Assessment of Coastal Access Proposals between

Combe Martin and Marsland Mouth

on sites and features of nature conservation concern

15th January 2020

About this document

This document should be read in conjunction with the published Reports for the Combe Martin to Marsland Mouth Stretch and the Habitats Regulations Assessment (HRA).

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

https://www.gov.uk/government/publications/england-coast-path-from-combe-martin-to-marsland-mouth-comment-on-proposals

A HRA is required for European sites (SPA, SAC and Ramsar sites). The HRA is published alongside the Coastal Access Reports.

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

The NCA is arranged site by site. Maps 1-11 on pages 48-58 show designated sites along this stretch of coast.

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

Contents

Assessment of coastal access proposals on:

Hele, Samson's and Combe Martin Bays SSSI

Is this site also part of a European site? No

Current situation

The route of the proposed trail follows the existing South West Coast Path and runs inland of the SSSI for most of its area. On the western section of the SSSI, and for part of the eastern section there is a caravan park and other property separating the proposed trail from the SSSI. On the eastern section of the site and also on some of the western section, much of the land closest to the trail is already designated as Open Access land.

1. Geological Features • EC - Marine Devonian • EC - Variscan Structures	The SSSI provides sites of considerable national importance for Devonian stratigraphy, palaeontology and paleogeography in addition to providing key exposures of fold structures situated on the northern edge of the Variscan fold belt. At the time of the last assessment in 2012 the site was considered to be in 'favourable' condition.

Risk analysis

1. Geological Features • EC - Marine Devonian • EC - Variscan Structures	The SSSI could be impacted if works were proposed that could obscure or damage the geological feature, however, no such works are proposed. The rock exposures, landforms or deposits are not susceptible to existing or increased access. The fossil features can be damaged by unmanaged geological specimen collection, however, we do not think this is an issue at present, or is likely to become a problem as a result of our proposal since the foreshore is already accessible and well used. Therefore it is concluded that there will be no impacts on the site from the Coastal Access proposals.

Establishment works

Is SSSI assent needed to implement any specific proposals for establishment works? No

Assessment of coastal access proposals on:

Morte Point SSSI

Is this site also part of a European site? No

Current situation

The route of the proposed trail follows the existing South West Coast Path around the SSSI maintaining good views of the sea, with the SSSI covering the whole of the Morte Point promontory. Much of the land closest to the trail is already designated as Open Access, notably the flatter heath and grassland areas.

1. **Open Coastal Vegetation** • MC8 - *Festuca rubra - Armeria maritima* maritime grassland • H7 - *Calluna vulgaris - Scilla verna* heath • H8 - *Calluna vulgaris - Ulex gallii* heath	The promontory of Morte Point has important maritime heath and grassland communities. Ling, Bell heather and Western gorse dominate certain areas. Bracken is prevalent on steeper slopes. Maritime grasses and herbs occur on flatter slopes. Maritime grassland communities and lowland heath communities at Morte Point are in 'favourable' condition. The site is owned by the National Trust and there is an ongoing programme of scrub and bracken control as well as livestock grazing to maintain the site in the favourable condition as found when last assessed in 2009.

Risk analysis

1.Open Coastal Vegetation • MC8 - *Festuca rubra - Armeria maritima* maritime grassland • H7 - *Calluna vulgaris - Scilla verna* heath • H8 - *Calluna vulgaris - Ulex gallii* heath	The heathland and maritime grassland communities are fairly resilient to trampling and there are many existing pathways crossing the site at present. It is unlikely that there will be any significant change in the pattern of use of the site by walkers as a result of our proposals, and if the main route of the England Coast Path is in good condition and well maintained by the Trust our proposals are unlikely to add to trampling pressure. Therefore these features are not considered vulnerable to our proposals.

Establishment works

Is SSSI assent needed to implement any specific proposals for establishment works? No

Assessment of coastal access proposals on:

Barricane Beach SSSI

Is this site also part of a European site? No

Current situation

The route of the proposed trail follows the existing South West Coast Path landward of the SSSI with the SSSI covering an area of sand and rocks seaward of the proposed trail.

1. Geological features • EC - Marine Devonian	The Upper Devonian (Frasnian-Famennian) Morte Slates exposed here were deposited in a shallow marine environment and are richly fossiliferous. This is the best fossil locality in the Morte Slates. The site was last assessed in 2011 and considered to be in 'favourable' condition.

Risk analysis

1. Geological features • EC - Marine Devonian	No risks identified as they are rock exposures, landforms or deposits not susceptible to existing or increased access. The fossil features can be damaged by unmanaged geological specimen collection, however, we do not think this is an issue at present, or is likely to become a problem as a result of our proposal since the foreshore is already accessible and well used. This feature group is therefore not considered sensitive to our proposals.

Establishment works

Is SSSI assent needed to implement any specific proposals for establishment works? No

Assessment of coastal access proposals on:

Mill Rock SSSI

Is this site also part of a European site? No

Current situation

This SSSI covers a small exposure (0.16 ha) of rock at Woolacombe Sand located just above Mean High Water. The route of the proposed trail follows the existing South West Coast Path landward of the SSSI at the back of the beach running through Woolacombe Warren.

1. Geological features • EC - Silurian - Devonian Chordata	Scattered well-preserved fragments of Upper Devonian fossil fish occur here in a tuff and in associated shales within the Pickwell Down Sandstones. The site was last assessed in 2012 and considered to be in 'favourable' condition.

Risk analysis

1. Geological features • EC - Silurian - Devonian Chordata	No risks identified as they are rock exposures, landforms or deposits not susceptible to existing or increased access. The fossil features can be damaged by unmanaged geological specimen collection, however, we do not think this is an issue at present, or is likely to become a problem as a result of our proposal since the foreshore is already accessible and well used. This feature group is therefore not considered sensitive to our proposals.

Establishment works

Is SSSI assent needed to implement any specific proposals for establishment works? No

Assessment of coastal access proposals on:

Saunton to Baggy Point Coast SSSI

Is this site also part of a European site? No

Current situation

The route of the proposed trail predominately follows the existing South West Coast Path, which passes through the SSSI throughout its length around Baggy Point. At Croyde the SSSI includes Croyde Sand and the proposed route of the trail passes through the SSSI in the dunes at Croyde Burrows at the back of the beach. The SSSI also includes the northern strip of Saunton Sands. The route mainly follows the coastline quite closely and maintains good views of the sea. The coastal margin around Baggy Point is already designated as Open Access Land.

This section of the North Devon coast is of special interest for its geological exposures, and for its botanical features particularly maritime heathland, grassland and lichens. It is made up of coastal cliffs and slopes with a small dune system at Croyde. The cliff land at Baggy Point contains some high quality remnants of maritime heathland together with extensive areas of unimproved maritime grassland, including scrub and bracken.

1. Geological Features • EC - Marine Devonian • EC - Quaternary Of South-West England • IS - Quaternary Of South-West England	The coast between Saunton and Croyde is one of the most important localities for illustrating key features of the coastal geomorphology and Pleistocene stratigraphy of South West England. It is particularly noted for a series of shore platforms, large erratic boulders and a succession of raised beach, blown sand and head deposits. The site was last assessed in 2012 to 2014 and the geological features were considered to be in 'favourable' condition.
2. Plant Species • Population of Schedule 8 moss - *Didymodon cordatus*, Cordate Beard-moss • Lichen assemblage • Vascular Plant Assemblage	The headlands at Saunton Down and Baggy Point face westerly into the Atlantic, and a wide range of conditions for plant growth are provided by the variety of aspect of clifftops, bare cliffs and crevices, exposed rocky shore and the sands of Croyde Bay and Burrows. Much of Baggy Point is covered with dense low-growing Gorse *Ulex spp*. In places this gives way to communities of maritime heath with Heather *Calluna vulgaris* and maritime grassland. The rocks and mineral-rich soils support important lichen communities. The schedule 8 moss *Didymodon cordatus* is assessed as 'favourable', it occurs on cliff-face habitat and vertical rock. The lichen assemblage is assessed as 'unfavourable declining' due to encroachment of scrub which has led to an increase of shade and loss

	of open habitat near the colony of one of the key species, also the spread of Hottentot Fig has led to the loss of some lichen habitat. The vascular plant assemblage is assessed as 'favourable', the supporting habitats for the assemblage include maritime grassland on cliff and slope and also sand dune habitat (strand line, embryo and mobile dunes).

Risk analysis

1. Geological Features • EC - Marine Devonian • EC - Quaternary Of South-West England • IS - Quaternary Of South-West England	No risks identified as they are rock exposures, landforms or deposits not susceptible to existing or increased access. The fossil features can be damaged by unmanaged geological specimen collection, however, we do not think this is an issue at present, or is likely to become a problem as a result of our proposal since the foreshore is already accessible and well used. This feature group is therefore not considered sensitive to our proposals.
2. Plant Species • Population of Schedule 8 moss - *Didymodon cordatus*, Cordate Beard-moss • Lichen assemblage • Vascular Plant Assemblage	The schedule 8 moss *Didymodon cordatus* occurs on cliff-face habitat and vertical rock so it is considered unlikely that it will be affected by the access proposals as it is inaccessible. The key species in the important lichen assemblage occur on exposed rock faces which are often steep and relatively difficult to access, therefore, it is unlikely that the access proposals will impact on the assemblage. The vascular plant assemblage occurs on maritime grassland on cliff and slope and also sand dune habitat (strand line, embryo and mobile dunes). The route of the proposed trail is in good condition along this section of coast and no route changes or improvements are proposed. Away from the paths use of the site for recreation is naturally limited by steep slopes and rough terrain. Established patterns of recreational use are compatible with conservation aims for the site and are unlikely to change as a result of the access proposals, therefore these features are not considered sensitive to our proposals.

Establishment works

Is SSSI assent needed to implement any specific proposals for establishment works? No

There will be some ground works required to cut a new path through vegetation near Chesil Cliff House at Croyde. These works will be just outside of the SSSI, although consultation will be made with the SSSI Responsible Officer to ensure no adverse effect on the SSSI.

Assessment of coastal access proposals on:

Braunton Burrows SSSI

Is this site also part of a European site? Yes

Note that notified features of the SSSI that are also qualifying features of the European site are omitted from this assessment as they are included with the accompanying Habitats Regulation Assessment. The following SSSI features are also features or sub features of the Braunton Burrows SAC:

- IA - Coastal Geomorphology
- Fixed Dune Grassland
- Sand dune; strandline, embryo and mobile dunes (SD1-6)
- Humid dune slacks
- Population of Schedule 8 liverwort - *Petalophyllum ralfsi*, Petalwort

Both the Braunton Burrows SAC and SSSI designations cover the same geographical area. Braunton Burrows is at the centre of North Devon's Biosphere Reserve. This is a UNESCO-designated biosphere reserve that covers 55 square miles and includes the whole of this stretch of England Coast Path (ECP) from Combe Martin to Marsland Mouth

Current situation

Braunton Burrows is one of the largest dune systems in Britain, and one of the best documented in Europe. It is about 5 km long north-south and 1 1/2 km 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. There is therefore a variety of habitats for many flowering and lower plants, and for many birds and invertebrates. Several species are nationally rare or vulnerable.
The route of the proposed England Coast Path will be realigned seaward of the current SWCP with the route diverging from the current route of the SWCP at the north of the reserve and then running at the back of Saunton Sands beach just seaward of Braunton Burrows dunes. The proposed route will then join the public footpath behind the Neck and run landward of the now partially inundated Horsey Island where it re-joins the Tarka Trail and SWCP just south of The Toll House. There is default landward coastal margin as far in-land as the American Road (except in the north east of the site at Saunton Golf Course) which therefore means the majority of the SSSI is in the coastal margin.

1. Woodland Features • Wet woodland	The woodlands support a lichen assemblage and demonstrate dune vegetation succession. The woodland is mostly 'favourable' with one unit in 'unfavourable recovering' condition.

2. Plant Species • Population of Schedule 8 plant - *Liparis loeselii,* Fen Orchid • Population of Schedule 8 plant - *Teucrium scordium*, Water Germander • Lichen assemblage • Vascular Plant Assemblage	Fen Orchid (*Liparis loeselii*) is in 'unfavourable recovering' condition. Water Germander (*Teucrium scordium*) is in 'unfavourable recovering' condition with habitat works such as scrapes carried out to create suitable habitat. An area on the landward side of the dunes is particularly important for lichens, some 60 species having been recorded from the compacted soils of that area alone. The grassland, or "dune pasture", carries a rich mixture of grasses, sedges and herbs. The vascular plant assemblage is largely in 'favourable' condition with two units in 'unfavourable recovering' condition. The lichen assemblage is 'unfavourable recovering'. The site is in a Countryside Stewardship Higher Tier agreement.
3. Molluscs • Population of Schedule 5 mollusc - *Catinella arenaria*, Sandbowl Snail	Sandbowl Snail (*Catinella arenaria*) is currently in unfavourable recovering condition. The grazing levels are now managed more appropriately under the Countryside Stewardship Higher Tier agreement.
4. Non breeding birds • Aggregation of >20000 non-breeding waterbirds	This is a feature of the Taw-Torridge Estuary SSSI but many birds make use of the estuary mouth, and Sanderlings *Calidris alba* in particular tend to congregate on Saunton Sands, which for Sanderlings is their primary estuary site for foraging.

Risk analysis

1. Woodland Features • Wet woodland	The woodland and scrub habitat is largely landward of the proposed route and not in the proposed coastal margin. Therefore this feature is not sensitive to our proposals.
2. Plant Species • Population of Schedule 8 plant - *Liparis loeselii,* Fen Orchid • Population of Schedule 8 plant - *Teucrium scordium*, Water Germander • Lichen assemblage • Vascular Plant Assemblage	The lichen assemblage is largely found landward of the proposed route in the proposed landward coastal margin. Likewise the sensitive plants and vascular plant assemblage are found in the dunes and slacks in the landward coastal margin. Localised impacts could occur to all these plant species if changes in access lead to more frequent trampling of vegetation in sensitive areas. However this is a well-known site, with good access, and for this reason use of this area for recreation will not

	change significantly as a result of becoming margin, therefore these features are not sensitive to our proposals.
3. Molluscs • Population of Schedule 5 mollusc - *Catinella arenaria*, Sandbowl Snail	Limited impact from increased footfall is expected as walkers are likely to avoid areas of habitat such as damp hollows in sand dunes. Furthermore as above, as this is a well-known and well used site, recreational use will not change as a result of the area becoming coastal margin, therefore these features are not sensitive to our proposals.
4. Non breeding birds • Aggregation of >20000 non-breeding waterbirds	Sanderlings are disturbed by walkers with their dogs off leads walking on Saunton Sands. The route of the England Coast Path is proposed to realign along the seaward side of the dunes, which will bring walkers closer to the sea, however walkers should have their dogs under effective control whilst on the route of the ECP or in the coastal margin. Furthermore as above, as this is a well-known and well used site, actual recreational use of the beach is unlikely to change as a result of the realignment and the area becoming coastal margin, therefore these features are not sensitive to our proposals. There will be new signage at both ends of Braunton Burrows and this will give walkers information about the sensitive species and their rights and responsibilities.

Establishment works

Is SSSI assent needed to implement any specific proposals for establishment works? No

Assessment of coastal access proposals on:

Taw-Torridge SSSI

Is this site also part of a European site? No

Current situation

The Taw-Torridge Estuary is of major importance for its overwintering and migratory populations of wading birds. The Estuary's wide tidal range is reflected by the large areas of mudflats and sandbanks present. These areas, together with beaches and saltmarshes, provide a rich and varied source of food for many birds and other animals.

The route of the proposed trail around the estuary predominately follows the existing South West Coast Path and Tarka Trail, which is close to the estuary except at Chivenor, east of Fremington Quay and Home Farm Marsh. There are significant recreational and population pressures with a large number of people living in Barnstaple, Bideford, Appledore and Instow, and a large variety and frequency of recreational activities being undertaken both on land and water.

