flooded slacks, grassland and scrub, inland of a wide sandy foreshore. This provides a rich variety of dune habitat for many flowering and lower plants, and for many birds and invertebrates. Several species are nationally rare or vulnerable. There are also important features of geological interest. Braunton Burrows is a key site for coastal geomorphology. It is one of the three largest sand dune systems on the west coast of Britain and the one least affected by underlying geology and afforestation. It is also important for its diversity of form and has the greatest height range of any west coast dune system.

Table 3: Qualifying Features

Qualifying features	Bristol Channel Approaches SAC	Tintagel- Marsland – Clovelly Coast SAC	Braunton Burrows SAC
Harbour porpoise <i>Phocoena phocoena</i>	✓		
H1230 Vegetated sea cliffs of the Atlantic and Baltic Coasts		✓	
H91A0 Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles		✓	
H4030 European dry heaths		✓	
H1140 Mudflats and sandflats not covered by seawater at low tide			✓
H2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> , (white dunes). (Shifting dunes with marram)			✓
H2130 Fixed dunes with herbaceous vegetation (grey dunes). (Dune grassland)			✓
H2170 Dunes with <i>Salix repens ssp. argentea</i> (Salicion arenariae). (Dunes with creeping willow)			✓
H2190 Humid dune slacks			✓
S1395 <i>Petalophyllum ralfsii</i> , Petalwort			✓

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;

Bristol Channel Approaches SAC

<http://jncc.defra.gov.uk/page-7241>

Tintagel- Marsland - Clovelly Coast SAC

<http://publications.naturalengland.org.uk/publication/4847772322758656>

Braunton Burrows SAC

<http://publications.naturalengland.org.uk/publication/5092780342771712>

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 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 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 Sites 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 sites.

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 in Table 3 as 'feature groups' in order to simplify the screening assessment in Table 4. Each feature group comprises habitats / species that share similar ecological sensitivities to aspects of the coastal access proposals.

Table 4: Feature Groups

Feature group	Qualifying feature(s)
Sand dune habitats	H2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> , (white dunes). (Shifting dunes with marram); H2130 Fixed dunes with herbaceous vegetation (grey dunes). (Dune grassland); H2170 Dunes with <i>Salix repens ssp. argentea</i> (Salicion arenariae). (Dunes with creeping willow); H2190 Humid dune slacks
Open coastal habitats	H1230 Vegetated sea cliffs of the Atlantic and Baltic coasts; H4030 European dry heaths
Intertidal habitats	H1140 Mudflats and sandflats not covered by seawater at low tide
Harbour porpoise <i>Phocoena phocoena</i>	Harbour porpoise <i>Phocoena phocoena</i>
Woodland habitats	H91A0 Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles
Lower plant species	S1395 <i>Petalophyllum ralfsii</i> , Petalwort

Table 5. Assessment of likely significant effects alone

Feature	Relevant pressure	Sensitivity to coastal access proposals	Assessment of risk to site conservation objectives	LSE alone?
Sand dune habitats	Physical damage	Dunes are somewhat resilient to trampling, especially larger dune systems. Walking can be a contributing agent to management of the dunes, helping to maintain eg mobility / areas of bare sand or low vegetation. Care is needed over siting of infrastructure or if significant	Braunton Burrows will become part of the coastal margin. The dunes are already open to the public and with a dense network of informal paths already present on the ground. Public access will be secured by the proposals but the pattern of use on the ground is unlikely to be affected. However, the coast	Yes

		changes to access patterns are proposed, such as the rerouting of established paths.	path is proposed to be realigned from the back of the dune habitat to the sand flats in front of the fore dunes following an existing walked route through the sand dunes to the south of the site. Therefore, this aspect of the proposal will be considered further within the Appropriate Assessment.	
Open coastal habitats	Trampling of vegetation, Loss of extent and Temporary damage to habitat	<p>Due to the nature of the vegetation of these habitats they are somewhat resilient to trampling. However, repeated, focused trampling could adversely impact the vegetation and potentially cause erosion of the substrate.</p> <p>Realignments of the SWCP could temporarily damage surrounding habitat if machinery was not used carefully or during wet weather. Such works could also destroy coastal habitats if hard structures or materials were placed over areas of heath or grassland habitat.</p>	<p>Realignments of the existing SWCP are proposed within the Tintagel-Marsland-Clovelly Coast SAC at Dyers Lookout, south of Hartland Point and Gallantry Bower, north west of Clovelly. The realignments are proposed due to erosion of the substrate at Dyer's Lookout, and the presence of a Scheduled Monument close to the existing SWCP at Gallantry Bower. At both locations the primary habitat is Dry Heathland.</p> <p>Due to these proposed realignments, there is concluded to be a risk to the heathland feature of the site. The risk of an increase in trampling impact away from the proposed coast path is low due to existing formal and informal access allowed within the coastal margin and the above works ensuring the proposed coast path is more robust and easier to follow ensuring walkers are less likely to wander from the defined route.</p>	Yes
Intertidal habitats	Trampling / damage to habitats	Sensitivity to public access varies between the different sediment types. Sand flats are mobile and are less sensitive to trampling, whereas mudflat could be more sensitive to focused, repeated trampling	<p>No appreciable risk</p> <p>The realignment of the SWCP onto the sand flats seaward of the dune habitat at Braunton Burrows is not considered to pose a risk to the sand flat feature. This habitat is not sensitive to public access, with the beach area currently regularly used at present. The mudflat feature is limited to the mouth of the Taw Torridge</p>	No

