www.gov.uk/englandcoastpath

Assessment of England Coast Path proposals between Cleveleys, Lancashire and Pier Head, Liverpool

On Sefton Coast Special Area of Conservation (SAC), Ribble and Alt Estuaries Special Protection Area (SPA) and Ramsar site, Liverpool Bay SPA and Mersey Narrows and North Wirral Foreshore SPA and Ramsar site

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

Summary

I) Introduction

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

Natural England has a statutory duty under the Marine and Coastal Access Act 2009 to improve access to the English coast. This assessment considers the potential impacts of our detailed proposals for coastal access from Cleveleys to Pier Head, Liverpool, on the following sites of international importance for wildlife:

- Sefton Coast Special Area of Conservation (SAC)
- Ribble and Alt Estuaries Special Protection Area (SPA) and Ramsar site
- Liverpool Bay SPA
- Mersey Narrows and North Wirral Foreshore SPA and Ramsar site

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

www.gov.uk/government/publications/england-coast-path-cleveleys-to-pier-head-liverpool-comment-on-proposals

II) Background

The main wildlife interests for this stretch of coast are summarised in Table 1 (see Tables 3 and 4 for a full list of qualifying features).

Table 1. Summary of the main wildlife interest

Interest	Description
Overwintering and passage birds	The Ribble and Alt Estuaries SPA and Ramsar site contain extensive areas of saltmarsh and intertidal mud and sand which, along with areas of coastal grazing marsh and adjacent functionally-linked land, support internationally important populations of waterbirds in winter including swans, geese, ducks and waders. The site is also of major importance during migration periods, especially for wader populations moving along the west coast of Britain. The offshore waters of Liverpool Bay SPA support non-breeding red-throated diver, common scoter, little gull and additionally (within the waterbird assemblage) red-breasted merganser and great cormorant.
Breeding seabirds and waders	The Ribble and Alt Estuaries SPA and Ramsar site supports breeding lesser back-backed gull and common tern, along with black-headed gull and other seabirds (within the seabird assemblage). Liverpool Bay SPA also supports breeding common and little terns.
Dune habitats and species	Sefton Coast SAC comprises extensive areas of dune habitats at different successional stages, ranging from embryo and mobile dunes to fixed dunes, dune grassland and dune heath, and also containing large areas of dune slacks. The slacks in particular, along with other areas are important in supporting natterjack toads (a Ramsar feature) and great crested newts, along with petalwort (a rare liverwort).

The table shows where the wildlife interests of overwintering and passage birds, breeding seabirds and waders and dune habitats and species occur within the sites of international importance for wildlife on stretch of coast.

III) Our approach

Natural England's approach to ensuring the protection of sensitive nature conservation features under the Coastal Access Programme is set out in the Coastal Access Scheme [Ref 1]. Note that, following a ruling by the Court of Justice of the European Union (Case C-323/17 – usually cited as People over Wind), we have issued a technical memorandum concerning the application of this methodology where assessment under the Habitats Regulations is required.

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

Evidence is also gathered as appropriate from a range of other sources which can include information and data held locally by external partners or from the experience of local land owners, environmental consultants and occupiers. The approach includes looking at any current visitor management practices, either informal or formal. It also involves discussing our emerging

conclusions as appropriate with key local interests such as land owners or occupiers, conservation organisations or the local access authority. In these ways, any nature conservation concerns are discussed early and constructive solutions identified as necessary.

The conclusions of this assessment are approved by a member of Natural England staff who is not a member of coastal access programme team and who has responsibility for protected sites. This ensures appropriate separation of duties within Natural England.

IV) Aim and objectives for the design of our proposals

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

Key considerations in developing coastal access proposals for this stretch have been the possible impact of disturbance on waterbirds and dune species and damage to dune habitats as a result of recreational activities. Objectives for design of our proposals have been to:

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

V) Conclusion

We have considered whether our detailed proposals for coastal access between Cleveleys and Pier Head might have an impact on the SPA, SAC and Ramsar sites along this stretch (see (I) above for list of sites). In Part C of this assessment we identify some possible risks to the relevant qualifying features and conclude that proposals for coastal access, without incorporated mitigation, may have a significant effect on these sites. In Part D we consider these risks in more detail, taking account of avoidance and mitigation measures incorporated into our access proposal, and conclude that there will not be an adverse effect on the integrity of any of these sites. These measures are summarised in Table 2 below.

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

Risk to conservation objectives	Relevant design features of the access proposal
Repeated disturbance to foraging or resting birds during winter and on passage, following changes in recreational activities as a result of the access proposal, may lead to reduced fitness and reduction in population and/or contraction in the distribution of qualifying features within the site.	• The proposed route follows existing access almost all of its length and is set back from the foreshore / mean high water mark for the majority of it. Coast path users will be directed to follow the route rather than access the foreshore / intertidal area at sensitive locations. • Nearly all the saltmarsh and other sensitive intertidal habitats in the coastal margin are unsuitable for walking and access will be excluded by direction. • Sensitive areas of coastal margin not already restricted as above will additionally be restricted year round for nature conservation and/or land management at Marshside, Hesketh Out Marsh, Hutton In Marsh and the land east of Warton Aerodrome. • Additional on-site notices will be installed, or existing notices updated, at key access points to inform people about the restricted areas. • Signposts and waymarking will be used to ensure the route of the trail is clear and easy to follow.
Repeated disturbance to birds during the breeding season, following changes in recreational activities as a result of the access proposal, may lead them to abandon nesting areas or reduce their breeding success.	• The proposed route follows existing access almost all of its length and is set back from the foreshore / mean high water mark for the majority of it. Coast path users will be directed to follow the route rather than access the foreshore. • Nearly all the saltmarsh and other sensitive intertidal habitats in the coastal margin are unsuitable for walking and access will be excluded by direction. • Sensitive areas of coastal margin not already restricted as above will additionally be restricted year round for nature conservation and/or land management at Marshside, Hesketh Out Marsh, Hutton In Marsh, and the land east of Warton Aerodrome. • Additional on-site notices will be installed, or existing notices updated, at key access points to inform people about the restricted areas. • Signposts and waymarking will be used to ensure the route of the trail is clear and easy to follow.
Repeated increased trampling and/or dog fouling, following changes in recreational activities as a result of the access proposal, may damage sensitive dune habitats and	• The proposed route follows existing access and walked routes along almost all of its length. There is expected to be a mostly negligible increase in use within Sefton Coast SAC as a result of the proposals.

Risk to conservation objectives	Relevant design features of the access proposal
species leading to long-term declines in their quality, distribution or numbers within the site.	• Where there is a low but appreciable risk of changes in patterns of use affecting features, monitoring of the trail will detect such changes and temporary diversions put in place if necessary. • Information boards will inform the public about the sensitive features present and the need to protect them. • Signposts and waymarking will be used to ensure the route of the trail is clear and easy to follow.
Increased disturbance of dune slacks by dogs, following changes in recreational activities as a result of the access proposal, may impact on breeding amphibians leading to long-term declines in their distribution or numbers within the site.	• The proposed route follows existing access and walked routes along almost all of its length. There is expected to be a mostly negligible increase in use within Sefton Coast SAC as a result of the proposals. • Where there is a low but appreciable risk of changes in patterns of use affecting features, monitoring of the trail will detect such changes and temporary diversions put in place if necessary. • People with dogs will continue to be restricted from the NNR grazing enclosures as part of the coast path proposals. • Information boards will inform the public about the sensitive features present and the need to protect them. • Signposts and waymarking will be used to ensure the route of the trail is clear and easy to follow.
New public access rights on grazed land as a result of the access proposal may lead to dogs or their owners scaring livestock, resulting in the temporary or permanent cessation of grazing management, or significant changes to the grazing regime. Where the grazed land affected supports designated habitats and species, this disruption of the grazing regime may lead to reduction in quality, distribution and numbers within the site.	• People with dogs will continue to be restricted from the NNR grazing enclosures as part of the coast path proposals. • Information boards will inform the public about the sensitive features present and the need to protect them. • Signposts and waymarking will be used to ensure the route of the trail is clear and easy to follow.

The above table lists the risks to conservation objectives from our proposals and the mitigation measures built in to protect them.

VI) Implementation

Once a route for the trail has been confirmed by the Secretary of State, we will work with the local authorities of Liverpool, Sefton, West Lancashire, South Ribble, Preston, Fylde and Blackpool to

ensure any works on the ground are carried out with due regard to the conclusions of this appraisal and relevant statutory requirements.

VII) Thanks

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

PART A: Introduction and information about the England Coast Path

A1. Introduction

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

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

Where implementation of a Coastal Access Report could impact on a site designated for its international importance for wildlife, called a 'European site[1]', a Habitats Regulations Assessment must be carried out.

The conclusions of this assessment are approved by a member of Natural England staff who is not a member of coastal access programme team and who has responsibility for protected sites. This ensures appropriate separation of duties within Natural England.

Natural England's approach to ensuring the protection of sensitive nature conservation features under the Coastal Access Programme is set out in the Coastal Access Scheme [Ref 1]. Note that, following a ruling by the Court of Justice of the European Union (Case C-323/17 – usually cited as People over Wind), we have issued a technical memorandum concerning the application of this methodology where assessment under the Habitats Regulations is required.

A2. Details of the plan or project

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

Our proposals for coastal access have two main components:

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

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

England Coast Path

A continuous walking route around the coast – the England Coast Path National Trail - will be established by joining up existing coastal paths and creating new sections of path where necessary. The route will be established and maintained to National Trail quality standards. Where specified in our proposals, the coastal path will be able to 'roll back' as the coast erodes or where there is significant encroachment by the sea such as occurs when sea defences are breached deliberately as part of a coastal 'managed realignment' scheme.

Coastal Margin

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

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

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

Note that coastal access rights over most areas of saltmarsh and flats seaward of the proposed route in this stretch will be excluded year round by direction under s25A of the Countryside and Rights of Way Act (2000), because they are unsuitable for public access.

It should be noted that while the above restrictions are not made on nature conservation grounds, they are important in reducing the potential for adverse effects on waterbirds and other sensitive SPA, SAC, and Ramsar site features. Therefore if in future there is a proposal to remove these restrictions from any areas along the stretch, further Habitats Regulations Assessment would be essential.

Promotion of the England Coast Path

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

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

Maintenance of the England Coast Path

The access proposals provide for the permanent establishment of a path and associated infrastructure, including additional mitigation measures referred to in this assessment and described in the access proposals. The England Coast Path will be part of the National Trails family of routes, for which there are national quality standards. Delivery is by local partnerships and there is regular reporting and scrutiny of key performance indicators, including the condition of the trail.

Responding to future change

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

Establishment of the trail

Establishment works to make the trail fit for use and prepare for opening, including any special measures that have been identified as necessary to protect the environment, will be carried out before the new public rights come into force on this stretch. Details of the works to be carried out and the estimated cost are provided in the access proposals. The cost of establishment works will be met by Natural England. Works on the ground to implement the proposals will be carried out by the local authorities of Liverpool, Sefton, West Lancashire, South Ribble, Preston, Fylde and Blackpool, subject to any further necessary consents being obtained, including to undertake operations on a SSSI. Natural England will provide further advice to the local authority carrying out the work as necessary.

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

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

Sefton Coast SAC

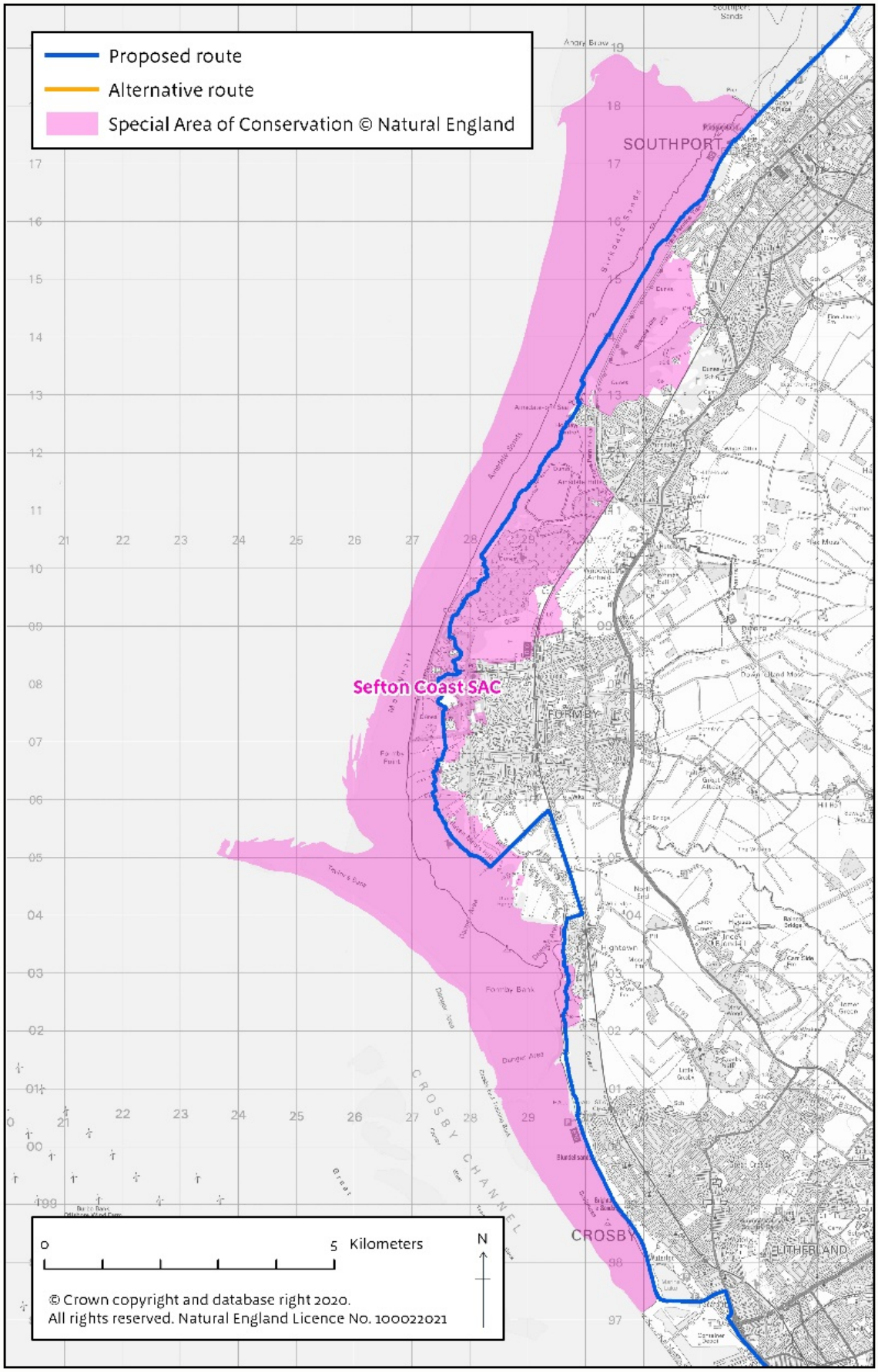
Sefton Coast is a large sand dune system in north-west England stretching over 20 km from Southport in the north (at the mouth of the Ribble estuary) to Crosby in the south (at the mouth of the Mersey). The site displays both rapid erosion and active shifting dunes, with a substantial stretch of the dune system fronted by shifting dunes. The area of dunes around Formby Point has been eroding since 1906 while areas north and south of this are accreting (where the nature of the coast allows). Despite some urban and recreational development, both successional and geomorphological processes are still active and the structure and function of the site as a whole is still well-conserved.

The sequence of habitats from foredunes to dune grassland and dune slack is extensive, and substantial areas of open dune vegetation remain. There are large areas of semi-fixed and fixed dunes with herbaceous vegetation exhibiting considerable variation from calcareous to acidic. There are extensive dune slacks dominated by creeping willow Salix repens *ssp. Argentea*. The site also contributes to the range and variation of humid dune slack vegetation, being a large and representative base-rich system towards the northern limit for some humid dune slack communities along the west coast of Britain.

A large population of petalwort *Petalophyllum ralfsii* occurs at this site. It seems to prefer damp ground around the edges of dune slacks of fairly recent origin, with the largest populations found in slacks of less than 25 years old. The plant is often found in association with footpaths, where light trampling keeps the ground vegetation sparse; infrequently-used paths or less-trampled edges of pathways seem to be favoured.

Pools in the hollows and slacks amongst the more fixed dunes are the habitat of a large population of great crested newts *Triturus cristatus*.