1. Non Breeding Birds

- Aggregation of >20000 non-breeding waterbirds
- Aggregations of non-breeding birds - Curlew, *Numenius arquata*
- Aggregations of non-breeding birds - Golden Plover, *Pluvialis apricaria*
- Aggregations of non-breeding birds - Lapwing, *Vanellus vanellus*

The site regularly supports nationally important numbers of Curlew *Numenius arquata*, Golden Plover *Pluvialis apricaria* and Lapwing *Vanellus vanellus*. Other species of waders such as Redshank *Tringa totanus*, Dunlin *Calidris alpina* and Oystercatcher *Haematopus ostralegus* are also abundant, so that the total number of waders present at any one time can reach over 20,000. Although there are a number of 'hotspots' for bird activity, they are generally present throughout the site.

A condition assessment was carried out in 2011/12 using Wetland Bird Survey (WeBS) (BTO) data, and it states that although numbers of Curlew and Lapwing and the overall assemblage fall below threshold values, they all appear to mirror a national trend towards wintering further north and east in general. Golden Plover still exceed their threshold value, but numbers are also changing in line with national trends. The bird features are therefore considered to be in 'favourable' condition.

A new report has been published in 2019 (Berridge, R. Identification of Wintering Wildfowl High Tide Roosts & Recreational Disturbance Impacts on the Taw-Torridge Estuary Site of Special Scientific Interest (SSSI). Natural England Commissioned Reports, Number 281). This was commissioned by Natural England, RSPB, North Devon Council, Torridge District Council and North Devon AONB. It sought to

understand recreational disturbance on this important estuary and provides a range of management and mitigation proposals aimed at addressing the issue.

The project undertook a comprehensive review of the current and historical wintering waterbird populations and distribution on the Taw Torridge Estuary. High tide roosts within the proposed coastal margin were identified and described in conjunction with the Wetland Bird Survey (WeBS) team. Surveys were undertaken to assess the effects of recreational activity between October 2018 and March 2019. High Tide Roost Sites were mapped and of those 18 are in the proposed coastal margin. These are shown on Map 11 with the corresponding number from the Berridge report. The roost sites and main species present are detailed in Table 1.

Table 1. High tide roost sites within the proposed coastal margin

Report Roost Number	Roost Site	Main Species
2	Northam Foreshore	Heron, Egret
3	Skern Bay	Many including Oystercatcher, Golden Plover, Curlew, Dunlin, Redshank
4	Skern Pill	Many including Oystercatcher, Golden Plover, Curlew, Dunlin, Redshank, Lapwing
5	Crow point Saltmarsh	Oystercatcher, Redshank, Curlew, Wigeon
6	Crow Point Beach	Oystercatcher, Curlew
7	Crow Point Groynes	Gulls, small numbers of Curlew, Sanderling, Dunlin and Ringed Plover
11	Horsey Island White House	Golden Plover, Lapwing
12	Horsey Island Pill Mouth	Dunlin, Lapwing
13	Horsey Island Fields	Lapwing, Golden Plover, Curlew, Dunlin, Redshank
14	Isley Marsh	Curlew
15	Yelland	Oystercatcher, Curlew, Lapwing
16	Black Ground	Oystercatcher, Dunlin, Wigeon, Ringed Plover
17	Cool Stone	Oystercatcher, Dunlin, Wigeon, Ringed Plover
18	Chivenor Point	Oystercatcher, Lapwing, Dunlin, Wigeon, gulls
19	River Caen	Oystercatcher, Lapwing, Curlew, Wigeon

20	Home Farm Marsh NE	Lapwing, Redshank, Shelduck, Black-headed gull
21	Home Farm Marsh NW	Oystercatcher, Lapwing, Wigeon
22	Penhill	Geese, Shelduck, Black-headed Gull, Lapwing

2. Intertidal Habitat

- SM10 transitional low marsh vegetation with *Puccinallia maritima, Salicornia* and *Suaeda maritima*
- SM13a *Puccinellia Maritima* saltmarsh and dominant sub communities
- SM8 *Salicornia* saltmarsh
- SM9 *Suaeda maritima* saltmarsh
- Littoral sediment
- Sheltered muddy Shores

These intertidal habitat features dominate the site and are present throughout the estuary. Saltmarsh establishes in the lower energy coastal areas and estuarine mud habitats are present all over between the estuary banks and the river channels.

Condition of the three SSSI units in 2011/12 is recorded as 'favourable' for Units 103 and 102 which cover the vast majority of the site. However, Unit 101 is recorded as 'unfavourable - no change' on account of inappropriate coastal management. Saltmarsh extent is increasing within the unit. Littoral sediment extent within the unit has declined slightly as a result of the expansion of saltmarsh. There has been no apparent change otherwise in biotope types or extents.

Risk analysis

1. Non Breeding Birds

- Aggregation of >20000 non-breeding waterbirds
- Aggregations of non-breeding birds - Curlew, *Numenius arquata*
- Aggregations of non-breeding birds - Golden Plover, *Pluvialis apricaria*
- Aggregations of non-breeding birds - Lapwing, *Vanellus vanellus*

Changes in coastal access have the potential to increase above water noise and visual disturbance. All non-breeding bird species associated with the Taw-Torridge SSSI are currently in decline and known to be sensitive to these pressures.

Specific areas of the site which have been identified as having higher use by overwintering birds are the Skern (back of Northam Burrows), RSPB's Isley Marsh, Fremington salt marsh and creek, fields to the west of Horsey Island and Chivenor (especially for Golden Plover). However, anywhere that is relatively flat, short grazed / short sward and arable could be used as a potential roost site by the birds. During day

time low tides Lapwing and Golden plover are known to roost on the sandbars of the estuary. Analysis of 2011/12 WeBS count data reveals the following 'hotspots' for different bird species on the Taw Torridge Estuary SSSI:

- Curlew: Isley – Instow, Barnstaple – Heanton, Barnstaple – Penhill
- Golden Plover: Skern, River Caen & Horsey Island, Heanton – Caen
- Lapwing: Isley – Instow, Heanton – Caen, Barnstaple – Heanton
- Redshank: Fremington Pill and Quay, Barnstaple – Heanton, Barnstaple – Penhill
- Dunlin: Skern, Isley – Instow, Heanton – Caen
- Oystercatcher: Whitehouse to Airy, Skern, Isley - Instow

The waterbirds use the estuary when both feeding and roosting and the lack of available alternative high tide roost sites leaves them particularly vulnerable when at the main 'hotspot' roosts.

The 2019 Berridge report significantly builds on the evidence available prior to this report. The survey identified the main causes of recreational disturbance to wintering waterbirds along the estuary and found that increasing levels of recreational activity are having a negative impact on the waterbirds present. Disturbance at the high tide roosts was identified as a key factor and Natural England has used this report to inform development of our detailed proposals for coastal access.
The Berridge report also recommended management and mitigation measures for particular sites which are discussed below.

Roosts on saltmarsh and mudflats

A number of the high tide roost sites that occur within the coastal margin are in intertidal areas where the salt marsh or mud flats are unsuitable for public access. This is due to the presence of a network of creeks and channels, mudflats with deep channels and soft sinking mud, features that change regularly and unseen dangers such as tides. Recreational activities in these areas are naturally limited because they are difficult and dangerous to walk over. Over much of this area, no new coastal access rights will be created, as access will be excluded under s25A, and this will include the following roosts 3,4,5,11,12,13, 14,15,18,19,20, 21 and 22. This excluded area can be seen on the direction maps in reports 4-7 (Maps CMM 4A-CMM 7C).
The beaches at Instow and Appledore that are already well used by the public are within the coastal margin and not excluded under this s25A direction. The dunes at Instow beach will also be within the coastal margin and subject to coastal access rights (open access rights already apply here because the area is a registered common).
Traditional rights such as bait digging will not be affected by this direction.
Some signage may be required to make people aware of this estuary wide direction where natural barriers to access are not sufficient, or where the dangers are not obvious. The implementation of any signage will be through Devon County Council in the implementation phase. The s25A Direction will also be advertised on the Natural England website.

Assessment of other roost sites not covered by s25A

Roost 2, is a heronry on cliffs in the Torridge and is physically inaccessible with the route of the trail a long way inland. The Berridge report states that 'The terrain is considered to be ample deterrent to land based recreation'. Therefore we do not think there will be additional access management required at this roost site.

Crow Point

There are three high tide roosts associated with Crow Point. These roost sites are actually within Braunton Burrows SSSI but they are considered under the Taw-Torridge SSSI as they are estuary wide populations.

Roost 5, Crow Point Saltmarsh, uses a small area of saltmarsh intersected by muddy creeks, so access to it will be excluded under s25A.

Roost 6, Crow Point Beach forms on the shoreline at the eastern tip of Crow Point and is one of the biggest Oystercatcher roosts on the estuary.

Roost 7, Crow Point Groynes, covers the western beach from Crow Point to the groynes and is heavily weather dependent being abandoned when the wind is westerly to northerly.

The Berridge report highlights major disturbance issues at Crow Point; the large car park at the end of the toll road at the White House has over 200 cars a day using it at peak times, and there is another at nearby Sandy Lane within Braunton Burrows; both contribute to the heavy recreational use of the area. A particularly popular circular walk takes walkers past some of the high tide roost locations, and disturbance to all high tide roosts in the sector is most often caused by free running dogs, with some actively pursuing birds or chasing balls over the saltmarsh or into the water. It was also found that disturbance during daylight hours often results in the roost sites not forming or being abandoned by all wader species.

The Berridge report found that there is currently very little access management and recommends various measures including an on-site wardening presence, signage and increasing the price of the toll road. Currently this whole area is heavily used by local people, and there is a low awareness amongst users of the effect of disturbance that their activities are having on the roost sites. We propose that there will be new signage installed at the main carparks, the details of which will be finalised during the establishment phase. The signage will encourage people to use the route of the England Coast Path (ECP) and to keep their dogs under effective control on the path or within the coastal margin. We will work with the local authorities to ensure our signage compliments the access management work that may follow the Berridge report (the report identified signage should be properly sited at major access points to the foreshore with specific, justified advice related to mapped areas).

Horsey Island

There are three roost sites associated with the recently inundated Horsey Island. In 2017 a major breach of the sea wall occurred which has seen the site change from reclaimed grazing land to a tidal lagoon with saltmarsh and mudflats becoming established. The walked line of the SWCP has already been diverted inland of Horsey Island with fencing and signage preventing access to the area of the breach and

Horsey Island itself. The ECP is proposed to follow the walked line of the diverted SWCP. Recent evidence shows that the majority of Horsey Island is now saltmarsh or mudflat habitat with newly formed creeks and channels, mudflats with deep channels and soft sinking mud. Therefore the whole area will have access excluded under s25A as it is unsuitable for access.

Roost 11, Horsey Island White House, forms near the bank on which the England Coast Path is to be proposed, however it is sheltered from the route of the ECP by the White House. The Berridge report recommends diverting the footpath off the top of the sea wall on the outer edge of Horsey Island which is what our proposals are doing. This will continue to reduce levels of disturbance that occurred prior to the breach and therefore it is not thought this roost site will be vulnerable to our proposals.

Roost 12, Horsey Island Pill Mouth, forms on a promontory of rock and on saltmarsh near the mouth of the River Caen. It is fairly remote and difficult to reach and parts of it are assessed as unsuitable for access. It is not thought our proposals will increase access at this site therefore it is not thought this roost site will be vulnerable to our proposals.

Roost 13, Horsey Island Fields, is on higher ground within the newly formed saltmarsh and flats on the inundated fields, the ECP will pass landward of these fields and they will be excluded from access as noted above. Also the whole area is physically inaccessible due to fencing and signage. Therefore it is not thought this roost site will be vulnerable to our proposals.

Yelland

Roost 15 - The Berridge report found that this is an important roost site in the estuary context. It found it is often disturbed, with the main source of disturbance being from walkers with dogs off lead that veer off the SWCP to traverse the saltmarsh, or more often the open rocky area between the vegetation and the shoreline.

The Berridge report recommends that this site should be considered a priority and recommends information boards and fencing. As described above, this roost falls within an area that has been found to be unsuitable for access and will have access excluded under s25A and dogs should be under effective control on the route of the ECP and within the coastal margin. However this in itself would not stop dogs straying onto the saltmarsh.

A major long planned development at the old Yelland Power Station may add visitor pressure to this area. If permitted, mitigation is likely to include the provision of information boards showing the roost site and screening or fencing along a section of the SWCP and ECP. These measures could compliment the s25A direction. In the meantime we propose to make provision for installing new access management infrastructure to help reduce disturbance from recreational activities.

Black Ground and Cool Stone

Roost 16 Black Ground is on rock and shingle so can be accessed by the public. The walked line of the SWCP has already been diverted inland behind the North Devon Cricket Club ground at Instow. The original alignment seaward of the club is now not suitable as the route of a National Trail due to the slippery boulder-like rocks and inundation at high tide. Our proposals are for the ECP to follow the

walked line of the SWCP. This will therefore take most users of the trail someway inland from this roost site, so we would not expect access levels to increase from current levels as a result of our proposals.

Roost 17 Cool Stone is also on rock and shingle and the route of the trail will follow the walked line of the SWCP past this roost site.

The Berridge report found that disturbance from walkers, dogs, joggers and anglers is frequent at these roosts with Black Ground most affected due to the proximity to Instow beach. The most frequently observed disturbance events are free-running dogs chasing birds or running across the rocks, chasing balls and running in and out of the water.

The Berridge report suggests potential management and mitigation including winter restricted areas over the roosts, information boards at access points, and even an exclusion zone incorporating the Black Ground and Cool Stone intertidal areas.

Therefore for both of these sites there is considerable local access pressure currently and it is not thought our proposals will increase this activity. For Black Ground the formal re-routing of the trail may help alleviate these problems. We do propose signage at these locations which can complement the recommended works in the Berridge report, and it will be important to work closely with the local authorities when implementing any access management in this area.

Home Farm Marsh and High Tide Roosts 20 and 21.

Home Farm Marsh is a 71 acre area of farmland in between the Tarka Trail and the estuary. It is owned by the Gaia Trust and large areas of it are being restored to wetland to enhance its biodiversity. The area is used by many overwintering waterbirds and farmland birds, with many birds also breeding on the marsh.

Gaia Trust have provided data that gives an indication of SSSI bird features using the marsh, and a number of notable additional species. Their list details 132 species using the site with 59 species having bred on or close to the site recently, and another 9 species have been identified as potential breeders on the site.

There are a number of Oystercatcher breeding on the site in low numbers, and one pair of Shelduck and Little Grebe, and potentially Redshank, Lapwing, Snipe and Curlew. Significant numbers of Skylark also breed in the farmland areas.

Outside the breeding season the site is used by several species including curlew and lapwing (up to 100 recorded). Other notable non-breeding birds using the site include: Shelduck, Redshank, Snipe, Wigeon, and a range of more common waterbird species (Mallard, Little Grebe etc), and possibly Brent Goose.

Currently access is restricted to waymarked routes and dogs are not allowed on the land.

There are two high tide roosts associated with Home Farm Marsh, roosts 20 and 21. The North West roost site, 21 is located just to the north west of Home Farm Marsh with the birds gathering on the rock and shingle, and then as the tide falls birds use the mud which will be included in the s25A direction. A waymarked route within Home Farm Marsh passes close to the roost site but this location is fairly remote and there is a sign discouraging visitors from leaving the path at this point.

The North East roost, 20, is the larger of the two roosts with birds congregating near the Saltpill Duck Pond at high tide, with many birds then remaining in the area to feed on the mud exposed as the tide falls. The SSSI extends landward of the estuary at this point into Home Farm Marsh, including some of the Saltpill Duck Pond. There is an area of mud above the mean high water mark that will be included in the s25A direction. This roost is close to the popular Tarka Trail and more vulnerable to disturbance from recreational activities.