			estuary. It is currently accessed by the public on an informal basis and is not considered to be sensitive to the coastal access proposals due to the regular public access seen at present.	
Harbour porpoise <i>Phocoena phocoena</i>	None	Our access proposals (including the associated coastal margin) extend to Mean Low Water (MLW) and therefore this feature lies outside the scope of this assessment.	No appreciable risk The boundaries of this site and the associated features are below Mean Low Water and therefore will not be affected by our proposals for coastal access.	No
Woodland habitat	Trampling of vegetation / damage to habitat	The woodland feature could be sensitive to our proposals if the coast path was realigned through the woodland habitat resulting in repeated trampling of the ground flora and potential impact on trees adjacent to the path due to compaction of the ground.	No appreciable risk The line of the existing SWCP is to be used within the vicinity of the woodland habitat with the majority of the woodland located on steep coastal slopes which are not compatible with public access.	No
Lower plant species	Loss of extent / Eutrophication	Petalwort <i>Petalophyllum ralfsii</i> favours areas of short and open turf. Therefore, a certain level of trampling can help to maintain the right conditions for this species However, Petalwort <i>Petalophyllum ralfsii</i> is sensitive to excessive trampling or the growth of rank vegetation as a result of eutrophication caused by concentrated dog fouling.	The main area recorded for Petalwort <i>Petalophyllum ralfsii</i> within the Braunton Burrows SAC is located around the Broadsands car park at the southern end of the site. In addition Petalwort is recorded along the southern end of the American Road which is currently used as part of the SWCP. As the proposed path is to follow a different route in this location, it is concluded that the proposals could have a Likely Significant Effect on the Petalwort <i>Petalophyllum ralfsii</i> feature.	Yes

Conclusion:

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

- H4030 European dry heaths
- H2120 Shifting dunes along the shoreline with *Ammophila arenaria*, (white dunes). (Shifting dunes with marram)

- H2130 Fixed dunes with herbaceous vegetation (grey dunes)
- S1395 *Petalophyllum ralfsii*, Petalwort

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

- Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles
- Harbour porpoise *Phocoena phocoena*
- H2170 Dunes with *Salix repens ssp. argentea* (*Salicion arenariae*). (Dunes with creeping willow)
- H2190 Humid dune slacks
- H1140 Mudflats and sandflats not covered by seawater at low tide

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

In C2.1 the qualifying features on which the access proposals might have an effect alone are identified – these are considered further in Part D of this assessment. For all other features, no other appreciable risks arising from the access proposals were identified that have the potential to act in combination with similar risks from other proposed plans or projects to also become significant. It has therefore been excluded, on the basis of objective information, that the project is likely to have a significant effect in-combination with other proposed plans or projects.

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 Sites ‘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 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 6 Scope of Appropriate Assessment

Environmental pressure	Qualifying Feature(s) affected	Risk to Conservation Objectives
Physical damage to the dune habitat due to realignment of the SWCP.	<ul style="list-style-type: none"> H2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i>, (white dunes). (Shifting dunes with marram) H2130 Fixed dunes with herbaceous vegetation (grey dunes) 	The routing of the proposed coast path through the dunes to the beach at the southern end of the Braunton Burrows site could result in physical damage to the dune habitat.
Loss of habitat as a result of installing new access management infrastructure related to new alignments at Dyers Lookout and Gallantry Bower.	<ul style="list-style-type: none"> H4030 European Dry Heaths 	The installation of new access management infrastructure to establish a new alignment impacts on the extent and distribution of qualifying features.
Temporary damage as a result of carrying out works on site	<ul style="list-style-type: none"> H4030 European Dry Heaths 	When installing the realignments to the path at Dyer’s Lookout and Gallantry Bower, the process of undertaking these works may cause temporary damage to a wider area of heathland habitat.
Trampling by recreational activities	<ul style="list-style-type: none"> H4030 European Dry Heaths 	Trampling pressure over the site is increased as a result of changes to the alignment of the SWCP causing a reduction in the extent and distribution of qualifying features.
Loss of extent of the Petalwort, <i>Petalophyllum ralfsii</i> population due to the change in access patterns.	<ul style="list-style-type: none"> S1395 <i>Petalophyllum ralfsii</i>, Petalwort 	Reduction in extent of the Petalwort population at Braunton Burrows due to the realignment of the SWCP on site resulting in a change in access patterns within the vicinity of known locations for the species.

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

Tintagel-Marsland-Clovelly Coast SAC

The total extent of the Vegetated sea cliffs of the Atlantic and Baltic coasts within the Tintagel-Marsland-Clovelly Coast SAC is estimated at 52km or 109ha. The supplementary guidance for the site details the extent and the mosaic of habitats that fall within this feature.... *‘The target of 52km is an approximate measure based upon Ordnance Survey (OS) maps, excluding those sections of wooded cliffs (The Dizzard, Blackchurch Rock to Clovelly and Hobby to Peppercombe). This length is derived by measuring linear sections between significant headlands and embayments rather than the more intricate length of mean high or low water as defined by the OS which would produce a far greater but arguably misleading measurement. These NVC surveys report a cumulative total of approximately 109 ha of maritime cliff (MC) communities. But this must be treated as a minimal extent given that it excludes transitional and mosaic stands of vegetation which contain an element of maritime vegetation and does not include either of the Devon component SSSIs.*

Heath communities are listed here as they are present in vegetative mosaics and transitions with other community types on the vegetated cliffs of this SAC. These communities also comprise the H4030 European dry heaths within this SAC and Table 2 should be referred to for all relevant attributes’.

There is approximately 190 ha of the H4030 European Dry Heath feature on the site, although this should be treated as the minimum extent as detailed within the supplementary advice package.

‘The estimate has been derived from a number of sources:

NVC surveys have been carried out for the Cornwall component SSSIs (see references in ‘Sources of site-based evidence’). These NVC surveys report a cumulative total of approximately 131.5 ha of heath (H) communities. But this must be treated as a minimal extent given that it excludes transitional and mosaic stands of vegetation which contain an element of heath communities. The area of “maritime heath” within Marsland to Clovelly Coast SSSI has been estimated as 58.5 ha based upon interpretation of aerial photographs from 2001 (Natural England 2009). There is no significant amount of heath vegetation within Hobby to Peppercombe SSSI. Phase 1 habitat maps from the 1980s are available for component SSSIs in North Devon, but coverage is not complete and they are at a large scale’.