Map 1. Sefton Coast SAC



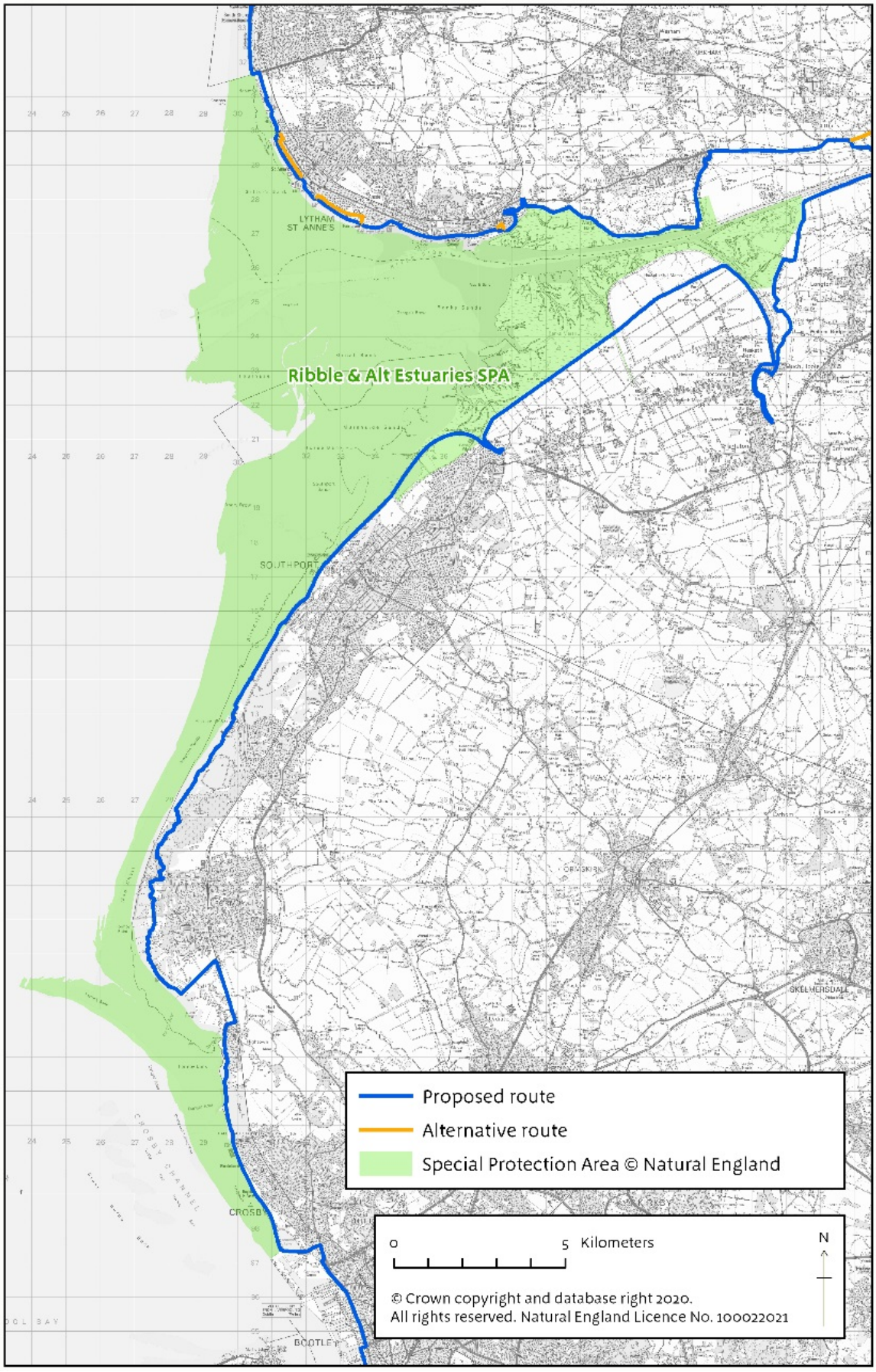
Ribble and Alt Estuaries SPA and Ramsar site

The Ribble and Alt Estuaries SPA lies on the coast of Lancashire and Sefton in northwest England. It comprises two estuaries, of which the Ribble is by far the larger, together with an extensive area of sandy foreshore along the Sefton Coast, and forms part of the chain of west coast SPAs that fringe the Irish Sea. Indeed, there is considerable interchange in the movements of birds between this site and Morecambe Bay, Mersey Estuary, Dee Estuary and Martin Mere. The site consists of extensive areas of sand and mudflats and, particularly in the Ribble, large areas of saltmarsh. There are also areas of coastal grazing marsh. The intertidal flats are rich in invertebrates on which waders and some wildfowl feed. The highest densities of feeding birds are on the muddier substrates of the Ribble, though sandy shores throughout are also used. Saltmarshes and coastal grazing marshes support high densities of wildfowl and these, together with intertidal sand and mudflats throughout, are used as high tide roosts. The larger expanses of saltmarsh and areas of coastal grazing marsh support breeding birds, in particular large concentrations of common tern and lesser black-backed gull (both qualifying features in their own right) which together with black-headed gull form a breeding seabird assemblage. These seabirds feed both offshore and inland, outside the SPA. Several species of waterfowl (notably pink-footed goose Anser brachyrhynchus) make significant use of agricultural land outside the SPA boundary for feeding. The site is of major importance during the winter for duck and wader species and for supporting wader populations moving along the west coast of Britain during the spring and autumn migration periods.

The SPA supports a diverse range of over-wintering or passage waders, with ten species named as qualifying features in their own right. These include both black-tailed and bar-tailed godwit, grey and golden plover, dunlin, knot and sanderling. In addition there are two swan species (whooper and Bewick's) and several ducks (pintail, shelduck, teal and wigeon). The site also qualifies as it regularly supports over 20,000 waterbirds in any season, at the time of classification the figure was 323,861 individual waterbirds (5 year peak mean 1993/4 – 1997/8)

The Ribble and Alt Estuaries Ramsar site covers the same area as the SPA but also covers large areas of Sefton Coast SAC. It is designated for the overwintering and passage bird features shared with the SPA as well as the natterjack toad Epidalea calamita, for which the dunes of Sefton Coast are an important stronghold.

Map 2. Ribble & Alt Estuaries SPA/Ramsar



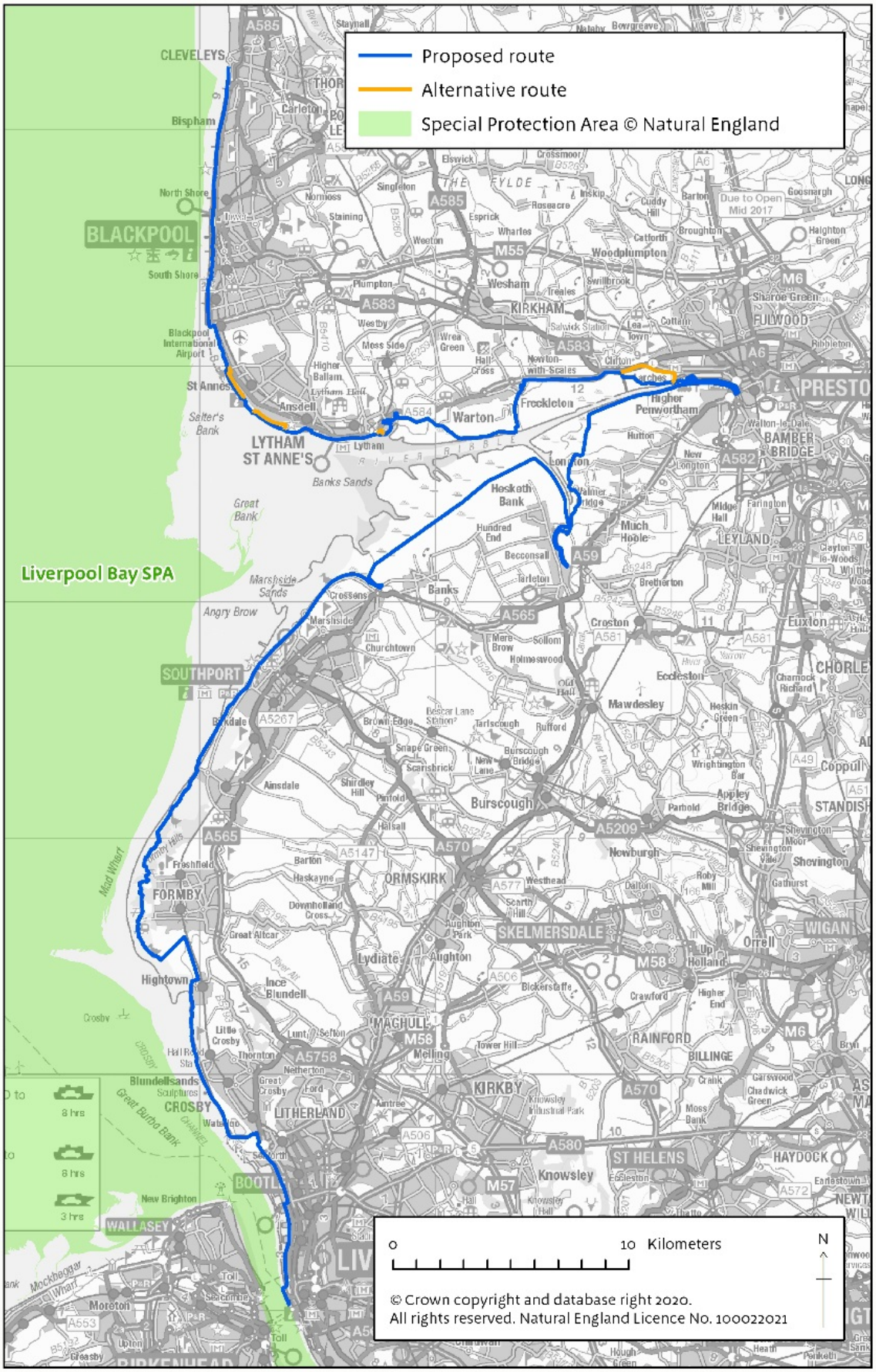
Liverpool Bay SPA

Liverpool Bay is located in the south-eastern region of the northern part of the Irish Sea, bordering north-west England and north Wales. This marine SPA forms a broad arc running roughly from Morecambe Bay to the east coast of Anglesey. The seabed of the SPA consists of a wide range of mobile sediments. Large areas of muddy sand stretch from Rossall Point to the Ribble Estuary, and sand predominates in the remaining areas, with a concentrated area of gravelly sand off the Mersey Estuary and a number of prominent sandbanks off the English and Welsh coasts. The tidal currents throughout the SPA are generally weak, which combined with a relatively large tidal range facilitates the deposition of sediments.

The SPA was originally classified in 2010 as an important site during the non-breeding season for red-throated diver Gavia stellata, common scoter Melanitta nigra, and a waterbird assemblage comprised primarily of these two species. The SPA was then extended in 2017 to include the most important areas for non-breeding little gull Hydrocoloeus minutus and to protect foraging habitat used by breeding little terns Sternula albifrons and common terns Sterna hirundo which are notified features of adjacent coastal SPAs (breeding little tern are a feature of the Dee Estuary SPA and breeding common tern a feature of both the Dee and Mersey Narrows and North Wirral Foreshore SPA). In addition to these individual features the 2017 extension also added two more named component species to the waterbird assemblage: red-breasted merganser Mergus serrator and great cormorant Phalacrocorax carbo.

The original SPA extent was 252,773 ha and the extension has added a further 82,481 ha, of which almost a quarter is seaward of the 12nm boundary of territorial waters. The landward boundary of the SPA generally follows the mean low water mark or the boundaries of existing SPAs, whichever is the furthest seaward apart from at Prestatyn and in the river Mersey where it follows mean high water or the boundaries of existing SPAs.

Map 3. Liverpool Bay SPA



Mersey Narrows and North Wirral Foreshore SPA and Ramsar site

Mersey Narrows and North Wirral Foreshore SPA and Ramsar site is located on the northwest coast of England at the mouths of the Mersey and Dee estuaries. The site comprises intertidal habitats at Egremont foreshore, man-made lagoons at Seaforth and the extensive intertidal flats at North Wirral Foreshore. Egremont is most important as a feeding habitat for waders at low tide whilst Seaforth is primarily a high tide roost site, as well as a nesting site for common terns, which use rafts within the lagoons. North Wirral Foreshore supports large numbers of feeding waders at low tide and also includes important high tide roost sites.

The site qualifies as it is used regularly by 1% or more of the Great Britain populations of the following species - bar-tailed godwit *Limosa lapponica* (non-breeding); common tern *Sterna hirundo* (breeding) – and as it is used regularly by 1% or more of the biogeographical populations of the following regularly occurring migratory species (other than those listed in Annex I) in any season: Knot *Calidris canutus* (non-breeding). In addition it is one of the most important locations in the UK for: Little Gull *Hydrocoloeus minutus* (non-breeding); Common Tern *Sterna hirundo* (non-breeding).

The site further qualifies as in the non-breeding season the area regularly supports 32,366 individual waterbirds (5 year peak mean 2004/05 - 2008/09) including: Cormorant *Phalacrocorax carbo*, Oystercatcher *Haematopus ostralegus*, Grey Plover *Pluvialis squatarola*, Sanderling *Calidris alba*, Knot *Calidris canutus*, Dunlin *Calidris alpina alpina*, Bar-tailed Godwit *Limosa lapponica*, Redshank *Tringa totanus*.

The only part of the SPA / Ramsar site relevant to this stretch of the proposed coast path is at Seaforth Nature Reserve within the Liverpool Docks complex which includes the following habitats: saltwater lagoon, saltmarsh, sand and mud flats and a large freshwater lagoon. This 30ha reserve is the only part of the SPA/Ramsar site (which covers over 2,000ha in total) on the east bank of the River Mersey.

Map 4. Mersey Narrows & North Wirral Foreshore SPA/Ramsar

Tables of qualifying features

Table 3. Avian qualifying features

Avian Qualifying Feature [1]	Liverpool Bay SPA	Mersey Narrows & North Wirral Foreshore SPA	Mersey Narrows & North Wirral Foreshore Ramsar	Ribble & Alt Estuaries SPA	Ribble & Alt Estuaries Ramsar
Bar-tailed Godwit *Limosa lapponica* (non-breeding)		X	X	X	X
Bewick's swan *Cygnus columbianus bewickii* (non-breeding)				X	X
Black-tailed godwit, *Limosa limosa islandica* (non-breeding)				X	X
Common scoter *Melanitta nigra* (non-breeding)	X				
Common tern *Sterna hirundo* (breeding)	X[2]	X		X	
Common tern *Sterna hirundo* (non-breeding)		X	X		
Dunlin *Calidris alpina alpina* (non-breeding)				X	X
European golden plover *Pluvialis apricaria* (non-breeding)				X	
Grey Plover *Pluvialis squatarola*, (non-breeding)				X	X
Knot *Calidris canutus* (non-breeding)		X	X	X	X
Lesser black-backed gull *Larus fuscus* (breeding)				X	X
Little gull *Hydrocoloeus minutus* (non-breeding)	X	X	X		
Little tern *Sternula albifrons* (breeding)	X[2]				
Eurasian oystercatcher *Haematopus ostralegus* (non-breeding)				X	X

Avian Qualifying Feature [1]	Liverpool Bay SPA	Mersey Narrows & North Wirral Foreshore SPA	Mersey Narrows & North Wirral Foreshore Ramsar	Ribble & Alt Estuaries SPA	Ribble & Alt Estuaries Ramsar
Pink-footed goose *Anser brachyrhynchus* (non-breeding)				X	X
Northern pintail *Anas acuta* (non-breeding)				X	X
Common redshank *Tringa totanus* (non-breeding)				X	X
Red-throated diver *Gavia stellata* (non-breeding)	X				
Ringed plover *Charadrius hiaticula* (non-breeding)				X	X
Ruff *Philomachus pugnax* (breeding)				X	
Sanderling *Calidris alba* (non-breeding)				X	X
Common shelduck, *Tadorna tadorna* (non-breeding)				X	X
Eurasian teal, *Anas crecca* (non-breeding)				X	X
Whooper swan *Cygnus cygnus* (non-breeding)				X	X
Eurasian wigeon *Anas penelope* (non-breeding)				X	X
Waterbird assemblage (non-breeding) – Liverpool Bay[4]	X				
Waterbird assemblage (non-breeding) - Mersey Narrows and North Wirral Foreshore[5]		X	X		
Waterbird assemblage (non-breeding) - Ribble & Alt Estuaries[6]				X	X
Breeding seabird assemblage[7]				X	X

This table lists bird species and identifies which of the sites of international importance for wildlife they are qualifying features of.

Notes:

[1] Latin names and International English names for species, as used in SPA Conservation Objectives, are given. Elsewhere in this HRA, shorter and more familiar English vernacular names are used for some species (for example: avocet, oystercatcher, knot, redshank).

[2] The Liverpool Bay SPA protects the foraging habitat of both little and common terns which breed within adjacent coastal SPAs (The Dee Estuary SPA and Mersey Narrows and North Wirral Foreshore SPA). There are no breeding colonies within the Liverpool Bay SPA itself.

[3] Bird species covered by the Ramsar Convention's Strategic Framework definition of 'waterbird' are included in SPA and Ramsar site waterbird assemblage features. 'Main component species' of an assemblage are those which regularly occur on the site in internationally or nationally important numbers or regularly exceed 2,000 individuals. WeBS 5 year mean peak counts have been used for the period ending 2017/18 and the percentage of the relevant threshold level in operation during 2017/18 [Ref 2]. Latin names are only given for those assemblage species which are not also a designated site feature in their own right. The main component species are:

[4] Non-breeding waterbird assemblage – Liverpool Bay SPA: Common scoter, red-throated diver, little gull, cormorant *Phalacrocorax carbo*, red-breasted merganser *Mergus serrator*.

[5] Non-breeding waterbird assemblage - Mersey Narrows and North Wirral Foreshore SPA / Ramsar: Brent Goose (light-bellied of Nearctic origin); barnacle Goose; pink-footed Goose; whooper swan; shelduck; wigeon; pintail; teal; eider; common scoter; red-breasted merganser; little egret; cormorant; oystercatcher; lapwing; golden plover; grey plover; ringed plover; whimbrel; curlew; bar-tailed godwit; black-tailed godwit; turnstone; knot; sanderling; dunlin; redshank; greenshank

[6] Non-breeding waterbird assemblage - Ribble and Alt Estuaries SPA / Ramsar: Pink-footed goose; whooper Swan; shelduck; shoveler; wigeon; pintail; teal; common scoter; little egret; cormorant; oystercatcher; avocet; lapwing; golden plover; grey plover; ringed plover; curlew; bar-tailed godwit; black-tailed godwit; knot; sanderling; dunlin; redshank

[7] Breeding seabird assemblage - Ribble and Alt Estuaries SPA / Ramsar: Common tern, lesser black-backed gull, black-headed gull *Larus ridibundus.*

Table 4. Non-avian Qualifying features

Non-avian Qualifying Feature	Sefton Coast SAC	Ribble & Alt Estuaries Ramsar
Atlantic decalcified fixed dunes (*Calluno-Ulicetea*) *	X	
Dunes with *Salix repens* ssp. *Argentea* (*salicion arenariae*).	X	
Embryonic shifting dunes	X	
Fixed dunes with herbaceous vegetation (`grey dunes`)*	X	
Humid dune slacks	X	
Shifting dunes along the shoreline with *Ammophila arenaria* (`white dunes`)	X	
Great crested newt *Triturus cristatus*	X	
Petalwort *Petalophyllum ralfsii*	X	
Natterjack toad *Epidalea calamita*		X

This table lists other species and habitats and identifies which of the sites of international importance for wildlife they are qualifying features of.

* Denotes a priority natural habitat or species. Some of the natural habitats and species for which UK SACs have been selected are considered to be particular priorities for conservation at a European scale and are subject to special provisions in the Habitats Regulations. These priority natural habitats and species are denoted by an asterisk (*) in Annex I and II of the Habitats Directive. The term 'priority' is also used in other contexts, for example with reference to particular habitats or species that are prioritised in UK Biodiversity Action Plans. It is important to note however that these are not necessarily the priority natural habitats or species within the meaning of the Habitats Regulations.

Table 5. Summary of geographical extents of European designated sites within this Coast Path stretch and its six constituent lengths and proposal reports

Lengths/ Proposal reports / Designated site	CPH 1: South Promenade, Cleveleys to Poolside, Freckleton	CPH 2: Freckleton to Preston	CPH 3: Preston to Tarleton	CPH 4: Tarleton Lock to Southport	CPH 5: Southport to Cabin Hill	CPH 6: Cabin Hill to Pier Head
Sefton Coast SAC				✓	✓✓	✓✓
Ribble and Alt Estuaries SPA	✓✓	✓*	✓*	✓✓*	✓✓	✓*
Ribble and Alt Estuaries Ramsar site	✓✓	✓*	✓*	✓✓	✓✓	✓*
Liverpool Bay SPA	✓					✓
Mersey Narrows and North Wirral Foreshore SPA and Ramsar site						✓

This table lists the designated sites within this Coast Path stretch and attributes which of the reports those sites are found within or adjacent to.