The Berridge report states that there is some use of Home Farm Marsh by people with dogs, despite the fact dogs are banned from the reserve.

The Berridge report recommendations include that the eastern roost may benefit from signage identifying the roost area and attempting to restrict access, and that using volunteers to enforce dog walking restrictions or increased staffing of the site could also help to enforce the restriction of dog walking at the site.

Home Farm Marsh will be in the coastal margin under our proposals but the route of the trail will run landward of the Marsh on the well-used Tarka Trail. Dogs have to be under effective control on the route of the ECP and within the coastal margin, however as stated above dogs are currently excluded from Home Farm Marsh. Given the presence of overwintering birds particularly sensitive to disturbance (Curlew and lapwing) and a smaller number of birds sensitive to disturbance breeding on Home Farm Marsh it is proposed to replicate the current management and exclude people with dogs (except assistance dogs), from the coastal margin at Home Farm Marsh. This will be all year-round by direction under section 26(3)(a) of the Countryside and Rights of Way Act (2000). See Direction Map CMM 6C in length report CMM 6.

Regarding the two roosts, the North West roost will partly have access excluded under s25A due to being unsuitable for access, and it is fairly remote and only accessed through Home Farm Marsh where the s26 direction to exclude people with dogs will help prevent disturbance. The North East roost is close to the Tarka Trail and is more vulnerable to disturbance from recreational activities. New signage identifying and explaining the importance of the area for roosting birds will be installed alongside the proposed route of the path as recommended in the Berridge report.

<u>Conclusion</u>

Therefore looking at this group of features, as we do not expect visitor numbers to increase across the estuary as a result of our proposals, and given the implementation of the proposed s25A direction, the proposed s26 direction at Home Farm Marsh and relevant signage, we do not consider this feature group will be vulnerable to our proposals.

Table 2 Proposed Access Management

Report Roost Number	Roost Site	Proposed access management
2	Northam Foreshore	None - the heronry is on rocks and cliffs that are physically inaccessible
3	Skern Bay	Coastal access rights will be excluded as the site is unsuitable for public access
4	Skern Pill	Coastal access rights will be excluded as the site is unsuitable for public access
5	Crow point Saltmarsh	Coastal access rights will be excluded as the site is unsuitable for public access
6	Crow Point Beach	New signage will be installed to raise awareness about how people can help to protect the roost site.
7	Crow Point Groynes	New signage will be installed to raise awareness about how people can help to protect the roost site.
11	Horsey Island White House	Realignment of trail. The roost site is within the recently inundated Horsey Island, therefore coastal access rights will be excluded as the site is unsuitable for public access, and physically inaccessible due to fencing and signage.
12	Horsey Island Pill Mouth	Realignment of trail and coastal access rights will be excluded from part of the roost site as the site is unsuitable for public access, also it is remote and diffcult to access
13	Horsey Island Fields	Realignment of trail. The roost site is within the recently inundated Horsey Island, coastal access rights will be excluded as the site is unsuitable for public access, and it is physically inaccessible due to fencing and signage.
14	Isley Marsh	Coastal access rights will be excluded as the site is unsuitable for public access. Installation of new signage will be considered during establishment stage, in conjunction with the RSPB
15	Yelland	Coastal access rights will be excluded as the site is unsuitable for public access. Installation of new access management measures are proposed during the establishment stage.
16	Black Ground	We propose to realign the ECP inland of the North Devon Cricket Club ground at Instow and away from the high tide roost. Walkers wil be directed along the new route and new signage will be installed to raise awareness about how people can help to protect the roost site.

17	Cool Stone	New signage will be installed to raise awareness about how people can help to protect the roost site.
18	Chivenor Point	Coastal access rights will be excluded as the site is unsuitable for public access
19	River Caen	Coastal access rights will be excluded as the site is unsuitable for public access
20	Home Farm Marsh NE	Partially within the S25A and new signage will be installed to raise awareness of how people can help protect the roost site
21	Home Farm Marsh NW	Partially within the S25A and the ECP will follow the Tarka Trail in this location and will be some way inland of the roost. People with dogs will be excluded from Home Farm Marsh, and new signage will be installed at the entrance to the roost site.
22	Penhill	Coastal access rights will be excluded as the site is unsuitable for public access

2. Intertidal Habitat • SM10 transitional low marsh vegetation with *Puccinallia maritima, Salicornia* and *Suaeda maritima* • SM13a *Puccinellia Maritima* saltmarsh and dominant sub communities • SM8 *Salicornia* saltmarsh • SM9 *Suaeda maritima* saltmarsh • Littoral sediment • Sheltered muddy Shores
Mudflats (littoral sediment) are not sensitive to being walked on occasionally. Established saltmarsh is generally able to withstand people walking on it occasionally. Localised damage could occur if there is repeated access, however we do not expect visitor numbers to increase a result of our proposals as the saltmarsh and flats will be excluded from access under s25A CROW.

Establishment works

Is SSSI assent needed to implement any specific proposals for establishment works? No

There is a set of replacement steps required on the route of the proposed England Coast Path north east of Watertown garage which sit just outside the boundary of the SSSI and therefore do not require SSSI assent. In addition new path works to the west of Watertown Garage are outside the boundary of the SSSI and therefore do not require SSSI assent.

Assessment of coastal access proposals on:

Fremington Quay SSSI

Is this site also part of a European site? No

Current situation

The route of the proposed trail follows the existing South West Coast Path landward of this site following the popular and well used Tarka Trail which is also the route of the South West Coast Path. This follows the route of the old railway line to Barnstaple in the east and on up the Taw Valley to the west of the old station at Fremington Quay. To the east of Fremington Quay it passes through a cutting and sea views are lost for half a kilometre. The SSSI is situated in the proposed coastal margin. This SSSI notified for its geological features is mostly overlapping with the area of Taw-Torridge Estuary SSSI above.

1. Geological Features • EC - Dinantian • EC - Marine Devonian • EC - Quaternary Of South-West England	Fremington Quay is an important reference site in the debate on the Pleistocene stratigraphy of North Devon. These features are coastal rock exposures or landforms important for sedimentology, mineralogy fossils or coastal geomorphology.

Risk analysis

1. Geological Features • EC - Dinantian • EC - Marine Devonian • EC - Quaternary Of South-West England	No risk is identified as the features are rock exposures, landforms or deposits not susceptible to existing or increased access. The fossil features can be damaged by unmanaged geological specimen collection, however, we do not think this is an issue at present, or is likely to become a problem as a result of our proposal since the foreshore is already accessible and well used. This feature group is therefore not considered sensitive to our proposals.

Establishment works

Is SSSI assent needed to implement any specific proposals for establishment works? No

Assessment of coastal access proposals on:

Northam Burrows SSSI

Is this site also part of a European site? No

Current situation

The route of the proposed England Coast Path predominately follows the seaward side of Northam Burrows around the outside of the burrows. The proposed route of the England Coast Path (ECP) will follow the walked line of the South West Coast Path. Northam Burrows are s15 Common Land and are therefore designated as Open Access Land and this extends into the seaward coastal margin to approximately Mean High Water. The common is grazed by sheep and horses. The area is also classified as Northam Burrows Country Park and includes the Royal North Devon Golf Club.

Northam Burrows is important because of its wide range of coastal habitats, from mobile sand dunes to fixed dune grassland and wet dune slacks. It is also particularly important for rare and local plants including Sea stock, Sharp rush and Water germander. The site provides feeding grounds for wildfowl and waders during the autumn and winter. The site also hosts breeding birds such as Grasshopper warbler. There are several rare sand dune and dune grassland invertebrates. Also of interest is Westward Ho! Cobble Ridge, which is a classic coastal feature noted in particular for the large size of the sediments present.

1. Sand dune habitats • IA - Coastal Geomorphology MG11 - *Festuca rubra - Agrostis stolonifera - Potentilla anserina* grassland • Fixed dune grassland • SD14 - *Salix repens - Campylium stellatum* dune-slack community • SD15 - *Salix repens - Calliergon cuspidatum* dune-slack community • SD16 - *Salix repens - Holcus lanatus* dune slack community • SD7 - *Ammophila arenaria - Festuca rubra* semi-fixed dune community	Fixed dune grassland and humid dune slacks are largely in 'unfavourable recovering' condition with some 'favourable' condition and some 'unfavourable' condition areas unchanged due to over grazing and drying of the site. The SSSI is currently in a HLS agreement that is aiming to address these issues. Some scrapes have been created and scrub cleared under the scheme. The sand dunes are in 'unfavourable' condition and eroding rapidly.

• SD8 - *Festuca rubra - Galium verum* fixed dune grassland	
2. Vascular Plant Species • Population of Schedule 8 plant - *Teucrium scordium*, Water Germander • Vascular plant assemblage	The nationally rare Water germander (*Teucrium scordium*) is in 'unfavourable no change' and 'unfavourable recovering' condition due to a lack of suitable wet areas, and with habitat works such as scrapes leading to a slight increase in numbers, although the plant is still struggling. The vascular plant assemblage is in a mix of 'unfavourable no change', 'unfavourable recovering' and 'favourable' condition across site units.

Risk analysis

1. Sand dune habitats • IA - Coastal Geomorphology MG11 - *Festuca rubra - Agrostis stolonifera - Potentilla anserina* grassland • Fixed dune grassland • SD14 - *Salix repens - Campylium stellatum* dune-slack community • SD15 - *Salix repens - Calliergon cuspidatum* dune-slack community • SD16 - *Salix repens - Holcus lanatus* dune slack community • SD7 - *Ammophila arenaria - Festuca rubra* semi-fixed dune community • SD8 - *Festuca rubra - Galium verum* fixed dune grassland	The vegetation of sand dunes can be susceptible to excessive trampling. This is particularly important here as sand dunes are eroding quickly with pressure from wind and the sea. The route of the trail will be seaward of the dunes, however they will be in the landward margin at the north western side of the Burrows. This is a well-known site, with good pedestrian access as s15 common land, and for this reason use of this area for recreation will not change significantly as a result of becoming margin, therefore these dune features are not sensitive to our proposals. Short grassland communities are fairly resilient to trampling and as above use of this area for recreation will not change significantly as a result of becoming margin. Therefore we do not consider these communities will be vulnerable to our proposals. The walked line of the SWCP is currently not clear across the westward seaward length of the burrows and approximately six new finger posts will be required to improve access here and ensure people stay on the route of the ECP.
2. Vascular Plant Species • Population of Schedule 8 plant - *Teucrium scordium*, Water Germander • Vascular plant assemblage	Localised impacts could occur if changes in access lead to more frequent trampling of vegetation in sensitive areas. The vascular plant assemblages could potentially be damaged by increased visitor pressure. However this is a well-known site, with good pedestrian access as s15 common land, and for this reason use of

	this area for recreation will not change significantly as a result of becoming margin, therefore these features are not considered sensitive to our proposals.

Establishment works

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

SSSI assent will be required for the installation of approximately six new finger posts required to identify the walked line of the proposed England Coast Path across the western seaward length of the burrows.

Assessment of coastal access proposals on:

Westward Ho! Cliffs SSSI

Is this site also part of a European site? No

Current situation

The route of the proposed trail follows the existing South West Coast Path running landward of this reserve. The route mainly follows the coastline closely and maintains good views of the sea. Much of the coastal margin here is cliff with the reserve wholly in the coastal margin as far as Mean Low Water.

1. Geological features • EC - Quaternary Of South-West England • IS - Quaternary Of South-West England	Westward Ho! is an important locality illustrating several key features of the coastal geomorphology and Quaternary deposits of South West England. Both of these features are coastal rock exposures or landforms important for sedimentology, mineralogy fossils or coastal geomorphology.

Risk analysis

1. Geological features • EC - Quaternary Of South-West England • IS - Quaternary Of South-West England	No risks identified as they are rock exposures, landforms or deposits not susceptible to existing or increased access. The fossil features can be damaged by unmanaged geological specimen collection, however, we do not think this is an issue at present, or is likely to become a problem as a result of our proposal since the foreshore is already accessible and well used. This feature group is therefore not considered sensitive to our proposals.

Establishment works

Is SSSI assent needed to implement any specific proposals for establishment works? No

Assessment of coastal access proposals on:

Mermaid's Pool to Rowden Gut SSSI

Is this site also part of a European site? No

Current situation

The route of the proposed trail follows the existing South West Coast Path running landward of this reserve. The route mainly follows the coastline closely and maintains good views of the sea. Much of the coastal margin here is cliff and rock with an area of sand and the whole SSSI is in the coastal margin as far as Mean Low Water.

1. Geological Features • EC - Westphalian	The 5.5km long coastal section from Mermaid's Pool to Rowden Gut exposes the only complete sequence available through the Bideford Formation - a localised development of fluvio-lacustrine 'Coal Measure' type deposits. These features are coastal rock exposures or landforms important for sedimentology, mineralogy fossils or coastal geomorphology.

Risk analysis

1. Geological Features • EC - Westphalian	No risks identified as they are rock exposures, landforms or deposits not susceptible to existing or increased access. The fossil features can be damaged by unmanaged geological specimen collection, however, we do not think this is an issue at present, or is likely to become a problem as a result of our proposal since the foreshore is already accessible and well used. This feature group is therefore not considered sensitive to our proposals.

Establishment works

Is SSSI assent needed to implement any specific proposals for establishment works? No

Assessment of coastal access proposals on:

Hobby to Peppercombe SSSI

Is this site also part of a European site? Yes

Note that notified features of the SSSI that are also qualifying features of the European site are omitted from this assessment as they are included with the accompanying Habitats Regulation Assessment. The following SSSI features are also features or sub features of the Tintagel-Marsland-Clovelly Coast SAC:

- Upland oakwood with the notified features:
  - W10 - *Quercus robur - Pteridium aquilinum - Rubus fruticosus* woodland
  - W17 - *Quercus petraea - Betula pubescens - Dicranum majus* woodland
  - W22 - *Prunus spinosa - Rubus fruticosus* scrub
  - W23 - *Ulex europaeus - Rubus fruticosus* scrub
- Hard maritime cliff and slope

The Hobby to Peppercombe SSSI is completely within the much Tintagel-Marsland-Clovelly Coast SAC.

Current situation

The route of the proposed trail follows the existing South West Coast Path running mostly landward of this SSSI. The route mainly follows the coastline closely and maintains good views of the sea. Much of the coastal margin here is cliff and rock with the SSSI encompassing the coastal margin down to Mean Low Water along this stretch.

This site is important for its Sessile oak woodlands growing on and above the coastal cliff slopes. These woods contain nationally important communities of lichens, with many rarities. All 5 units are assessed as in favourable condition.

1. Breeding Birds • Assemblages of breeding birds - Mixed: Scrub, Woodland	A wide variety of breeding birds occur here. Coastal species include Fulmar *Fulmarus glacialis*, Oystercatcher *Haematopus ostralegus* and Great black-backed gull *Larus marinus*. Woodland birds are well represented with Raven *Corvus corax*, Sparrowhawk *Accipiter nisus*, Buzzard *Buteo buteo*, Barn owl *Tyto alba*, Great spotted woodpecker (*Dendrocopos major*).
2. Plant Species • Lichen Assemblage	The site's long-established woodland and suitable prevailing climate have enabled an extremely rich and healthy lichen flora to develop. The Lobarion assemblage is particularly well established and includes the very rare *Lobaria amplissima* as well as *L. pulmonaria*, *L. laetevirens* and

	L. scrobiculata. Only lichen assemblages feature in the citation and the Favourable Condition Table (FCT) and these are not vulnerable to increased access.

Risk analysis

1. Breeding Birds • Assemblages of breeding birds - Mixed: Scrub, Woodland	Due to the steep nature of the site, people rarely stray from the path, therefore use of this area for recreation will not change significantly as a result of becoming margin, therefore these features are not sensitive to our proposals.
2. Plant Species • Lichen Assemblage	Due to the steep nature of the site, people rarely stray from the path, therefore use of this area for recreation will not change significantly as a result of becoming margin, therefore these features are not sensitive to our proposals.