The condition of the SAC habitats are assessed as part of the condition assessment of the underlying SSSI sites. The majority of the SSSI units within the Clovelly to Marsland and Hobby to Peppercombe SSSIs are deemed as in favourable or unfavourable recovering condition. Only one unit of the Clovelly to Marsland SSSI is assessed as in unfavourable condition due to a lack of active grazing management.

The Tintagel-Marsland-Clovelly Coast SAC Site Improvement Plan details seven main threats to condition / remedies:

1. Undergrazing – the need to re-introduce grazing to priority areas
2. Deer – effective deer control to encourage natural woodland regeneration
3. Invasive species – effective control of non-native invasive plant species
4. Forestry and woodland management – remove immature beech from sessile oak stands

5. Disease – Monitor infestations of ash die-back to inform appropriate action
6. Air pollution – investigate the impact of aerial nitrogen deposition
7. Pheasant rearing – Avoid damage from pheasant pens

Recreation is not listed as a current pressure or threat in the Site Improvement Plan.

The supplementary advice package for the site details the following as targets to maintain or restore favourable condition which relate to the environmental pressures outlined in table 4 above:

Vegetated Sea Cliffs and European Dry Heaths:

1. Maintain the total extent of the features, (excluding any trivial loss)
2. Maintain the geomorphological naturalness of the sea cliff system, from cliff top to foreshore connection with the intertidal zone.

European Dry Heaths:

1. Maintain an overall cover of dwarf shrub species which is typically between 25-90%

Typically the Vegetated sea cliffs and heathland habitats are widespread within this 60km coastal site. They often occur in a complex mosaic within the coastal margin making the assessment of impacts on individual features difficult.

Braunton Burrows SAC

The extent of the various dune habitats within the Braunton Burrows SAC extend to 891ha in total. The supplementary guidance package for the site details the extent of the various dune habitats as follows: *Braunton Burrows SAC is one of the largest dune systems in Britain, about 5km long north-south and 1km wide, with lime-rich dunes up to 30 m high, and an extensive system of variably-flooded slacks, grassland and scrub, inland of a wide sandy foreshore. This provides a rich variety of dune habitat for many flowering and lower plants, and for many birds and invertebrates. Several species are nationally rare or vulnerable. There are also important features of geological interest. Braunton Burrows is a key site for coastal geomorphology. It is one of the three largest sand dune systems on the west coast of Britain and the one least affected by underlying geology and afforestation. It is also important for its diversity of form and has the greatest height range of any west coast dune system.*

The sites condition is assessed as part of the monitoring programme of the underlying SSSI. The majority of the site is considered to be in unfavourable recovering condition due to the extent of scrub cover on the site and failing of targets in relation to the sward height and structure. In addition, the Site Improvement Plan details a number of threats and pressures on the site:

1. Inappropriate coastal management
2. Hydrological changes
3. Inappropriate scrub control
4. Air pollution: impact of atmospheric nitrogen deposition
5. Agricultural management practices
6. Public access/disturbance

Priority 6 within the site improvement plan relates to public access. Further detail is provided within the document as follows: *Public use is heavy and may affect all SAC features. Highly popular with local dog-walkers and for general recreation the site receives significant use by tourists each summer. As a result there is localised erosion, occasional fires (accidental or deliberate), localised eutrophication and litter problems. There is a need to better understand the ecological effects of these on the SAC.* The stated action associated with this threat is detailed as: *Investigate the effects of eutrophication (severity) caused by dog fouling on sand dunes, perhaps in conjunction with atmospheric nitrogen deposition.*

The supplementary advice package for the site details the following as targets to maintain or restore favourable condition which relate to the environmental pressures outlined in table 4 above:

H2120 Shifting dunes along the shoreline with *Ammophila arenaria* ('White dunes')

If loss (or gain) of area is due to natural causes, this is not a decline in condition; but any significant loss due to human interference (e.g. sand extraction, visitor impacts) is to be regarded as unfavourable.

H2130 Fixed dunes with herbaceous vegetation ('Grey dunes')

For this feature if loss (or gain) of area is from natural causes dynamism this is not an unacceptable decline in condition, but any significant loss due to human interference is to be regarded as unfavourable.

Patches of bare sand are essential for a wide range of typical dune invertebrates and 'dune annual' plants. For semi-fixed/fixed dunes the range of bare ground/sand is typically between 5-20%. Areas of bare sand which are maintained by frequent human disturbance should not increase in extent.

S1395 Petalwort, *Petalophyllum ralfsii*

The current recreational use of the site assists in maintain the habitat in part. However, there is an inadvertent risk of damage, where nutrient enrichment by dogs may encourage taller growth of vegetation that can overgrow Petalwort.

Petalwort requires firm or compacted substrates and avoids very loose or mobile sand, thus excessive disturbance will be harmful. There is a narrow zone of disturbance intensity that provides the right conditions - too much and the ground remains too unstable for establishment, whilst too little and the ground may become overgrown by a closed turf. There should be no excessive disturbance to dune slacks or other sandy ground supporting Petalwort, for example caused by excessive trampling or jogging, or the use of vehicles or scrambler motorbikes.

The recreational use of the site assists in maintain the habitat in part. However, there is a risk of damage, particularly by the presence of dogs.

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 Proposed path improvement works within the Tintagel-Marsland-Clovelly Coast and Braunton Burrows SAC sites

The South West Coast Path National Trail passes through the Tintagel-Marsland-Clovelly Coast SAC providing an estimated 35km of managed path within the coastal stretch subject to this assessment. The width of the path varies but where the terrain allows is typically 1.5m, allowing two people to walk abreast or space for overtaking/passing. The surface of the path is generally compacted earth created by regular passage of feet. In addition to the SWCP there are a number of other recreational routes within the site.

As part of implementing coastal access within this stretch of coast, targeted realignments of the SWCP are proposed to create a path that is easier to follow, prevents damage to important archaeology and coastal habitats and improves the experience for those using the path.