✓: <50% of length within or adjacent to the designated site.
✓✓: >50% of length within or adjacent to the designated site.
*: part of length also adjacent to functionally linked land important for features of the designated site.

B2. European Site Conservation Objectives (including supplementary advice)

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

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

- The extent and distribution of their qualifying natural habitats,
- The structure and function (including typical species) of their qualifying natural habitats,

- The supporting processes on which their qualifying natural habitats rely,
- The supporting processes on which the habitats of their qualifying features rely,
- The population of each of their qualifying features, and
- The distribution of their qualifying features within the site.

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

In light of the European Sites which could be affected by the plan or project, this assessment will be informed by the following site-specific Conservation Objectives, including any available supplementary advice [Ref 3]:

Supplementary advice on the conservation objectives for Sefton Coast SAC can be viewed at:

http://publications.naturalengland.org.uk/file/6735322931265536

Supplementary advice on the conservation objectives for Ribble and Alt Estuaries SPA can be viewed at:

https://designatedsites.naturalengland.org.uk/Marine/MarineSiteDetail.aspx?SiteCode=UK9005103&SiteName=ribble&SiteNameDisplay=Ribble and Alt Estuaries SPA&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=&NumMarineSeasonality=20&HasCA=1

Previous supplementary advice (currently under review) on the conservation objectives for Liverpool Bay SPA can be viewed at:

http://publications.naturalengland.org.uk/file/5733149452009472

Supplementary advice on the conservation objectives for Mersey Narrows and North Wirral Foreshore can be viewed at:

https://designatedsites.naturalengland.org.uk/Marine/MarineSiteDetail.aspx?SiteCode=UK9020287&SiteName=mersey&SiteNameDisplay=Mersey Narrows and North Wirral Foreshore SPA&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=&NumMarineSeasonality=5&HasCA=1

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

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

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

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

Conclusion:

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

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

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

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

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

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

C2.1 Risk of Significant Effects Alone

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

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

Table 6. Feature Groups

Feature group	Qualifying feature(s)
Overwintering and passage waterbirds	A037 Cygnus columbianus bewickii; Bewick's swan (non-breeding) A038 Cygnus cygnus; Whooper swan (non-breeding) A040 Anser brachyrhynchus; Pink-footed goose (non-breeding) A048 Tadorna tadorna; Common shelduck (non-breeding) A050 Anas penelope; Eurasian wigeon (non-breeding) A052 Anas crecca; Eurasian teal (non-breeding) A054 Anas acuta; Northern pintail (non-breeding) A130 Haematopus ostralegus; Eurasian oystercatcher (non-breeding) A137 Charadrius hiaticula; Ringed plover (non-breeding) A140 Pluvialis apricaria; European golden plover (non-breeding) A141 Pluvialis squatarola; Grey plover (non-breeding) A143 Calidris canutus; Red knot (non-breeding) A144 Calidris alba; Sanderling (non-breeding) A149 Calidris alpina alpina; Dunlin (non-breeding) A156 Limosa limosa islandica; Black-tailed godwit (non-breeding) A157 Limosa lapponica; Bar-tailed godwit (non-breeding) A162 Tringa totanus; Common redshank (non-breeding Waterbird assemblage (non-breeding) – Mersey Narrows & North Wirral Foreshore Waterbird assemblage (non-breeding) – Ribble & Alt Estuaries
Breeding seabirds	A183 Larus fuscus; Lesser black-backed gull (breeding) A193 Sterna hirundo; Common tern (breeding) – see also offshore birds feature group Seabird assemblage (breeding)
Breeding ruff	A151 Philomachus pugnax; Ruff (breeding)
Offshore birds	A001 Gavia stellata; Red-throated diver (non-breeding) A065 Melanitta nigra; Common scoter (non-breeding) A177 Hydrocoloeus minutus; Little gull (non-breeding) A193. Sterna hirundo; Common tern (non-breeding) A193. Sterna hirundo; Common tern (breeding) – when foraging offshore

Feature group	Qualifying feature(s)
	A195 Sterna albifrons, Little tern (breeding) – when foraging offshore Waterbird assemblage (non-breeding) – Liverpool Bay
Dune habitats	H2110. Embryonic shifting dunes H2120. Shifting dunes along the shoreline with Ammophila arenaria ("white dunes"); Shifting dunes with marram H2130. Fixed dunes with herbaceous vegetation ("grey dunes"); Dune grassland* H2150. Atlantic decalcified fixed dunes (Calluno-Ulicetea); Coastal dune heathland* H2170. Dunes with Salix repens ssp. argentea (Salicion arenariae); Dunes with creeping willow H2190. Humid dune slacks
Amphibians	S1166. *Triturus cristatus*; Great crested newt *Epidalea calamita* Natterjack toad
Petalwort	S1395. *Petalophyllum ralfsii*; Petalwort

This table lists the species or habitats which are features of the designated sites.

The risk of significant effects alone is considered in the following table.

Table 7. Assessment of likely significant effects alone

Feature	Relevant pressure	Sensitivity to coastal access proposals	Assessment of risk to site conservation objectives	LSE alone?
Overwintering and passage waterbirds	Disturbance of feeding or resting birds	Birds feeding or resting in the vicinity of a coastal path may be disturbed by recreational activities including walking and walking with a dog. Disturbance may also occur during installation of coast path infrastructure.	Low to medium risk for Ribble and Alt Estuaries SPA and Ramsar site. The level of risk is higher where the access proposals are likely to bring people close to places on which large numbers of birds depend, such as key high tide roost sites and important feeding areas (including on functionally linked land outside of the SPA). No appreciable risk for Mersey Narrows and North Wirral Foreshore SPA and Ramsar site. The only part of this site along this stretch of coast is the 30ha Seaforth Nature Reserve. This lies within the Liverpool Docks Complex and is therefore excepted land over which no new coastal access rights will be created. Access to the reserve will continue to be by permit only.	Yes
	Disturbance from recreational activities in the breeding season	The breeding population of a species may contribute to the non-breeding population of a site by being wholly or largely resident. Breeding birds are potentially at risk from disturbance by recreational activities including walking and walking with a dog.	The level of risk is higher at places where a breeding population of a species significantly contributes to the non-breeding population. Most adult waterbirds leave Ribble & Alt Estuaries and Mersey Narrow & North Wirral Foreshore to breed. Those that stay are not considered to contribute significantly to the non-breeding population. However; significant numbers of oystercatcher, redshank, ringed plover and shelduck breed on saltmarsh in the Ribble & Alt Estuaries and may be at risk from disturbance.	Yes
	Loss of supporting habitat through installation of access management infrastructure	The supporting habitats of the features may be permanently lost due to installation of new access management infrastructure.	Localised risk. The level of risk is higher where there is a permanent and irreversible loss of the extent of supporting habitat which waterbirds depend on. No appreciable risk for Mersey Narrows & North Wirral Foreshore SPA and Ramsar site. Only part of the site along this stretch is the 30ha Seaforth Nature Reserve. This is within excepted land and no new access infrastructure will be installed here.	Yes
Breeding seabirds	Disturbance of nesting,	Birds and their nests in the vicinity of the Coast Path may be disturbed by recreational	Low to medium risk. The level of risk is higher where the access proposals are likely to bring people close to places on which	Yes

Feature	Relevant pressure	Sensitivity to coastal access proposals	Assessment of risk to site conservation objectives	LSE alone?
	feeding or resting birds	activities including walking and walking with a dog.	large numbers of birds depend, such as key nesting and roosting sites and important feeding areas.	
	Loss of supporting habitat through installation of access management infrastructure	The supporting habitats of the features may be permanently lost due to installation of new access management infrastructure.	Low risk. The level of risk is higher where there is a permanent and irreversible loss of the extent of supporting habitat which breeding seabirds depend on.	Yes
Breeding ruff	Disturbance of nesting, feeding or resting birds	Birds and their nests in the vicinity of the Coast Path may be disturbed by recreational activities including walking and walking with a dog.	Low to medium risk. The level of risk is higher where the access proposals are likely to bring people close to places on which breeding waders depend, such as key nesting and roosting sites and important feeding areas.	Yes
	Loss of supporting habitat through installation of access management infrastructure	The supporting habitats of the features may be permanently lost due to installation of new access management infrastructure.	Low risk. The level of risk is higher where there is a permanent and irreversible loss of the extent of supporting habitat which breeding waders depend on.	Yes
Offshore birds	Disturbance of feeding or resting birds	Seagoing birds using waters near the shore line in the vicinity of the Coast Path might be disturbed by land-based recreational activities including walking and walking with a dog, and also activities associated with the installation of the route.	No appreciable risk. Birds in this feature group using the coastal waters along the stretch are highly unlikely to be significantly disturbed by usage or installation of the coast path. Liverpool Bay is a marine SPA and no new access infrastructure will be installed within it. The proposed route for the Coast Path is largely set back from the foreshore along the majority of the stretch which rules out any interaction. The distance between the foreshore and open coastal waters across the intertidal sandflats / mudflats along this stretch of coast are generally considerable except at very high tides. Where the proposed route does run along or near the foreshore at Lytham this is a popular seaside destination where the established patterns and levels of use are unlikely to be noticeable affected by the proposals.	No

Feature	Relevant pressure	Sensitivity to coastal access proposals	Assessment of risk to site conservation objectives	LSE alone?
			At the Liverpool end of the stretch, wet docks provide supporting habitat for cormorant and occasionally other waterbirds. From the ferry terminal, the proposed route for the Coast Path makes use of existing paved footways through the retail and leisure developments at Princes Dock. Public use of this area will not be noticeably affected by the proposals. Beyond Princes Dock, the proposals will have no effect on birds use of the Liverpool Waters dockland development area because the proposed route bypasses the area following pavements alongside Regent Road and no new coastal access rights will be created over the docks.	
Dune habitats	Trampling	If the Coast Path crosses dune habitats, or the feature is included in spreading room, then trampling by walkers could damage the features, changing their structure and species composition. Dune communities vary considerably in their sensitivity to trampling.	Moderate risk. The proposed route is aligned through dune habitats along the length of Sefton Coast SAC.	Yes
	Eutrophication	If the Coast Path crosses dune habitats, or the feature is included in spreading room, then eutrophication from dog fouling could damage the features, changing their structure and species composition.	Moderate risk. The proposed route is aligned through dune habitats along the length of Sefton Coast SAC.	Yes
	Loss of feature extent through installation of access management infrastructure	Areas of dune habitats may be permanently lost due to the installation of new access management infrastructure (eg signage, bridges, gates, surfacing).	Moderate localised risk. The proposed route is aligned through dune habitats along the length of Sefton Coast SAC.	Yes
	Disturbance of grazing	If Coast Path proposals include new access rights onto grazed areas important for dune habitats / species, new access by walkers and their dogs may disrupt the grazing	Moderate localised risk. The proposed route is adjacent to NNR grazing enclosures on dune habitats within Sefton Coast SAC that would fall within the landward margin.	Yes

Feature	Relevant pressure	Sensitivity to coastal access proposals	Assessment of risk to site conservation objectives	LSE alone?
	animals by dogs / walkers	regime and so cause declines in feature condition.	The NNRs are open access though have dog restrictions on the grazing enclosures.	
Amphibians	Trampling	If the Coast Path crosses or runs adjacent to breeding pools, then excessive trampling by walkers could injure / kill spawn and toadlets and damage the supporting habitat.	Localised low risk. The proposed route is aligned through dune habitats along the length of Sefton Coast SAC which support amphibian colonies.	Yes
	Disturbance to amphibians and their breeding pools	If the Coast Path crosses dune habitats / slacks that support amphibians, or the features are included in spreading room, then disturbance caused primarily by dogs running into breeding pools - as well as trampling by walkers - could impact the features by causing damage to spawn, amphibians and supporting habitat.	Moderate localised risk. The proposed route is aligned through dune habitats along the length of Sefton Coast SAC which support amphibian colonies.	Yes
	Eutrophication	If the Coast Path crosses or is adjacent to dune habitats / slacks that support amphibians, or the feature is included in spreading room, then eutrophication from dog fouling could impact the features by damaging and altering their supporting habitat.	Moderate localised risk. The proposed route is aligned through dune habitats along the length of Sefton Coast SAC which support amphibian colonies.	Yes
	Disturbance of grazing animals by dogs / walkers	If Coast Path proposals include new access rights onto grazed areas important for natterjack toads, new access by walkers and their dogs may disrupt the grazing regime and so cause declines in feature condition.	Moderate localised risk. The proposed route is adjacent to NNR grazing enclosures on dune habitats within Sefton Coast SAC that would fall within the landward margin. The NNRs are open access though have dog restrictions on the grazing enclosures.	Yes
	Spread of disease by people and dogs	Potential for chytrid fungus *Batrachochytrium dendrobatidis* and other diseases to be spread by people and dogs.	The level of risk is higher in areas where the ECP connects sites where amphibians are known to occur, particularly if this is new access.	Yes

Feature	Relevant pressure	Sensitivity to coastal access proposals	Assessment of risk to site conservation objectives	LSE alone?
	Loss of feature extent through installation of access management infrastructure	Areas of suitable supporting habitat may be permanently lost due to the installation of new access management infrastructure (eg signage, bridges, gates, surfacing).	Low localised risk. The proposed route is aligned through dune habitats along the length of Sefton Coast SAC which contain numerous breeding slacks and pools, notably around Ainsdale / Birkdale.	Yes
Petalwort	Trampling	If the Coast Path crosses petalwort colonies, or the feature is included in spreading room, then excessive trampling by walkers could damage the feature and its supporting habitat.	Moderate localised risk. The proposed route is aligned through dune habitats along the length of Sefton Coast SAC which contain petalwort colonies, notably around Ainsdale / Birkdale. There is a narrow zone of disturbance intensity that provides the right conditions for petalwort - too much and the ground remains too unstable for establishment, whilst too little and the ground may become overgrown by a closed turf. Access management may be required to maintain optimum levels on routes with important petalwort populations.	Yes
	Eutrophication	If the Coast Path crosses dune habitats containing petalwort, or the feature is included in spreading room, then eutrophication from dog fouling could damage the feature and its supporting habitat.	Moderate localised risk. The proposed route is aligned through dune habitats along the length of Sefton Coast SAC which contain petalwort colonies, notably around Ainsdale / Birkdale.	Yes
	Loss of feature extent through installation of access management infrastructure	Areas of petalwort and/or suitable supporting habitat may be permanently lost due to the installation of new access management infrastructure (eg signage, bridges, gates, surfacing).	Moderate localised risk. The proposed route is aligned through dune habitats along the length of Sefton Coast SAC which contain petalwort, notably around Ainsdale / Birkdale.	Yes

This table lists the identified features, the pressure exerted by the proposals and the explanation of the sensitivity to this pressure, together with an assessment of the risk caused by this pressure and whether is it enough to cause a 'likely significant effect' on that feature.

Conclusion:

The plan or project alone is likely to have a significant effect on the following feature groups (qualifying features shown in brackets):

- **Overwintering and passage waterbirds (of Ribble & Alt Estuaries SPA and Ramsar site)** (Bewick's swan (nb); whooper swan (nb); pink-footed goose (nb); shelduck (nb); wigeon (nb); teal (nb); pintail (nb); oystercatcher (nb); ringed plover (nb); golden plover (nb); grey plover (nb); knot (nb); sanderling (nb); dunlin (nb); waterbird assemblage (nb) – Ribble & Alt Estuaries)
- **Breeding seabirds** (Lesser black-backed gull (b); common tern (b); breeding seabird assemblage)
- **Breeding ruff** (ruff (b))
- **Dune habitats** (Embryonic shifting dunes; shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes"); fixed dunes with herbaceous vegetation ("grey dunes"); Atlantic decalcified fixed dunes (*Calluno-Ulicetea*); dunes with *Salix repens* ssp. *argentea* (*Salicion arenariae*); humid dune slacks)
- **Amphibians** (great crested newt; natterjack toad)
- **Petalwort** (petalwort)

The plan or project alone is unlikely to have a significant effect on the following feature groups (qualifying features shown in brackets):

- Overwintering and passage waterbirds (of Mersey Narrows & North Wirral Foreshore SPA and Ramsar site) (waterbird assemblage (nb) – Mersey Narrows & North Wirral Foreshore)
- Offshore birds (Red-throated diver (nb); common scoter (nb); little gull (nb); common tern (nb); waterbird assemblage (nb) – Liverpool Bay; common tern (b) – when foraging offshore; little tern (b) – when foraging offshore).

(Any appreciable risks identified that are not significant alone are further considered in section C2.2)

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

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

Natural England considers that it is the appreciable risks of effects (from a proposed plan or project) that are not themselves considered to be significant alone which must be further assessed to determine whether they could have a combined effect significant enough to require an appropriate assessment.

In C2.1 the qualifying features on which the access proposals might have an effect alone are identified – these are considered further in Part D of this assessment. For all other features, no other appreciable risks arising from the access proposals were identified that have the potential to act in combination with similar risks from other proposed plans or projects to also

become significant. It has therefore been excluded, on the basis of objective information, that the project is likely to have a significant effect in-combination with other proposed plans or projects.

C3. Overall Screening Decision for the Plan/Project

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

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

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

PART D: Appropriate Assessment and Conclusions on Site Integrity

D1. Scope of Appropriate Assessment

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

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

Table 8. Scope of Appropriate Assessment

Environmental pressure	Qualifying Feature(s) affected	Risk to Conservation Objectives
Disturbance of feeding or resting overwintering and passage birds	• **Overwintering and passage waterbirds (Ribble and Alt Estuaries SPA /Ramsar only).** Bewick's swan (nb); whooper swan (nb); pink-footed goose (nb); shelduck (nb); wigeon (nb); teal (nb); pintail (nb); oystercatcher (nb); ringed plover (nb); golden plover (nb); grey plover (nb); knot (nb); sanderling (nb); dunlin (nb); waterbird assemblage (nb) - Ribble & Alt Estuaries.	Repeated disturbance to foraging or resting birds during winter and on passage, following changes in recreational activities as a result of the access proposal, may lead to reduced fitness and reduction in population and/or contraction in the distribution of qualifying features within the site.
Disturbance of breeding birds	• **Overwintering and passage waterbirds (Ribble and Alt Estuaries SPA /Ramsar only).** Oystercatcher; redshank (nb); ringed plover (nb) and shelduck (nb).	The access proposals modify how the site is used for recreation, causing disturbance to breeding birds that make a significant contribution to the non-breeding population of these species.
Disturbance of nesting, feeding or resting breeding birds	• **Breeding seabirds (Ribble and Alt Estuaries SPA /Ramsar only).** (Lesser black-backed gull (b); common tern (b); breeding seabird assemblage) • **Breeding ruff** (ruff (b))	Repeated disturbance to birds during the breeding season, following changes in recreational activities as a result of the access proposal, may lead them to abandon nesting areas or reduce their breeding success (for example by causing eggs to become chilled, reducing food supply to chicks, or increasing the vulnerability of eggs, chicks or adults to predation).