Establishment works

Is SSSI assent needed to implement any specific proposals for establishment works? No

Assessment of coastal access proposals on:

Marsland to Clovelly Coast SSSI

Is this site also part of a European site? Yes

Note that notified features of the SSSI that are also qualifying features of the European site are omitted from this assessment as they are included with the accompanying Habitats Regulation Assessment. The following SSSI features are also features or sub features of the Tintagel-Marsland-Clovelly Coast SAC:

- Upland oakwood
    - W11- *Quercus petraea - Betula pubescens* - Oxalis acetosella woodland
    - W16 - *Quercus spp.-Betula spp.-Deschampsia flexuosa* woodland
    - W17 - *Quercus petraea - Betula pubescens - Dicranum majus* woodland
- Lowland dry heath
- H4030. European dry heaths
- H7 - *Calluna vulgaris - Scilla verna* heath
- H8 - *Calluna vulgaris - Ulex gallii* heath
- Hard maritime cliff and slope

The Tintagel-Marsland-Clovelly Coast SAC predominantly covers the same area as the Marsland to Clovelly Coast SSSI.

Current situation

The route of the proposed trail predominantly follows the existing South West Coast Path along this stretch. The route mainly follows the coastline closely and maintains good views of the sea, and the proposed coastal margin is mostly coastal cliff along this section. A long section of the proposed coastal margin is currently designated as Open Access land, west from Mouthmill Beach around Hartland Point and south to Blegberry Beach. There is a small realignment at Hartland Quay being proposed.

The Marsland to Clovelly coast extends some 19.5km from Marsland Mouth to Clovelly along the north Devon Coast. The cliffs are very steep rising to 110m in places above the rocks of the intertidal wave-cut platform.

The dramatic geological folds and faults of cliffs between Marsland, Hartland and Clovelly also have a rich diversity of habitats and species. The site is therefore nationally important for its geological, geomorphological and biological interest; from cliff-top maritime heath and grassland to the stunted western Sessile oak woodland rich with western species of lichen and bryophytes.

1. Geological Features • EC - Variscan Structures • EC - Westphalian • IA - Coastal Geomorphology	The coastline shows unrivalled exposures through Upper Carboniferous rocks belonging to the Crackington and Bude formations. The site is also important for geomorphology, in particular for relationships between coastal and fluvial features. It contains fine examples of hog's back cliffs and shore platforms and demonstrates clear relationships between cliff forms, platform development and lithological variations. All of these features are coastal rock exposures or landforms important for sedimentology, mineralogy fossils or coastal geomorphology.
2. Open Coastal Habitats • MC5 - *Armeria maritima - Cerastium diffusum ssp. diffusum* maritime therophyte community • MC8 - *Festuca rubra - Armeria maritima* maritime grassland • M25 - *Molinia caerulea - Potentilla erecta* mire	The cliff top grassland communities are characterised by Thrift *Armeria maritima* and Red Fescue *Festuca rubra*, with Sea Campion *Silene maritima*, Buckshorn Plantain *Plantago coronopus*, Kidney Vetch *Anthyllis vulneraria* here showing an unusual range of colour forms, and Wild Thyme *Thymus praecox*. The coast path generally runs at the edge of the very steep coastal slope. In parts of Units 35 – 37 (all favourable), sections of the path run across: U35 maritime grassland species rich, rabbit grazed, frequent ant hills. U36: open heathland/grassland. U37 nice close cropped maritime grassland above Speke's Mill waterfall.
3. Plant Species • Lichen assemblage • Vascular Plant Assemblage	Over 120 species of lichen have been recorded including many rare western species and old-forest indicators, and Clovelly Deer Park is particularly important for lichens. These Lichen assemblages are not vulnerable to increased access. Vascular plants feature in the draft Favourable Condition Table (FCT) but not the citation. Generally in 'favourable' condition and these are not vulnerable to increased access. Under Site Features, the only unit in which there is any detail is U15, 'unfavourable recovering'.
4. Invertebrate Assemblages • Invert. assemblage F111 bare sand & chalk • Invert. assemblage F112 open short sward	A large number of insect species occur on the site, with many scarce and rare butterflies (see below) and moths occurring. The nationally rare Scarce Blackneck Moth *Lygephila craccae*, nationally scarce Woodlouse *Halophiloscia couchi* and Bog Bush Cricket *Metrioptera brachyptera* occur here, and in addition there are a number of nationally scarce beetles. Bare sand and chalk: Very little detail on the site features for these 59 units. The little there is has Units 33 & 45 in 'favourable' condition.

	Open short sward: Very little detail on the site features for these 59 units. The little there is has Unit 33 in 'favourable' & U45 in 'unfavourable recovering' condition.
5. Butterflies • Population of nationally rare butterfly species - *Argynnis adippe*, High brown Fritillary • Populations of nationally scarce butterfly species - *Leptidea sinapis*, Wood White	There is limited information on these. 2016 site checks for Units 1, 4 – 11 & 21 indicates that Wood Whites, and High Browns should be removed from reportable features as they are no longer present. Site checks for Units 48, 49, 51 – 55 comment that the site is unlikely to have Wood Whites & High Browns. The nationally scarce White Letter Hairstreak *Strymonidia w-album* is also listed in the citation but there was no mention of White-letter hairstreak in the 2016 site check on these parcels.
6.Breeding Birds • Assemblages of breeding birds - Woodland	The SSSI Citation states that site supports over 70 species of breeding birds. The coast is a traditional breeding area for the Peregrine *Falco peregrinus*, Kestrel *F. tinnunculus*, Raven *Corvus corax* and Fulmar *Fulmarus glacialis*, while Gulls *Larus* spp. and Rock pipit *Anthus spinoletta* also breed on the cliffs. It has recently (2015) been discovered that the breeding bird interest of the SSSI as a whole has been incorrectly identified as a 'woodland breeding bird' assemblage rather than a 'variety of breeding species' assemblage. Units in 'favourable' condition are 2, 3, 8, 15 16. Units in 'unfavourable recovering' condition are 17 & 50.

Risk analysis

1. Geological Features • EC - Variscan Structures • EC - Westphalian • IA - Coastal Geomorphology	No risk identified as they are rock exposures, landforms or deposits not susceptible to existing or increased access. The fossil features can be damaged by unmanaged geological specimen collection, however, we do not think this is an issue at present, or is likely to become a problem as a result of our proposal since the foreshore is already accessible and well used. This feature group is therefore not considered sensitive our proposals.
2. Open Coastal Habitats • MC5 - *Armeria maritima* - *Cerastium diffusum ssp. diffusum* maritime therophyte community • MC8 - *Festuca rubra* - *Armeria maritima* maritime grassland	The steepness of slopes and density of vegetation means the features are not likely to be sensitive to any change in access levels, apart from short sections in Units 35 – 37 where sections of the path runs across more open vegetation. Here the route of the proposed trail is in good condition and no route changes or improvements are proposed. Away from the paths use of the site for recreation is naturally limited by

• M25 - *Molinia caerulea - Potentilla erecta* mire	steep slopes and rough terrain. Established patterns of recreational use are compatible with conservation aims for the site and are unlikely to change as a result of the access proposals, therefore these features are not considered sensitive to our proposals.
3. Plant Species • Lichen assemblage • Vascular Plant Assemblage	There will be very limited sensitivity for the vascular plants or lichen assemblage due to the steep slopes across almost all of the site. Where the path cuts across more open grassland, it is unlikely that our proposals will have a significant impact as we are not expecting any significant changes to access levels.
4. Invertebrate Assemblages • Invert. assemblage F111 bare sand & chalk • Invert. assemblage F112 open short sward	Very limited sensitivity due to steep slopes for almost all of the site. Where the path cuts across more open grassland, it is unlikely that the proposed changes will have a significant impact.
5. Butterflies • Population of nationally rare butterfly species - *Argynnis adippe*, High Brown Fritillary • Populations of nationally scarce butterfly species - *Leptidea sinapis*, Wood White	High Brown Fritillary uses bracken dominated habitats or grass bracken mosaics often in woodland clearings. Wood Whites breed in tall grassland or light scrub, in partially shaded or edge habitats, mostly in woodland rides and clearings or coastal undercilffs. It is not considered likely that our proposals in general will have a significant effect on these butterflies as their preferred habitats are not likely to see an increase in numbers of people, with most people remaining on the trail and access in the margin unlikely to change. The established patterns of recreational use are compatible with the conservation aims for the site, therefore these features are not considered sensitive to our proposals.
6.Breeding Birds • Assemblages of breeding birds - Woodland	The assemblage actually being a 'variety of breeding species' is found in the coastal slopes and amongst the woodland. In general the use of the site for recreation is naturally limited by steep slopes and rough terrain and the wooded areas tend to be landward of the trail. Established patterns of recreational use are compatible with conservation aims for the site and are unlikely to change as a result of the access proposals, therefore these features are not considered sensitive to our proposals.

Establishment works

Is SSSI assent needed to implement any specific proposals for establishment works? Further assessment of proposed path improvements is made in the associated HRA as these improvements relate to SAC features as opposed to SSSI features.

Assessment of coastal access proposals on:

Bideford to Foreland Point MCZ

Is this site also part of a European site? No

Current situation

Bideford to Foreland Point MCZ is an inshore site located on the coast of north Devon in the south west of England. The site covers an area of 104 km².

This site protects a wide range of habitats, from beaches of intertidal sand, which are exposed to the air at low tide and below water at high tide, to subtidal sediment and rock habitats, which are permanently submerged.

The reserve encompasses up to Mean High Water so includes the intertidal area of the proposed Coastal Margin.

1. Intertidal Rock Habitats • High energy intertidal rock (A1.1) • Moderate energy intertidal rock (A1.2) • Low energy intertidal rock (A1.3)	High energy intertidal rock, Moderate energy intertidal rock and Low energy intertidal rock are features that are found throughout the whole site, except from around the sediment dominated Woolacombe, Putsborough, Croyde, Saunton and Westward Ho! beaches. Condition has not been assessed, but the general management approach applied is 'Maintain' so it is assumed that the features are in 'favourable' condition.
2. Intertidal Sediments • Intertidal coarse sediment (A2.1) • Intertidal sand and muddy sand (A2.2) • Intertidal mixed sediments • (A2.4)	Intertidal sand and muddy sand is the dominant sediment habitat for the western half of this site. It is present at Woolacombe, Putsborough, Croyde, Saunton and Westward Ho! beaches. In the eastern half of the site Intertidal coarse sediment is more common in the small inlets and bays formed by the rocky reef structures. There are small patches of Intertidal mixed sediment in this eastern half of the site. Condition has not been assessed, but the general management approach applied is 'Maintain' so it is assumed that the features are in 'favourable' condition.
3. Subtidal Rock Habitats • High energy infralittoral rock (A3.1) • High energy circalittoral rock (A4.1) • Moderate energy circalittoral rock (A4.2)	High energy infralittoral rock, Moderate energy infralittoral rock, Low energy infralittoral rock, High energy circalittoral rock and Moderate energy circalittoral rock are all present offshore within the site. They are mostly found in the eastern half of the site.

4. Subtidal Sediments • Subtidal coarse sediment (A5.1) • Subtidal sand (A5.2) • Subtidal mixed sediments (A5.4)	West from Morte Point the dominant offshore habitats are sediments e.g. Subtidal coarse sediment, Subtidal sand and Subtidal mixed sediments. The general management approach applied for Subtidal sand is 'recover to favourable condition' as a result of exposure to certain fishing activities so, although there has been no formal condition assessment, it is assumed that this feature is not currently in 'favourable' condition. For all other subtidal features condition has not been assessed, but the general management approach applied is 'Maintain' so it is assumed that the features are in 'favourable' condition.
5. Marine Habitats of conservation importance • Fragile sponge & anthozoan communities on subtidal rocky habitats (HOCI 7) • Honeycomb worm (*Sabellaria alveolata*) reefs (HOCI 8) • Intertidal underboulder communities (HOCI 10) • Littoral chalk communities (HOCI 11)	Honeycomb worm (*Sabellaria alveolata*) reefs (HOCI 8) are found west of Westward Ho! and around Down End Point. There has been no condition assessment of the feature, but the general management approach is 'maintain in favourable condition' so it is assumed that the feature is currently in 'favourable' condition. Fragile sponge & anthozoan communities on subtidal rocky habitats (HOCI 7) are found sporadically throughout the subtidal part of the site with higher concentrations in the eastern end from Ilfracombe to Foreland Point. There has been no condition assessment of the feature, but the general management approach is 'maintain in favourable condition' so it is assumed that the feature is currently in 'favourable' condition. Intertidal underboulder communities (HOCI 10) are only found in Freshwater Bay (just east of Lee Bay). There has been no condition assessment of the feature, but the general management approach is 'maintain in favourable condition' so it is assumed that the feature is currently in 'favourable' condition. Littoral Chalk Communities (HOCI 11) are a feature of the Bideford to Foreland Point MCZ and are found between Lee Bay and Bull Point There has been no condition assessment of the feature, but the general management approach is 'maintain in favourable condition' so it is assumed that the feature is currently in 'favourable' condition.
6. Pink Sea Fan • Pink sea-fan (*Eunicella verrucosa)*	Pink sea-fan (*Eunicella verrucosa*) are slow-growing soft corals found on rocky reefs in subtidal areas of strong currents. The Pink sea-fan is a 'Species of Principal Importance/ Priority Species' as listed under the Natural Environment and Rural Communities

	(NERC) Act, 2006. It is also protected under Schedule 5 of the Wildlife and Countryside Act, 1981. It is found in subtidal areas of this reserve, however there are not many sightings, there have been a cluster of records for both species in the stretch between Ilfracombe and Foreland Point. There has been no formal condition assessment of the features. However, the general management approach for Pink sea-fan is 'maintain in favourable condition' so it is assumed that the feature is currently in 'favourable' condition.
7. Spiny Lobster Spiny lobster (*Palinurus elephas*) (SOCI 24)	Spiny lobsters are found near the coast and offshore up to 70m deep, and here are found throughout the subtidal areas of the site. The Spiny lobster is a UK BAP Priority Species and is a species of principal importance under the Natural Environment and Rural Communities (NERC) Act, 2006. There has been no condition assessment of the feature, but the general management approach is 'recover to favourable condition' so it is assumed that the feature is not currently in 'favourable' condition.

Risk analysis

1. Intertidal Rock Habitats • High energy intertidal rock (A1.1) • Moderate energy intertidal rock (A1.2) • Low energy intertidal rock (A1.3)	Increase in access onto the foreshore may lead to the following pressures 'abrasion/disturbance of the substrate on the surface of the seabed', 'penetration and/or disturbance of the substrate below the surface of the seabed, including abrasion and 'introduction or spread of non-indigenous species.' All intertidal features are sensitive to the pressures of abrasion, disturbance and penetration of the substrate on the surface and/or below the surface of the seabed, other than intertidal coarse sediment. All the features are sensitive to the pressure 'Introduction or spread of non-indigenous species', other than intertidal coarse sediment, intertidal mud and subtidal mud. These marine features that are found in intertidal areas could be sensitive to activities that cause abrasion or disturbance to the surface of the seabed, or harvesting or removal of species. We are generally following the walked line of the South West Coast Path which does not pass through the intertidal area, and in general the foreshore is already well accessed in this area. Therefore it is not thought access levels will increase significantly as a result of our proposals in the coastal margin, therefore these features are not considered sensitive to our proposals.
2. Intertidal Sediments • Intertidal coarse sediment (A2.1) • Intertidal sand and muddy sand (A2.2) • Intertidal mixed sediments • (A2.4)	These marine features that are found in intertidal areas could be sensitive to activities that cause abrasion or disturbance to the surface of the seabed, or harvesting or removal of species. However we are generally following the walked line of the South West Coast Path which does not pass through the intertidal area, and in general the foreshore is already well accessed in this area. Therefore it is not thought access levels will increase significantly as a result of our proposals in the coastal margin, therefore these features are not considered sensitive to our proposals.
3. Subtidal Rock Habitats • High energy infralittoral rock (A3.1) • High energy circalittoral rock (A4.1)	Marine features that are underwater at all states of the tide will not be affected by our proposals for coastal access.