Our proposals for the England Coast Path within the two SACs will improve the experience for people using the SWCP and help to manage walkers by creating a path surface that is easy to use and follow at all times of year. This in turn will encourage walkers to remain on the line of the coast path ensuring previously damaged habitat in the margin can recover as can be seen at Dyers Lookout. We are using remedies that have been tried and tested by the Access Authority over a number of years.

D3.2 Detailed assessment of planned works

In this section we have made a location by location assessment of the works planned. Following surveys of the condition of the existing SWCP site surveys by the Access Authority and Historic England, the locations detailed below within the Tintagel-Marsland-Clovelly Coast SAC have been selected for the following reasons:

Dyers Lookout

The existing SWCP at Dyers Lookout is steep and difficult to follow with shallow soils resulting in wider damage to the SAC heathland as walkers spread out from the line of the path, (see photos below). It is proposed to realign the path slightly inland and create a path that zigzags up the slope to prevent erosion of the path surface and wider damage to the heathland habitat due to surface runoff and the migration of walkers.



Gallantry Bower

The existing SWCP runs seaward of the Scheduled Monument at present. Historic England are concerned that the path is causing damage to the tumulus structure due to the route of the path skirting the base of the structure at this location. As such it is proposed to close off a short section of the SWCP and redirect walkers landward of the monument along existing paths, cutting back the scrub either side to make the route more attractive to use. Cut vegetation will be used to block off the existing path allowing vegetation to re-colonise.

Braunton Burrows

At present the SWCP follows the American Road running at the back of the sand dune site. As a result the path in this location is some distance from the coast with no sea views. For these reasons it was not felt that the SWCP route in this location met the objectives of the Coastal Access Scheme. Therefore, it is proposed to use an existing spur of the SWCP to take the coast path through the dunes at the southern end of the site and realign the coast path along the beach in front of the dune system.

Table 7 Detail of planned trail realignment works

Location	Coast path section number	Habitat	Current Issue	Remedial actions
Dyers Lookout	CMM Sec 429-431	Dry coastal heathland	Existing route is difficult to use and causing wider damage to heathland habitat.	To create a new sustainable alignment inland of the existing route, with two waymarker posts at either end of the new alignment and post and rail fencing to block off the old route. Timber or granite revetments will be installed at each bend as the path zig zags up the slope. 2 x waymarker posts = 0.02m ² Brushcutting vegetation along line of new path – 360m x 1.2m = 432m ² Post and rail fence to block off old path as a safety measure = 0.9m ² 5 Timber or granite revetments - 1m x 0.1m = 0.5m ²
Gallantry Bower	CMM Sec 367	Dry coastal heathland	Existing route is causing damage to Scheduled Monument	To re-direct the coast path landward of the monument through the gorse following existing desire lines. Cut material will be used to block off existing SWCP. Brushcutting vegetation along line of new path – 60m x 1.5m = 90m ²
Braunton Burrows	CMM Sec 171A – 171E	Sand dune and sand flat	Existing route is inland with no sea views.	To re-route the coast path through the dunes from Broadsands car park, to run the coast path along the beach in front of the dune system. No new works required due to path within dunes already in place.

Temporary damage whilst works are carried out

Temporary damage may occur to SAC habitat during the carrying out of some of the proposed works, particularly at Dyers Lookout where waymarkers and revetments are to be installed along the new alignment. However, it should be noted that at present this location suffers from damage to the habitat due to foot fall, shallow soils and runoff. The proposed works are designed to manage these issues in a sustainable way, with the affected areas likely to re-vegetate. Without taking this action, this location will remain with damaged habitat that is unlikely to recover in the foreseeable future.

It should be noted that particular care will be taken when carrying out the proposed works at Dyers Lookout and Gallantry Bower. When considering the method of undertaking the works the following points have been included to ensure minimal temporary impact on the site:

- Materials will be transported to site by hand.
- Existing tracks and / or adjoining agricultural land will be used to transport materials to the vicinity of the work site.
- Work on site will be carried out by hand.
- Works will be carried out when conditions are dry to avoid poaching of the ground.

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

In this section of the assessment we consider the overall impact of the access proposals on the Tintagel-Marsland-Clovelly Coast SAC and Braunton Burrows SAC.

Table 8 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?
Physical damage to the dune habitat due to realignment of the SWCP.	The proposed realignment will use an existing 'spur' of the SWCP taking the new coast path through the sand dunes from Broadsands car park to the beach in front of the dune system.	Yes Through consultation with the Access Authority it was confirmed that the existing bridleway / SWCP 'spur' could accommodate additional use as part of the realigned coast path without having a detrimental impact on the sand dune habitat. Existing signage is adequate for the new path, with any new information signs to be attached to existing infrastructure on site.	No
Loss of habitat as a result of vegetation clearance and installation of new access management infrastructure at	Clearance of existing vegetation and installation of infrastructure at Dyers Lookout. Clearance of the new path at Gallantry Bower.	Yes Along the proposed new sections of path, an area of up to 522m ² will be cleared to make way for the new alignments. Within this area 0.5m ² will be lost as a result of installing revetments to the new path at	Yes