Environmental pressure	Qualifying Feature(s) affected	Risk to Conservation Objectives
Trampling	• **Dune habitats** (Embryonic shifting dunes; shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes"); fixed dunes with herbaceous vegetation ("grey dunes"); Atlantic decalcified fixed dunes (*Calluno-Ulicetea*); dunes with *Salix repens* ssp. *argentea* (*Salicion arenariae*); humid dune slacks) • **Amphibians** (great crested newt; natterjack toad) • **Petalwort** (petalwort)	Repeated trampling, following changes in recreational activities as a result of the access proposal, may damage sensitive habitats, plant communities or species, leading to long-term declines in their quality, distribution or numbers within the site. Types of possible effect include physical changes to habitats (for example through compaction or erosion of the substrate), shifts in the species composition of plant communities, and reductions in species' population size or distribution. This could also include direct trampling of amphibians e.g. toadlets emerging from breeding pools.
Eutrophication from dog fouling	• **Dune habitats** (Embryonic shifting dunes; shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes"); fixed dunes with herbaceous vegetation ("grey dunes"); Atlantic decalcified fixed dunes (*Calluno-Ulicetea*); dunes with *Salix repens* ssp. *argentea* (*Salicion arenariae*); humid dune slacks) • **Amphibians** (great crested newt; natterjack toad) • **Petalwort** (petalwort)	An increase in the number of dogs and thus dog fouling along and around the route, following changes in recreational activities as a result of the access proposal, may cause negative impacts to the composition, structure and condition of dune habitats (and species supported by them) through the effects of eutrophication.
Disturbance of slacks / pools by dogs	• **Amphibians** (great crested newt; natterjack toad)	An increase in incidences of dogs accessing breeding ponds, following changes in recreational activities as a result of the access proposal, may cause disturbance, injury or death of amphibian eggs, tadpoles or adults. This could lead to a reduction in population abundance.
Interruption or cessation of grazing management necessary for the survival of sensitive species	• **Dune habitats** (Embryonic shifting dunes; shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes"); fixed dunes with herbaceous vegetation ("grey dunes"); Atlantic decalcified fixed dunes (*Calluno-Ulicetea*); dunes with *Salix repens* ssp. *argentea*	New public access rights on grazed land as a result of the access proposal may lead to dogs or their owners scaring livestock, resulting in the temporary or permanent cessation of grazing management, or significant changes to the grazing regime. Where the grazed land affected supports important populations of rare plant species that require a short, open sward to allow them to compete successfully, this

Environmental pressure	Qualifying Feature(s) affected	Risk to Conservation Objectives
	(*Salicion arenariae*); humid dune slacks) • **Amphibians** (great crested newt; natterjack toad) • **Petalwort** (petalwort)	disruption of the grazing regime may lead to reduction in the species' populations and distribution within the site or even local extinction.
Spread of disease by people and dogs.	• **Amphibians** (great crested newt; natterjack toad)	Potential for chytrid fungus Batrachochytrium dendrobatidis and other diseases to be spread by people and dogs. This leads to a reduction in population abundance.
Loss of feature extent or of species' supporting habitat through installation of access management infrastructure	• **Overwintering and passage waterbirds (Ribble and Alt Estuaries SPA /Ramsar only).** (Bewick's swan (nb); whooper swan (nb); pink-footed goose (nb); shelduck (nb); wigeon (nb); teal (nb); pintail (nb); oystercatcher (nb); ringed plover (nb); golden plover (nb); grey plover (nb); knot (nb); sanderling (nb); dunlin (nb); waterbird assemblage (nb)). • **Breeding seabirds (Ribble and Alt Estuaries SPA /Ramsar only).** (Lesser black-backed gull (b); common tern (b); breeding seabird assemblage) • **Breeding ruff** (ruff (b)) • **Dune habitats** (Embryonic shifting dunes; shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes"); fixed dunes with herbaceous vegetation ("grey dunes"); Atlantic decalcified fixed dunes (*Calluno-Ulicetea*); dunes with *Salix repens* ssp. *argentea* (*Salicion arenariae*); humid dune slacks) • **Amphibians** (great crested newt; natterjack toad) • **Petalwort** (petalwort)	The installation of access management infrastructure may lead to a permanent loss of extent within the site of habitats that are qualifying features themselves or support bird, plant or amphibian species that are qualifying features.

This table shows the features which could not be ruled out by mitigation and are within scope for the Appropriate Assessment. It lists the environmental pressures to those features and the risk to the conservation objectives.

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

Overwintering and passage waterbirds

The Ribble and Alt Estuaries SPA is used regularly by over 20,000 waterbirds (waterbirds as defined by the Ramsar Convention) in any season. At the time of classification, the site supported 323,861 individual waterbirds (5 year peak mean 1993/4 – 1997/8).

Within the SPA Supplementary Advice none of the attributes for any of the overwintering / passage bird features currently have any targets set to 'Restore'. The document states that there is evidence from survey or monitoring that shows the feature(s) to be in a good condition and/or are currently un-impacted by anthropogenic activities. Where recent declines in numbers are noted these are largely taken to mirror national / regional trends. For recreational disturbance the target is set to 'restrict' any increase in disturbance impacts, though again it states that currently 'the target has been set due to a lack of evidence that the feature is being impacted by any anthropogenic activities'. [Ref 3]

One of the key factors we take into account when developing proposals for the alignment of the England Coast Path is the potential for disturbance to waterbirds, particularly when the birds are qualifying features of coastal SPAs and Ramsar sites. This is clearly an important consideration on this stretch of the Coast Path which runs close to and along the boundaries of the Ribble and Alt Estuaries SPA / Ramsar, which have a non-breeding waterbird assemblage and numerous waders and waterfowl as qualifying features.

Birds using the mudflats and outer saltmarshes of the Ribble and adjacent coasts are generally less susceptible to recreational disturbance than those using the inner shoreline of (especially) the Sefton Coast because of the lower levels of use, distances from the shore and less accessible terrain.

Birds using adjacent functionally-linked land (supporting habitat lying outside SPA boundaries) are largely some distance from current recreational use, though may be susceptible to disturbance if levels and patterns of recreational use were to change significantly.

Restricting disturbance at major high tide roosts is important, particularly if there are no suitable alternative roost sites nearby, because these roosts are used by large numbers of birds 'commuting' to and from much larger foraging areas.

Major roost sites in the SPA along this Coast Path stretch include [Ref 3 & 4]:

- Bar-tailed godwit – high tide roosts at Ainsdale Beach, Formby and Marshside Beach, Lytham Beach
- Bewick's swan – Longton and Hesketh marshes
- Black-tailed godwit – two main roost sites at Marshside 1 and 2 (WeBS count sectors)
- Dunlin - Banks Marsh Central, Banks Marsh West and Marshside Beach, Formby and Hightown, Marshside and Lytham Beach
- European golden plover – Roost sites are within, or close to, the landward boundaries of Hesketh Out-Marsh, Banks Marsh and Marshside areas
- Grey plover - Lytham Beach, Crossens Outmarsh, Marshside Beach, Formby, Hightown
- Knot – Large roosts at Banks Marsh West, Marshside Beach, Formby and Hightown and smaller ones at Crossens Outmarsh and Lytham Beach
- Eurasian oystercatcher – large roost at Banks Marsh Central
- Pink-footed goose – roost sites at Crossens Outmarsh and Taylors Bank
- Northern pintail – one important roost site at Banks Marsh West
- Common redshank – Lytham Beach, Marshside and Hightown
- Ringed plover - Lytham, Formby and Hightown
- Sanderling - Formby, Hightown and Lytham Beach
- Common shelduck - Longton, Hesketh and Banks marshes, and Marshside. Smaller roost at Hightown.
- Eurasian teal - Hesketh Outmarsh and Marshside
- Whooper swan - Longton and Hesketh marshes
- Eurasian wigeon - Hesketh Outmarsh, Banks Marsh West and Marshside

Large key areas for roosting and feeding within the Ribble fall within the Ribble Estuary NNR (Banks Marsh, Hesketh Out Marshes) managed by NE or the RSPB, or are within other RSPB land (Marshside), so are already managed for nature conservation. Other large areas such as at Longton Marsh are managed by a wildfowling group. Any proposed new or enhanced access would need to avoid or minimise creating a disturbance issue.

Breeding seabirds

The Ribble and Alt Estuaries SPA is used regularly by over 20,000 seabirds in any season. At the time of classification, the site supported qualifying numbers of black-headed gull (*Chroicocephalus ridibundus*), lesser black-backed gull (*Larus fuscus graellsii*) and common tern (*Sterna hirundo*) in the breeding season, these being the main component species of the breeding seabird assemblage - with lesser black-backed gull and common tern also being features in their own right. Arctic tern, herring gull, Mediterranean gull and great black-backed gull have also been recorded as breeding within the site but are not notified features.

Within the SPA Supplementary Advice the abundance and diversity attributes of the assemblage have targets set at 'Restore', whilst other attributes including supporting habitat

and anthropogenic disturbance are broadly set at 'Maintain' (though a lack of evidence to the contrary is acknowledged).

The abundance and diversity attributes are considered unfavourable due to the decline in numbers of common tern and black-headed gull on the site in recent years, the colonies seemingly lost (mainly from Banks Marsh) to sites outside of the SPA. Counts in 2015 indicate that black-headed gull have decreased within the SPA from 11,900 pairs on Banks Marsh in 1996 to 257 pairs at Marshside in 2015. Common tern have declined from 182 pairs in 1996 to 2 individuals in 2015. Arctic tern have not been observed since 1999 (158). By contrast breeding large gulls have increased in number - lesser black-backed gull have increased from 1,800 pairs in 1993 to 8,461 pairs in 2015, and herring gull have increased from 730 pairs in 1998 to 1,046 pairs in 2015. [Ref 3]

Common tern migrate to this site from wintering grounds in Western Africa. The species arrives in April with numbers peaking in May and June, and depart for their wintering grounds in August and September. Numbers may increase in July and August due to the arrival of post-breeding individuals from other sites. The Alt Estuary is an important breeding area with sandy foreshore, marsh and estuarine habitats ideal for nesting, roosting and feeding opportunities. Common tern now also nest at Preston Docks – outside of the SPA but part of the meta-population. Birds roost at Banks Marsh, Longton Marsh and Cabin Hill National Nature Reserve (NNR). Common tern feed largely offshore with some feeding in the intertidal parts of the SPA as well as further offshore within Liverpool Bay SPA.

Lesser black-backed gulls breeding on the SPA migrate from wintering sites in South Africa and the Persian Gulf. Breeding individuals arrive on site in April and numbers peak anytime between April and August. Migration to wintering grounds begins at the end of August. There is evidence that small populations of this species remain on site year-round. This species has two main breeding areas at Banks and Hesketh marshes and a smaller one at Warton Marsh. The main colony used to be at Banks Marsh but this is now more dominated by larger gull species. A grazing management scheme in these areas keeps the saltmarsh sward at optimum height for nesting. The gulls feed throughout the intertidal area at St Annes and Lytham Beaches and up to Warton Marsh, with smaller numbers feeding on the intertidal mud and sandflats close to Banks and Crossens marshes and the river mouth at low tide.

The number of black-headed gulls breeding in the area has reduced substantially in recent years after approximately 10,000 moved to Belmont Reservoir in the West Pennine Moors. There is a small black-headed gull colony at Ainsdale Sand Dunes NNR. The colony is some distance from the proposed route of the trail and out of sight amongst the dunes, in the north west corner of the grazing enclosure where access with dogs is restricted.

Recreational disturbance is not currently considered to be having a significant impact on the breeding seabird features of the SPA, with the birds and people/dogs being largely well separated across the large areas of saltmarsh and mud/sandflats. The key areas for breeding seabirds fall within the Ribble Estuary NNR (Banks Marsh, Hesketh Out Marshes) managed by NE or the RSPB, or are within other RSPB land (Marshside), so are already managed for nature conservation. Any proposed new or enhanced access would need to avoid or minimise creating a disturbance issue.

Breeding Ruff

When classified in 2002 the Ribble and Alt Estuaries SPA supported nationally important numbers of Ruff (1 nest) during the breeding season, representing 9.1% of the GB population. The breeding population is currently unknown although there is evidence to suggest that more than 60 individuals use the site. Breeding can occur anytime between April and August.

It is not understood exactly where within the site ruff may breed, though the saltmarsh of Banks and Hesketh marshes and wet grassland at Marshside are likely locations. This species is considered to prefer to breed in lowland wet meadows that are subject to a grazing regime in summer and flooded in winter. Coastal grazing marsh and saltmarsh that offer similar breeding habitat occur across many parts of the Ribble Estuary.

Given the low numbers and extent of suitable habitat where there is no, or very limited, public access it is unlikely that recreational disturbance is currently a significant issue for breeding ruff within the SPA. Even so any proposed new or enhanced access would need to avoid or minimise creating a potential disturbance issue and/or impacting on likely supporting habitat.

Dune habitats, amphibians and petalwort

Within the Supplementary Advice for Sefton Coast SAC most if not all of the component attributes of extent, distribution, topography, zonation, undesirable species, vegetation transitions, structural diversity, substrate, adaptation and resilience, functional connectivity, Aeolian processes, hydrology, water quality/quantity, air quality and conservation measures have targets set to 'Restore' for each of the SAC dune features. A number of these attributes are by extension also set to 'Restore' for the SAC species great crested newt and petalwort – and are relevant to Ramsar feature natterjack toads – that utilise the dunes as supporting habitat.

Dune habitats at Sefton have been damaged by coastal defences, dumped waste, forestry plantations and scrub encroachment. These factors are also the main restrictions on sediment transport and coastal dynamism on the site [Ref 5], which has limited the movement and development of dune habitats and the transitions between them. In particular forestry plantations are preventing embryonic shifting dunes from rolling-back around Formby where the coast is currently rapidly eroding. Other key factors impacting on site condition include invasive species taking over areas of dune habitat, raised nutrient levels in substrate and water affecting species composition, habitat fragmentation and loss of connectivity, and forestry plantations, water abstractions affecting site hydrology, and damage caused by recreational access.

Recreational access (people, dogs and vehicles) is identified as a key issue affecting the dune habitats and associated species in a number of ways, chiefly through damage to dune features and modification of dune topography, nutrient enrichment of substrates and water by dog fouling, and disturbance of habitats and species by dogs (particularly slacks / pools and breeding natterjack toads and great crested newts within the dunes, but also SPA bird features along the shoreline). In some areas controlled destabilisation and remobilisation of 'grey' or fixed dunes through recreational access can be beneficial. Petalwort also benefits from light to moderate trampling in maintaining its habitat requirements of damp, compacted

sand and low, open vegetation. It is generally advised however that the extent and distribution of recreational access (and associated trails etc) should not significantly increase or alter beyond the current baseline.

Conservation measures have restore targets because large scale management is required to return coastal dynamism to the site. In particular, the most appropriate interventions and management of the frontal woodlands to enable habitat connectivity and mobility need to be determined. Management is required to reduce the extent of scrub and to increase structural diversity and extent of bare ground in the sward (e.g. through grazing or mowing). Works are required in some slacks to set back succession and create bare ground (to maintain the extent of early-successional slacks in the long term), to reduce the extent of scrub and invasive non-natives. In some areas access management is required to control recreational access, reduce anthropogenic erosion of dune features, and control dog-fouling and disturbance by dogs.

The vast majority of (terrestrial) Sefton Coast SAC is owned / leased and managed by three large organisations for both nature conservation and access. Sefton Metropolitan Borough Council (SMBC) manage land at the southern and northern ends at Hightown dunes and Ainsdale and Birkdale Local Nature Reserve (LNR), the latter also being in a Higher Level Stewardship (HLS) agreement. Adjacent to these two areas Natural England manage two National Nature Reserves at Cabin Hill and Ainsdale. The National Trust manage most of the land in between, including the Formby estate (a small area is in HLS) and also Ravenmeols LNR (formerly managed by SMBC). Nature conservation is the primary management principle on the NNRs (though alongside managed access), whereas nature conservation and access can be said to have equal importance on SMBC and National Trust land. Smaller areas of the SAC are managed by Lancashire Wildlife Trust (in HLS), the Ministry of Defence (MOD) and five private golf courses (one being in a Countryside Stewardship CS agreement).

Recreational use tends be focussed near to and spread out from 'honeypot' locations with car parks and other facilities, such as at Ainsdale-on-Sea, Formby NT estate and Lifeboat Road, with foreshore and the dunes nearby seeing higher levels of use. A number of existing trails through the dunes are however well used especially by local dog walkers and other users

As recreational disturbance is already identified as a factor (amongst a number of others) impacting on dune habitats and species and contributing to adverse condition of features, then it is vital that proposals for new, enhanced or altered access as part of the ECP do not exacerbate these issues by – as the Supplementary Advice cautions – significantly increasing or altering the extent and/or distribution of recreational access within the SAC.

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

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

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

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

Here an overview of each section of the stretch is given (using the same division of the stretch from the report chapters) to provide a consideration of the proposed route and margin, its interaction with Natura 2000 (N2K) features, and the likelihood of the proposals causing an appreciable increase / change in levels and patterns of recreational use and thus an appreciable risk of significant effects on features. Environmental data, including from the WeBS and recent reviews of waterbird trends have been used to compile this part of the assessment [Ref 2, 4, 6]. Where specific risks at specific locations have been identified these are each considered in more detail in **D3.2**. Any residual risks are also identified and these are considered further in section **D4**.

Note that location maps in the associated Coastal Access Reports are sometimes referred to in the text, for example maps showing the extent of areas where it is proposed to restrict coastal access rights for nature conservation reasons.

1. Cleveleys to Freckleton

Between Cleveleys and Lytham the proposed ECP route largely follows existing public right of way (the Lancashire Coastal Way) along the promenade and other existing seafront walked routes adjacent to busy, built up areas. The route passes through open landscape Lytham St Annes Dunes. The boundary of Liverpool Bay SPA is located circa 500m+ offshore - the features of this SPA were screened out from being at risk from the proposals in Part C. The boundary of Ribble and Alt Estuaries SPA / Ramsar is similarly some distance offshore (circa 150m+), except for a 1900m stretch where it abuts the Lytham St Annes Dunes – this is already a very well-used stretch of coast for recreation and a negligible change in levels or change in patterns of use is expected here from the ECP proposals.