• Moderate energy circalittoral rock (A4.2)	
4. Subtidal Sediments • Subtidal coarse sediment (A5.1) • Subtidal sand (A5.2) • Subtidal mixed sediments (A5.4)	Marine features that are underwater at all states of the tide will not be affected by our proposals for coastal access.
5. Marine Habitats of conservation importance • Fragile sponge & anthozoan communities on subtidal rocky habitats (HOCI 7) • Honeycomb worm (*Sabellaria alveolata*) reefs (HOCI 8) • Intertidal underboulder communities (HOCI 10) • Littoral chalk communities (HOCI 11)	The intertidal features *Sabellaria alveolata* reefs (HOCI 8) and Intertidal Underboulder Communities (HOCI 10) are sensitive to the following pressures associated with increased access to the foreshore; • Abrasion/disturbance of the substrate on the surface of the seabed. • Penetration and/or disturbance of the substrate below the surface of the seabed, including abrasion. • Introduction or spread of non-indigenous species. These features may be sensitive to changes in access however we are generally following the walked line of the South West Coast Path which does not pass through the intertidal area, and in general the foreshore is already well accessed in this area. Therefore it is not thought access levels will increase significantly as a result of our proposals in the coastal margin, therefore these features are not considered sensitive to our proposals. Fragile sponge & anthozoan communities on subtidal rocky habitats (HOCI 7) are only found sub tidally so are not considered sensitive to our proposals.
6. Marine Species • Pink sea-fan (*Eunicella verrucosa)*	No ecological sensitivities have been identified as they are subtidal features and marine features that are underwater at all states of the tide and will not be affected by our proposals for coastal access.
7. Marine Species • Spiny lobster (*Palinurus elephas*) (SOCI 24)	No ecological sensitivities have been identified as they are subtidal features and marine features that are underwater at all states of the tide and will not be affected by our proposals for coastal access.

Assessment of coastal access proposals on:

Hartland Point to Tintagel MCZ

Is this site also part of a European site? Yes

The Marine Conservation Zone (MCZ), overlaps with the Tintagel – Marsland – Clovelly Coast Special Area of Conservation, (SAC) within the intertidal area between mean high and low water along this stretch which spans part of the north coast of Devon and Cornwall. The SAC extends beyond both Hartland Point to the north and Tintagel to the south which defines the boundary of the MCZ. Despite the geographical overlap of the two sites, they do not share the same features, with the SAC focused on terrestrial habitats that are located above the Mean High Water mark.

Current situation

Hartland Point to Tintagel MCZ is an inshore site on the north coast of Devon and Cornwall in the south west of England. The site covers 304 km², and follows the coastline along the Mean High Water mark from Tintagel Head to Hartland Point, with about a quarter of its length in Devon.

This site protects a wide range of features from rocky habitats in deeper waters (circalittoral rock) which are dominated by a mosaic of different marine creatures such as sponges, anemones and sea-fan corals living on the rocky surfaces, to soft sediment. This site is crucial for connectivity of habitats along the north coast of Devon and Cornwall, contributing to the protection of large intertidal habitats.

The reserve encompasses up to Mean High Water, therefore it includes the intertidal area of the proposed Coastal Margin.

1. Intertidal Rock Habitats • High energy intertidal rock • Moderate energy intertidal rock • Low energy intertidal rock	High energy intertidal rock and Low energy intertidal rock are found throughout the site and make up the majority of the intertidal habitat protected by the designation. Condition has not been assessed, but the general management approach applied is 'maintain in favourable condition' so it is assumed that the features are in 'favourable' condition.
2. Intertidal Sediments • Intertidal coarse sediment • Intertidal sand and muddy sand	Intertidal coarse sediment is a feature found at the top of many of the bays and inlets along the coast in this site. Condition has not been assessed, but the general management approach applied is 'Maintain' so it is assumed that the feature is in 'favourable' condition.

	Intertidal sand and muddy sand is a feature that is found throughout the site either immediately adjacent to the coast, or fringing some of the intertidal rock features. Condition has not been assessed, but the general management approach applied is 'Maintain in favourable condition' so it is assumed that the features are in 'favourable' condition.
3. Intertidal Habitats • Coastal saltmarshes and saline reedbeds	Coastal saltmarsh and saline reedbeds are only found in one location within the site, near a hard coastal defence at Bude. Condition has not been assessed, but the general management approach applied is 'Maintain' so it is assumed that the feature is in 'favourable' condition.
4. Subtidal Rock Habitats • High energy infralittoral rock • Moderate energy infralittoral rock • High energy circalittoral rock • Moderate energy circalittoral rock	High energy circalittoral rock, Moderate energy infralittoral rock, High energy infralittoral rock are subtidal features found throughout the site. Condition has not been assessed, but the general management approach applied is 'maintain in favourable condition' so it is assumed that the features are in 'favourable' condition. Moderate energy circalittoral rock has a general management approach of 'recover to favourable condition' so it is assumed that they are not yet in favourable condition.
5. Subtidal Sediments • Subtidal coarse sediment • Subtidal sand	Subtidal coarse sediment, and subtidal sand are subtidal features that have a general management approach of 'recover to favourable condition' so it is assumed that they are not yet in 'favourable' condition.
6. Marine Habitats of conservation importance • Fragile sponge & anthozoan communities on subtidal rocky habitats (HOCI 7) • Honeycomb worm (*Sabellaria alveolata)* reefs	*Sabellaria alveolata* reefs (Honeycomb worm reefs - HOCI 8) require a range of intertidal sediment and rock habitats as supporting habitats, from large to very large boulders, small boulders, cobbles, pebbles and sand. They are formed from the closely-packed sand tubes constructed by the colonial Honeycomb worm. They are found sporadically between Welcombe Mouth and Marsland, between Steeple Point to Warren Gutter beach, south of Bude, and at Widmouth beach, on the mid-low shore on the site. There has been no condition assessment of the feature, but the general management approach is 'maintain in favourable condition' so it is assumed that the feature is currently in 'favourable' condition.

	Fragile sponge and anthozoan communities include soft corals, sea fans, cup corals and anemones. They are located between mean low water and a maximum depth of 50 metres. They are found throughout the subtidal areas of the site, mostly mapped between Crackington Haven and Tintagel, and in the offshore area west of Morwenstow. There has been no condition assessment of the feature, but the general management approach is 'recover to favourable condition' so it is assumed that the feature is not currently in 'favourable' condition.
7. Marine Species • Spiny lobster (*Palinurus elephas*) (SOCI 24)	Spiny lobster (SOCI 24) are found throughout the subtidal areas of the site near the coast and offshore up to 70m deep. The number of spiny lobsters caught has been falling (in some cases dramatically), the animals that are caught tend to be smaller, and they seem to have disappeared entirely from areas of south-west England in which they were common during the 1970s. The Spiny lobster is a UK BAP Priority Species and is a species of principal importance under the Natural Environment and Rural Communities (NERC) Act, 2006. There has been no condition assessment of the feature, but the general management approach is 'recover to favourable condition' so it is assumed that the feature is not currently in 'favourable' condition.

Risk analysis

1. Intertidal Rock Habitats • High energy intertidal rock • Moderate energy intertidal rock • Low energy intertidal rock	High energy intertidal rock and Low energy intertidal rock are intertidal features and increased access to the foreshore may lead to the following pressures: 'abrasion/disturbance of the substrate on the surface of the seabed', 'penetration and/or disturbance of the substrate below the surface of the seabed, including abrasion and 'introduction or spread of non-indigenous species.' All intertidal features are sensitive to the pressures of abrasion, disturbance and penetration of the substrate on the surface and/or below the surface of the seabed, other than intertidal coarse sediment. All the features are sensitive to the pressure 'Introduction or spread of non-indigenous species', other than intertidal coarse sediment, intertidal mud and subtidal mud.

	We are generally following the walked line of the South West Coast Path which does not pass through the intertidal area, and in general the foreshore where accessible is already well accessed in this area. Therefore it is not thought access levels will increase significantly as a result of our proposals in the coastal margin, therefore these features are not considered sensitive to our proposals.
2. Intertidal Sediments • Intertidal coarse sediment • Intertidal sand and muddy sand	The intertidal sediment features are not sensitive to use of the foreshore for informal recreation on foot and none of the species of conservation interest for the site rely on these features as supporting habitats.
3. Intertidal Habitats • Coastal saltmarshes and saline reedbeds	The saltmarsh designated within the site is not easily accessible by foot and is unlikely to be vulnerable to any additional trampling as a result of our proposals.
4. Subtidal Rock Habitats • High energy infralittoral rock • Moderate energy infralittoral rock • High energy circalittoral rock • Moderate energy circalittoral rock	These are all subtidal features and will therefore not be affected by our proposals for coastal access.
5. Subtidal Sediments • Subtidal coarse sediment • Subtidal sand	These are all subtidal features and will therefore not be affected by our proposals for coastal access.
6. Marine Habitats of conservation importance • Fragile sponge & anthozoan communities on subtidal rocky habitats (HOCI 7) • Honeycomb worm (*Sabellaria alveolata)* reefs	Fragile sponge & anthozoan communities on subtidal rocky habitats (HOCI 7) are only found subtidally so are not considered sensitive to our proposals. *Sabellaria alveolata* reefs are sensitive to the following pressures associated with increased access to the foreshore; • Abrasion/disturbance of the substrate on the surface of the seabed. • Penetration and/or disturbance of the substrate below the surface of the seabed, including abrasion. • Introduction or spread of non-indigenous species. However we are generally following the walked line of the South West Coast Path which does not pass through the intertidal area, and in general the foreshore where accessible is already well

	accessed in this area. Therefore it is not thought access levels will increase significantly as a result of our proposals in the coastal margin, therefore these features are not considered sensitive to our proposals.
7. Marine Species • Spiny lobster (*Palinurus elephas*) (SOCI 24)	No ecological sensitivities have been identified as they are subtidal features found throughout the subtidal areas of the site that are underwater at all states of the tide and will not be affected by our proposals for coastal access.

Conclusion

We, Natural England, are satisfied that our proposals to improve access to the English coast between Combe Martin and Marsland Mouth are fully compatible with our duty to further the conservation and enhancement of the notified features of Hele, Samson's and Combe Martin Bays, Morte Point, Barricane Beach, Mill Rock, Saunton to Baggy Point Coast, Braunton Burrows, Taw-Torridge, Fremington Quay, Northam Burrows, Westward Ho!, Mermaid's Pool to Rowden Gut, Hobby to Peppercombe, Marsland to Clovelly Coast Sites of Special Scientific Interest consistent with the proper exercise of our functions[1].

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

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

The conclusions of this assessment have been checked by:

Christine Goodall, Area Team Leader	06/01/2020	Senior Officer with responsibility for protected sites
Richard Andrews, Coastal Access Senior Specialist	06/01/2020	On behalf of the Coastal Access Programme Team

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

Nature Conservation Assessment Sites

Proposed route

Marine Conservation Zones © Natural England and JNCC

Sites of Special Scientific Interest (SSSI) © Natural England

SS

Bideford to Foreland Point

Exmoor Coastal Heaths

Hele, Samson's and Combe Martin Bays

Napp's Cave

ILFRACOMBE

Berrynarbor

Combe Martin Bay

Rillage Point

Widmouth Head

Burrow Nose

Hangman Point

Capstone Point

Beacon Point

Hele Bay

Widmouth

Lydford Fm

Widmouth 158 Hill

Hole Fm

Goosewell

Lester Point

Wild Pear Beach

Lester Cliff

Brandy Cove Point

The Outfalls

Tors Park

Langleigh

Chambercombe

Beara Fm

Hagginton Hill

Home Barton

The Castle

Manor

Trayne Hills

West Hagginton

Lee

Lee Hills

Clorridge

Higher Slade

Lincombe

Whitestone

Shield Tor

Channel Fm

Kitstone Hill

Trayne

Hill Barton

Lower Slade

Score

Mullacott

Slade Resrs

Oakridge Fm

Warmscombe Fm

Cockhill

Keypitts

Ruggaton Fm

Adventure

Kilometers

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N

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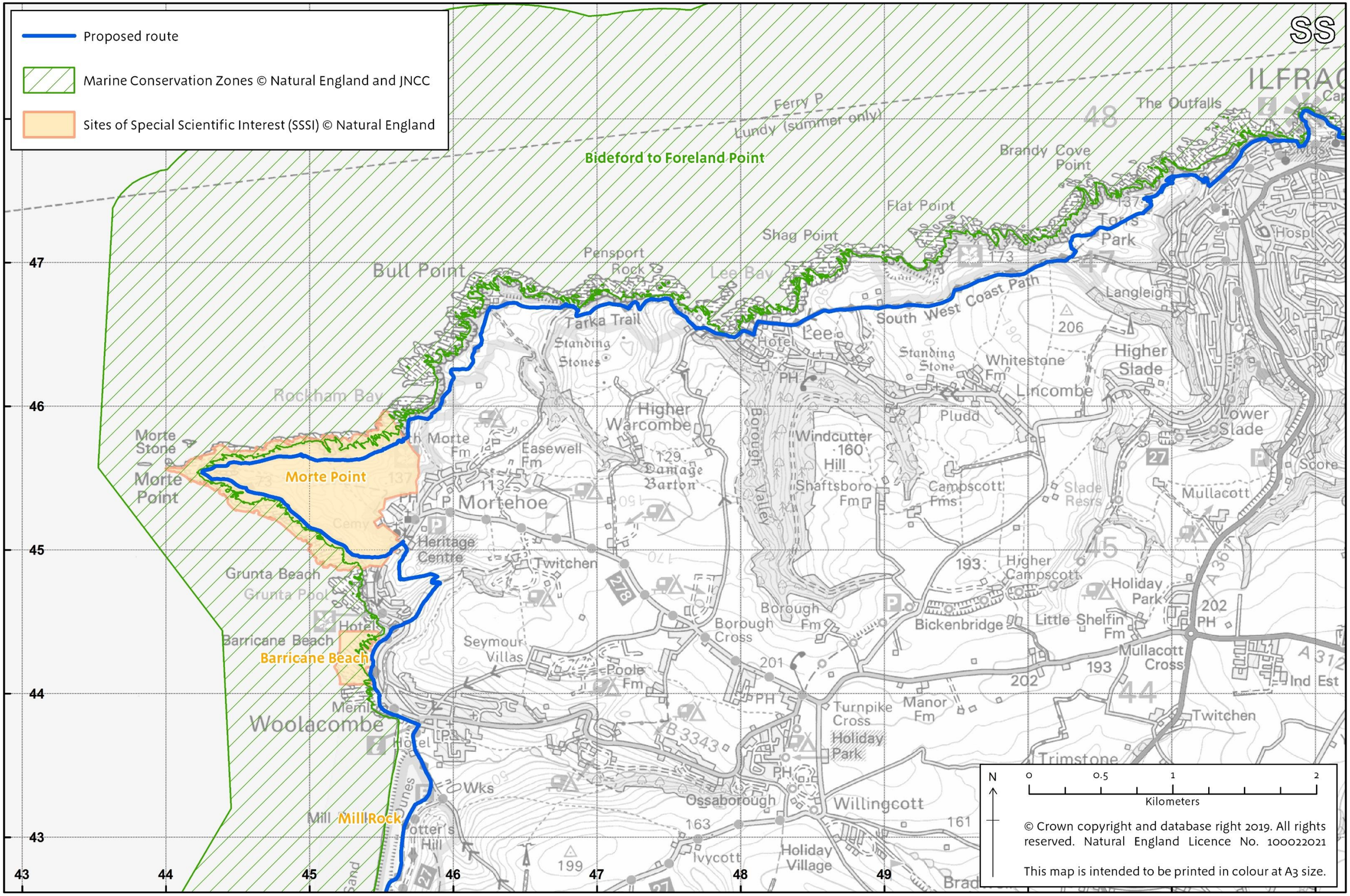
Nature Conservation Assessment Sites