Dyers Lookout and Gallantry Bower.		<p>Dyers Lookout. An additional 0.92m² will be lost at this site due to post and rail fencing to block the old route and installation of new waymarkers.</p> <p>The area affected, (522.92m²), is small in the overall context of the site. These realignments occur within heathland habitat, with the total area of the heathland feature of the site estimated to be a minimum of 190ha, (1,900,000m²).</p> <p>The proposed infrastructure will help prevent the path becoming eroded and damaging adjacent SAC habitat.</p> <p>The former line of the path at both Dyers Lookout and Gallantry Bower will be blocked off with fencing or cut gorse allowing recolonization to occur.</p> <p>Although it is concluded no adverse effect on integrity, it is considered that a residual impact remains, due to the new access infrastructure at Dyers Lookout resulting in a permanent loss of heathland habitat, (1.42m²).</p>	
Temporary damage as a result of carrying out works on site	Use of methods and techniques that minimise temporary impacts whilst works are carried out.	<p>Yes</p> <p>Any temporary damage will be kept to a minimum with the installed works resulting in a more appropriate and robust path in the long term.</p>	No
Trampling by recreational activities	Due to the topography at Dyers Lookout and proximity of the cliff edge at Gallantry Bower, the new alignments are considered more sustainable and likely to result in less damage to the surrounding habitat than the existing line of the SWCP. At Braunton Burrows, the proposed route is already a well used section of path being part of the SWCP and used as part of a popular circular route.	<p>Yes</p> <p>There will be an increase in trampling along newly created sections, however; Realignment of the path at Dyers Lookout is taking place where the current route is causing erosion and it is difficult to maintain a suitable surface for walkers. The proposed realignment will help to manage access to the site and reduce damage, or risk of damage, to SAC habitat.</p> <p>There is less risk of new desire lines from the alignments being created due to the gradient, surrounding vegetation and the fact the new alignments will be clearly defined on the ground with associated infrastructure.</p> <p>The area affected (522m²) is small in the overall context of the site.</p> <p>Where walkers are directed along the new alignment, trampling pressure will reduce along the line of the former path, allowing some recolonisation.</p> <p>The newly established alignments will be maintained by clearing encroaching</p>	No

		vegetation. By doing this it will ensure that the line of the path is clear and walkers will remain on the line of the path preventing damage to the wider SAC habitat.	
Loss of extent of the Petalwort, <i>Petalophyllum ralfsii</i> population due to the change in access patterns.	The proposed realignment at the southern end of the Braunton Burrows site, will divert walkers of the coast path away from the Petalwort population found along the American Road.	<p>Yes</p> <p>The Petalwort feature is found at five main locations within the site, with the majority of plants found within and around the Broadsands car park area. A smaller population is located along the margins of the American road to the south of the site, (see map at Appendix 1). The proposed realignment of the coast path at Braunton Burrows is expected to cause some re-distribution of access patterns in the southern section of the site, as the England Coast Path will be signposted along an existing path through the dunes, rather than using the current SWCP route along the American Road. Footfall along the American Road may decrease as a result but not to the extent conditions for Petalwort will be affected, since it is part of popular circular routes from the car park at Broadsands. Footfall along the new route over the dunes is expected to increase, but Petalwort doesn't grow in this area as the sand is looser and substrate not suitable. Petalwort is also found in parts of the Broadsands car park, through which the SWCP passes. Use of the visitor car park is both a benefit and a threat to Petalwort and management measures are in place, including to encourage owners to pick up after their dogs. The access proposals will not interfere with current or future action in this regard.</p>	No

Conclusion:

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:

- **Physical damage to the dune habitat due to realignment of the SWCP.**
- **Temporary damage as a result of carrying out works on site**
- **Trampling by recreational activities**
- **Loss of extent of the Petalwort, *Petalophyllum ralfsii* population due to the change in access patterns.**

D4 Assessment of potentially adverse effects 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.

Residual risk of insignificant impacts from the access proposals

Natural England considers that in this case the potential for adverse effects from the access proposals 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 plans or projects. These are:

Table 9 Residual risk of insignificant impacts from the access proposals

Residual risk	Qualifying features affected
Loss of extent due to the proposed path realignments at Dyers Lookout and Gallantry Bower	Tintagel-Marsland-Clovelly Coast SAC: H4030 European Dry Heaths

Combinable risks arising from other plans or projects

In this section we consider other live plans or projects we are aware of, that might interact with the access proposals, to identify any insignificant and combinable effects that have been highlighted in corresponding Habitats Regulations Assessments.

Table 10 Review of other live plans or projects

Competent Authority	Plan or project	Have any insignificant and combinable effects been identified?
Cornwall Council	Local Plan – 2016 - 2030	<p>Yes</p> <p>The Local Authority have concluded that there would be an insignificant effect from an increase in residents in the area. This may result in an increase in footfall and risk of trampling within the site. The Local Plan suggests that a visitor survey in the future might be needed to establish the future visitor numbers using the site and where visitors have originated from.</p>
North Devon and Torridge District Councils	Local Plan – 2011 - 2031	<p>No</p> <p>The assessment concludes no Likely Significant Effect or residual effects on the Tintagel-Marsland-Clovelly Coast SAC as a result of the proposed housing development in this area.</p>
Cornwall Council/Natural England	Planning consultations within the site and projects subject to SSSI consent since 2013	<p>No</p> <p>Investigation through the Natural England mapping system Webmap has revealed a number of planning consultations and projects subject to SSSI consent or assent have been recorded within the boundary of the SAC since 2013. However, none are recorded which have resulted in either a loss of the heathland qualifying feature or identify residual risks to the SAC features which should be considered in combination with this assessment.</p>

Natural England	Coastal Access Proposals for the Marsland Mouth to Newquay stretch.	Yes The proposals for the Marsland Mouth to Newquay stretch has identified a small loss of extent, (90m ²) associated with the installation of new access infrastructure where the existing SWCP is to be realigned. This loss of extent is also associated with the H4030 European Dry Heaths feature.
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Assessment of in-combination effects

In light of the conclusions above, we have made an assessment of the risk of in combination effects. The results of this risk assessment, taking account of each qualifying feature of each site and in view of each site's Conservation Objectives, are as follows:

Qualifying feature affected	In-combination pressure	Assessment of risk to site conservation objectives	Adverse effect in-combination?
H4030 European Dry Heaths	A small increase in visitors to the SAC is likely as a result of the Cornwall Council Local Plan that might increase trampling of SAC habitat.	The Coast Path proposals will result in a small loss of SAC habitat as a result of realigning the path and installing new access management infrastructure. No further loss of habitat is anticipated as a consequence of the Local Plan. The improvements proposed as part of coastal access will make the Coast Path more robust and so help reduce the risk of impacts on SAC habitat as a result of more visitors to the coast.	No
H4030 European Dry Heaths	The incombination effect from the Coastal Access proposals for Marsland Mouth to Newquay include a small loss of extent of the dry heath feature.	The coastal access proposals for both stretches within the Tintagel-Marsland-Clovelly Coast SAC result in a combined loss of extent to the Heathland feature of 91.42m ² . However, the proposed realignments will create a more robust, well defined coast path that will limit any wider damage to the SAC	No

		habitat caused by users deviating from the official route. In addition it should be noted that the calculated loss of extent remains very small compared to the total area of the H4030 European Dry Heaths feature, (190ha).	
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The possibility of adverse effects arising in combination with other plans and projects is thus ruled out.