Lytham Beach is used as a high tide roost by several waterbird species. The main roost locations are identified in [Ref 4] and some are close to areas used for recreation. In this area the proposed route for the Coast Path follows a raised and surfaced promenade with limited access to the foreshore. This is a well-known path, popular with people that live nearby and visitors to the town and the proposals will not significantly change the patterns or levels of use here.

At Lytham the route follows existing walked routes and public right of ways alongside a small area of non-SPA saltmarsh and around Liggard Brook up to Lytham Dock. This includes a short section that follows an existing walked route that cuts around the edge of a carpark via approximately 120m of upper saltmarsh / rough ground. This is immediately adjacent to a busy, built up area and is not of importance to any N2K feature.

Beyond Lytham Dock the proposed ECP route again – bar some small diversions – follows the existing public right of way (Lancashire Coastal Way) past Warton Bank, around Warton

Aerodrome, and then alongside Dow Brook up to Freckleton. The route is adjacent to Ribble and Alt Estuaries SPA / Ramsar saltmarsh between Lytham Dock and Dow Brook including the large area of Warton Marsh.

The existing path is in reasonable condition and includes sections of board walk. There is no access to the aerodrome and other than following the path, options for walking in this area are naturally limited by the terrain. To the west and south west of the aerodrome the path is through fields raised above the level of the marsh and with some scrub and other vegetation providing a natural barrier and screening. To the south of the aerodrome, near Naze Mount Farm, the salt marsh is much narrower and the path is on the edge of the marsh. There are several important high tide roost in this area but they are on the opposite bank of the Ribble, at Hesketh Out Marsh and Longton [Ref 4], and sufficiently distant that birds using them are not disturbed by people using the path. Because the path around the aerodrome is already a promoted route and in reasonable condition, we don't anticipate a significant increase in the frequency of use. The level of use is limited by the distance of this section of path from the closest access points via Freckleton and a small parking area at Warton Bank.

There are not considered to be any appreciable risks to N2K features arising from the ECP proposals between Cleveleys and Freckleton, where only a negligible increase in levels or change in patterns of use is expected. ECP access to most areas of saltmarsh and mudflat will be restricted for public safety, and distances between people and dogs on / near the shore and birds using saltmarsh, mudflats and sandflats are generally considerable, or otherwise adequately separated. The route does not directly cross or pose risks of damage to any supporting habitat for N2K features.

2. Freckleton to Preston

From Freckleton the proposed ECP route follows the Preston New Road and then a short section of the Blackpool Road as far as Savick Brook. Although largely outside the N2K designations, the land seaward of the trail here between Dow Brook and Savick Brook that forms the coastal margin has a number of nature conservation and other sensitivities which are considered further in section D3.2A.

Beyond Savick Brook the proposed route follows paths (a former public right of way) that run landward of Lea Marsh and a go-karting establishment before joining with an existing public right of way that heads into Preston, running past the docks area and then alongside the Ribble upstream to the crossing point at Penwortham New Bridge.

Aside from the issues to be dealt with in section D3 there are not considered to be any other appreciable risks to N2K features arising from the ECP proposals between Freckleton and Preston. The saltmarsh at Lea Marsh is not a designated site and will have ECP access restricted where required for public safety. There are no other interactions with N2K sites or features along the route into Preston.

3. Preston to Tarleton

After crossing the Ribble the proposed route follows the existing public right of way (Ribble Way) west out of Preston. This follows the south bank of the Ribble along the sea wall with a thin strip of non-SPA saltmarsh on the seaward side. At the point the proposed route / public

right of way meets the Ribble and Alt Estuaries SPA / Ramsar it diverts south, and follows a course inland of the sea wall before rejoining it further on.

The large areas of saltmarsh (Hutton and Longton Marshes) beyond the sea wall are to have ECP access restricted for public safety. However a large area of land including SPA grazing marsh and embankments that lies seaward of the trail would not have these public safety restrictions applied. This area has nature conservation sensitivities that are considered further in section D3.2B.

Beyond this area the proposed route / public right of way continues south along the sea wall with (restricted) saltmarsh to the west. From where the Ribble Way ends the proposed ECP route continues along another public right of way which diverts inland then follows the River Douglas upstream along its eastern bank as far as Tarleton Lock. Our proposal does not currently create a continuous route here but picks up again on the opposite side of Tarleton Lock. Any future plans for a new crossing over the River Douglas will require separate consideration as to the need for an HRA although it should be noted that the Tarleton area falls well outside any of the N2K designations

Aside from the issues to be dealt with in section D3 there are not considered to be any other appreciable risks to N2K features arising from the ECP proposals alone between Preston and Tarleton, where only a small increase in levels or change in patterns of use is expected and the route follows existing public right of ways. The areas of saltmarsh will have ECP access restricted for public safety. There are no other significant interactions with N2K sites or features expected along the route towards Tarleton.

There is however a residual risk here that promotion of the ECP route will attract a small increase in use along remoter stretches of the trail (with currently low to moderate levels of use) which has the potential to act in-combination with pressures arising from other plans and projects. This is considered in more detail in section D4.

4. Tarleton Lock to Southport

From the western bank of Tarleton Lock the proposed route follows an existing public right of way north along the sea wall on the west bank of the River Douglas. From Becconsall Marsh north this is adjacent to a thin strip of saltmarsh on the seaward side – this is within the Ribble Estuary NNR from this point, though only falls within the SPA / Ramsar from a point further north at the outlet of Carr Heys Watercourse. ECP access to this saltmarsh will be restricted for public safety.

The proposed route then follows the public right of way as it diverts southwest along the inner sea wall at Hesketh Out Marsh. There are nature conservation sensitivities at Hesketh Out Marsh that are considered further in section D3.2C.

Beyond Hesketh Out Marsh the proposed route continues southwest along a track on the sea wall - for a short distance as new access rights on an existing walked route - before the public right of way rejoins the sea wall further on. The route / public right of way follows the sea wall as far as Fiddler's Ferry. ECP access to the expanses of adjacent saltmarsh to the northwest will be restricted for public safety.

There are several key high tide roost at Banks Marsh and Crossens Out-Marsh [Ref 4]. The salt marsh is extensive here and physically separated from the proposed route for the Coast Path that follows the embankment path. The marshes are unsuitable for access and no new coastal access rights will be created in this area.

Beyond Fiddler's Ferry the proposed route follows the coastal road 'Marine Drive' as far as the seafront at Southport. Between Marine Drive, Crossens and Hesketh Road this coastal road cuts further into the SPA / Ramsar site with designated land on either side of it. At the Marshside RSPB reserve a large area of saltmarsh seaward of the route will not have access restricted for public safety though does have nature conservation sensitivities – this situation and proposed mitigation is discussed further in D3.2D.

Aside from the issues to be dealt with in section D3 there are not considered to be any other appreciable risks to N2K features arising from the ECP proposals between Tarleton and Southport, where only a small increase in levels or change in patterns of use is expected and the route almost entirely follows existing public right of ways. Most areas of saltmarsh will have ECP access restricted for public safety. There are no other significant interactions with N2K sites or features expected along the route towards Southport.

There is however a residual risk here that promotion of the ECP route will attract a small increase in use along remoter stretches of the trail (with currently low to moderate levels of use) which has the potential to act in-combination with pressures arising from other plans and projects. This is considered in more detail in section D4.

5. Southport to Cabin Hill

The proposed ECP route continues from Southport seafront along Marine Drive almost to the roundabout at Weld Road. The road is adjacent to relatively recently formed saltmarsh and flats within both Ribble and Alt Estuaries SPA / Ramsar and Sefton Coast SAC, though the route is on a cycleway/pavement on the landward side of the road in an already busy seaside town which then becomes a promenade on the seaward side of the road.

From near the Weld Road roundabout the proposed path takes a different route to the existing Sefton Coastal Footpath (SCF) (and Trans-Pennine Trail) and does not meet the SCF again until it meets the Fisherman's Path further south. It heads southwest along an existing walked track on the seafront then follows the 'Velvet Trail' – an existing walked route (not a public right of way) promoted by Sefton Metropolitan Borough Council (SMBC) – through the dunes of Sefton Coast SAC seaward of the road as far as Ainsdale-on-Sea. The route here is within or adjacent to Ainsdale and Birkdale Hills LNR. There are ephemeral ponds in the dune slacks in this area that are used by amphibians. The majority of these we have avoided through our route alignment. This is by aligning the route on a more seaward existing walked line, such as just north of Shore Road within Ainsdale and Birkdale Hills LNR. For much of the Velvet Trail the route is already well established and signed and in regular use. Where the Velvet Trail passes close to key pools used by natterjack, these are already fenced off to discourage dogs entering these areas and no additional access management measures are needed.

Towards Ainsdale-on-Sea there is no signage or official route for the Velvet Trail. The proposed route continues along an informal network of dune paths (and this has been agreed with SMBC to be a suitable route for the Velvet Trail to officially follow). There are

some nature conservation sensitivities here arising from the ECP proposals where the proposed route runs adjacent to some early successional stage dune habitats of the 'Green Beach' - these are considered further in section D3.2E.

From Ainsdale-on-Sea the proposed ECP route continues south along existing walked tracks through the LNR and then through Ainsdale Sand Dunes NNR (largely along 'dune path north'). There is an existing large network of tracks through the dunes and the route through the length of the SAC generally follows the more well used tracks with easier walking, and avoids dune crests and sensitive dune slacks.

In some places along this section there are opportunities at establishment stage to make minor adjustment to the current walked line of the path on the ground that will help to guide people away from ephemeral pools used by amphibians. The location and/or specification of new infrastructure items will be further considered with NNR staff during establishment stage. At Ainsdale Sand Dunes NNR the proposed route follows 'Dune Path North', a locally promoted route except for a short stretch, where dune movement has blocked the existing path. Here the proposed route passes through a short section of woodland to link up with another promoted path, then across to Fisherman's Path. There are few scrapes or ponds close to this route except at the new section, where our path skirts around an old slack. The NNR team plan to restore this slack by removing scrub vegetation and will fence off the cleared area from visitors as part of this work.

There are high tide roosts in this area, at Ainsdale Beach and Formby. These will not be affected by the proposed route for the Coast Path landwards and amongst the dunes.

Within Ainsdale Sand Dunes NNR (and at Cabin Hill NNR further south) there are enclosures where the habitat is managed by grazing. As they fall within the landward margin of the trail these require dogs-on-leads restrictions to be continued as part of the ECP proposals – this is considered further in section D3.2F.

Within the SAC and at Ainsdale Sand Dunes NNR in particular the potential interaction of the proposed ECP route with planned works as part of the 'Dynamic Dunescapes' project has been considered, where re-mobilised sand from dune notching and other works may in the shorter or longer term render certain sections of the trail unviable. In this scenario the trail is able to 'roll-back' to a new alignment that would be subject to a new Habitats Regulations Assessment (an explanation of roll-back is given in the stretch overview report).

At the southern end of Ainsdale Sand Dunes NNR the proposed route briefly meets the SCF and follows the Fisherman's Path for a short distance. From here as far as Blundell Avenue the existing SCF is largely on mobile dunes and the dune front (the coast is eroding here). The proposed ECP route however is aligned further inland and avoids mobile dunes and the eroding dune front, and also makes a diversion to avoid the edge of a slack which is due to be cleared of vegetation in NNR management works as a suitable natterjack breeding pool. From Fisherman's Path, the proposed route follows the edge of Formby Golf Course, heads inland of Freshfield Caravan Park, avoiding an area of mobile dunes, to Victoria Road, continues south past the edge of Sandfield Farm, past Blundell Avenue and further on arrives at the car park at Lifeboat Road. In this vicinity the existing SCF heads further inland and does not rejoin the proposed ECP route until after Cabin Hill NNR. From Lifeboat Road via Seabank House to the far side of Cabin Hill NNR the proposed route follows an existing

track largely through fixed dune habitat which avoids key mobile dune and slack features (such as Devil's Hole).

Aside from the issues to be dealt with in section D3.2 there are not considered to be any other appreciable risks to N2K features arising from the ECP proposals alone between Southport and Cabin Hill. There are no other significant interactions with N2K sites or features expected along this section, and as this is already a well-used stretch of coast only a small increase in recreational use is expected as a result of the ECP proposals. The majority of this section is aligned on existing walked routes through fixed dune and dune grassland habitats, which are generally more resilient to trampling pressure and can benefit from trampling at moderate levels.

There is however a residual risk of changes to existing patterns of use within Sefton Coast SAC arising from the proposals, given that the ECP route will very likely be promoted as 'the' coastal route in the area instead of the existing SCF. This may cause an increase in use along the proposed route (through changing patterns of use) which has the potential to act in-combination with pressures arising from other plans and projects (especially where the proposed route takes a more seaward course than the existing SCF). This is considered in more detail in section D4.

6. Cabin Hill to Pier Head

From Cabin Hill NNR the proposed route joins an existing public right of way and heads directly inland, as there is no possible seaward route around the Altcar Rifle Range where access is restricted. It rejoins the existing SCF further along this track.

A small potential nature conservation risk was highlighted at the junction of the dune track and the public right of way. The foreshore at Cabin Hill attracts significant numbers of roosting birds (this roost extending round to the relatively undisturbed foreshore at Altcar and the Alt estuary). There is an important roost site at Taylors Bank, which is a large sand spit approximately 2 to 5 km offshore [Ref 4]. There have been previous issues with bird disturbance here caused by dog walkers and uncontrolled dogs. As the ECP route would potentially bring walkers closer to the foreshore than the existing SCF currently does, there is a small risk of directing more people onto the actual foreshore and causing increased disturbance. The ECP proposals will ensure that at this junction walkers are very clearly directed onto the dune trail and not towards the foreshore. In addition, to help manage the existing pressure, a new information board will be installed in the Cabin Hill area raising awareness about how visitors can help to reduce disturbance to roosting birds.

The proposed route then largely follows the existing SCF around the back of Altcar Rifle Range to Hightown. There is no public access to the Rifle Ranges, which are physically separated from Hightown by the channel of the River Alt. This area is popular for recreation and there are many small paths, though the majority of visitors stick to the Sefton Coastal Path. There are ponds and slacks landwards of the proposed route in Hightown Dunes that are used by amphibians, including natterjack toads and these sensitive areas have been fenced off from the coastal path. The route then passes through Hightown dunes and along the promenade from Hall Road as far as Crosby Marine Lake. Here the proposed route takes a more seaward course continuing along the promenade before then heading inland behind the docks at Seaforth. At Crosby the route is currently viable as the local authority

clear sand from building dunes that accumulates on the promenade – there is a likelihood however that this clearance will cease at some point in the future and natural processes of dune formation are allowed to develop. In this scenario the trail can again 'roll-back' to a new alignment.

From Seaforth to the end of the stretch the proposed route follows roadways to the rear of the Liverpool docks complex (these not forming part of the coastal margin being exempted land) before meeting the developed foreshore and ferry terminal at Pier Head. The nature reserve at Seaforth docks will also not form part of the coastal margin being within the aforementioned excepted land.

Aside from the issues to be dealt with in section D3 there are not considered to be any other appreciable risks to N2K features arising from the ECP proposals between Cabin Hill and Southport, where only a negligible increase in levels or change in patterns of use is expected. Areas of intertidal habitat around the mouth of the Alt and at Crosby will have ECP access restricted for public safety (in addition to existing areas of military restriction). There are no other significant interactions with N2K sites or features expected along the route towards Pier Head.

Infrastructure and small scale habitat loss

Permanent loss of habitat as a consequence of establishment work has also been considered. Our proposals will see the installation of new infrastructure within designated sites across the trail.

Ribble & Alt Estuaries SPA and Ramsar site

The approximate footprint of infrastructure within Ribble & Alt Estuaries SPA is as follows:

Table 9. Infrastructure on public right of way on an embankment near Lytham

Infrastructure Type	Number	Area affected (m^2)
Fingerpost	2	0.02
Kissing gate (with flagstones underneath)	5	11
Post and rail fence	3 sections (2m, 2m & 4m lengths)	0.06
Total		**11.08**

This table lists the infrastructure on a public right of way on an embankment near Lytham within the Ribble & Alt Estuaries SPA and Ramsar site and calculates its total footprint as affecting 11.08m^2 of the designated site.

Table 10. Infrastructure on public right of way or existing walked route on saltmarsh near Warton airfield

Infrastructure Type	Number	Area affected (m^2)
Fingerpost	2	0.02
Kissing gate (with flagstones underneath)	1	2.2
Sleeper bridge (new)	2	1.52
Sleeper bridge (replacement)	1	0.76
Raised sleeper walkway (2 metre width) (replacement)	5 sections (60m, 60m, 55m, 35m and 100m). Total length of walkway = 310m	620
A3 sign	2	0.02
Total (replacement infrastructure)		**620.76**
Total (new infrastructure)		**3.76**
Total (new and replacement)		**624.52**

This table lists the infrastructure on a public right of way or existing walked route on saltmarsh near Warton airfield within the Ribble & Alt Estuaries SPA and Ramsar site and calculates its total footprint as affecting 624.52m^2 of the designated site, of which 620.76m^2 is replacement infrastructure.

Table 11. Infrastructure on an embankment, south side of Ribble Estuary

Infrastructure Type	Number	Area affected (m^2)
Kissing gate (with flagstones underneath)	2	4.4
Post and rail fence	10m section	0.075
Total		**4.475**

This table lists the infrastructure on an embankment, south side of Ribble Estuary within the Ribble & Alt Estuaries SPA and Ramsar site and calculates its total footprint as affecting 4.475m^2 of the designated site.

Most of the infrastructure footprint on Ribble and Alt Estuaries SPA comprises replacement rather than new items. The scale of loss from new infrastructure can be regarded as 'trival' in the context of the conservation objectives for the SPA features and their supporting habitat. Most of the new footprint is on embankments rather than saltmarsh, and the nature of the works will not adversely affect the continuity and functioning of the habitat types and the species they support. The infrastructure will be located along existing walked routes rather than the wider habitat. As the signs and other infrastructure are intended to guide people along the coastal path they will also help to minimise any potential impact on the wider habitat.

Sefton Coast SAC

The approximate footprint of infrastructure within Sefton Coast SAC is as follows:

Table 12. Infrastructure on sand dune, Velvet Trail (just south of Southport)

Infrastructure Type	Number	Area affected (m^2)
Sleeper bridge (replacement)	1	0.76
Sleeper bridge (new)	1	0.76
Footbridge (replacement)	2	2.6
Footbridge (new)	1	1.3
Waymarker (replacement)	7	0.07
Waymarker (new)	13	0.13
Fingerpost	1	0.01
Scrub clearance (increasing paths by 1m width)	25m length	25
Total (replacement infrastructure)		**3.43**
Total (new infrastructure)		**2.2**
Total (new and replacement, does not include scrub clearance)		**5.63**

This table lists the infrastructure on the Velvet Trail (just south of Southport) within the Sefton Coast SAC and calculates its total footprint as affecting 5.63m^2 of the designated site, of which 3.43m^2 is replacement infrastructure.