Nature Conservation Assessment Sites

Alternative route

Proposed route

Marine Conservation Zones © Natural England and JNCC

Sites of Special Scientific Interest (SSSI) © Natural England

Bideford to Foreland Point

Saunton to Baggy Point Coast

Braunton Burrows

Mill Rock

Morte Bay

Croyde Bay

Woolacombe

Ossaborough

Georgeham

Putsborough

Croyde

Saunton Down

Woolacombe Down

Pickwell Down

Buckland Down

Baggy Point

Wheeler's Stone

Black Rock

Vention

Pickwell

Croydehoe Farm

Middleborough Hill

Ora Hill

Combas Farm

Crowborough

Darracott

Upcott

Nethercott

Forda

Cross

Roadway Farm

Little Roadway Farm

Roadway Corner

Higher Spreacombe

Middle Spreacombe

Barton Close Farm

Withycott

Reservoir

Pickwell Manor

Pickwell Manor Farm

Putsborough Manor

Putsborough Sand

Long Bar

Napps Cliff

Whiting Hole

Long Rock

Woolacombe Sand

Woolacombe Warren

Marine Drive

Tarka Trail

South West Coast Path

Challacombe Hill

Water Treatment Works

Potter's Hill

Eastacott

Holiday Park

Sports Gd

Sch

P.O

Hotel

Caravan Park

Willingcott Cross

Willingcott Cottages

Willingcott Valley

Ivycott Farm

High Bullen

Georgeham Road

Hartnoll Lane

Cleave Wood

Hartnoll Cottages

The Folly

Quarries (dis)

Pennwell Lane

Spreacombe Lodge

Panfield Steep

Cleave Plantation

Barton Close Lane

Earthwork

Chapel Close Plantation

Chapel Wood

Chapel (rems of)

Spreacombe Manor The Plantation

Vyse Wood

Long Plantation

Lower Panfield

Spreacombe Mine (dis)

Down Plantation

Hook's Wood

Smallacombe Bridge

North Wood

Castle Street Farm

North Buckland Cox's Lane

North Buckland Hill

Eastern Down Lane

Buckland Mine (dis)

Bye Cross

Adwell Lane

March End Farm

Incledon Farm

Cemy

Sch

P.O

Bottoms Lane

Northfield Road

West Lane

Down Lane (Nr)

Nethercott Farm

Upcott Farm

Quarr (dis)

Progstreet Hill

North Hole Farm

Meadow Lane

Stenaway Lane

Millaway Lane

Down Lane

Somerthing Lane

Down End

Downend House

Robber's Hall

South Hole Farm

High Legh

Hole Cleave Road

Orchardon Lane

Lobbthorn Stile

Long Lane

Incledon

Hannaburrow Lane

Quarries (dis)

Cultivation Terraces

SWC Path

Saunton Court

Hotel

Warren Farm

East S Farm

T Trail

Path

Tarka Trail

Napps Cliff

Middleborough Hill

Holiday Park

Croyde Bay

Croyde

Chapel (rems of)

Down End

Somerthing Lane

Downend House

Saunton Down

Cultivation Terraces

Hotel

Braunton Burrows

Pickwell

Pickwell Manor

Pickwell Manor Farm

Putsborough Manor

Putsborough

Ford

Putsborough Road

Georgeham

P.O

Crowborough

Darracott

Upcott

Nethercott

Forda

Cross

Roadway Farm

Little Roadway Farm

Roadway Corner

Higher Spreacombe

Middle Spreacombe

Barton Close Farm

Withycott

Reservoir

Pickwell Down

Down Lane

Mains Down Lane

Buckland Down

Oxford Cross

Castle Street Farm

North Buckland Cox's Lane

North Buckland Hill

Eastern Down Lane

Bye Cross

Adwell Lane

March End Farm

Incledon Farm

Cemy

Bottoms Lane

Northfield Road

West Lane

Down Lane (Nr)

Nethercott Farm

Upcott Farm

Quarr (dis)

Progstreet Hill

North Hole Farm

Meadow Lane

Stenaway Lane

Millaway Lane

Down Lane

Somerthing Lane

Down End

Downend House

Robber's Hall

South Hole Farm

High Legh

Hole Cleave Road

Orchardon Lane

Lobbthorn Stile

Long Lane

Incledon

Hannaburrow Lane

Quarries (dis)

Cultivation Terraces

SWC Path

Saunton Court

Hotel

Warren Farm

East S Farm

T Trail

Path

Tarka Trail

Napps Cliff

Middleborough Hill

Holiday Park

Croyde Bay

Croyde

Chapel (rems of)

Down End

Somerthing Lane

Downend House

Saunton Down

Cultivation Terraces

Hotel

Braunton Burrows

N

0 0.5 1 2

Kilometers

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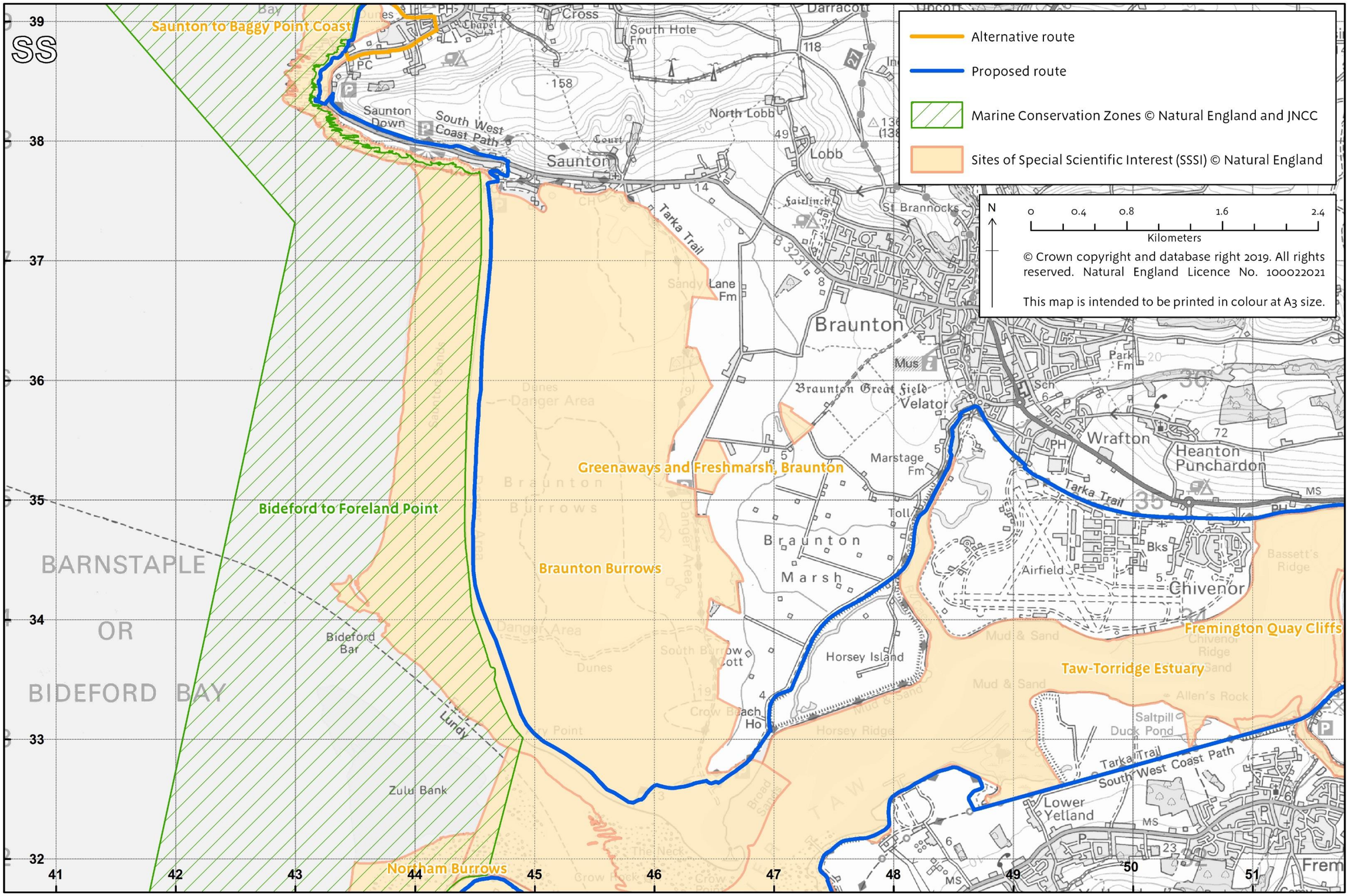
Coastal Access - Combe Martin to Marsland Mouth - Natural England's Proposals

Report CMM 4: Cock Rock, Croyde to Velator

Nature Conservation Assessment Sites



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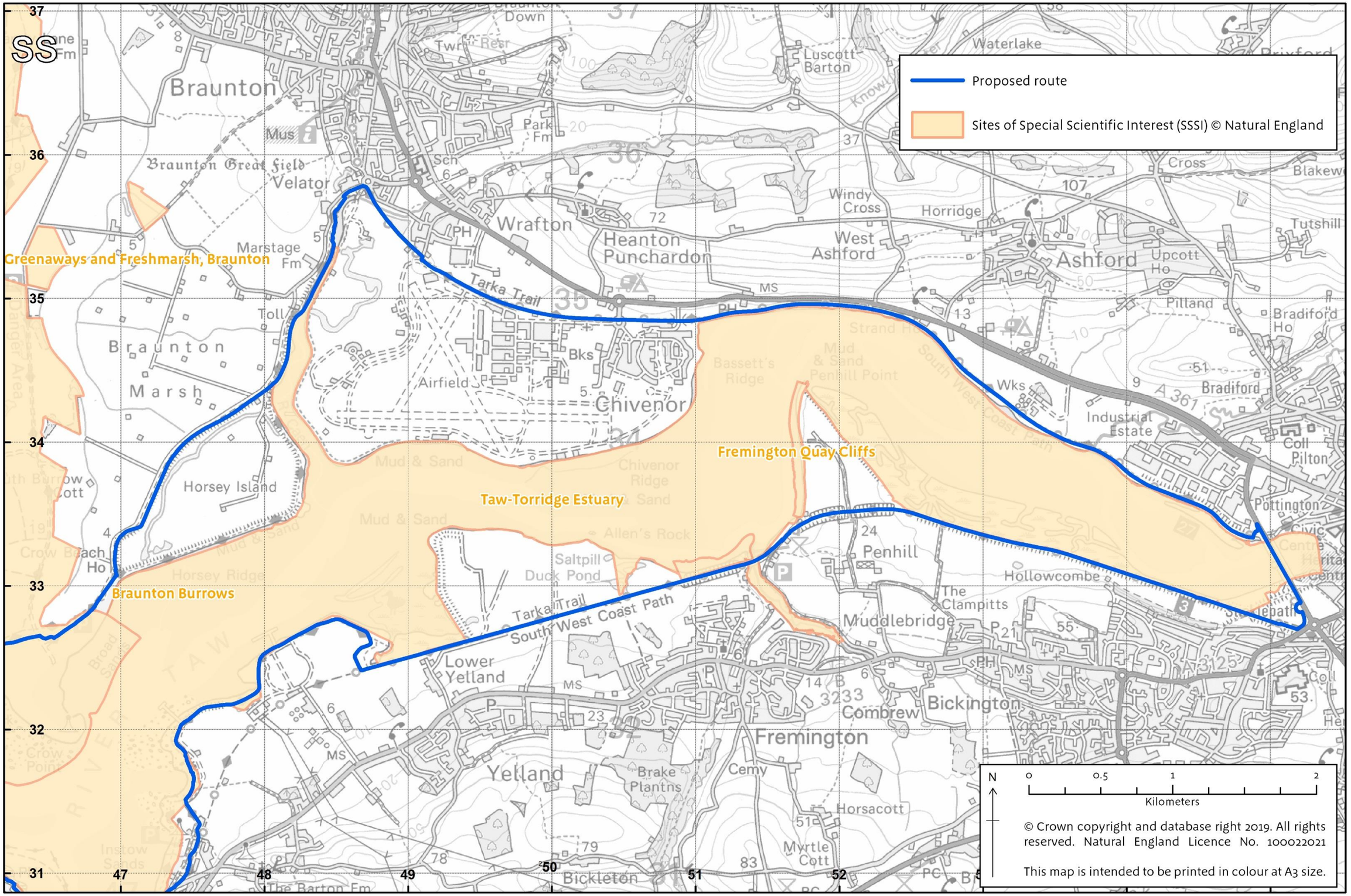
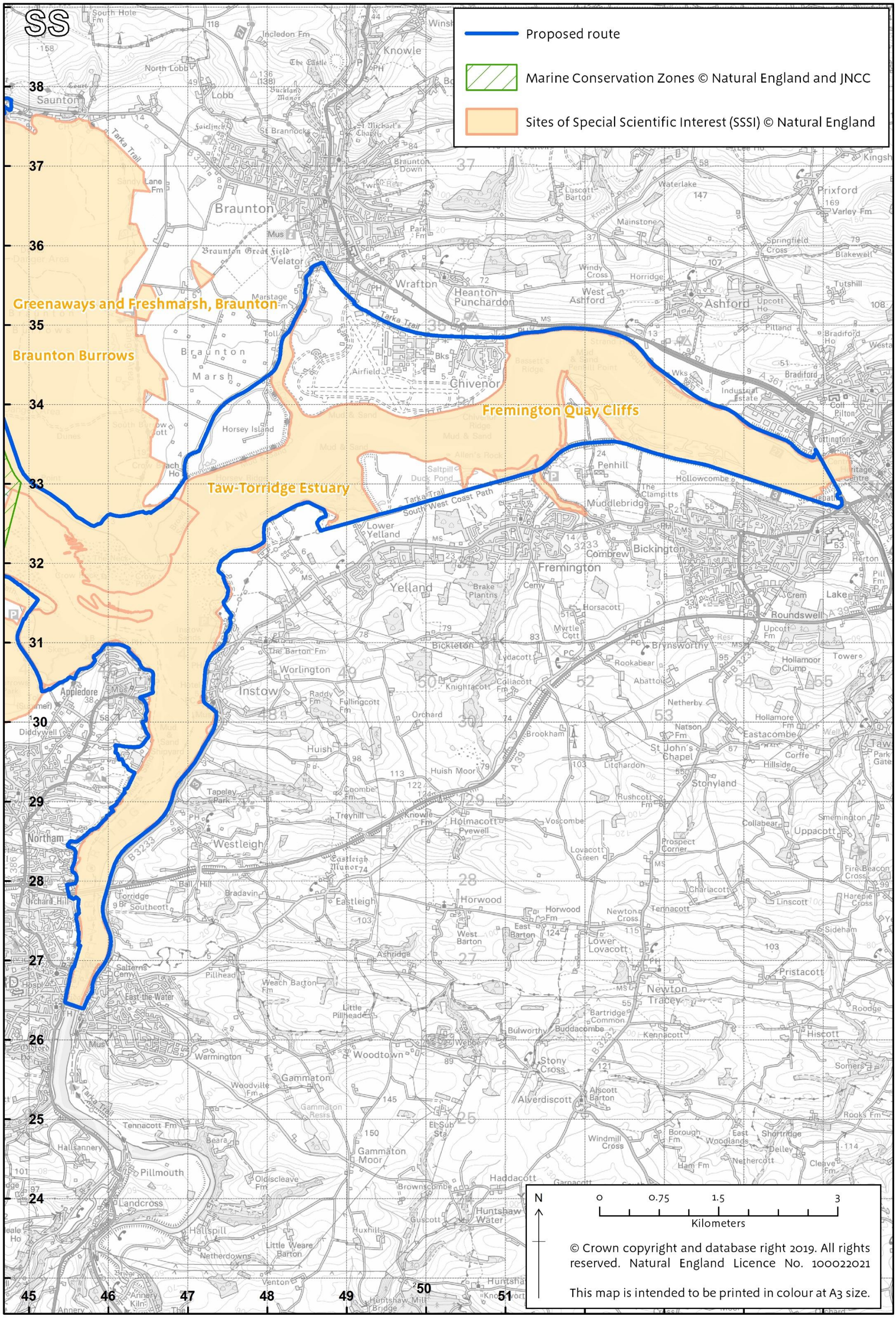