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.

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 Tintagel-Marsland-Clovelly Coast SAC or Braunton Burrows SAC either alone or in combination with other plans and projects.

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 Combe Martin to Marsland Mouth 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 by:	Hugh Tyler	Cornwall Team Adviser
Date:	18 th October 2019	
HRA approved by:	Christine Goodall	Senior officer with responsibility for protected sites
Date:	18 th October 2019	

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Coastal Access - Combe Martin to Marsland Mouth

Habitat Regulations Assessment Sites

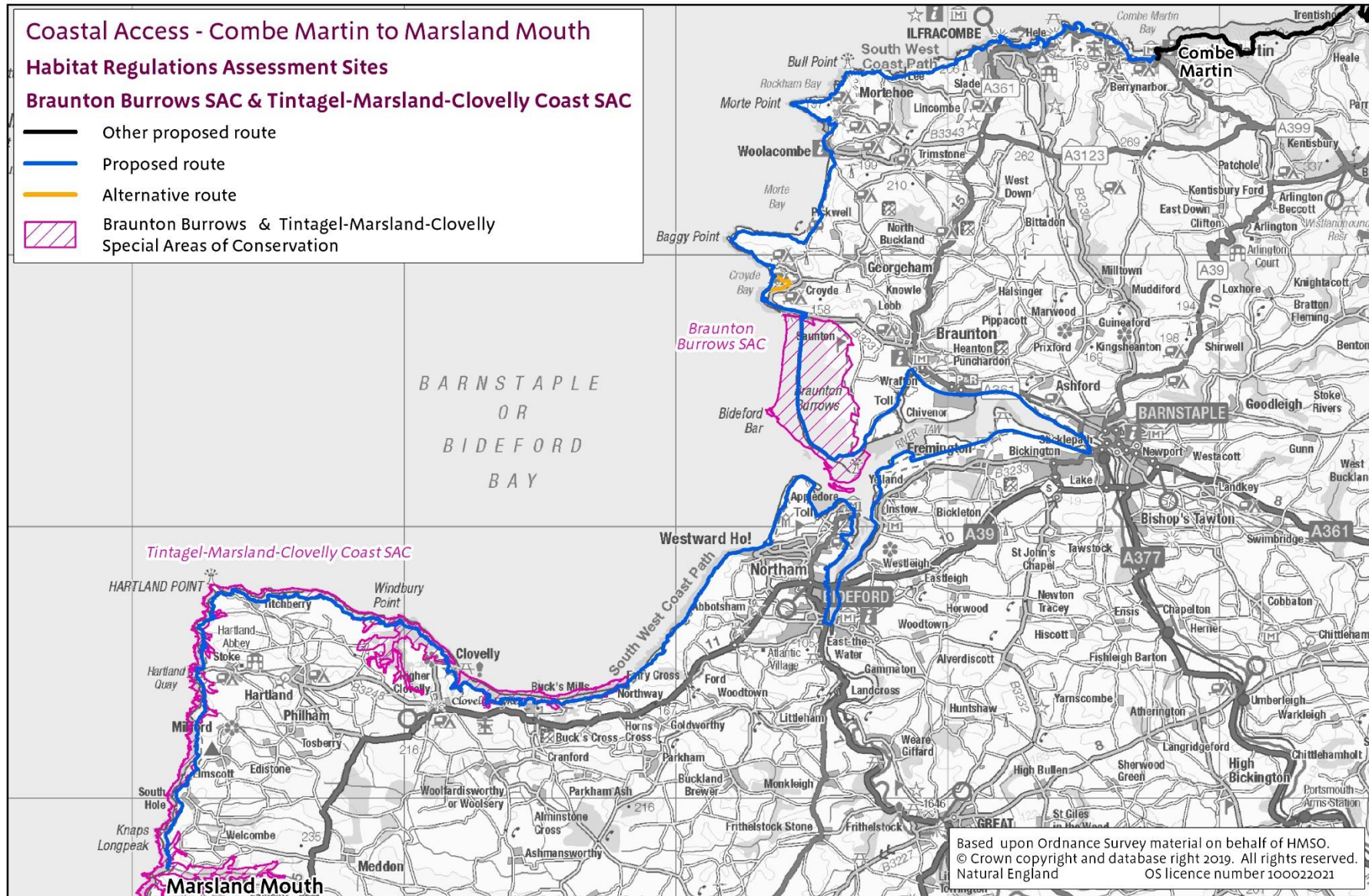
Braunton Burrows SAC & Tintagel-Marsland-Clovelly Coast SAC