Table 13. Total infrastructure on areas shown as sand dune on the priority habitats inventory

Infrastructure Type	Number	Area affected (m^2)
Sleeper bridge (replacement)	1	0.76
Sleeper bridge (new)	1	0.76
Footbridge	2	2.6
Footbridge (new)	1	1.3
Waymarker (replacement)	59	0.59
Waymarker (new)	73	0.73
Fingerpost (replacement)	4	0.04
Fingerpost (new)	7	0.07
Interpretation panel (replacement)	1	0.02
Interpretation panel (new)	4	0.08
Post and rail fence	6m	0.045
Scrub clearance (increasing paths by 1m width)	5 sections, (20m, 8m, 625m, 2178m, 25m) = 2856m length	2856
Total (replacement infrastructure)		**4.01**
Total (new infrastructure)		**2.985**
Total (new and replacement, does not include scrub clearance)		**6.995**

This table lists the total infrastructure on areas shown as sand dune on the priority habitat layer within the Sefton Coast SAC and calculates its total footprint as affecting 6.995m^2 of the designated site, of which 4.01m^2 is replacement infrastructure.

Table 14. Total infrastructure on areas of pine plantation which does not show as 'sand dune' according to the priority habitats inventory

Infrastructure Type	Number	Area affected (m^2)
Waymarker (replacement)	6	0.06
Waymarker (new)	13	0.13
Fingerpost (replacement)	2	0.02
Fingerpost (new)	1	0.01
Total (replacement infrastructure)		**0.08**
Total (new infrastructure)		**0.14**
Total (new and replacement)		**0.22**

The table above lists the total infrastructure on areas of pine plantation which does not show as sand dune according to the priority habitat layer within the Sefton Coast SAC and

calculates its total footprint as affecting 0.22m^2 of the designated site, of which 0.08m^2 is replacement infrastructure.

A higher proportion of the infrastructure footprint on Sefton Coast SAC comprises replacement rather than new items. The scale of loss from new infrastructure can be regarded as 'trival' in the context of the conservation objectives for the SAC features (also the Ramsar feature natterjack toad).

The new infrastructure will be located along existing walked routes rather than the wider habitat, and the nature of the works will not adversely affect the continuity and functioning of the habitat types and the species they support. As the signs and other infrastructure are intended to guide people along the coastal path they will also help to minimise any potential impact on the wider habitat. SSSI consent will be required in advance of new and replacement infrastructure being installed. Checks will need to be made ahead of works being carried out, including for the presence of petalwort.

Scrub clearance within the SAC is also required during establishment works of the trail (areas are given in the sand dune table above). Scrub encroachment is an issue for the conservation management of the SAC, therefore clearance of scrub during establishment works should have a beneficial effect on the sand dune habitats. Those carrying out the works will need to have an understanding of how best to deal with scrub species considered particularly problematic within the SAC.

In summary, the overall impact of infrastructure and establishment works along this stretch on N2K sites is negligible, with scrub clearance on the dunes likely to be a positive impact. Pre-works checks will be needed to avoid damaging or disturbing sensitive habitats / species. SSSI consent will be required in advance of the works commencing. Where necessary, the location and/or specification of new infrastructure items, such as advisory signage, may need to be adjusted to avoid impacts.

Conclusion

From this overview of the stretch and its component sections it is concluded that, other than the specific risks identified for further discussion in **D3.2**, there are no likely significant effects on designated features arising from the ECP proposals 'alone' between Cleveleys and Pier Head. Establishing a well maintained and easy to follow Coast Path along the alignment proposed will also help with the long-term management of visitors to the area.

The residual risks identified that have the potential to act in-combination with other plans and projects will be considered further in **D4**.

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

In this part of the assessment we consider the key locations identified above along the coast between Cleveleys and Pier Head where establishing the England Coast Path and associated coastal access rights might impact on Qualifying Features of a European site.

We assess the possible risks at each location and explain how the detailed design of our proposals takes account of them.

The relationship between the locations referred to in this assessment and the corresponding Coastal Access Reports in which the access proposal is described is shown in the table below.

Table 15. Summary of key locations

Location	Cross ref to Coastal Access Reports	Overwintering and passage waterbirds	Breeding seabirds	Breeding ruff	Dune habitats	Amphibians	Petalwort
Land east of Warton Aerodrome and Dow Brook (see 3.2A)	Report 2	✓	✓	✓			
Hutton and Longton Marshes (see 3.2B)	Report 3	✓	✓	✓			
Hesketh Out Marsh (see 3.2C)	Report 4	✓	✓	✓			
Marshside (outer) (see 3.2D)	Report 4	✓	✓	✓			
Green Beach at Ainsdale-on-Sea (see 3.2E)	Report 5				✓	✓	✓
Ainsdale and Cabin Hill NNR grazing (see 3.2F)	Report 5				✓	✓	✓

This table lists the key locations which are involved in the appropriate assessment, the Coastal Access report in which they lie and which of the features are within scope.

To inform our assessment of risk, we have reviewed how relevant sections of coast are currently used for recreation, how this might change as a result of known factors (such as planned housing), and how the established patterns and levels of access might be affected by our proposed improvement to access. The predictions we have made from this work are informed by available information, including reports commissioned to support development of the local plan, on-line mapping and aerial photography, travel and visitor information, site visits and input from local access managers. The findings of this work are incorporated into the assessments below.

Our assessment of the impact of the access proposals at each of these location is set out below.

D3.2A Land east of Warton aerodrome and Dow Brook

I) Baseline situation

The area of land to the east of Warton aerodrome is an important site for non-breeding and breeding birds. A single field to the east of the Dow Brook is within the Ribble and Alt Estuaries SPA, the rest of this area is outside although adjacent to the SPA and is functionally-linked land for overwintering bird features. The area consists of saltmarsh, mudflat, farmland, Newton Marsh SSSI, a landfill site, and a sewage works.

Large numbers of non-breeding geese, swans and wigeon feed on the farmland and on the reclaimed areas of the landfill site.

Large flocks of golden plover regularly winter in nationally important numbers on the SSSI with equally large numbers of lapwing and smaller flocks of other waders and wildfowl, including nationally important numbers of black-tailed godwit [Ref 6].

This area is adjacent to BAE Systems Warton Aerodrome and on the approach flight path. Any activity which increased the interaction of the planes with birds in flight would cause serious safety concerns for BAE. Natural England have worked closely with BAE Systems to manage the health and safety risk and model bird movement to influence the timings and flight heights of planes.

The area currently has very low levels of access. There are no paths running along the River Ribble or through the farmland. There is some access by local dog walkers to fields adjacent to the village, this is discouraged by the landowner as it causes disturbance to livestock and birds.

II) Detailed design features of the access proposal

The proposed ECP is aligned landward of the SSSI on the pavement next to the dual carriageway of the Preston New Road (A584). The whole of the area of land between Dow Brook and Savick Brook to the east of Warton Aerodrome would fall within the coastal margin.

Access will be excluded from the saltmarsh and flats along the bank of the River Ribble under s25a (unsuitable for access). It is proposed that access be excluded from rest of the coastal margin, from Freckleton Pool to Savick Brook, under a s24 (land management) direction. The extent of these local restrictions is shown on Direction Maps 1A, 1D & 2C in the separately published report describing the access proposals. Land to the east of Warton Aerodrome at Freckleton is within the final approach flight path of the main runway. This area is known to be a haven for wild birds, including feral species. Airfield operations monitor bird numbers to ensure they will not impact on the operation of the airfield. An increase in numbers of people and dogs could disturb the birds and pose an air safety risk to the operation of the airfield.

In addition, a sign will be installed at Marsh Gates, Freckleton and 9 further locations along the A584, explaining the sensitivity and showing a map of the access exclusion.

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

The land to the east of Warton Aerodrome falls within the coastal margin. Significant numbers of non-breeding birds use this area and could be disturbed by an increase in numbers of people and dogs.

Taking into account the measures proposed there is considered to be no appreciable risk of an increase in disturbance by people and dogs as a result of the proposals. This is because the ECP is aligned on existing pavements, with a fence and hedge between the ECP and the coastal margin. Access will be excluded from the coastal margin under a s25A (unsuitable for access) and a s24 (land management) direction. Therefore there will be no new access rights within the coastal margin. Signage will be placed at the entrance to farm tracks which lead into the coastal margin, informing people that they do not have coastal access rights in the margin.

If the s24 (land management) or s25A (unsuitable for access) direction is ever removed, an assessment of the impact of the proposal on the features of the SPA / Ramsar should be carried out. An access restriction under s26 (nature conservation) may be required instead.

D3.2B Hutton and Longton Marshes

I) Baseline situation

Hutton and Longton Marshes comprise an extensive area of salt marsh on the south side of the Ribble. Next to these marshes is some reclaimed marsh/ farmland surrounded on three sides by larges areas of saltmarsh and farmland on the landward side. Both the marshes and reclaimed land are within Ribble and Alt Estuaries SPA / Ramsar site. An old flood embankment run between the saltmarsh (SSSI units 5 & 14) and the reclaimed marsh / farmland (SSSI unit 15), and a newer flood embankment runs landward of the reclaimed marsh / farmland. This means that the area of reclaimed marsh (unit 15) is completely surrounded by flood embankments.

The area of saltmarsh support large numbers of roosting and feeding non-breeding waterbirds, including whooper swan, shelduck, wigeon, teal, ringed plover, golden plover and redshank. There is an important wildfowl roost along the edge of Longton Marsh/ the River Douglas [Ref 4].

In the area of reclaimed marsh there are extensive pond systems, extending some 250+m and 50m wide in places, which are connected by wide creeks. Wigeon, coot, teal, mallard, shoveller and Whooper swans ~~are~~ use the water and fringing reed beds. This area is used by roosting waterbirds when the saltmarshes are covered by high tides and when rough coastal weather forces them off the saltmarshes. Large numbers of wigeon in particular use the area, flying in at evening and also as a day time resting area (with access to fresh water). Hutton and Longton Marshes area also provide habitat for breeding redshank (a significant proportion of wintering redshank are resident in the area). [Ref 7]

Part of Hutton Marsh (including the area of reclaimed marsh), has been maintained as a sanctuary and conservation area by Preston & District Wildfowl Association since 1953, where shooting or public access is not allowed and member access strictly controlled.

There is a popular public right of way, which is also part of the Ribble Way, landward of Hutton and Longton Marshes. There is a low level of informal existing public access onto Hutton and Longton Marshes.

II) Detailed design features of the access proposal

The proposed ECP route is aligned on the existing public right of way, which is also part of the Ribble Way long distance footpath. We expect that there will be a small increase in use of this route, as a result of it being promoted as a national trail. The whole of Hutton and Longton Marshes will fall within the coastal margin, however access will be excluded year round from the saltmarsh and flats along the bank of the river Ribble (SSSI units 5 & 14) under a s25A direction (unsuitable for access / public safety). Access will be excluded from the inner and outer embankments and the land within the embankments at Hutton marsh (SSSI unit 15) under a s26 direction (nature conservation). The extent of these local restrictions is shown on Direction Map 3E in the separately published report describing the access proposals. In addition three advisory signs at access points to the embankments, explaining the sensitivity and access exclusion will be installed.

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

The proposed ECP in this area is on an existing public right of way, with a small increase in use predicted as a result of promoting the route a national trail. The route runs through fields landward of Hutton Marsh, with fences between the field and Hutton Marsh, and then on a flood embankment south east of Longtown Marsh. The existing footpath is at the periphery of these marshes and physically separated from them. It is unlikely that a small increase in access on the existing footpath will cause an increase in disturbance to roosting, feeding or breeding birds on Hutton and Longton marsh.

Hutton & Longton Marshes are important sites for roosting, feeding and breeding waterbirds. The whole area falls within the coastal margin. The saltmarshes (units 5 & 14) are considered to be unsuitable for access, and there will be no new access rights to these areas.

The embankments and area of reclaimed marsh inside the embankments (SSSI unit 15) would become spreading room. If this area were to become spreading room, it is likely that access would increase along the inner and outer embankments, leading to an increase in disturbance to birds roosting or breeding near the embankments through skylining and dogs off lead running onto the saltmarshes. Access could also increase within the area of reclaimed marsh, leading to disturbance of roosting, feeding and breeding birds.

In order to reduce the risk of disturbance to birds roosting, feeding or breeding in unit 15, access will be excluded from the inner and outer embankments and the land within the embankments at Hutton Marsh under a s26 direction (nature conservation). Signs will be placed on the embankments and other access points to the coastal margin informing people of the access exclusions and the sensitivities of the site.

With these measures in place, the risk of additional disturbance of non-breeding waterbirds as a result of our proposals is low.

D3.2C Hesketh Out Marsh

I) Baseline situation

A large area of land at Hesketh Out Marsh had been reclaimed for agriculture from the original saltmarsh in the 1980s by the creation of an outer seabank. The land was later purchased by the RSPB who, in partnership with the Environment Agency and Natural England, implemented a scheme of managed realignment to restore saltmarsh on the site by breaching the outer seabank and creating new lagoons and creeks. The western half of Hesketh Out Marsh was restored in 2007, and work was completed restoring the eastern half in 2017. The RSPB now manage the land as a nature reserve. They do not allow visitors to access the outer seabank or the cross bank to avoid disturbance to birds. The saltmarsh seaward of the outer seabank is within the SPA and is managed by Natural England as part of the Ribble Estuary NNR. The RSPB land is also encompassed by an extension to the NNR.

The area is important for breeding and overwintering birds – including a number of species that are susceptible to disturbance – both within and beyond the outer seabank. There are key high tide roosts for non-breeding birds in the area.

II) Detailed design features of the access proposal

As part of implementing the proposals, access to the saltmarsh between the outer seabank and inner seabank – the RSPB land – will be restricted by a section 25a direction for public safety. This restriction also covers the fringe of saltmarsh between the seaward edge of the outer seabank and the channel of the Ribble itself.

It is further proposed that access to the land in the coastal margin at Hesketh Out Marsh that is not covered by the section 25a direction – seaward of route sections CPH-4-S023 to CPH-4-S028 (the outer seabank and cross bank) – is excluded all-year round by direction under section 26(3)(a) of the Countryside and Rights of Way Act (2000), to prevent disturbance to birds. The exclusion does not affect the route itself and will have no legal effect on land where coastal access rights do not apply. The extent of these local restrictions is shown on Direction Map 4D in the separately published report describing the access proposals. This restriction formalises RSPB's current approach to access management, and also manages the risk from the proposed route following the seabank directly west (currently blocked by the RSPB) to avoid the large inland diversion of the public right of way. In addition, five advisory signs at access points to the outer embankments will be installed, explaining the sensitivity and access exclusions.

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

The proposed ECP route follows the existing public footpath along the inner seabank. Access to the outer seabank is to be restricted year round for nature conservation and access to the saltmarsh within the outer seabank is to be restricted for public safety. The site is actively managed by the RSPB and it is unlikely that the ECP proposals will lead to significant impacts on N2K features (via increased disturbance to birds). The proposals are not expected to significantly change levels or patterns of recreational use in the area, and

the nature conservation sensitivities are covered directly and indirectly by the restrictions. It is considered therefore that there is no appreciable risk from the proposals to qualifying features.

D3.2D Marshside (outer marsh)

I) Baseline situation

The outer marsh at Marshside is an extensive area of saltmarsh at the mouth of the Ribble Estuary. It is important for overwintering and passage waterbirds. WeBS count data show the area is consistently used by large numbers of dunlin, knot, oystercatcher and other waterbirds. There are several key high tide roosts in the area (Marshside Beach and Marshside 1 & 2) [Ref 4]. A review of breeding birds across the Ribble Estuary SSSI shows that the outer marsh is particularly important for redshank (the resident population of this species contributes significantly to the number of overwintering birds) [Ref 8]. This is confirmed by data from RSPB who carry out regular surveys of breeding birds in the Marshside area[2].

People don't often walk over outer marsh. Most access is from a small car park off Marine Drive by the sand-winning compound from where there is a constructed track out over the marsh. Away from the track, the terrain is difficult to walk-over and a natural barrier to recreational use.

Landwards of Marine Drive is RSPB's Marshside reserve and RSPB also manage access to the outer marsh on the other side of the road. The sand-winning track is available for public use and visitors are asked to keep dogs on a lead. RSPB have also installed a viewing area to the north of the sand-winning compound. There is no access to the salt marsh beyond the track for either people or dogs. There are notices on site explaining where people can and can't go.

II) Detailed design features of the access proposal

The proposed route for the Coast Path in the Marshside area follows the pavement alongside Marine Drive. RSPB manage the outer marsh seaward of Marine Drive and limit access for conservation reasons. It is proposed that coastal access rights should be similarly restricted, specifically:

- People may use the sand-winning track but dogs must be kept on a lead all year round.
- No new coastal access rights will be created over the marsh either side of the track or any of the marsh seawards of Marine Drive, including the sand-winning compound.

These local restrictions are proposed for nature conservation reasons. RSPB have already installed notices on site explaining these limitations to access. These will be updated with coastal access information, explaining the sensitivity and asking people to observe the requirement to keep dogs on leads and only use the track. The extent of these local

[2] Thanks to RSPB Marshside for additional data provided.

restrictions is shown on Direction Maps 4E and 4F in the separately published report describing the access proposals.

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

The Coast Path follows Marine Drive and is separated from the salt marsh by a fence. The outer marsh is important for both non-breeding and breeding waterbirds and access to it is managed by RSPB. Public access to the marsh is limited to the sand-winning track and a viewing area near the sand-winning compound. Additional measures have been added to the access proposals to ensure continuation of current conservation management (described in II). As a result, it is considered therefore there is no appreciable risk from the proposals to qualifying features at this location.

D3.2E Green Beach at Ainsdale-on-Sea

I) Baseline situation

As described by Smith & Lockwood [Ref 5] the 'Green Beach' originated on the Birkdale foreshore in 1986, and developed as a mosaic of saltmarsh, dune, dune-slack, freshwater swamp and wet woodland habitats. It currently extends for a linear distance of about 4km between Birkdale and Ainsdale, covering an area of 66ha on this rapidly accreting section of coast. Southern extensions, resulting in part from the restriction of car parking zones on the beach north of Ainsdale-on-Sea, include the 400m-long "New Green Beach" which began to form in 2004 and the "Newest Green Beach" which is about 350m in length and originated in 2008. These primarily comprise of recently formed dune ridges (circa 50m+ west of the original dune front) with developing slacks / wetlands behind. In 2016, it became apparent that the Newest Green Beach was extending southwards again towards the beach carpark at Ainsdale-on-Sea to form an "Even Newer Green Beach". As before, a series of low mounds accreting around common saltmarsh grass *Puccinellia maritima* patches were rapidly colonised by dune-forming grasses, mainly sand couch *Elytrigia juncea* and marram *Ammophila arenaria*.