Coastal Access - Combe Martin to Marsland Mouth - Natural England's Proposals

Report CMM 6: Taw Bridge, Barnstaple to Bideford Long Bridge

Nature Conservation Assessment Sites



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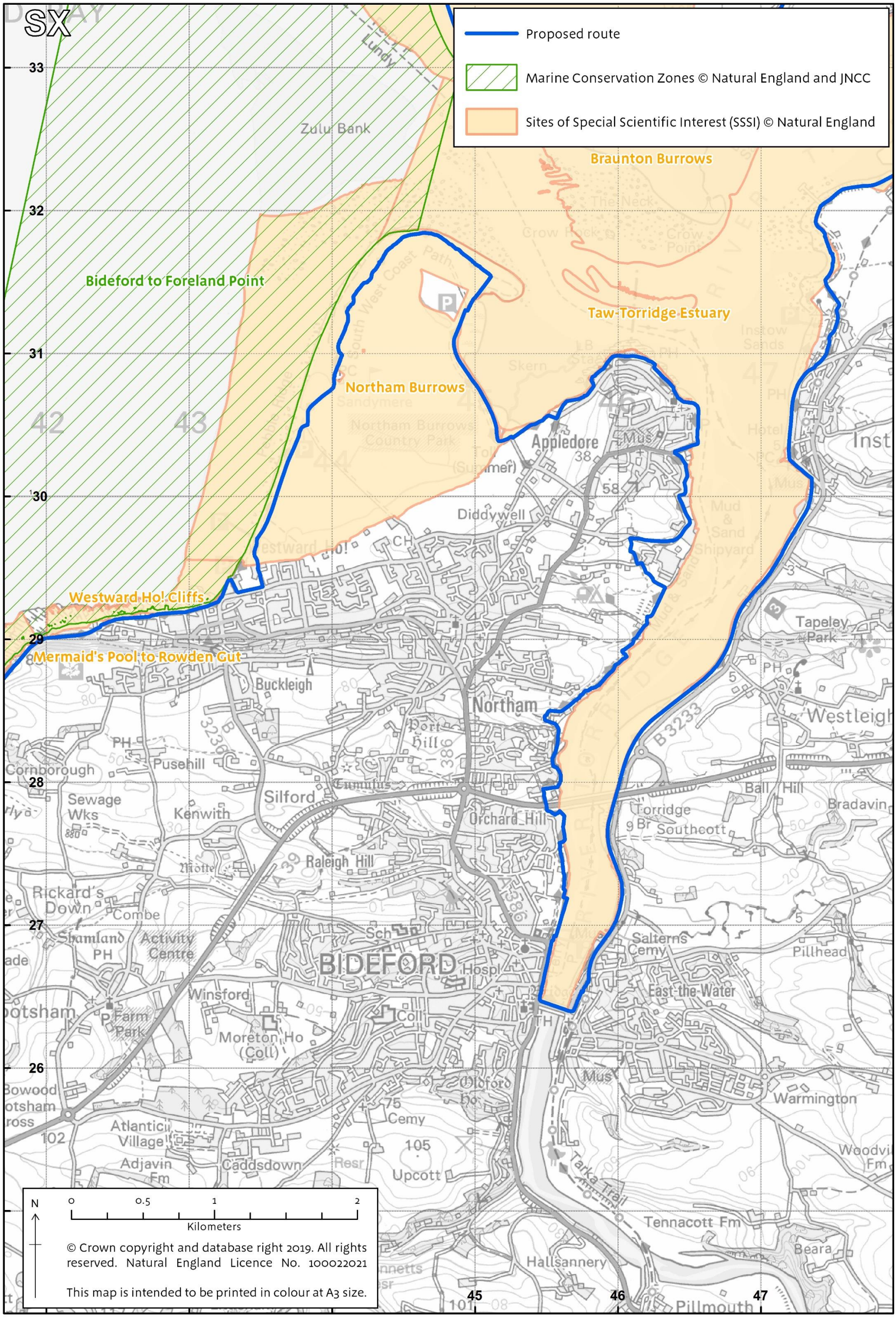
Nature Conservation Assessment Sites



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Nature Conservation Assessment Sites

Proposed route

Marine Conservation Zones © Natural England and JNCC

Sites of Special Scientific Interest (SSSI) © Natural England

Northam Burrows

Bideford to Foreland Point

Westward Ho! Cliffs

Mermaid's Pool to Rowden Gut

Hobby to Peppercombe

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0 0.5 1 2

Kilometers

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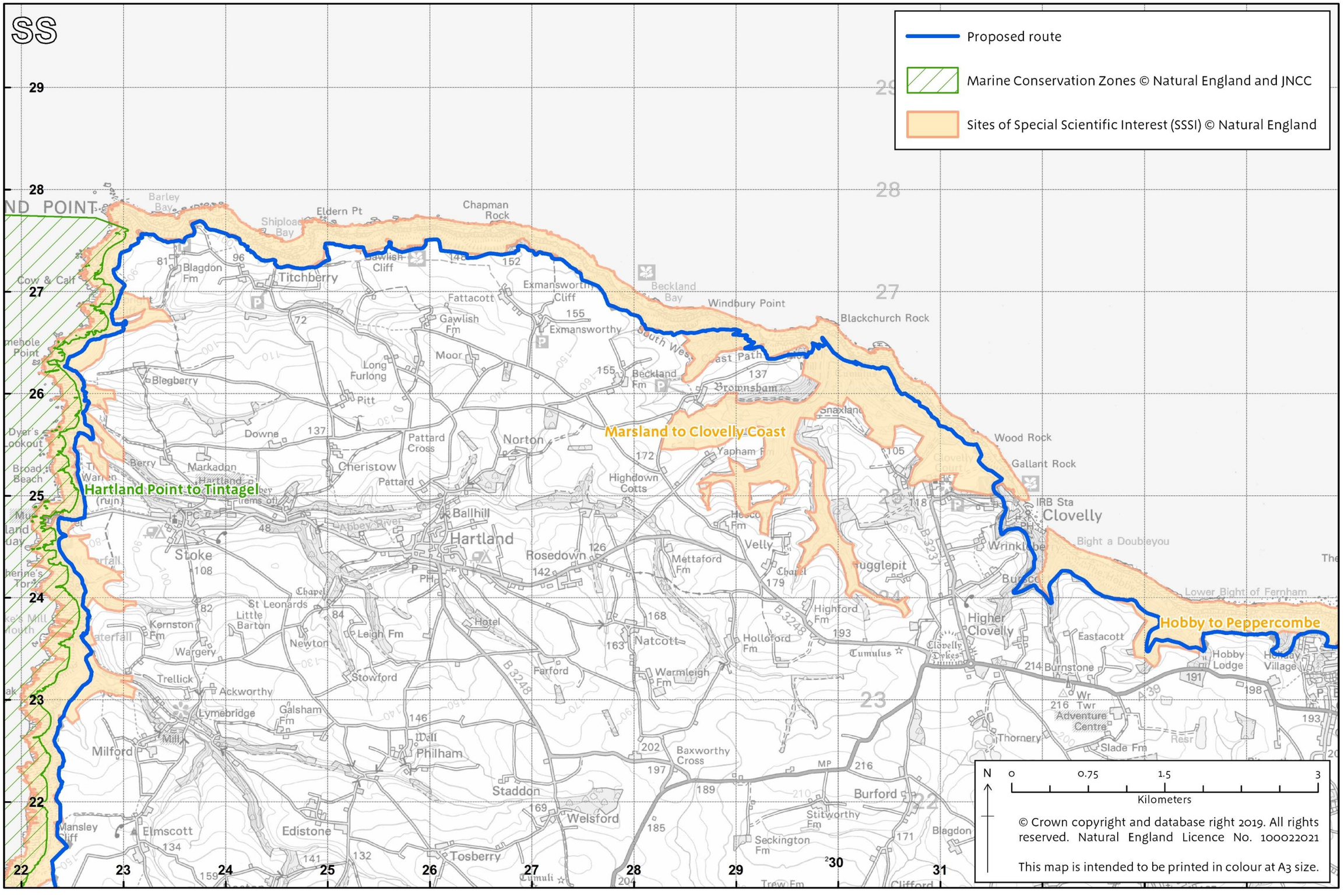
Nature Conservation Assessment Sites



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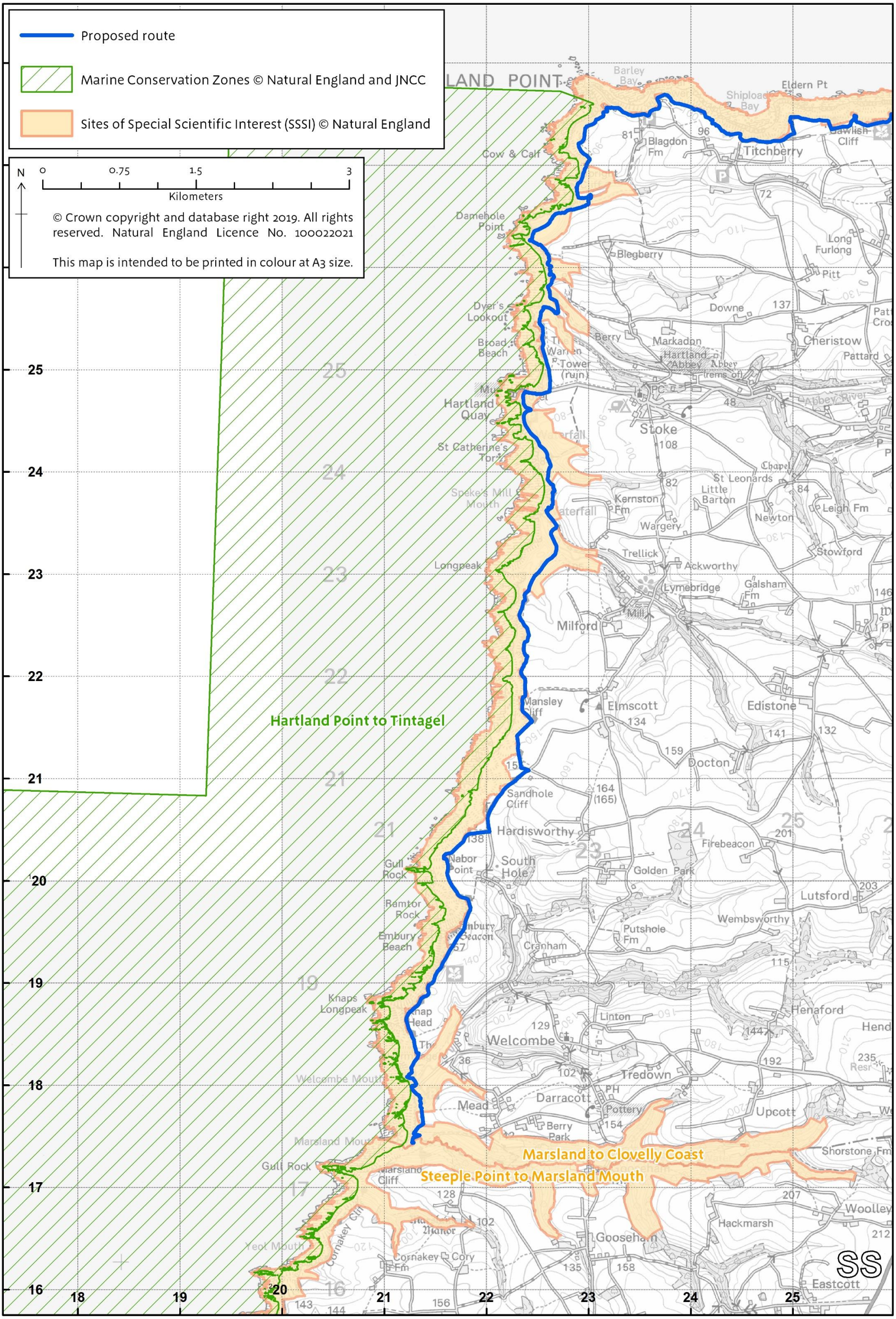
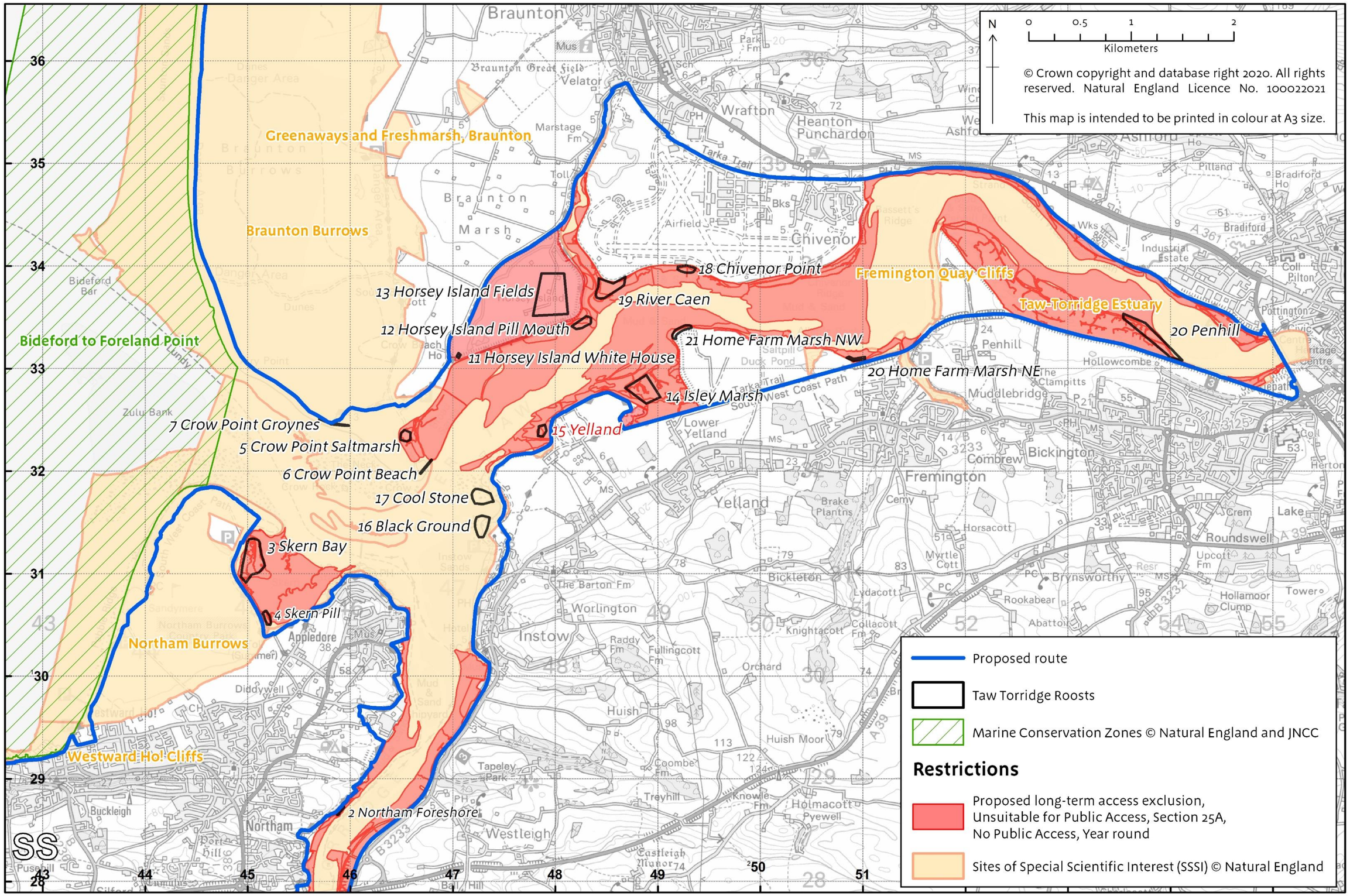
Coastal Access - Combe Martin to Marsland Mouth - Natural England's Proposals

Report CMM 10: Hartland Point to Marsland Mouth

Nature Conservation Assessment Sites



Nature Conservation Assessment Sites



Annex 1. Index to designated sites and features

Note: columns in grey are European sites for which a separate Habitats Regulations Assessment has been carried out.