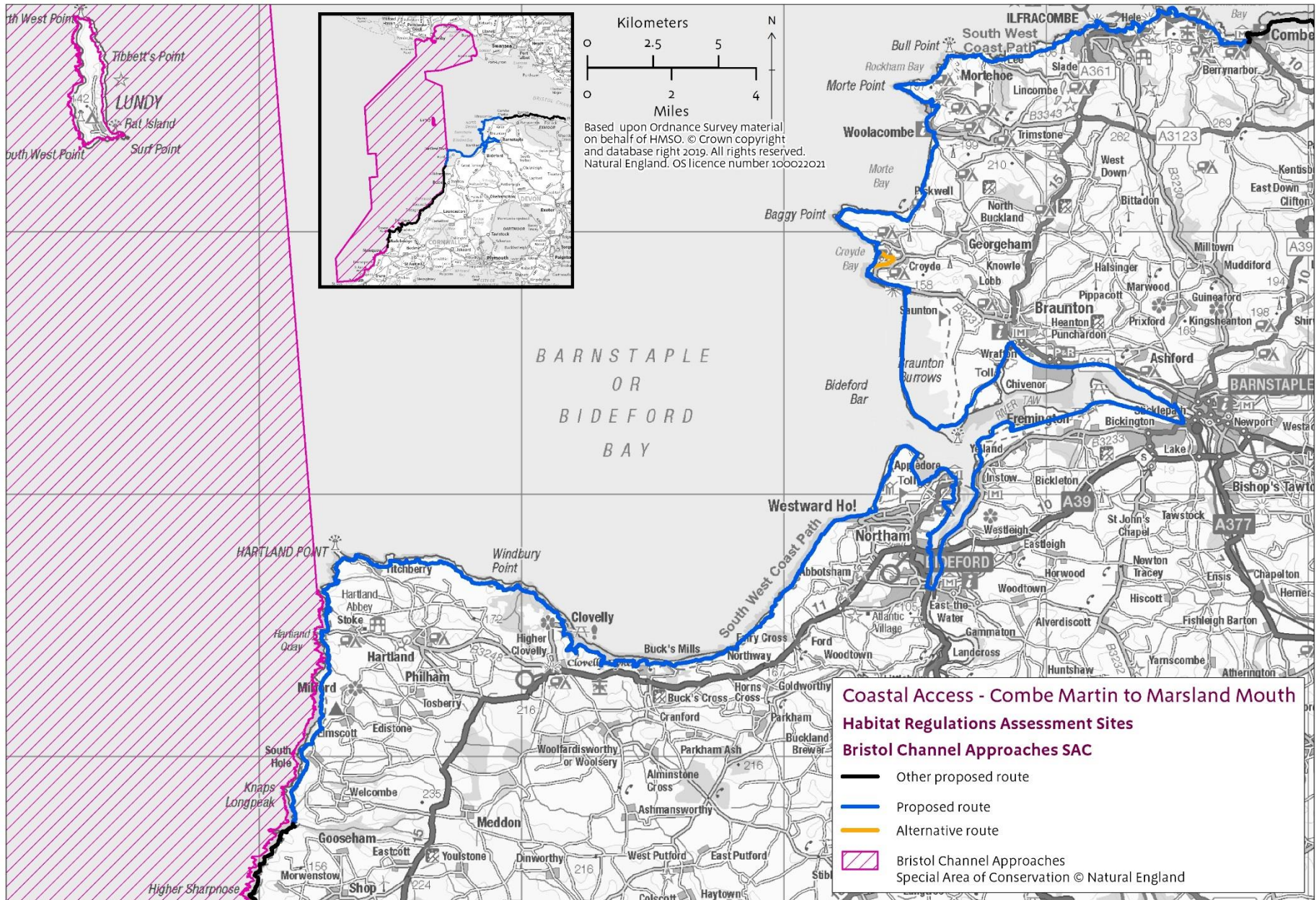
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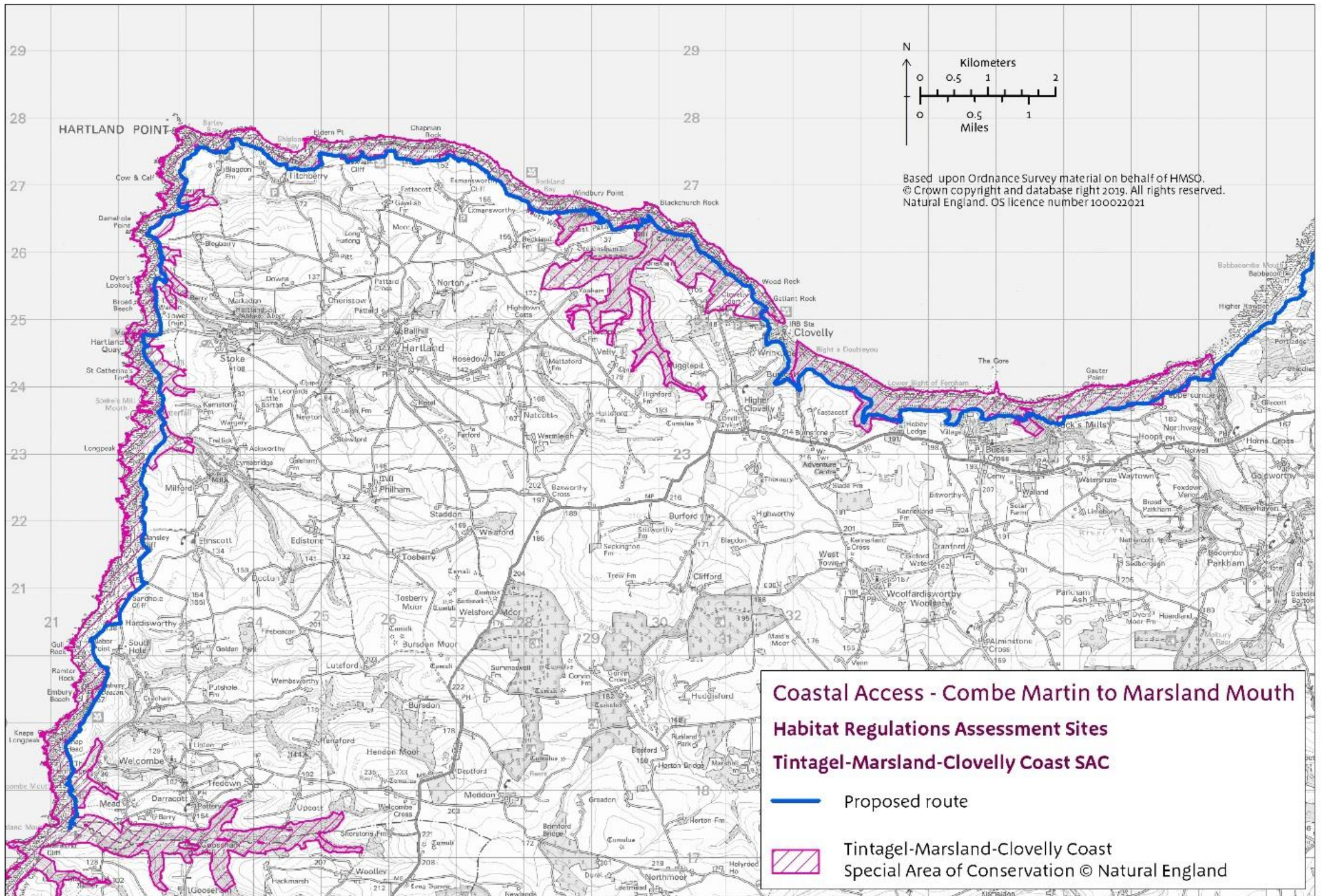
— Proposed route