The Green Beach is of particular importance within Sefton Coast SAC as an area of dynamic, actively accreting and developing early successional stage dune habitats. There has been rapid development of high floristic diversity within the newer sections both in the young slacks and the dune ridges, and including a significant number of regionally or nationally notable plants. Recent survey work has shown that these are key locations for the SAC feature petalwort *Petalophyllum ralfsii* and the nationally rare bryophyte sea bryum *Bryum warneum* [3]. The Newest Green Beach slack contains the largest known population of sea bryum in Britain (Smith & Lockwood 2, 2018 – ref 4). The area is also noted as important for an endemic sub-species of the rare Sandhill Rustic moth *Luperina nickerlii gueneei*, as well as the nationally rare Northern Dune Tiger Beetle *Cicindela hybrida*. Natterjack toads *Epidalea calamita* utilise numerous breeding pools and slacks within the Green Beach and the LNR as a whole, and the first (though unsuccessful) breeding attempts within the Newest Green Beach slack were recorded in 2018.

[3] We are grateful to Andrew Hampson for information on the Gems in the Dunes bryophyte surveys.

The area is owned and managed by Sefton Metropolitan Borough Council (SMBC) effectively as part of the Ainsdale and Birkdale Hills Local Nature Reserve (LNR) and its Higher Level Stewardship (HLS) agri-environment agreement (though it has developed seaward of the LNR boundary). SMBC maintain and promote an existing access route known as the Velvet Trail which runs alongside the Green Beach and through the older landward dunes between the Weld Road roundabout (Southport) and Ainsdale-on-Sea. The route is not a public right of way though largely follows a well-used trail through the dunes - this is signposted from Weld Road south to the "New Green Beach" area. Further south from here however the trail is not currently signposted and does not have an 'official' route as such, though connects with Ainsdale-on-Sea via a network of informal tracks, with those running broadly northeast – southwest appearing the more well used (this is apparent from visual information from the Strava app as well as on the ground) [Ref 9]. The nearest public right of way is the Sefton Coastal Path which runs parallel to the Velvet Trail further inland on the landward side of the coast road.

The Velvet Trail and some of its associated tracks are moderately well-used by local walkers / dog walkers and also visitors to the coast. Current levels of trampling within the network of tracks in the newer Green Beach areas and also further inland appear to be creating favourable conditions for petalwort, and do not seem to be significantly impacting negatively on other features. There are however existing issues with dogs in the area (as elsewhere in the SAC), notably dogs causing physical disturbance to slacks / pools and eutrophication from dog fouling, impacting on both the habitats and the species that use them.

II) Detailed design features of the access proposal

The proposed route for the ECP in the Green Beach area follows the existing Velvet Trail south from Weld Road. However as outlined above this is signposted and follows an established route only as far as the New Green Beach, and between here and Ainsdale-on-Sea it is currently unsigned and has no 'official' route (though most current usage largely continues along northeast-southwest trails). Discussions with SMBC took place to determine the route of the ECP / Velvet Trail in this area. The proposed route is shown on maps 5b to 5d in the separately published report describing the access proposals.

Heading north from the Ainsdale Discovery Centre the proposed route follows tracks through older dunes before emerging partway along the edge of the Newest Green Beach slack. It then follows the track that runs along the edge of this slack and continues north over to the edge of the New Green Beach slack, where it picks up the signed and established route of the Velvet Trail.

A number of alternative routes through the dunes between Ainsdale-on-Sea and the signed Velvet Trail (next to the New Green Beach slack) were considered, though the proposed route described above was opted for as it generally offers easier and less undulating walking, and unlike some of the potential routes slightly further inland does not awkwardly skirt around or directly go through a number of small pools and slacks. The current access management already means the key pool beside the track north of Shore Road is fenced and advisory signage at the entrance to Ainsdale and Birkdale Hills LNR / Ainsdale Sand Dunes will be upgraded, with room for seasonal messaging about the breeding pools. Once it meets the track alongside the Newest Green Beach slack it offers a straightforward linear route to connect up with the Velvet Trail further along.

Given the already high / moderate levels of recreational use of large parts of Sefton Coast SAC, the proposed route of the ECP in the vicinity of the Green Beach is expected to potentially attract only a small increase in additional users. However, there is a small but appreciable risk that patterns of use could be altered by the establishment of the ECP, especially around the Newest Green Beach and the adjacent dunes further inland where there is currently no signed and formalised trail. This risk may increase further if SMBC decide to promote the ECP as the main coastal trail (which appears likely) and this draws usage away from the existing Sefton Coastal Footpath.

It also needs to be taken into account that whilst this area is already well used by people, the relatively recent development of early successional stage dune habitats in the newer / newest Green Beach areas has increased the sensitivity of this location to recreational impacts along with its importance as an accreting, dynamic part of the SAC.

Trampling by walkers helps to create and maintain suitable habitat for several dune specialist plants, including petalwort. However; if usage of the proposed route were to noticeably increase beyond current levels in and around the Newest Green Beach area then there is potential for this to negatively impact on particularly sensitive dune habitats and species (early successional stage humid dune slacks, embryo and shifting dunes, petalwort, plus numerous non-N2K features) through erosion of the surface and/or eutrophication from dog fouling.

The risk of this occurring is considered low but still appreciable, with some uncertainty regarding the potential for the ECP to concentrate use along the 'new' route. It is therefore proposed that the condition of the path is checked regularly for signs of the surface of the path becoming damaged (increased levels of erosion / churned up sand or other obvious physical damage). SMBC own and manage access to the site. There are multiple paths through the dunes in this area and if the surface shows signs of becoming damaged they will rest the path by temporarily diverting the promoted route. Informal measures such as signage and guide fencing can be used to direct walkers whilst the path surface is given time to recover. SMBC have indicated their willingness to monitor and manage the route in this way.

The mechanism for this monitoring will need to focus on condition of the path and surrounding ground rather than on condition of the designated features, partly as it would be difficult to determine if any reduction in feature condition was attributable to usage of the ECP as opposed to a number of other anthropogenic and environmental factors, and partly as it is more readily identified in the field and earlier than any significant reduction in feature condition.

Annual inspection of the coast path route and immediate surrounds through the LNR is proposed (with a particular focus on the newer Green Beach areas), and would look for noticeably increased levels of erosion / churned up sand and other obvious physical damage to the trail, dunes and slacks, and also increased levels of dog fouling and disturbance by dogs along the trail. SMBC Rangers' working knowledge of the site is considered an appropriate means to detect changes over time (and would operate through the year). The annual inspection should ideally be conducted at a similar time each year and should include photography to allow for comparison of previous trail / ground conditions. If significant changes were detected then it would be up to SMBC Rangers (in consultation with NE) to

determine and provide an appropriate temporary diversion – ensuring that features were not unduly impacted elsewhere.

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

The proposed ECP route in the vicinity of the newer Green Beach areas formalises an official route for the Velvet Trail where it is currently unsigned between the New Green Beach slack and Ainsdale-on-Sea. In terms of risks to qualifying features the benefits of this route are that it avoids the open foreshore / dune front further seaward and also numerous slacks and pools further landward. However the route does pass through and adjacent to sensitive early stage successional slack and dune habitats, and there is a small but appreciable risk that the establishment of a formalised route here – and which is likely to be promoted in favour of the existing Sefton Coastal Footpath – will focus and increase recreational usage into this area. This therefore carries a small but appreciable risk that qualifying features may be impacted by increased levels of trampling, disturbance by dogs and eutrophication from dog fouling.

The monitoring proposed above comprises of an annual inspection (with photographic record) of condition of the trail / surrounds for evidence of increased erosion, dog fouling and disturbance (as opposed to inspection of actual feature condition as such – though there is crossover between the two). This monitoring is considered sufficient to highlight at an early stage a significant increase in use and an associated increased risk to qualifying features. Were this to occur SMBC Rangers are able to manage the situation with temporary path diversions, allowing time for the surface of the main trail to recover.

With the addition of the monitoring of the trail as outlined here it is considered that there are no appreciable risks of impacts to N2K features in this area arising from the ECP proposals, as any potentially damaging impacts can be recognised at an early stage and action taken to mitigate the effects.

D3.2F Conservation grazing within Ainsdale and Cabin Hill NNRs

I) Baseline situation

Ainsdale and Cabin Hill NNRs were established in the 1960s. Areas of dunes in both sites have been managed by grazing for over twenty years within large fenced enclosures. Rabbits were historically important but are now too low in numbers to be the main grazing agent. Plus they wouldn't make much impact on all the scrub encroachment and dense sward in a lot of places, though they still play a role in the open areas. The enclosures are currently being grazed by Herdwick sheep and a few Highland cattle to get things in better condition. The grazing management is seen as an effective way of maintaining a low, open and diverse sward within the dune grassland and slacks (which would otherwise require more resource intensive intervention). This in turn helps maintain conditions suitable for specialist dune plant species and also natterjack toads.

Public access to the enclosures and the NNRs as a whole was previously managed with a tiered approach via a permitting scheme, with different levels of access allowed in different areas. A permit was required to access the enclosures, with no dogs as a condition of the permit.

In 2012 Natural England proposed that all NNRs should be dedicated as Open Access land under the provisions of Countryside and Rights of Way (CRoW) Act 2000, bar any land that was deemed unsuitable for increased public access. This would potentially have meant that the existing permitting scheme would end and people with dogs would have free access to the enclosures. In discussions that followed concerns were raised regarding the potential impacts of this, chiefly the likely disruption to the grazing regime via increased disturbance to livestock by dogs and people – with an associated decrease in habitat condition – and also direct impacts to breeding natterjack toads by dogs disturbing slacks. It was agreed that the exclusion of people with dogs should continue as the least restrictive option to balance the needs of access and nature conservation.

Following the dedication of the NNRs as open access land under s16 of the CROW Act, Natural England put in place directions to exclude access year round by people with dogs from the enclosures as part of the conservation management of the sites

II) Detailed design features of the access proposal

The existing restrictions to people with dogs in the enclosures in the NNRs form part of the CRoW Act open access rights. Following commencement of new coastal access rights, such rights will replace the current open access rights. However, it will continue to be necessary to similarly restrict access in the affected areas.

It is proposed therefore that access to the land in the coastal margin landward of route sections CPH-5-S013, CPH-5-S014 and CPH-5-S030 (the enclosures) is excluded to people with dogs, all-year round, by direction under section 24 of the Countryside and Rights of Way Act (2000), for land management purposes (the exclusion does not affect the route itself and will have no legal effect on land where coastal access rights do not apply). The extent of these local restrictions is shown on Direction Maps 5A and 5B in the separately published report describing the access proposals. Existing notices are in place to manage this area. These will be updated with coastal access information, explaining the sensitivity and asking people to observe the requirement to keep dogs out of the enclosures.

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

The year round exclusion of people with dogs from the enclosures will continue with the new restrictions under coastal access rights. It is therefore considered that there is no appreciable risk of impacts to N2K features within the enclosures arising from the ECP proposals, as there will be no increase in disturbance to livestock and/or breeding natterjack toads from people with dogs.

Conclusion

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

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

In this section we assess the potential for adverse effects on site integrity resulting from the environmental pressures and consequent risks to site conservation objectives identified in Table 7. We consider the whole Coast Path stretch and take into account mitigation measures incorporated into the design of our access proposal. Each of the following subsections deals with one type of pressure. For ease of reference, we repeat the risk to conservation objectives and the qualifying features affected given in Table 7 (see D1) before summarising relevant design features, our conclusions on site integrity and whether non-significant residual effects remain which need to be considered in combination with non-significant effects of other plans or projects (see D4).

Disturbance to overwintering and passage waterbirds (Ribble and Alt Estuaries SPA /Ramsar)

Risk to conservation objectives:
Repeated disturbance to foraging or resting birds during winter and on passage, following changes in recreational activities as a result of the access proposal, may lead to reduced fitness and reduction in population and/or contraction in the distribution of qualifying features within the site.

Also that the access proposals modify how the site is used for recreation, causing disturbance to breeding birds that make a significant contribution to the non-breeding population of these species.

Qualifying feature(s) affected: Bewick's swan (nb); whooper swan (nb); pink-footed goose (nb); shelduck (nb); wigeon (nb); teal (nb); pintail (nb); oystercatcher (nb); ringed plover (nb); golden plover (nb); grey plover (nb); knot (nb); sanderling (nb); dunlin (nb); waterbird assemblage (nb) – Ribble & Alt Estuaries

Relevant design features of the access proposal:

- Access will be restricted year round to the coastal margin at Hutton In Marsh by a formal direction on nature conservation grounds. Three advisory signs will be installed at access points to the embankments, explaining the sensitivity and access exclusion.
- The route will be aligned on the inner seabank at Hesketh Out Marsh, and access to the outer sea banks will be restricted year round by a formal direction on nature

conservation grounds. Five advisory signs will be installed at access points to the outer embankments, explaining the sensitivity and access exclusions.

- Access will be restricted year round to the coastal margin on the land east of Warton Aerodrome / Dow Brook by a formal direction on land management grounds (the area is sensitive for conservation reasons as well). A sign will be installed at Marsh Gates, Freckleton, explaining the sensitivity and showing a map of the access exclusion. 9 advisory signs will be installed at access points to the coastal margin along the A584, explaining the sensitivity and showing a map of the access exclusion.
- Access to the outer marsh at Marshside will be restricted year round and the trackway will have a year round dogs on leads restriction. Existing notices are in place to manage this area: these will be updated with coastal access information, explaining the sensitivity and asking people to observe the requirement to keep dogs on leads and only use the track.
- Near Cabin Hill NNR signage will clearly direct coast path users along the trail and away from the foreshore. In addition, to help manage the existing pressure, a new information board will be installed in the Cabin Hill area raising awareness about how visitors can help to reduce disturbance to roosting birds.

Can 'no adverse effect' on site integrity be ascertained? Yes, for the following main reasons:

- Along most of this stretch the route follows existing public rights of way and walked routes where only small increases in levels of use are expected.
- The route is mostly set back from the foreshore along most of its length between Lytham and Liverpool.
- Nearly all of the saltmarsh and intertidal mud/sandflats will have coastal access rights restricted year round by direction for public safety.
- Sensitive areas of the coastal margin not covered by the above will have access restricted year round by direction for nature conservation and land management.
- Additional disturbance to key high tide roosts including at Lytham Beach, Longton Marsh, Hesketh Marshes, Banks Marsh, Crossens Out-Marsh, Marshside Out Marsh, Ainsdale Beach, Formby, Taylors Bank and Hightown has been avoided.
- The foreshore between Cabin Hill and Hightown is largely inaccessible to coast path users due to existing MOD restrictions.

Are there residual effects? Yes. The very small but appreciable risk of promotion of the ECP route attracting an increase in use along remoter stretches of the trail (with currently low to moderate levels of use) may potentially act in-combination with pressures arising from other plans and projects.

Disturbance to breeding seabirds / ruff (Ribble and Alt Estuaries SPA /Ramsar)

Risk to conservation objectives: Repeated disturbance to birds during the breeding season, following changes in recreational activities as a result of the access proposal, may lead them to abandon nesting areas or reduce their breeding success (for example by causing eggs to become chilled, reducing food supply to chicks, or increasing the vulnerability of eggs, chicks or adults to predation).

Qualifying feature(s) affected: Lesser black-backed gull (b); common tern (b); breeding seabird assemblage & ruff (b)

Relevant design features of the access proposal:

- Access will be restricted year round to the coastal margin at Hutton In Marsh by a formal direction on nature conservation grounds. Three advisory signs will be installed at access points to the embankments, explaining the sensitivity and access exclusion.
- The route will be aligned on the inner seabank at Hesketh Out Marsh, and access to the outer sea banks will be restricted year round by a formal direction on nature conservation grounds. Five advisory signs will be installed at access points to the outer embankments, explaining the sensitivity and access exclusions.
- Access will be restricted year round to the coastal margin on the land east of Warton Aerodrome / Dow Brook by a formal direction on land management grounds (the area is sensitive for conservation reasons as well). A sign will be installed at Marsh Gates, Freckleton, explaining the sensitivity and showing a map of the access exclusion. 9 advisory signs will be installed at access points to the coastal margin

along the A584, explaining the sensitivity and showing a map of the access exclusion.

- Access to the outer marsh at Marshside will be restricted year round and the trackway will have a year round dogs on leads restriction. Existing notices are in place to manage this area: these will be updated with coastal access information, explaining the sensitivity and asking people to observe the requirement to keep dogs on leads and only use the track.

Can 'no adverse effect' on site integrity be ascertained? Yes, for the following main reasons:

- Along most of this stretch the route follows existing public rights of way and walked routes where only small increases in levels of use are expected.
- The route is mostly set back from the foreshore along most of its length between Lytham and Liverpool.
- Nearly all of the saltmarsh and intertidal mud/sandflats will have coastal access rights restricted year round by direction for public safety.
- Sensitive areas of the coastal margin not covered by the above will have access restricted year round by direction for nature conservation and land management.
- The foreshore between Cabin Hill and Hightown is largely inaccessible to coast path users due to existing MOD restrictions.

Are there residual effects? No

Trampling

Risk to conservation objectives: Repeated trampling, following changes in recreational activities as a result of the access proposal, may damage sensitive habitats, plant communities or species, leading to long-term declines in their quality, distribution or numbers within the site. Types of possible effect include physical changes to habitats (for example through compaction of the substrate), shifts in the species composition of plant communities, and reductions in species' population size or distribution.

Qualifying feature(s) affected:

- Dune habitats (Embryonic shifting dunes; shifting dunes along the shoreline with Ammophila arenaria ("white dunes"); fixed dunes with herbaceous vegetation ("grey dunes"); Atlantic decalcified fixed dunes (Calluno-Ulicetea); dunes with Salix repens ssp. argentea (Salicion arenariae); humid dune slacks)
- Amphibians (great crested newt; natterjack toad)
- Petalwort
- Overwintering and passage waterbirds (supporting habitat)
- Breeding seabirds/ ruff (supporting habitat)

Relevant design features of the access proposal:

- The trail is aligned mostly inland of sensitive foreshore and intertidal habitats.
- Within Sefton Coast SAC the trail is mostly aligned through fixed dunes, dune grassland and some areas of woodland, and avoids more sensitive embryo / mobile dune and slack features.
- Around the Ribble the trail is mostly aligned on seabanks, roadways and promenades.
- The trail around the newer Green Beach will be monitored, with scope to temporarily move the route if required.
- Signposts and waymarking will be used to ensure the route of the trail is clear and easy to follow.