Features – of the designated sites listed in 2.2. Note: * indicates Priority feature on Annexes I and II of the EC Habitats Directive	Braunton Burrows SAC	Tintagel-Marsland-Clovelly SAC	Hartland Point to Tintagel MCZ	Bideford to Foreland Point MCZ	Hele, Samson's and Combe Martin Bays SSSI	Morte Point SSSI	Barricane Beach SSSI	Mill Rock SSSI	Saunton to Baggy Point SSSI	Braunton Burrows SSSI	Taw- Torridge SSSI	Fremington Quay Cliffs SSSI	Northam Burrows SSSI	Westward Ho! SSSI	Mermaid's Pool to Rowden Gut SSSI	Hobby to Peppercombe SSSI	Marsland to Clovely SSSI
Geological features																	
EC - Dinantian												√					
EC - Marine Devonian					√		√		√			√					
EC - Variscan Structures					√												√
EC - Silurian - Devonian Chordata								√									
EC - Quaternary Of South-West England									√			√		√			
EC - Westphalian															√		√
IA - Coastal Geomorphology										√			√				√
IS - Quaternary Of South-West England									√					√			
Woodland Features																	
Wet woodland										√							

Features – of the designated sites listed in 2.2. Note: * indicates Priority feature on Annexes I and II of the EC Habitats Directive	Braunton Burrows SAC	Tintagel-Marsland-Clovelly SAC	Hartland Point to Tintagel MCZ	Bideford to Foreland Point MCZ	Hele, Samson's and Combe Martin Bays SSSI	Morte Point SSSI	Barricane Beach SSSI	Mill Rock SSSI	Saunton to Baggy Point SSSI	Braunton Burrows SSSI	Taw- Torridge SSSI	Fremington Quay Cliffs SSSI	Northam Burrows SSSI	Westward Ho! SSSI	Mermaid's Pool to Rowden Gut SSSI	Hobby to Peppercombe SSSI	Marsland to Clovely SSSI
H91A0. Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles; Western acidic oak woodland		√														√	√
W7 - *Alnus glutinosa - Fraxinus excelsior - Lysimachia nemorum* woodland																	
W10 - *Quercus robur - Pteridium aquilinum - Rubus fruticosus* woodland																√	
W11 - *Quercus petraea - Betula pubescens* - Oxalis acetosella woodland																	√
W16 - *Quercus spp.-Betula spp.-Deschampsia flexuosa* woodland																	√
W17 - *Quercus petraea - Betula pubescens - Dicranum majus* woodland																√	√
W22 - *Prunus spinosa - Rubus fruticosus* scrub																√	
W23 - *Ulex europaeus - Rubus fruticosus* scrub																√	

Features – of the designated sites listed in 2.2. Note: * indicates Priority feature on Annexes I and II of the EC Habitats Directive	Braunton Burrows SAC	Tintagel-Marsland-Clovelly SAC	Hartland Point to Tintagel MCZ	Bideford to Foreland Point MCZ	Hele, Samson's and Combe Martin Bays SSSI	Morte Point SSSI	Barricane Beach SSSI	Mill Rock SSSI	Saunton to Baggy Point SSSI	Braunton Burrows SSSI	Taw- Torridge SSSI	Fremington Quay Cliffs SSSI	Northam Burrows SSSI	Westward Ho! SSSI	Mermaid's Pool to Rowden Gut SSSI	Hobby to Peppercombe SSSI	Marsland to Clovely SSSI
Open Coastal Vegetation																	
MG11 - *Festuca rubra - Agrostis stolonifera - Potentilla anserina* grassland													√				
MC1 - *Crithmum maritimum - Spergularia rupicola* maritime rock-crevice community																	
MC5 - *Armeria maritima - Cerastium diffusum ssp. diffusum* maritime therophyte community																	√
MC8 - *Festuca rubra - Armeria maritima* maritime grassland						√											√
MC9 - *Festuca rubra - Holcus lanatus* maritime grassland																	
MC10 - *Festuca rubra - Plantago spp*. maritime grassland																	
M25 - *Molinia caerulea - Potentilla erecta* mire																	√

Features – of the designated sites listed in 2.2. Note: * indicates Priority feature on Annexes I and II of the EC Habitats Directive	Braunton Burrows SAC	Tintagel-Marsland-Clovelly SAC	Hartland Point to Tintagel MCZ	Bideford to Foreland Point MCZ	Hele, Samson's and Combe Martin Bays SSSI	Morte Point SSSI	Barricane Beach SSSI	Mill Rock SSSI	Saunton to Baggy Point SSSI	Braunton Burrows SSSI	Taw- Torridge SSSI	Fremington Quay Cliffs SSSI	Northam Burrows SSSI	Westward Ho! SSSI	Mermaid's Pool to Rowden Gut SSSI	Hobby to Peppercombe SSSI	Marsland to Clovely SSSI
H2120 Shifting dunes along the shoreline with *Ammophila arenaria* ('White dunes')	√																
H2130 Fixed dunes with herbaceous vegetation ('Grey dunes')	√																
H2170 Dunes with *Salix repens ssp. argentea (Salicion arenariae)*	√																
H2190 Humid dune slacks	√																
Fixed dune grassland										√			√				
SD14 - *Salix repens - Campylium stellatum* dune-slack community													√				
SD15 - *Salix repens - Calliergon cuspidatum* dune-slack community													√				
SD16 - *Salix repens - Holcus lanatus* dune slack community													√				

Features – of the designated sites listed in 2.2. Note: * indicates Priority feature on Annexes I and II of the EC Habitats Directive	Braunton Burrows SAC	Tintagel-Marsland-Clovelly SAC	Hartland Point to Tintagel MCZ	Bideford to Foreland Point MCZ	Hele, Samson's and Combe Martin Bays SSSI	Morte Point SSSI	Barricane Beach SSSI	Mill Rock SSSI	Saunton to Baggy Point SSSI	Braunton Burrows SSSI	Taw- Torridge SSSI	Fremington Quay Cliffs SSSI	Northam Burrows SSSI	Westward Ho! SSSI	Mermaid's Pool to Rowden Gut SSSI	Hobby to Peppercombe SSSI	Marsland to Clovely SSSI
SD6 - *Ammophila arenaria* mobile dune community													√				
SD7 - *Ammophila arenaria - Festuca rubra* semi-fixed dune community													√				
SD8 - *Festuca rubra - Galium verum* fixed dune grassland													√				
H1230 Vegetated sea cliffs of the Atlantic and Baltic coasts		√														√	√
H4030. European dry heaths																	√
H7 - *Calluna vulgaris - Scilla verna* heath						√											√
H8 - *Calluna vulgaris - Ulex gallii* heath						√											√
Lowland dry heath		√															√
Intertidal Habitat																	

Features – of the designated sites listed in 2.2. Note: * indicates Priority feature on Annexes I and II of the EC Habitats Directive	Braunton Burrows SAC	Tintagel-Marsland-Clovelly SAC	Hartland Point to Tintagel MCZ	Bideford to Foreland Point MCZ	Hele, Samson's and Combe Martin Bays SSSI	Morte Point SSSI	Barricane Beach SSSI	Mill Rock SSSI	Saunton to Baggy Point SSSI	Braunton Burrows SSSI	Taw- Torridge SSSI	Fremington Quay Cliffs SSSI	Northam Burrows SSSI	Westward Ho! SSSI	Mermaid's Pool to Rowden Gut SSSI	Hobby to Peppercombe SSSI	Marsland to Clovely SSSI
H1140 Mudflats and sandflats not covered by seawater at low tide	√																
Coastal saltmarshes and saline reedbeds			√														
Sheltered muddy shores (incl. estuarine muds)											√						
SM10 transitional low marsh vegetation with *Puccinallia maritima, Salicornia* and *Suaeda maritima*											√						
SM13a *Puccinellia Maritima* saltmarsh and dominant sub communities											√						
SM8 *Salicornia* saltmarsh											√						
SM9 *Suaeda maritima* saltmarsh											√						
Littoral sediment											√						
Plant Species																	

Features – of the designated sites listed in 2.2. Note: * indicates Priority feature on Annexes I and II of the EC Habitats Directive	Braunton Burrows SAC	Tintagel-Marsland-Clovelly SAC	Hartland Point to Tintagel MCZ	Bideford to Foreland Point MCZ	Hele, Samson's and Combe Martin Bays SSSI	Morte Point SSSI	Barricane Beach SSSI	Mill Rock SSSI	Saunton to Baggy Point SSSI	Braunton Burrows SSSI	Taw- Torridge SSSI	Fremington Quay Cliffs SSSI	Northam Burrows SSSI	Westward Ho! SSSI	Mermaid's Pool to Rowden Gut SSSI	Hobby to Peppercombe SSSI	Marsland to Clovely SSSI
S1395 Petalwort, *Petalophyllum ralfsi*	√																
Population of Schedule 8 liverwort - *Petalophyllum ralfsi*, Petalwort										√							
Population of Schedule 8 moss - *Didymodon cordatus*, Cordate Beard-moss									√								
Population of Schedule 8 plant - *Liparis loeselii,* Fen Orchid										√							
Population of Schedule 8 plant - *Teucrium scordium*, Water Germander										√			√				
Lichen assemblage									√	√						√	√
Vascular Plant Assemblage									√	√			√				√
Invertebrates Assemblages																	
Invert. assemblage F111 bare sand & chalk																	√
Invert. assemblage F112 open short sward																	√

Features – of the designated sites listed in 2.2. Note: * indicates Priority feature on Annexes I and II of the EC Habitats Directive	Braunton Burrows SAC	Tintagel-Marsland-Clovelly SAC	Hartland Point to Tintagel MCZ	Bideford to Foreland Point MCZ	Hele, Samson's and Combe Martin Bays SSSI	Morte Point SSSI	Barricane Beach SSSI	Mill Rock SSSI	Saunton to Baggy Point SSSI	Braunton Burrows SSSI	Taw- Torridge SSSI	Fremington Quay Cliffs SSSI	Northam Burrows SSSI	Westward Ho! SSSI	Mermaid's Pool to Rowden Gut SSSI	Hobby to Peppercombe SSSI	Marsland to Clovely SSSI
Butterflies																	
Population of nationally rare butterfly species - *Argynnis adippe*, High brown Fritillary																	√
Populations of nationally scarce butterfly species - *Leptidea sinapis*, Wood White																	√
Populations of nationally scarce butterfly species - *Satyrium w-album*, White-letter Hairstreak																	
Molluscs																	
Population of Schedule 5 mollusc - *Catinella arenaria*, Sandbowl Snail										√							
Breeding Birds																	
Assemblages of breeding birds - Mixed: Scrub, Woodland																√	

Features – of the designated sites listed in 2.2. Note: * indicates Priority feature on Annexes I and II of the EC Habitats Directive	Braunton Burrows SAC	Tintagel-Marsland-Clovelly SAC	Hartland Point to Tintagel MCZ	Bideford to Foreland Point MCZ	Hele, Samson's and Combe Martin Bays SSSI	Morte Point SSSI	Barricane Beach SSSI	Mill Rock SSSI	Saunton to Baggy Point SSSI	Braunton Burrows SSSI	Taw- Torridge SSSI	Fremington Quay Cliffs SSSI	Northam Burrows SSSI	Westward Ho! SSSI	Mermaid's Pool to Rowden Gut SSSI	Hobby to Peppercombe SSSI	Marsland to Clovely SSSI
Assemblages of breeding birds - Woodland																	√
Non Breeding Birds																	
Aggregation of >20000 non-breeding waterbirds											√						
Aggregations of non-breeding birds - Curlew, *Numenius arquata*											√						
Aggregations of non-breeding birds - Golden plover, *Pluvialis apricaria*											√						
Aggregations of non-breeding birds - *Lapwing, Vanellus vanellus*											√						
Broadscale Marine Habitats																	
High energy intertidal rock (A1.1)			√	√													
Moderate energy intertidal rock (A1.2)			√	√													
Low energy intertidal rock (A1.3)			√	√													

Features – of the designated sites listed in 2.2. Note: * indicates Priority feature on Annexes I and II of the EC Habitats Directive	Braunton Burrows SAC	Tintagel-Marsland-Clovelly SAC	Hartland Point to Tintagel MCZ	Bideford to Foreland Point MCZ	Hele, Samson's and Combe Martin Bays SSSI	Morte Point SSSI	Barricane Beach SSSI	Mill Rock SSSI	Saunton to Baggy Point SSSI	Braunton Burrows SSSI	Taw- Torridge SSSI	Fremington Quay Cliffs SSSI	Northam Burrows SSSI	Westward Ho! SSSI	Mermaid's Pool to Rowden Gut SSSI	Hobby to Peppercombe SSSI	Marsland to Clovely SSSI
Intertidal coarse sediment (A2.1)			√	√													
Intertidal sand and muddy sand (A2.2)			√	√													
Intertidal mixed sediments (A2.4)				√													
High energy infralittoral rock (A3.1)			√	√													
Moderate energy infralittoral rock (A3.2)			√	√													
Low energy infralittoral rock (A3.3)				√													
High energy circalittoral rock (A4.1)			√	√													
Moderate energy circalittoral rock (A4.2)			√	√													
Subtidal coarse sediment (A5.1)			√	√													
Subtidal sand (A5.2)			√	√													
Subtidal mixed sediments (A5.4)				√													
Marine Habitats of conservation importance																	

Features – of the designated sites listed in 2.2. Note: * indicates Priority feature on Annexes I and II of the EC Habitats Directive	Braunton Burrows SAC	Tintagel-Marsland-Clovelly SAC	Hartland Point to Tintagel MCZ	Bideford to Foreland Point MCZ	Hele, Samson's and Combe Martin Bays SSSI	Morte Point SSSI	Barricane Beach SSSI	Mill Rock SSSI	Saunton to Baggy Point SSSI	Braunton Burrows SSSI	Taw- Torridge SSSI	Fremington Quay Cliffs SSSI	Northam Burrows SSSI	Westward Ho! SSSI	Mermaid's Pool to Rowden Gut SSSI	Hobby to Peppercombe SSSI	Marsland to Clovely SSSI
Fragile sponge & anthozoan communities on subtidal rocky habitats (HOCI 7)			√	√													
Honeycomb worm (*Sabellaria alveolata*) reefs (HOCI 8)			√	√													
Intertidal underboulder communities (HOCI 10)				√													
Littoral chalk communities (HOCI 11)				√													
Marine Species																	
Pink sea-fan (*Eunicella verrucosa*) (SOCI 8)				√													
Spiny lobster (*Palinurus elephas*) (SOCI 24)				√													

Annex 2. Reference

Berridge, R., 2019, Identification of Wintering Wildfowl High Tide Roosts & Recreational Disturbance Impacts on the Taw Torridge Estuary Site of Special Scientific Interest (SSSI). Natural England Commissioned Reports, Number 281
http://publications.naturalengland.org.uk/publication/6334652342337536