— Alternative route

▨ Braunton Burrows & Tintagel-Marsland-Clovelly
Special Areas of Conservation



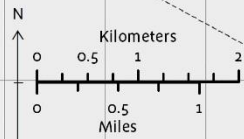




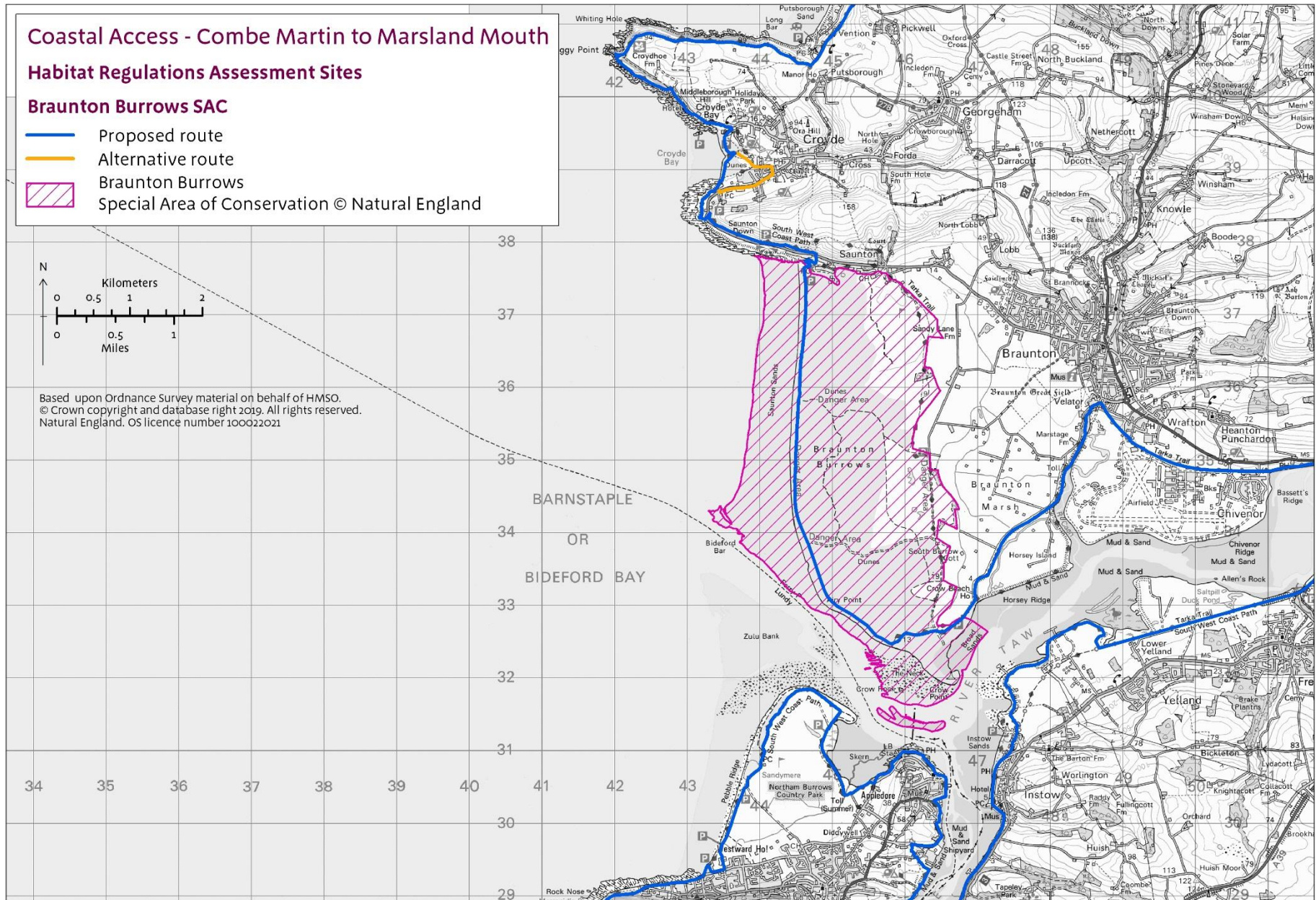
Coastal Access - Combe Martin to Marsland Mouth Habitat Regulations Assessment Sites

Braunton Burrows SAC

-  Proposed route
-  Alternative route
-  Braunton Burrows
Special Area of Conservation © Natural England



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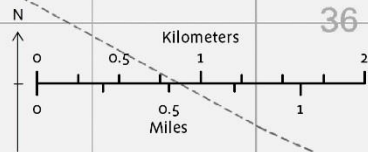
Coastal Access - Combe Martin to Marsland Mouth Habitat Regulations Assessment Sites

Braunton Burrows SAC

 Proposed route

 Petalwort locations

 Braunton Burrows
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BARNSTAPLE

36

34

OR
BIDEFORD BAY

33

32