Can 'no adverse effect' on site integrity be ascertained? Yes, for the following main reasons:

- Along most of this stretch where the route follows existing public rights of way and walked routes, only small increases in levels of use are expected.
- Fixed dune habitats are generally more resilient (than some earlier successional stage dune habitats) – light to moderate trampling can be beneficial in maintaining a low open sward and creating suitable conditions for petalwort.
- Nearly all the saltmarsh and other sensitive intertidal habitats in the coastal margin (SPA / Ramsar supporting habitat) are unsuitable for walking and access will be excluded by direction.

Are there residual effects? Yes. The very small but appreciable risk of changes to existing patterns of use within Sefton Coast SAC arising from the proposals (and the probable promotion of the ECP route instead of the existing Sefton Coastal Footpath) causing an increase in use along the trail may potentially act in-combination with pressures arising from other plans and projects.

Eutrophication from dog-fouling

Risk to conservation objectives: An increase in the number of dogs and thus dog fouling along and around the route, following changes in recreational activities as a result of the access proposal, may cause negative impacts to the composition, structure and condition of dune habitats (and species supported by them) through the effects of eutrophication.

Qualifying feature(s) affected:

- Dune habitats (Embryonic shifting dunes; shifting dunes along the shoreline with Ammophila arenaria ("white dunes"); fixed dunes with herbaceous vegetation ("grey dunes"); Atlantic decalcified fixed dunes (Calluno-Ulicetea); dunes with Salix repens ssp. argentea (Salicion arenariae); humid dune slacks)
- Amphibians (great crested newt; natterjack toad)
- Petalwort

Relevant design features of the access proposal:

- Within Sefton Coast SAC the trail is mostly aligned through fixed dunes, dune grassland and some areas of woodland, and avoids more sensitive embryo / mobile dune and slack features.
- The trail around the newer Green Beach will be monitored, with scope to temporarily move the route if required.
- Restricted year round access to the grazing enclosures within Ainsdale and Cabin Hill NNRs by people with dogs will be maintained by a formal direction on land management grounds. Existing notices are in place to manage this area: these will be updated with coastal access information, explaining the sensitivity and asking people to observe the requirement to keep dogs out of the enclosures.
- Signposts and waymarking will be used to ensure the route of the trail is clear and easy to follow.

Can 'no adverse effect' on site integrity be ascertained? Yes, for the following main reasons:

- Along most of this stretch where the route follows existing public rights of way and walked routes, only small increases in levels of use are expected.
- The proposals do not increase the amount of existing access to dune habitats.

Are there residual effects? Yes. The very small but appreciable risk of changes to existing patterns of use within Sefton Coast SAC arising from the proposals (and the probable promotion of the ECP route instead of the existing Sefton Coastal Footpath) causing an increase in use along the trail may potentially act in-combination with pressures arising from other plans and projects.

Disturbance of slacks / pools by dogs

Risk to conservation objectives: An increase in incidences of dogs accessing breeding ponds, following changes in recreational activities as a result of the access proposal, may cause disturbance, injury or death of amphibian eggs, tadpoles or adults. This could lead to a reduction in population abundance.

Qualifying feature(s) affected: Natterjack toad; Great crested newt

Relevant design features of the access proposal:

- Within Sefton Coast SAC the trail is mostly aligned through fixed dunes, dune grassland and some areas of woodland, and avoids more sensitive embryo / mobile dune and slack features.
- The trail around the newer Green Beach will be monitored, with scope to temporarily move the route if required.
- Restricted year round access to the grazing enclosures within Ainsdale and Cabin Hill NNRs by people with dogs will be maintained by a formal direction on land management grounds. Existing notices are in place to manage this area: these will be updated with coastal access information, explaining the sensitivity and asking people to observe the requirement to keep dogs out of the enclosures.

- Signposts and waymarking will be used to ensure the route of the trail is clear and easy to follow.

Can 'no adverse effect' on site integrity be ascertained? Yes, for the following main reasons:

- Along the stretch through the SAC the route follows existing public rights of way and walked routes. Only small increases in levels of use are expected.
- The proposals do not increase the existing amount of access to areas with slacks and pools important to amphibians.

Are there residual effects? Yes. The very small but appreciable risk of changes to existing patterns of use within Sefton Coast SAC arising from the proposals (and the probable promotion of the ECP route instead of the existing Sefton Coastal Footpath) causing an increase in use along the trail may potentially act in-combination with pressures arising from other plans and projects.

Disruption of grazing management causing damage to sensitive features

Risk to conservation objectives: New public access rights on grazed land as a result of the access proposal may lead to dogs or their owners scaring livestock, resulting in the temporary or permanent cessation of grazing management, or significant changes to the grazing regime. Where the grazed land affected supports important populations of rare plant species that require a short, open sward to allow them to compete successfully, this disruption of the grazing regime may lead to reduction in the species' populations and distribution within the site or even local extinction.

Qualifying feature(s) affected:

- Dune habitats (Embryonic shifting dunes; shifting dunes along the shoreline with Ammophila arenaria ("white dunes"); fixed dunes with herbaceous vegetation ("grey dunes"); Atlantic decalcified fixed dunes (Calluno-Ulicetea); dunes with Salix repens ssp. argentea (Salicion arenariae); humid dune slacks)
- Amphibians (great crested newt; natterjack toad)
- Petalwort

Relevant design features of the access proposal:

- Restricted year round access to the grazing enclosures within Ainsdale and Cabin Hill NNRs by people with dogs will be maintained by a formal direction on land management grounds. Existing notices are in place to manage this area: these will be updated with coastal access information, explaining the sensitivity and asking people to observe the requirement to keep dogs out of the enclosures.

Can 'no adverse effect' on site integrity be ascertained? Yes, because there are no other grazing enclosures within the SAC that already restrict access to people with dogs (the grazing enclosures within the LNR can currently be accessed).

Are there residual effects? No.

Spread of disease by people and dogs

Risk to conservation objectives: Potential for chytrid fungus *Batrachochytrium dendrobatidis* and other diseases to be spread by people and dogs. This leads to a reduction in population abundance.

Qualifying feature(s) affected:

- Amphibians (great crested newt; natterjack toad)

Relevant design features of the access proposal:

- Following local site manager advice about the choice of route through extensive dune systems to avoid where possible pools and slacks that are more important for amphibians

Can 'no adverse effect' on site integrity be ascertained? Yes, for the following main reasons:

- Studies in the UK have found that spread of the chytrid fungus is most likely linked to where people have deliberately introduced non-native alpine newts into pools with native amphibians, or transferred infected animals between pools. Bio security measures have been introduced for people that work with native amphibians e.g. capturing animals to collect biological data or involved in translocation schemes. Beyond these specific activities, the risks of spreading the chytrid fungus in UK appear to be low. Dogs entering pools are not thought any more likely to transfer the fungus than other possible agents, such as wild birds. Therefore, no special measures are currently considered necessary in connection with general recreational activities.
- The risks during establishment and maintenance work will be mimimized by using reasonable avoidance measures during works.

Are there residual effects? No.

Habitat loss caused by installation of infrastructure

Risk to conservation objectives: The installation of access management infrastructure within designated sites may lead to a permanent loss of extent of habitats that are qualifying features themselves or support bird, plant or amphibian species that are qualifying features.

Qualifying feature(s) affected:

- Dune habitats (Embryonic shifting dunes; shifting dunes along the shoreline with Ammophila arenaria ("white dunes"); fixed dunes with herbaceous vegetation ("grey dunes"); Atlantic decalcified fixed dunes (Calluno-Ulicetea); dunes with Salix repens ssp. argentea (Salicion arenariae); humid dune slacks)
- Amphibians (great crested newt; natterjack toad)
- Petalwort
- Overwintering and passage waterbirds (supporting habitat)
- Breeding seabirds/ ruff (supporting habitat)

Relevant design features of the access proposal:

- New (rather than replacement) infrastructure within N2K sites to be installed on habitat that is a SAC feature or supporting habitat for SPA birds accounts for only about 7m^2 of habitat loss.
- The remaining new infrastructure within designated site boundaries occupies embankments in the SPA and pine woodland in the SAC – these are not designated features or important as supporting habitat.
- The higher proportion of proposed infrastructure is replacement rather than new.
- Before infrastructure is installed, pre-works checks for sensitive species and habitats will be carried out and locations adjusted if necessary to avoid them.

Can 'no adverse effect' on site integrity be ascertained? Yes, for the following main reasons:

- Installation of infrastructure will serve to direct and keep coast path users following the trail and away from sensitive habitats and locations.
- An approximately 7m^2 overall loss of actual designated habitats / supporting habitats can be considered 'trivial' in the context of the conservation objectives for the designated features.
- The scrub clearance on dune habitats proposed as part of the establishment works is likely to be beneficial for the condition of the SAC.

Are there residual effects? No.

Conclusion:

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

- Habitat loss caused by installation of infrastructure
- Disruption of grazing management causing damage to sensitive features
- Spread of disease by people and dogs
- Disturbance to breeding seabirds / breeding waders

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

- Disturbance to overwintering and passage waterbirds
- Trampling
- Eutrophication from dog fouling
- Disturbance of slacks / pools by dogs

D4 Assessment of potentially adverse effects considering the project 'in-combination' with other plans and projects

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

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

Residual risk of insignificant impacts from the access proposals

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

Table 16. Residual risk of insignificant impacts from the access proposals

Residual risk	Qualifying features affected
Disturbance to overwintering and passage waterbirds	Bewick's swan (nb); whooper swan (nb); pink-footed goose (nb); shelduck (nb); wigeon (nb); teal (nb); pintail (nb); oystercatcher (nb); ringed plover (nb); golden plover (nb); grey plover (nb); knot (nb); sanderling (nb); dunlin (nb); waterbird assemblage – Ribble & Alt Estuaries (nb)
Trampling damage to sensitive features	• Dune habitats (Embryonic shifting dunes; shifting dunes along the shoreline with Ammophila arenaria ("white dunes"); fixed dunes with herbaceous vegetation ("grey dunes"); Atlantic decalcified fixed dunes (Calluno-Ulicetea); dunes with Salix repens ssp. argentea (Salicion arenariae); humid dune slacks) • Amphibians (great crested newt; natterjack toad) • Petalwort • Overwintering and passage waterbirds (supporting habitat) • Breeding seabirds/ ruff (supporting habitat)
Eutrophication from dog-fouling	• Dune habitats (Embryonic shifting dunes; shifting dunes along the shoreline with Ammophila arenaria ("white dunes"); fixed dunes with herbaceous vegetation ("grey dunes"); Atlantic decalcified fixed dunes (Calluno-Ulicetea); dunes with Salix repens ssp. argentea (Salicion arenariae); humid dune slacks) • Amphibians (great crested newt; natterjack toad) • Petalwort
Disturbance of slacks / pools by dogs	Natterjack toad; Great crested newt

The above table lists the residual risks from insignificant impacts of the proposals to disturbance of overwintering and passage birds, trampling damage to sensitive features, eutrophication from dog fouling and disturbance of slacks / pools by dogs.

Combinable risks arising from other live plans or projects

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

Table 17. Review of other live plans and projects

Competent Authority	Plan or project	Have any insignificant and combinable effects been identified?
Liverpool City Region Authorities	Local Plans in the Liverpool City Region	**No.** Liverpool City Region authorities are progressing with development of a joint Recreational Mitigation Strategy for mitigating the combined additional recreational disturbance impacts from additional housing. Further assessment in relation to the details of this package is not possible at this stage, however; the improvement and maintenance of a high quality coastal walking route will help to provide for and manage any increased demand for recreation as a result of new housing. The possibility of in-combination effects arising in connection with individual local plans is considered below.
Fylde Council	Fylde Local Plan to 2032	**No**. The HRA associated with the Local Plan considers the potential impacts of increased recreational pressure and loss of habitats from new development. A number of mitigation measures have been included in the plan. These include policies that clearly set out the requirements for European sites to be taken into account during the planning process and the requirements for the provision of green space. It was concluded that there would be no adverse effect on integrity, and with the mitigation measures in place no residual effects were identified.
Blackpool Council	Blackpool Local Plan to 2027	**No.** The HRA associated with the Local Plan considers the potential impacts of increased recreational pressure and loss of habitats from new development. The plan commits to avoid impacts from development on N2K species associated with Ribble and Alt Estuaries SPA using functionally linked land in the Blackpool area.

Competent Authority	Plan or project	Have any insignificant and combinable effects been identified?
Preston Council South Ribble Council	Central Lancashire Core Strategy to 2026	**No**. The joint HRA associated with the Local Plans considers the potential impacts of increased recreational pressure and loss of habitats from new development. The HRA considers that potential impacts are mitigated for by policies within the plan, including requirements for European sites to be taken into account during the planning process and for the provision of local green space. The HRA also considers that the distances and few impact pathways to the N2K sites make significant impacts unlikely. It was concluded that there would be no adverse effect on integrity and no residual effects were identified.
West Lancashire Council		**No.** The HRA of preferred options associated with the emerging Local Plan (in development) considers the potential impacts of increased recreational pressure and loss of habitats from new development. A number of possible mitigation measures have been suggested where these may be needed, including the requirements for European sites to be taken into account during the planning process, the need for further bird surveys and the provision of local recreational spaces. On the proviso that these are adopted no likely significant effect from the Local Plan was concluded either alone or in-combination. As the Plan has yet to be finalised and adopted there is not however enough information to allow a meaningful assessment of any combinable effects with the ECP proposals.
Sefton Council		**No**. The Habitat Regulations Assessment (HRA) associated with the Local Plan considers the potential impacts of recreational pressure and habitat loss from proposed new development. A number of mitigation measures have been built into the Plan to address these potential impacts. It is a requirement for project specific HRAs to be produced for the identified housing allocations. An Information Note was approved by the Council in March 2018 that sets out the threshold for the number of new dwellings which triggers the need for mitigation of recreation pressure on the Sefton Coast. This is an interim approach to mitigating increased recreational impacts on SAC / SPA / Ramsar features from developments is in place whilst the Liverpool City Region Visitor Management Strategy is produced – this requires any

Competent Authority	Plan or project	Have any insignificant and combinable effects been identified?
		development that produces a net increase of 85+ dwellings to mitigate potential impacts. It was concluded that there would be no adverse effect on integrity, and with the mitigation measures in place no residual effects were identified.
Liverpool Council	Liverpool Local Plan	**No**. The potential impacts of disturbance from recreational activities is being considered for the Liverpool Local Plan. The Habitat Regulations Assessment (HRA) associated with the Local Plan (yet to be adopted) considers recreational pressure and habitat loss from proposed new development. A number of mitigation measures have been built into the Plan to address these potential impacts. It is a requirement for project specific HRAs to be produced for the identified housing allocations. It is envisaged that the possibility of disturbance as a result of increased demand for opportunities for recreation are to be mitigated via the Liverpool City Region Visitor Management Strategy which is currently being produced. It was concluded that there would be no adverse effect on integrity, and with the mitigation measures (including the Visitor Management Strategy) in place no residual effects were identified.
Liverpool Council	Liverpool Waters	**No.** The outline permission for Liverpool Waters is considering strategic mitigation of developments arising from this multi-phase development. Project specific mitigation is being developed and several of the developments have already contributed to mitigation of disturbance to cormorants, including for installation of a raft at Princes Half Tide Dock. It is assumed that sufficient mitigation can be provided during the lifetime of this major development to conclude that there will be no adverse effect on integrity. No residual effects have been identified at this stage.
Shoreline Management Plan 2	North West Shoreline Management Plan	**No.** The Shoreline Management Plan is a high level study. Due to the fact that it is about Policy setting, rather than proposing specific options at a scheme or project level, where specific details about construction or engineering proposals will be detailed, it is very difficult to determine the exact effects any proposal would have on the integrity of the N2K sites concerned, especially in the long term. HRAs would need to be undertaken at strategy/project level when more detail was available.

Competent Authority	Plan or project	Have any insignificant and combinable effects been identified?
		The policies of hold the line, managed realignment or no intervention along specific sections of the coast are broadly commensurate with the longer term nature conservation strategies of the N2K sites along the stretch.
Natural England	Dynamic Dunescapes	**No.** Potential interactions of changes on the ground as a result of Dynamic Dunescapes project works with the coast path can be managed through roll-back of the trail, which will require a further HRA.
Natural England	Wildfowling	**No.** Wildfowling in designated areas is carried out under consent granted by Natural England. Several wildfowling clubs operate in and around the Ribble Estuary including: Lytham & District Wildfowlers, Preston & District Wildfowling Association, Hesketh Bank Wildfowlers and Southport Wildfowlers. Wildfowling typically takes place at dawn/dusk and in parts of the saltmarsh that are difficult and dangerous to access. The level of wildfowling activity will not be affected by the access proposals and the impacts of consented wildfowling are a part of the characteristics and baseline environmental conditions affecting Ribble & Alt Estuaries SPA. Natural England is not aware of any new wildfowling notices affecting areas within the project area at the present time. Therefore no in-combination effects are wildfowling are identified at this time.
Natural England	Cormorant Management Licences	Groups of fisheries may apply to Natural England for a licence to control cormorants causing serious damage within a defined area or catchment. In 2020, Natural England carried out HRAs of all cormorant licence renewals within 10km of Ribble and Alt Estuaries, Mersey Narrows and North Wirral Foreshore, and Liverpool Bay SPAs, including shooting to reinforce scaring for the purposes of preventing serious damage to fisheries. These HRAs found that there were no residual effects of the cormorant management licence renewals.

The above table lists, by competent authority, the other live plans or projects at the time of assessment and confirms whether any insignificant and combinable effects have been identified.

In light of this review, we have not identified any insignificant and combinable effects that are likely to arise from other plans or projects and therefore no further in combination assessment is required.

D5. Conclusions on Site Integrity

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

Natural England has concluded that:

It can be ascertained, in view of site conservation objectives, that the access proposal (taking into account any incorporated avoidance and mitigation measures) will not have an adverse effect on the integrity of Sefton Coast Special Area of Conservation (SAC), Ribble and Alt Estuaries Special Protection Area (SPA) and Ramsar site, Liverpool Bay SPA and Mersey Narrows and North Wirral Foreshore SPA either alone or in combination with other plans and projects.

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

PART E: Permission decision with respect to European Sites

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

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

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

Certification

HRA prepared by:

Name: Dan Pedley Date: 8th September 2020

HRA approved by:

Name: Ginny Hinton Date: 18th September 2020

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

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